

# ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

# Bridgnorth Aluminium

CERTIFICATE NUMBER

58

ASI STANDARD

PERFORMANCE  
STANDARD  
(V3 2022)

CERTIFICATION LEVEL

PROVISIONAL  
CERTIFICATION

ASI ACCREDITED  
AUDITING FIRM

DNV BUSINESS  
ASSURANCE UK CO.  
LTD

DATE OF ISSUE

14 DECEMBER 2025

DATE OF EXPIRY

13 DECEMBER 2026

CERTIFIED SINCE

14 DECEMBER 2019

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](http://www.Aluminium-stewardship.org)

CERTIFICATION SCOPE

The manufacture of Lithographic plates, foil, transformer windings, and formable Aluminium strips/coils for automotive heat- and sound-absorbing components at Bridgnorth Aluminium Limited in Shropshire, UK.

\* 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	Bridgnorth Aluminium
ENTITY NAME	Bridgnorth Aluminium Limited
CERTIFICATION SCOPE	The manufacture of Lithographic plates, foil, transformer windings, and formable Aluminium strips/coils for automotive heat- and sound-absorbing components at Bridgnorth Aluminium Limited in Shropshire, UK.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none"><li>Aluminium Re-melting/Refining</li><li>Casthouses</li><li>Semi-Fabrication</li><li>Material Conversion</li><li>Other manufacturing or sale of products containing Aluminium</li></ul>
ASI STANDARD	<ul style="list-style-type: none"><li>Performance Standard V3 (April 2023)</li></ul>
AUDIT TYPE	<ul style="list-style-type: none"><li>Initial Certification Audit (28 – 30 October 2019)</li><li>Re-Certification Audit (8 – 10 November 2022)</li><li>Re-Certification and Scope Change Audit (4 – 6 November 2026)</li></ul>
AUDIT FIRM	DNV Business Assurance Services UK Ltd
AUDIT DATE	<ul style="list-style-type: none"><li>28 – 30 October 2019 (Initial Certification Audit)</li><li>8 – 10 November 2022 (Re-Certification Audit)</li><li>4 – 6 November 2026 (Re-Certification and Scope Change Audit)</li></ul>
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none"><li>3 December 2019 (Initial Certification Audit)</li><li>3 January 2023 (Re-Certification Audit)</li><li>4 – 6 November 2026 (Re-Certification and Scope Change Audit)</li></ul>
AUDIT SCOPE	<p><u>Initial Certification Audit (28 – 30 October 2019)</u></p> <p>Activities undertaken at Bridgnorth Aluminium Limited currently include those to manufacture Lithographic plates, foil, transformer windings and formable Aluminium strips/coils for automotive heat and sound absorbing components.</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none"><li>Aluminium Re-melting/Refining</li><li>Casthouses</li><li>Semi-Fabrication</li><li>Material Conversion (Production and Transformation)</li><li>Other manufacturing or sale of products containing Aluminium</li></ul> <p>All relevant Criterion in the ASI Performance Standard were included in the Audit Scope.</p> <p><u>Re-Certification Audit (8 – 10 November 2022)</u></p>

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Activities undertaken at Bridgnorth Aluminium Limited currently include those to manufacture Lithographic plates, foil, transformer windings and formable Aluminium strips/coils for automotive heat and sound absorbing components

Supply chain activities included in the Audit Scope:

- Aluminium Re-melting/Refining
- Casthouses
- Semi-Fabrication
- Material Conversion (Production and Transformation)
- Other manufacturing or sale of products containing Aluminium

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

Re-Certification and Scope Change Audit (4 – 6 November 2025)

The manufacture of Lithographic plates, foil, transformer windings, and formable Aluminium strips/coils for automotive heat- and sound-absorbing components at Bridgnorth Aluminium Limited in Shropshire, UK.

Supply chain activities included in the Audit Scope:

- Aluminium Re-melting/Refining
- Casthouses
- Semi-Fabrication
- Material Conversion
- Other manufacturing or sale of products containing Aluminium

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

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AUDIT OUTCOME

- Provisional Certification

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AUDIT METHODOLOGY  
DECLARATION

The Auditors confirm that:

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

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CERTIFICATION PERIOD

14 December 2025 – 13 December 2026

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NEXT AUDIT TYPE

Surveillance Audit

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NEXT AUDIT DATE

13 June 2026

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CERTIFICATE NUMBER

58



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

Bridgnorth Aluminium (the 'Entity'), is part of the Viahenco Group, with the Shropshire Facility occupying approximately covering around 27 hectares. The Entity commenced operations in 1933 and has operated under various ownership structures over this time. In 2022, the Entity was acquired by Viahenco.

The Entity supplies flat-rolled Aluminium to businesses in the lithographic, packaging, electrical, and automotive industries. The Entity is one of the largest employers in the Bridgnorth region, and currently employs 456 persons, of which 38 are women.

The Entity's processes include Aluminium melting, casting, rolling, coiling and transfer between subsequent processing stages. Depending on the end product, the coiled strip is transported to one of the finishing centres for further processing.

## 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
<b>SYSTEMS</b>	Medium	High	Medium	MEDIUM
<b>RISKS</b>	High	High	Medium	HIGH
<b>PERFORMANCE</b>	High	Medium	Medium	MEDIUM
<b>OVERALL</b>	MEDIUM			

## FINDINGS

CRITERION	RATING	COMMENT
<b>1. BUSINESS INTEGRITY</b>		
1.1 Legal Compliance	Conformance	The Entity subscribes to a proprietary legal update service, engages subject-matter experts, and maintains a legal register and training systems to ensure awareness of and compliance with Applicable Law. It has implemented an internal system to track implementation, which is communicated to relevant internal stakeholders.
1.2 Anti-Corruption	Conformance	The Entity works against Corruption in all its forms, consistent with Applicable Law and relevant International Standards, and has established a Code of Conduct that addresses Anti-Corruption requirements, including financial integrity, conflicts of interest, donations, sponsorships, gifts and entertainment. The Code is communicated through inductions, training, and financial audit checks. A Supplier Code of Conduct also covers business ethics and Anti-Corruption policies.
1.3a-e Code of Conduct	Minor Non-Conformance	<p>The Entity has implemented a Code of Conduct that considers environmental, social, and governance matters. All employees are trained in the Code. It also has a Supplier Code of Conduct and requests and tracks supplier responses confirming their understanding and implementation of the Code:</p> <p><a href="https://bridgnorthAluminium.co.uk/wp-content/uploads/2025/10/GEN_PL_03_Code-of-Conduct.pdf">https://bridgnorthAluminium.co.uk/wp-content/uploads/2025/10/GEN_PL_03_Code-of-Conduct.pdf</a></p> <p><a href="https://bridgnorthAluminium.co.uk/wp-content/uploads/2025/10/Supplier-Code-of-Conduct_v2_2023-.pdf">https://bridgnorthAluminium.co.uk/wp-content/uploads/2025/10/Supplier-Code-of-Conduct_v2_2023-.pdf</a></p> <p>It was noted during the Audit that record-keeping processes, however, were considered insufficient.</p>
<b>2. POLICY AND MANAGEMENT</b>		
2.1a-f Environmental, Social, and Governance Policy	Conformance	<p>The Entity has established an Integrated Management System, including Sustainability (Environmental), Health and Safety, and Quality policies. The Code of Conduct summarises the Policy principles and is available at:</p> <p><a href="https://bridgnorthAluminium.co.uk/wp-content/uploads/2025/10/GEN_PL_03_Code-of-Conduct.pdf">https://bridgnorthAluminium.co.uk/wp-content/uploads/2025/10/GEN_PL_03_Code-of-Conduct.pdf</a></p> <p>The Entity's senior management has endorsed the Policy Statements, which are regularly reviewed and supported through adequate resources. The Entity communicates its policies and expectations to employees, contractors and suppliers using training, proprietary systems, and communications.</p>
2.2a-c Leadership	Conformance	The Entity has nominated the Sustainability Manager as the Senior Management Representative, with overall responsibility and authority for ensuring compliance with the ASI Performance Standard.
2.3a Environmental and Social Management Systems - Environmental	Conformance	The Entity is ISO 14001 certified and was last audited in September 2025. There were some minor Non-Conformities identified during that audit, of which the Entity has since developed corrective action plans to address them.

CRITERION	RATING	COMMENT
2.3b Environmental and Social Management Systems – Social	Conformance	The Entity has systems in place to manage social issues, Labour, and Human Rights. a Code of Conduct for suppliers and employees, as well as meeting records, allocated responsibilities, training records, communications and other evidence reviewed on site.
2.4a-e Responsible Sourcing	Conformance	The Entity has implemented a Supplier Code of Conduct covering environmental, social and governance issues. Additional procedures are in place to evaluate supply chain risks and monitor conformance with the Code of Conduct through third-party assessments, supplier questionnaires, procurement procedures, and other documentation. Suppliers must acknowledge and comply with the Code. <a href="https://bridgnorthAluminium.co.uk/wp-content/uploads/2025/10/Supplier-Code-of-Conduct_v2_2023-.pdf">https://bridgnorthAluminium.co.uk/wp-content/uploads/2025/10/Supplier-Code-of-Conduct_v2_2023-.pdf</a>
2.5a-g Environmental and Social Impact Assessments	Minor Non-Conformance	The Entity conducts Environmental and Health and Safety Assessments for new capital expenditure projects exceeding a threshold value, including any major changes to existing Facilities. Evidence reviewed during the Audit indicates, however, that impact assessments are not being completed systematically, and that gender and broader social impact assessments are not being considered.
2.6a-h Human Rights Impact Assessment	Minor Non-Conformance	The Entity conducts Environmental and Health and Safety Assessments for new capital expenditure projects exceeding a threshold value, including any major changes to existing Facilities. Evidence reviewed during the Audit relating to recent on-site changes indicates, however, that impact assessments are not being completed systematically, and gender and broader social impact assessments are not being considered
2.7a-f Emergency Response Plan	Conformance	The Entity has a site-specific Emergency Response Plan developed in collaboration with Workers and their representatives, as well as relevant agencies, also in accordance with its Integrated Management System, and it is available upon request.
2.8a-d Suspended Operations	Conformance	The Entity has developed a business resilience plan to prepare for major disruptions, changes, or suspended operations, which addresses environmental and social considerations. The plan was most recently reviewed in 2025.
2.9a-b Mergers and Acquisitions	Conformance	The Viohalco Group, which owns the Entity, has a procedure in place that defines the Due Diligence process for mergers and acquisitions and addresses environmental, social, and governance issues. There have been no mergers or acquisitions undertaken to date.
2.10a-b Closure, Decommissioning and Divestment	Conformance	The Viohalco Group, which owns the Entity, has a procedure that defines the process for closure, decommissioning, and divestment and addresses environmental, social, and governance issues. There have been no significant closure, decommissioning or divestment activities undertaken to date.
<b>3. TRANSPARENCY</b>		
3.1a-b Sustainability Reporting	Minor Non-Conformance	The Entity publicly discloses information about some material environmental, social, and governance impacts. The materiality of

CRITERION	RATING	COMMENT
		impacts and the transparency of the approach are achievable and planned for future years; however, they were not fully demonstrated at the time of the Audit. More information is available at: <a href="https://bridgnorthaluminium.co.uk/wp-content/uploads/2025/11/Sustainability-2024.pdf">https://bridgnorthaluminium.co.uk/wp-content/uploads/2025/11/Sustainability-2024.pdf</a> and <a href="https://www.bridgnorthaluminium.co.uk/information/5810d0aa43066/Sustainability-and-Social-Responsibility">https://www.bridgnorthaluminium.co.uk/information/5810d0aa43066/Sustainability-and-Social-Responsibility</a>
3.2 Non-compliance and Liabilities	Conformance	The Entity has processes in place to publicly disclose information on significant fines, judgments, penalties, and non-monetary sanctions for failure to comply with Applicable Law.
3.3a-c Payments to Governments	Conformance	The Entity has made payments only to governments on a legal and/or contractual basis, as presented in recent public reports, accounts, and the Code of Conduct. <a href="https://bridgnorthaluminium.co.uk/sustainability/">https://bridgnorthaluminium.co.uk/sustainability/</a> <a href="https://bridgnorthaluminium.co.uk/policies-reports-and-certificates/">https://bridgnorthaluminium.co.uk/policies-reports-and-certificates/</a>
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	The Entity has implemented a Complaints Resolution Mechanism that is accessible, transparent, and adequate to address stakeholder Complaints, Grievances, and Requests for Information related to its operations. The third-party managed integrity hotline is available at: <a href="https://bridgnorthAluminium.co.uk/integrity-hotline/">https://bridgnorthAluminium.co.uk/integrity-hotline/</a>
<b>4. MATERIAL STEWARDSHIP</b>		
4.1a Environmental Life Cycle Assessment	Conformance	The Entity has evaluated the Life-Cycle impacts of its major product lines. The Life Cycle Assessment (LCA) Report is available to customers upon request.
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	The Entity has evaluated the Life-Cycle impacts of its major product lines. The Life Cycle Assessment (LCA) Report is available to customers upon request.
4.2 Product Design	Conformance	The Entity has implemented research and development processes that account for sustainability impacts and includes objectives to enhance sustainability in Product Design, including the product's life-cycle impacts.
4.3a-b Aluminium Process Scrap	Conformance	The Entity minimises the generation of Aluminium Process Scrap within its operations and collects 100% of process Scrap for re-use within its own process. The Entity separates Aluminium alloys and grades for recycling, as evidenced by scrap management processes and plans, as well as site observations.
4.4a-c Collection and Recycling of Products at End of Life - Material Conversion and other Manufacturing	Minor Non-Conformance	The Entity has implemented a recycling target for externally sourced Scrap, measures to engage customers on recycling, and investigations into increasing recycling capacity. The Entity's recycling targets and supporting strategy are not publicly disclosed, and secondly, the target has not been met.
4.4d Collection and Recycling of Products at End of Life	Conformance	The Entity engages with national and international industries, collection and recycling systems, and customers to support accurate measurement and efforts to increase Aluminium recycling rates.

CRITERION	RATING	COMMENT
<b>5. GREENHOUSE GAS EMISSIONS</b>		
5.1a-b Disclosure of GHG Emissions and Energy Use	Conformance	The Entity accounts for and publicly discloses in its Annual Report and Accounts, Material GHG Emissions and Energy Use from primary sources annually. More information is available in the Entity's Strategic Report, page 5: <a href="https://bridgnorthAluminium.co.uk/wp-content/uploads/2025/11/Bridgnorth-Aluminium-Ltd-Stats-2024-Final-signed.pdf">https://bridgnorthAluminium.co.uk/wp-content/uploads/2025/11/Bridgnorth-Aluminium-Ltd-Stats-2024-Final-signed.pdf</a>
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	Major Non-Conformance	The Entity has developed and implemented a GHG Reduction Plan, with supporting projects, to reduce overall direct emissions. Whilst the Entity operates in accordance with its GHG Emissions Management Plan and Strategy, a GHG Emissions Reduction Plan and Pathway consistent with a 1.5°C warming scenario was not, however, finalised at the time of the Audit.
5.3b-e GHG Emissions Reduction Plans - Targets, review and disclosure	Major Non-Conformance	The Entity maintains a robust Energy Management System that includes energy efficiency and reduction. Carbon reduction measures undertaken in the previous year included a lighting replacement project, a vehicle consumption management system, and Life Cycle Assessment studies. The Entity, however, lacks a systematic GHG Reduction Plan and pathway that includes a baseline year, associated targets, or reporting of its performance. At the time of the Audit, this Reduction Plan was in draft and awaiting approval and implementation.
5.4 GHG Emissions Management	Conformance	The Entity has implemented an effective and documented Energy Management System. Consumption is tracked at the individual machine and production-area levels through daily monitoring and reporting of energy usage. Energy management measures are outlined in the GHG Reduction Plan to ensure achievement.
<b>6. EMISSIONS, EFFLUENTS AND WASTE</b>		
6.1a-f Emissions to Air	Minor Non-Conformance	The Entity quantifies and reports its Emissions to Air that may have adverse effects on humans or the environment, and implements plans to minimise these adverse impacts, as evidenced by the documentation reviewed, management testimony, and observations. The Material air emission types and quantities are not currently disclosed, other than information provided via the Environment Agency website.
6.2a-g Discharges to Water	Minor Non-Conformance	The Entity quantifies and reports Discharges to Water and assesses potential adverse effects on humans or the environment and has implemented plans to minimise adverse impacts as evidenced by

CRITERION	RATING	COMMENT
		discharge consents and permitting requirements confirmed by the local Environment Agency. The Entity's water discharge data are not currently publicly disclosed.
6.3a-g Assessment and Management of Spills and Leakages	Conformance	The Entity has conducted assessments of major operational risk areas where Spills and Leakage may contaminate air, water, and/or soil, and has management plans in place, as evidenced by its Emergency Response Team Manual and risk assessment documentation. The Entity has proactive and reactive monitoring processes in place. For more information, refer to: <a href="https://bridgnorthAluminium.co.uk/wp-content/uploads/2025/11/Sustainability-infographic-FINAL.pdf">https://bridgnorthAluminium.co.uk/wp-content/uploads/2025/11/Sustainability-infographic-FINAL.pdf</a>
6.4a-b Public Disclosure of Spills and Leakages	Minor Non-Conformance	The Entity has implemented procedures to immediately disclose to affected parties the volume, type, and potential impact of significant spills. The Entity has published information on impact assessments, spill incidents and remediation actions taken, including via the Environment Agency. This information, however, is insufficient, as the Entity's Sustainability Report has not been updated since 2019.
6.5a-c Waste Management and Reporting	Minor Non-Conformance	The Entity has implemented a waste management strategy designed in accordance with the Waste Mitigation Hierarchy, along with action plans to achieve targets. The Entity publicly discloses the quantity of Hazardous and Non-Hazardous Waste on an annual basis via the Environment Agency's pollution inventory dataset. The Entity, however, has not updated its Sustainability Report, and there is little context and no reporting of associated waste disposal methods.
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 seeks to minimise the Aluminium content in Dross, as evidenced by procedures, and to maximise the recovery of Aluminium by treating Dross and Dross residues, as evidenced by a review of process documentation, observations, and documentation from its Dross suppliers. The Entity recovers 100% of its Dross, which is sent for recovery and recycling. It does not landfill any Dross.
<b>7. WATER STEWARDSHIP</b>		
7.1a-b Water Assessment and Disclosure	Conformance	The Entity identifies and maps its water withdrawal and use by mains source and sub-meters. It draws all water from the mains, as evidenced by water balance documentation. Water-related risk assessment is covered under the aspects and impacts register, as part of its Environmental Management Systems certification. Refer to: <a href="https://bridgnorthaluminium.co.uk/wp-content/uploads/2025/11/Sustainability-infographic-FINAL.pdf">https://bridgnorthaluminium.co.uk/wp-content/uploads/2025/11/Sustainability-infographic-FINAL.pdf</a>
7.2a-e Water Management	Conformance	The Entity has developed and implemented a water management plan that addresses Material risks as identified in the risk assessment. The plan provides targets for improvement.
<b>8. BIODIVERSITY AND ECOSYSTEM SERVICES</b>		

CRITERION	RATING	COMMENT
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	The Entity has assessed potential risks and impacts on Biodiversity that may arise from its activities in the Entity's Area of Influence, which includes the surrounding land, some broadleaved woodland and hedgerows, its airshed, and its local influence on the Watershed of the Severn River. The assessment confirmed that residual risk was minimal and that there was no Material impact.
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Not Applicable	This Criterion is not applicable to the Entity, as no significant Biodiversity or Ecosystem Services related risks were identified.
8.2a-g Biodiversity Management	Not Applicable	This Criterion is not applicable to the Entity, as no significant Biodiversity or Ecosystem Services related risks were identified.
8.3a-c Management of Priority Ecosystem Services	Not Applicable	This Criterion is not applicable to the Entity, as no significant Biodiversity or Ecosystem Services related risks were identified.
8.4 Alien Species	Conformance	Through its Biodiversity management processes, the Entity seeks to prevent the introduction of Alien Species that could have significant adverse impacts on Biodiversity.
8.5a-b Commitment to 'No Go' in World Heritage Properties	Conformance	The Entity is not located in or adjacent to a World Heritage Site and will not undertake any future activity within or near such localities.
8.6a-d Protected Areas	Conformance	The Entity does not operate in or adjacent to any Protected Areas, as confirmed via its Biodiversity Risk Assessment.
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.
<b>9. HUMAN RIGHTS</b>		
9.1a-d Human Rights Due Diligence	Minor Non-Conformance	<p>The Entity has a Code of Conduct recording its Human Rights policies, which has been communicated to employees.  <a href="https://bridgnorthAluminium.co.uk/wp-content/uploads/2025/10/GEN_PL_03_Code-of-Conduct.pdf">https://bridgnorthAluminium.co.uk/wp-content/uploads/2025/10/GEN_PL_03_Code-of-Conduct.pdf</a></p> <p>Supplier Due Diligence includes an EcoVadis assessment and a conflict barometer check.</p> <p>Whilst the Entity has implemented a Human Rights Due Diligence for its suppliers, it has not completed a Human Rights Due Diligence assessment for its own operations.</p>
9.2a-e Gender Equity and Women's Empowerment	Minor Non-Conformance	The Entity has implemented policies to ensure respect for Human Rights and Equal Opportunities. This was evidenced by its Code of Conduct, gender pay reporting, and recruitment efforts. Specific actions, including measurable targets, have not, however, been implemented for Gender Equity and Women's Empowerment.

CRITERION	RATING	COMMENT
9.3a-i Indigenous Peoples	Not Applicable	This Criterion is not applicable to the Entity as no Indigenous Peoples are present in the area.
9.4a Free, Prior, and Informed Consent (FPIC) - New Projects or Major Changes	Not Applicable	This Criterion is not applicable to the Entity as it has no New Projects or Major Changes planned.
9.4b Free, Prior, and Informed Consent (FPIC) - Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9.4c Free, Prior, and Informed Consent (FPIC) - Demonstrate support	Not Applicable	This Criterion is not applicable to the Entity as it has no New Projects or Major Changes planned.
9.5a Cultural and Sacred Heritage – Identification	Conformance	The Entity consults with local communities and has identified that it does not adversely affect Cultural Heritage sites in the region.
9.5b Cultural and Sacred Heritage – Impacts	Not Applicable	This Criterion is not applicable to the Entity as no Cultural and Sacred Heritage are present within the Entity's Area of Influence
9.6a-i Displacement	Not Applicable	This Criterion is not applicable to the Entity as it is located within an Industrial Area, and no displacement was required during the construction of the Entity, and no future construction is planned.
9.7a-h Affected Populations and Organisations	Conformance	The Entity explores opportunities to respect and support its local community and provides significant benefits to Bridgnorth as a major employer.
9.8a Conflict-Affected and High-Risk Areas - Strong Management Systems	Conformance	The Entity has an appropriate Management System, including a Supply Chain Policy, responsibilities and resources, information collation and supplier engagement. Risks are managed through supplier assessments and regularly assessed and reviewed.
9.8b Conflict-Affected and High-Risk Areas - Identify and assess risks	Conformance	The Entity effectively identifies and assesses risks within its Supply Chain through multiple channels, including its supplier Code of Conduct, EcoVadis Assessments and scorecard requirements.
9.8c Conflict-Affected and High-Risk Areas - Strategy to respond to risks	Conformance	The Entity has control measures in place to mitigate any potential supply chain risks. The code of conduct for suppliers specifies that Business Partners are expected to take measures to ensure that no conflict minerals/raw materials are being used. Business Partners provides country-of-origin information. Any direct or indirect support for public or private security forces that operate illegally in mining, transportation, or any other related upstream activities is grounds for immediate suspension of business relationships.
9.8d Conflict-Affected and High-Risk Areas - Audit of due diligence	Conformance	The Entity conducts an audit of due Diligence practices for metal and non-metal suppliers based on ESG risk. Example scorecards and evaluation questionnaires were reviewed during the audit.  This ASI Performance Standard Audit satisfies the requirements of this Criterion.

CRITERION	RATING	COMMENT
9.8e Conflict-Affected and High-Risk Areas – Report annually	Minor Non-Conformance	The Code of Conduct for Suppliers addresses Conflict and High-risk areas and includes principles on Human Rights and Labour rights. The Entity has not however disclosed information on the effectiveness of its measures.
9.9 Security practice	Conformance	The Entity employs private security providers, which have been informed of the Entity's Supplier Code of Conduct, which requires respect for Human Rights. The supplier is screened pursuant to the Entity's responsible sourcing systems.
<b>10. LABOUR RIGHTS</b>		
10.1a-c Freedom of Association and Right to Collective Bargaining	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. A Collective Bargaining agreement is in place at the Entity. Non-unionised employees can provide input into management views and opinions as evidenced through Worker interviews undertaken during the Audit.
10.1d Freedom of Association and Right to Collective Bargaining – Alternative means in context of Applicable Law	Not Applicable	This Criterion is not applicable as the Entity operates in a jurisdiction where Freedom of Association and Collective Bargaining are governed by United Kingdom (UK) labour law.
10.2a Child Labour	Conformance	The Entity does not use nor support the use of Child Labour and complies with related national and international law to not employ persons under 18 years old.
10.3a-c Forced Labour	Conformance	<p>The Entity neither engages in nor supports the use of Forced Labour in accordance with UK law and associated Human Resources (HR) systems, policies, and Due Diligence requirements. The Entity does not require any form of deposit, recruitment fee or equipment advance from Workers, neither uses recruitment agencies, does not hold Workers in Debt Bondage or force Workers to work to pay off a debt, does not restrict the freedom of movement of Workers in the workplace, does not retain original copies of Workers' identity papers, work permits, or travel documents as evidenced through human resources records viewed on site.</p> <p>The Entity provides access to Worker training certificates and training records. It does not deny Workers the freedom to terminate their employment at any time without penalty, provided they give reasonable notice. The Entity's Modern Slavery Statement is available at: <a href="https://bridgnorthAluminium.co.uk/wp-content/uploads/2025/07/Slavery-Human-Trafficking-Statement-2025-to-2026.pdf">https://bridgnorthAluminium.co.uk/wp-content/uploads/2025/07/Slavery-Human-Trafficking-Statement-2025-to-2026.pdf</a></p>
10.4a-c Non-Discrimination	Conformance	The Entity has provisions in place to ensure equal opportunities and does not engage in or support discrimination in recruitment, development or termination of Workers.
10.5 Communication and engagement	Minor Non-Conformance	The Entity works to ensure open Communication and direct Engagement with Workers and their representatives regarding working conditions and the resolution of workplace and compensation issues, without the threat of reprisal, intimidation, or Harassment. There are engagement efforts through employee surveys and workshops,

CRITERION	RATING	COMMENT
		however their effectiveness was not evident during the Audit and it was not clear how management utilises Worker feedback. Additionally, Union representation is low so the effectiveness of Worker representation and engagement is not clear.
10.6a-g Violence and Harassment	Conformance	<p>The Entity communicates its expectations regarding Anti-Violence and Anti-Harassment in its Code of Conduct. Refer to: <a href="https://bridgnorthAluminium.co.uk/wp-content/uploads/2025/10/GEN_PL_03_Code-of-Conduct.pdf">https://bridgnorthAluminium.co.uk/wp-content/uploads/2025/10/GEN_PL_03_Code-of-Conduct.pdf</a></p> <p>During the audit, the grievance log and process were reviewed, which demonstrated how complaints are managed. The Entity has implemented an external Integrity Helpline for reporting potential grievances. Refer to: <a href="https://bridgnorthAluminium.co.uk/integrity-hotline/">https://bridgnorthAluminium.co.uk/integrity-hotline/</a></p>
10.7a-d Remuneration	Conformance	The Entity respects the rights of Workers through employment practices relating to contractual agreements, living wage, overtime, wage payments as per UK Law, Union Representation, Collective Bargaining Agreement, and the Code of Conduct. The HR Department works on effective payroll practices, managed within SAP systems.
10.8a-c Working Time	Conformance	The Entity complies with the Applicable Law and industry standards on Working Time (including Overtime working hours), public holidays and paid annual leave. The Entity is taking active steps to reduce the business need for overtime, including changes to shift patterns and increased recruitment.
10.9a-b Informing Workers of Rights	Conformance	The Entity informs Workers of their rights through employment contracts, HR inductions, employee handbook and related policies, including the Code of Conduct.
<b>11. OCCUPATIONAL HEALTH AND SAFETY</b>		
11.1a Occupational Health and Safety (OH&S) Management System	Conformance	The Entity's Occupational Health and Safety (OH&S) Management System is certified to ISO 45001, and appropriate management reviews are implemented. Risk identification and leadership were evidenced and confirmed during Worker interviews undertaken as part of the Audit. The Entity has implemented corrective actions in response to one minor non-conformity arising from the previous ISO45001 audit.
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Minor Non-Conformance	The Entity's Occupational Health and Safety (OH&S) Management System is certified to ISO 45001, and appropriate management reviews are implemented. Where and if near-misses or incidents occur, a review system is in place with associated corrective actions. The Entity implements the management system and Health and Safety programme, however it has not disclosed its performance (via leading and lagging indicators), nor through peer comparison.
11.2 Employee engagement on Health and Safety	Conformance	The Entity provides Workers with a Health and Safety Committee, by which they can raise, discuss, and participate in the resolution of OH&S issues with management. Communication on Health and Safety topics includes monthly 'town hall' meetings, HSE committee meetings, and incident communication.

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### DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	14 December 2019	Initial Certification Audit – Full Certification
1	18 December 2022	Re-Certification Audit
2	22 May 2026	Re-Certification and Scope Change Audit (V2 to V3.1)

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