
ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

DADCO ALUMINA & CHEMICALS

CERTIFICATE
NUMBER

311

ASI
STANDARD

PERFORMANCE
STANDARD
(V2 2017)

CERTIFICATION
LEVEL

FULL
CERTIFICATION

ASI ACCREDITED
AUDITOR

GUTCERT
(AFNOR
GROUP)

DATE OF ISSUE

2 AUGUST 2023

DATE OF EXPIRY

1 AUGUST 2026

CERTIFIED SINCE

2 AUGUST 2023

AUTHORISED BY

A stylized, handwritten signature in black ink, likely representing the authorised signatory of the Aluminium Stewardship Initiative Ltd.

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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

Aluminium Oxid Stade GmbH Dadco's Refining facilities (in Stade, Germany), including refining processes, port and administrative facilities, storage areas and landfill.

SUMMARY AUDIT REPORT

PERFORMANCE

STANDARD

OVERVIEW

MEMBER NAME	Dadco Alumina and Chemicals Limited
ENTITY NAME	DADCO Alumina & Chemicals
CERTIFICATION SCOPE	Aluminium Oxid Stade GmbH Dadco's Refining facilities (in Stade, Germany), including refining processes, port and administrative facilities, storage areas and landfill.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Alumina Refining
ASI STANDARD	<ul style="list-style-type: none">Performance Standard V2
AUDIT TYPE	<ul style="list-style-type: none">Initial Certification Audit (9 – 11 May 2023)Surveillance Audit (2 – 3 December 2024)
AUDIT FIRM	GUTcert (AFNOR Group)
AUDIT DATE	<ul style="list-style-type: none">9 – 11 May 2023 (Initial Certification Audit)2 – 3 December 2024 (Surveillance Audit)
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">14 July 2023 (Initial Certification Audit)16 March 2025 (Surveillance Audit)
AUDIT SCOPE	<p><u>Initial Certification Audit (9 – 11 May 2023)</u></p> <p>The Audit Scope covered Dadco's refining facilities in Stade, Germany and included the refining processes, port and administrative facilities, storage areas and landfill.</p> <p>Supply chain activities included in the audit scope:</p> <ul style="list-style-type: none">Alumina Refining <p>All relevant criteria in the ASI Performance Standard were included in the Audit Scope.</p> <p><u>Surveillance Audit (2 – 3 December 2024)</u></p> <p>The Audit Scope covered Dadco's refining facilities in Stade, Germany and included the refining processes, port and administrative facilities, storage areas and landfill.</p> <p>Supply chain activities included in the audit scope:</p>

	<ul style="list-style-type: none"> Alumina Refining <p>All relevant criteria in the ASI Performance Standard were included in the Audit Scope.</p>
AUDIT OUTCOME	<ul style="list-style-type: none"> Certification
AUDIT METHODOLOGY DECLARATION	<p>The Auditors confirm that:</p> <ul style="list-style-type: none"> <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. <input checked="" type="checkbox"/> The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.
CERTIFICATION PERIOD	2 August 2023 – 1 August 2026
NEXT AUDIT TYPE	Re-Certification Audit
NEXT AUDIT DUE DATE	1 August 2026
CERTIFICATE NUMBER	311

SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	<p>The Entity has a local department and a global corporate structure to manage the legal requirements applicable to its operations. All business partners of the Entity are required to comply with the Entity's Supplier Code of Conduct. The Employee Code of Conduct is approved by senior management:</p> <p>https://www.aos-stade.de/medien/attachments/AOS%20Employee%20Code%20of%20Conduct%20EN.pdf</p>
1.2 Anti-Corruption	Conformance	<p>The Entity has established an Employee Code of Conduct which is supported by the Human Rights Policy and is also the valid policy against Corruption. All business partners of the Entity are required to comply with the Entity's Supplier Code of Conduct. The Employee Code of Conduct is approved by senior management:</p> <p>https://www.aos-stade.de/medien/attachments/AOS%20Employee%20Code%20of%20Conduct%20EN.pdf</p>
1.3 Code of Conduct	Conformance	<p>The Entity has a documented an Employee Code of Conduct and a Supplier Code of Conduct that is communicated to all Stakeholders, which are available at:</p> <p>https://www.aos-stade.de/medien/attachments/AOS%20Employee%20Code%20of%20Conduct%20EN.pdf and</p> <p>https://www.aos-stade.de/medien/attachments/AOS%20Supplier%20Code%20of%20Conduct%20EN.pdf</p>
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	<p>The Entity has implemented and maintains an integrated Company Policy consistent with the practices included in the ASI Performance Standard.</p>
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	<p>In accordance with the ASI Performance Standard as well as their Company Policy, the Entity has senior management endorsement and support through the provision of resources and regular review of the Policies. The Entity obtained ISO 14001, ISO 50001 and ISO 45001 Certifications which are consistent with their ASI Certification Scope.</p>
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	<p>The Entity has implemented and maintains an integrated Company Policy consistent with the practices included in the ASI Performance Standard. The</p>

CRITERION	RATING	COMMENT
		communication to both internal and external Stakeholders is ensured via the publication within the framework of the current Sustainability Report: https://www.aos-stade.de/medien/attachments/AOS%20Nachhaltigkeitsbericht%202024%20DE.pdf
2.2 Leadership	Conformance	The Entity has nominated a local manager to ensure that ASI Performance Standard requirements are met.
2.3a Environmental and Social Management Systems (environmental)	Conformance	The Entity has an integrated Environmental Management System and holds a valid ISO 14001:2015 certificate.
2.3b Environmental and Social Management Systems (social)	Conformance	The Entity has documented an Environmental Management System certified according to ISO 14001:2015. Furthermore, the Entity has implemented and fulfils the requirements of a Social Management System (SA 8000). Internal Social and Compliance Audits are undertaken on a regular basis.
2.4 Responsible Sourcing	Minor Non-Conformance	The Entity has made progress in responsible sourcing by integrating the Supplier Code of Conduct into supplier agreements and conducting a Materiality analysis in alignment with Human Rights Due Diligence requirements. Supplier compliance is now formally embedded in procurement processes, and responsibilities for external communication have been further clarified. However, gaps remain in clearly defining and systematically integrating sustainability risk criteria into procurement policies. Supplier Code of Conduct: https://www.aos-stade.de/medien/attachments/AOS%20Supplier%20Code%20of%20Conduct%20EN.pdf
2.5 Impact Assessments	Conformance	As part of internal risk assessments, the influencing factors such as environment, social and Human Rights are recorded and evaluated in the context of New Projects and system changes. No large new projects or Major Changes to existing Facilities have occurred since the Entity joined ASI. The site is located in a highly regulated country (Germany), where relevant projects and changes (linked to construction activities) must undergo a thorough analysis and authorisation process (including Human Rights) and the Entity has systems in place to manage this effectively.
2.6 Emergency Response Plan	Conformance	The Entity has a well implemented and trained Emergency Response Plan. External Stakeholders including the Community and relevant authorities are involved.

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		There are regular training exercises with the plant fire department, the Community and Workers.
2.7 Mergers and Acquisitions	Conformance	The Entity's parent company (Dadco) manages the processes and procedures relating to mergers and acquisitions.
2.8 Closure, Decommissioning and Divestment	Conformance	The Entity systematically reviews environmental, social and governance issues as part of the Entity's planning process. Closure, decommissioning and divestment activities are not managed on a local level but by corporate Headquarters.
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	The Entity has developed its Sustainability Report and communicated it to its various Stakeholders: https://www.aos-stade.de/medien/attachments/AOS%20Nachhaltigkeitsbericht%202024%20DE.pdf
3.2 Non-compliance and liabilities	Conformance	The Entity has not received notifications, warnings, economic or operational sanctions for non-compliance with legal requirements applicable to its operations. Public disclosure is ensured through the Sustainability Report, page 19: https://www.aos-stade.de/medien/attachments/AOS%20Nachhaltigkeitsbericht%202024%20DE.pdf
3.3a Payments to governments (legal and contractual)	Conformance	The Entity complies with strict local legislation and has implemented Policies and Procedures to conform to this requirement. To prevent Corruption, detailed behaviours are described in the Entity's Code of Conduct.
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 a local department and a global corporate structure to manage legal requirements applicable to its operations. The Entity's Code of Conduct and compliance Policies, including the complaints hotline, are available at: https://www.aos-stade.de/medien/attachments/AOS%20Nachhaltigkeitsbericht%202024%20DE.pdf
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	In cooperation with an external consultant, life cycle evaluations have been undertaken. As a tool, the GaBi software and databases were used. The requirements of ISO 14040 and ISO 14044 are fulfilled. The LCA summaries are available at:

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		https://www.aos-stade.de/pages/umwelt-sicherheit/main-nachhaltigkeit.html
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	The Entity has developed a Life Cycle Assessment (LCA) for Aluminium Oxide, both dry and wet Aluminium Hydroxide with a 'cradle-to-gate approach' which is provided as a summary at: https://www.aos-stade.de/pages/umwelt-sicherheit/main-nachhaltigkeit.html
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	The summary of the LCA is available to the public at: https://www.aos-stade.de/pages/umwelt-sicherheit/main-nachhaltigkeit.html
4.2 Product design	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.3a Aluminium Process Scrap (targets)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.3b Aluminium Process Scrap (alloy separation)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.4a Collection and recycling of products at end-of-life (strategy)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.4b Collection and recycling of products at end-of-life (engagement)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		
5.1 Disclosure of GHG emissions and energy use	Conformance	The Entity has included the presentation of Greenhouse Gas (GHG) emissions data in the Sustainability Report, Chapter 4: https://www.aos-stade.de/medien/attachments/AOS%20Nachhaltigkeitsbericht%202024%20DE.pdf
5.2 GHG emissions reductions	Conformance	Environmental activities to reduce energy consumption and as such GHG emissions are undertaken (e.g. Conversion of the overflow pumps in the sedimentation plants). For more information refer to the Sustainability Report, Chapter 4.5: https://www.aos-stade.de/medien/attachments/AOS%20Nachhaltigkeitsbericht%202024%20DE.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.

CRITERION	RATING	COMMENT
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	Emissions to Air are under strict regulation according to local regulations and permits. The emissions are monitored, controlled and reduced constantly. The main emission to air is dust. Further information can be reviewed in the Sustainability Report, Chapter 5: https://www.aos-stade.de/medien/attachments/AOS%20Nachhaltigkeitsbericht%202024%20DE.pdf
6.2 Discharges to Water	Conformance	The Entity has quantified, monitored and reported on Discharges to Water that may have adverse effects on humans or the environment. For more information refer to the Sustainability Report, Chapter 6: https://www.aos-stade.de/medien/attachments/AOS%20Nachhaltigkeitsbericht%202024%20DE.pdf
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	The Entity has maintained an updated evaluation process of the main risk areas of its operations where Spills and Leakages can contaminate the air, water and/or soil.
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	The Entity has developed an Emergency Response Plan with the use of risk analysis techniques with the coordination of the Environment Department and the fire brigade. Information on the Entity's Spill management processes are included in the Sustainability Report: https://www.aos-stade.de/medien/attachments/AOS%20Nachhaltigkeitsbericht%202024%20DE.pdf
6.4a Reporting of Spills (immediate disclosure)	Conformance	The Entity has a system to communicate to affected parties the volume, type, and potential impact of significant Spills immediately following an incident. The Entity has not recorded a significant Spill since the beginning of its operations. Information on the Entity's environmental performance is included in Chapter 7 of the Sustainability Report: https://www.aos-stade.de/medien/attachments/AOS%20Nachhaltigkeitsbericht%202024%20DE.pdf
6.4b Reporting of Spills (regular reporting)	Conformance	The Entity publicly discloses Spills and remedial actions taken. However, the Entity has not recorded a significant Spill since the beginning of its operations. The Entity has included information on significant Spills in the Sustainability Report, Chapter 7: https://www.aos-stade.de/medien/attachments/AOS%20Nachhaltigkeitsbericht%202024%20DE.pdf

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		stade.de/medien/attachments/AOS%20Nachhaltigkeitsbericht%202024%20DE.pdf
6.5a Waste management and reporting (strategy)	Conformance	<p>The Entity has implemented a Waste Management Strategy in accordance with the Waste Mitigation Hierarchy. The Entity has established environmental targets for waste generation and disposal. Environmental performance on waste generation and disposal is published in the Sustainability Report. Chapter 8:</p> <p>https://www.aos-stade.de/medien/attachments/AOS%20Nachhaltigkeitsbericht%202024%20DE.pdf</p>
6.5b Waste management and reporting (disclosure)	Conformance	<p>The Entity has implemented a Waste Management Strategy in accordance with the Waste Mitigation Hierarchy. The Entity has established environmental targets for waste generation and disposal. Environmental performance on waste generation (quantity of Hazardous and Non-Hazardous Waste) and details on disposal are published in the Sustainability Report, Chapter 8:</p> <p>https://www.aos-stade.de/medien/attachments/AOS%20Nachhaltigkeitsbericht%202024%20DE.pdf</p>
6.6a Bauxite Residue (storage construction)	Conformance	<p>The Entity has implemented and maintained Bauxite residue storage Facilities since 1973. These Facilities are constructed and managed in a way that effectively prevents the release of Bauxite residue and leachates into the environment. The site is located within a specifically licensed area and operates in accordance with the current Environmental Permit, and compliance was verified during the Audit.</p>
6.6b Bauxite Residue (integrity checks and controls)	Conformance	<p>Regular daily checks and controls are conducted by competent personnel and documented in the operations log. In addition, an annual inspection of the Bauxite residue landfill is carried out by the relevant authority (last conducted in June 2024). The structural integrity of the dike is assessed through regular wing soundings, which include evaluation of horizontal displacement. These measures demonstrate a systematic and consistent monitoring approach to ensure the safety and stability of the Bauxite residue storage area.</p>
6.6c Bauxite Residue (water discharge)	Conformance	<p>Water discharge from the Bauxite Residue storage area is continuously monitored and treated to ensure compliance with environmental standards. The Audit included a review of the water treatment system, measuring equipment, and related documentation. Excess water is treated before being discharged, while</p>

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		any water Leakage is returned to the landfill. Groundwater and surface water are regularly monitored through a system of wells constructed around the landfill, providing ongoing environmental surveillance and early detection of potential risks.
6.6d Bauxite Residue (marine and aquatic environments)	Conformance	The Entity has implemented operational procedures and monitoring systems to control and neutralise the discharge of Bauxite Residue and wastewater, thereby preventing environmental contamination. The Audit confirmed that no Bauxite Residue is discharged into marine or aquatic environments. The existing measures reflect a proactive approach to environmental protection, ensuring that waste streams are managed responsibly and in accordance with regulatory requirements.
6.6e Bauxite Residue (state of the art technologies)	Conformance	The Entity is actively engaged in several projects aimed at recycling and reuse of Bauxite Residue. These initiatives demonstrate a forward-looking approach to resource efficiency and waste reduction. By participating in multiple recycling projects, the Entity is exploring innovative ways to valorise Bauxite residue and reduce long-term environmental impacts. This commitment contributes to circular economy principles and reflects continuous improvement beyond compliance.
6.6f Bauxite Residue (remediation)	Conformance	As part of the BImSchG (Federal Emission Control Act) approval of the storage area for Bauxite Residues, the decommissioning process for residue stage areas is described. The Entity is in continuous discussions with the responsible approval authority on this issue. A recultivation/remediation plan has been developed.
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)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
6.8b Dross (recycling)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8c Dross (review of alternatives)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
PRINCIPLE 7 WATER STEWARDSHIP		
7.1a Water assessment (mapping)	Conformance	The Entity tracks its water usage according to local regulations. An overview of the water inputs, the various consumers within the site and the different wastewater flows are described and regularly reviewed.
7.1b Water assessment (risk assessment)	Conformance	The Entity has assessed its water-related risks and implemented prevention measures accordingly across its full Area of Influence.
7.2a Water management (management plans)	Conformance	The Entity has implemented targets for its water management. The targets are regularly reviewed during authority visits as well as during the Environmental Management System review on an annual basis. Risks have been assessed as low. This is provided within in the Sustainability Report, Chapter 6: https://www.aos-stade.de/medien/attachments/AOS%20Nachhaltigkeitsbericht%202024%20DE.pdf
7.2b Water management (monitoring)	Conformance	The Entity's water consumption figures and specifications are regularly monitored and reviewed.
7.3 Disclosure of water usage and risks	Conformance	There are no Material water-related risks identified. The Entity's water withdrawal and use is reported in the Sustainability Report, Chapter 6: https://www.aos-stade.de/medien/attachments/AOS%20Nachhaltigkeitsbericht%202024%20DE.pdf
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	The Entity has undertaken Environmental Risk Assessments that address the Entity's entire Area of Influence and include an assessment of Biodiversity impacts. More information is provided in the Sustainability Report, Chapter 9: https://www.aos-stade.de/medien/attachments/AOS%20Nachhaltigkeitsbericht%202024%20DE.pdf
8.2a Biodiversity management (biodiversity action plans)	Not Applicable	This Criterion is not applicable to the Entity as no Material Biodiversity risks were identified in the risk assessment process.

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8.2b Biodiversity management (consultation and mitigation hierarchy)	Not Applicable	This Criterion is not applicable to the Entity as no Material Biodiversity risks were identified in the risk assessment process.
8.2c Biodiversity management (reporting)	Conformance	The achieved Biodiversity outcomes are shared with Stakeholders. This information is available in the Sustainability Report, Chapter 9: https://www.aos-stade.de/medien/attachments/AOS%20Nachhaltigkeitsbericht%202024%20DE.pdf
8.3 Alien Species	Conformance	The Entity has not introduced or contributed to the spread of Alien Species in its Area of Influence. Packaging material (wood) is pre-treated in accordance with regulations.
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 has implemented and published a Human Rights Policy and other corporate Policies with a commitment to respect Human Rights: https://www.aos-stade.de/medien/attachments/AOS%20Human%20Rights%20Policy%20EN.pdf
9.1b Human Rights Due Diligence (process)	Conformance	The Entity has implemented a Code of Conduct including Human Rights aspects. As part of a risk assessment, the requirements of Human Rights within the Area of Influence of the Entity were examined.
9.1c Human Rights Due Diligence (remediation)	Conformance	The Entity has not identified, nor has contributed to any adverse Human Rights impacts, and therefore remedial actions have not been required.
9.2 Women’s Rights	Conformance	The Entity has implemented Policies and processes on site to ensure women’s rights are respected at all times.

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9.3 Indigenous Peoples	Not Applicable	This Criterion is not applicable as there are no Indigenous Peoples near the Entity.
9.4 Free, Prior, and Informed Consent (FPIC)	Not Applicable	This Criterion is not applicable as there are no Indigenous Peoples near the Entity.
9.5 Cultural and sacred heritage	Not Applicable	This Criterion is not applicable as there are no Indigenous Peoples near the Entity. There is no area of cultural or sacred heritage near the Entity.
9.6a Resettlements (avoid or minimise)	Conformance	The Entity has not relocated communities and does not plan any relocation in the future. If relocation is necessary, the appropriate measures will be defined and communicated to the local authorities.
9.6b Resettlements (where unavoidable)	Conformance	The Entity has not relocated communities and does not plan any relocation in the future. If relocation is necessary, the appropriate measures will be defined and communicated to the local authorities.
9.7a Local Communities (rights and interests)	Conformance	The Entity does not claim any resources that could lead to a lack of resources in the area and among its population. The Entity respects and is very sensitive to the local neighbourhood, the Community and all other interest groups in the vicinity of the work. An evaluation of the interested parties has been completed.
9.7b Local Communities (impacts)	Conformance	The Human Rights Impact Assessment confirmed that there are no issues with Local Communities and therefore there is no immediate need for action. However, the Entity prevents any adverse impacts on Local Community livelihoods.
9.7c Local Communities (livelihoods)	Conformance	The Entity has engaged with Local Communities regarding the development of actions and plans to prevent and/or mitigate adverse impacts on their livelihoods.
9.8 Conflict-Affected and High-Risk Areas	Conformance	In accordance with its Human Rights Policy, the Entity does not contribute to armed conflicts or Human Rights abuses. The entire upstream and downstream supply chain process is regularly assessed for risks through processes undertaken at Dadco Headquarters, including Bauxite suppliers. The Human Rights Due Diligence process confirmed that the Entity is well prepared to meet the requirements of the OECD 'five step' assessment process.
9.9 Security practice	Conformance	The Entity has implemented security practices on site that respect Human Rights. The Entity contracts an external security provider for gate control and plant

CRITERION	RATING	COMMENT
		security. The Entity does not employ armed security personnel.
PRINCIPLE 10 LABOUR RIGHTS		
10.1a Freedom of Association and Right to Collective Bargaining (freedom of association)	Conformance	The Entity respects the local regulations on Workers' rights and applies a collective agreement for the metallurgy sector. Most Workers have joined a Trade Union and there is an elected Workers council in place.
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Conformance	The Entity respects the local regulations on Workers' rights and applies a collective agreement for the metallurgy sector. Most Workers have joined a Trade Union and there is an elected Workers council in place. No infringement on this requirement has been reported (e.g. Collective Bargaining).
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Not Applicable	This Criterion is not applicable as local legislation does not restrict the right to Freedom of Association and Collective Bargaining, thus not requiring alternative means of Association for Workers.
10.2a Child Labour (minimum age)	Conformance	The Entity's Policies and local regulations are in place to avoid the hire of Child Labour. The Entity has strict control over any potential Child Labour.
10.2b Child Labour (hazardous)	Conformance	The Entity does neither use, nor support the use of Child Labour and does not engage in or support hazardous Child Labour. Young Workers are employed for educational purposes only.
10.2c Child Labour (worst forms)	Conformance	The Entity does neither use, nor support the use of Child Labour and does not engage in or support worst forms of 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 through any employment or recruitment agencies, as confirmed by interviews and 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.

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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 restrict the freedom of movement of Workers, as confirmed by interviews and document review.
10.3f Forced Labour (retention of identity papers, permits, certificates)	Conformance	The Entity does neither engage in, nor does it support the use of Forced Labour. The Entity does not retain original copies of Worker's documents and certificates, as confirmed by interviews and document review.
10.3g Forced Labour (freedom to terminate employment)	Conformance	The Entity does neither engage in, nor does it support the use of Forced Labour. The Entity does not deny Workers the freedom to terminate their employment at any time without penalty, given a notice of reasonable length, as confirmed by interviews and document review.
10.4 Non-Discrimination	Conformance	As confirmed by interviews and document review, the Entity does ensure equal opportunities and does not engage in or support Discrimination in hiring, salary, promotion, training, advancement opportunities or termination of any Worker on the basis of gender, race, national or social origin, religion, disability, political affiliation, sexual orientation, marital status, family responsibilities, age, or any other condition that could give rise to Discrimination.
10.5 Communication and engagement	Conformance	As confirmed by interviews and document review, the Entity does ensure open communication and direct engagement with Workers and their representatives regarding working conditions and resolution of workplace and compensation issues, without threat of reprisal, intimidation or harassment.
10.6 Disciplinary practices	Conformance	As confirmed by interviews and document review, the Entity does neither engage in, nor tolerate the use of corporal punishment, mental or physical coercion, harassment, and gender-based violence including sexual harassment, or the verbal abuse of Workers.
10.7a Remuneration (living wage)	Conformance	The Entity respects the rights of Workers to a living wage and ensures that wages paid for a normal working week meet the industry standard, as confirmed by document review and Worker interviews. Working Time, payment and leave are negotiated in Collective Bargaining Agreements. The wages paid by the Entity

CRITERION	RATING	COMMENT
		are substantially above the legal minimum prescribed in Germany and are in line with the industry standard.
10.7b Remuneration (method of payment)	Conformance	As verified by document review and interviews, the Entity's wage payments are timely, in legal tender and fully documented.
10.8 Working Time	Minor Non-Conformance	<p>The Entity complies with Applicable Law and industry standards on Working Time, public holidays, and paid annual leave. Working Time is part of the Collective Bargaining Agreements and each employment contract, and a clocking-in system is in place with records available.</p> <p>There are control mechanisms implemented to ensure compliance with legal working time limits, however, they are not fully effective at present.</p>
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	<p>The Entity has implemented an ISO 45001 Management System which is well established.</p> <p>A Policy has been implemented as well and is communicated as required by the ASI Performance Standard.</p>
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	<p>The Entity has implemented an ISO 45001 Management System which is well established.</p> <p>A Policy has been implemented as well and is communicated as required by the ASI Performance Standard and applies to all Workers and Visitors.</p>
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Conformance	The Entity has defined and communicated the Safety Policy which includes a commitment to comply with Applicable Laws.
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	The Entity has defined and communicated its Safety Policy. The Policy and procedures include the right of Workers to understand hazards and safe practices and the authority to refuse or stop unsafe work.
11.2 OH&S Management System	Conformance	<p>A Health and Safety Management System (ISO 45001) is in place and demonstrated to be effectively working.</p> <p>https://www.aos-stade.de/pages/produktion/main-qualitaetsmanagment.html</p>
11.3 Employee engagement on health and safety	Conformance	Employees are involved in the preparation of risk assessments. Safety Officers have a mandate in the regular Occupational Health and Safety Committees (which meet four times a year).
11.4 OH&S performance	Conformance	The continuous improvement of Occupational Health and Safety performance at the Entity is driven by performance indicators and the achievement of goals.

CRITERION	RATING	COMMENT
		Occupational Safety Committee meetings are held four times a year. There is a review of performance data and targets during these meetings and in the annual management review. Measures are discussed and coordinated. The performance measures include both lagging and leading indicators.

Document Control and Version History

Revision	Date	Notes
0	2 August 2023	Certification Audit – Full Certification
1	24 April 2025	Surveillance Audit