
ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

ALUMINIUM GmbH NACHRODT

CERTIFICATE
NUMBER

107

ASI
STANDARD

PERFORMANCE
STANDARD
(V2 2017)

CERTIFICATION
LEVEL

PROVISIONAL
CERTIFICATION

ASI
ACCREDITED
AUDITOR

TÜV
RHEINLAND
CERT GMBH

DATE OF ISSUE

5 JANUARY 2021

DATE OF EXPIRY

4 JANUARY 2022

CERTIFIED SINCE

5 JANUARY 2021

AUTHORISED BY

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

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

CERTIFICATION SCOPE

Production of extrusion billets from recycled
aluminium scrap.

SUMMARY AUDIT REPORT PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Alu Met GmbH (Austria)
ENTITY NAME	Aluminium GmbH Nachrodt
CERTIFICATION SCOPE	Production of extrusion billets from recycled aluminium scrap.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthouses
ASI STANDARD	<ul style="list-style-type: none">Performance Standard V2
AUDIT TYPE	<ul style="list-style-type: none">Certification Audit
AUDIT FIRM	TÜV Rheinland Cert GmbH
AUDIT DATE	<ul style="list-style-type: none">9 – 11 November 2020
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">4 December 2020
AUDIT SCOPE	<p>Production of extrusion billets from recycled aluminium scrap at the Scrap Remelting / Casthouse.</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthouses <p>All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.</p> <p>At the time of the audit (November 2020), access to the site was not possible, due to COVID-19 related travel restrictions. The audit has been undertaken as a 'desktop' exercise, in accordance with the ASI Interim Policy regarding Audits, Audit-Related Travel and Coronavirus (v4), and included a remote review of relevant documentation.</p>
AUDIT OUTCOME	<ul style="list-style-type: none">Provisional Certification
AUDIT METHODOLOGY DECLARATION	<p>The Auditors confirm that:</p> <ul style="list-style-type: none"><input checked="" type="checkbox"/> The information provided by the Entity is true and accurate to the best knowledge of the Auditor(s) preparing this report.

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- The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous.
 - The Audit Scope and audit methodology are sufficient to establish confidence that the findings are indicative of the performance of the Entity's defined Certification Scope.
 - The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.
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CERTIFICATION PERIOD 5 January 2021 - 4 January 2022

NEXT AUDIT TYPE Surveillance Audit

NEXT AUDIT DUE DATE 4 July 2021

CERTIFICATE NUMBER 104

SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	<p>The Entity has developed and implemented policies, systems, procedures and processes that conform to ASI Performance Standard's legal compliance requirements. The General Manager takes overall responsibility for legal compliance. There are systems in place (e.g. a legal database and qualified legal advisers) to maintain awareness of and to ensure compliance with applicable law. The Entity holds ISO 14001 and ISO 50001 certificates from an accredited certification body to ensure compliance with applicable law.</p>
1.2 Anti-Corruption	Conformance	<p>The Entity has issued an anti-corruption guideline and communicated it internally and externally (at the parent company's website: https://www.alu-met.com/fileadmin/daten/pdf/Werte_und_Handeln/Antikorruption.pdf).</p> <p>The financial system is annually audited by an external tax auditor.</p> <p>The Entity is not directly active on the market but all purchasing and sales of metals is done by parent company ALU-MET. Annual financial audits (conducted by licensed external tax auditor) demonstrate correct financial behaviour of the Entity.</p> <p>Transparency International's "Corruption Perceptions Index 2019" of Germany, where the Entity is located, is 80 (Rank 9).</p>
1.3 Code of Conduct	Conformance	<p>The Entity's parent company ALU-MET has issued and communicated documents (Social Standards document, anti-corruption guideline) including principles relevant to environmental, social and governance performance. These rules apply also for the Entity. The above mentioned documents can be accessed via the link below: https://www.alu-met.com/werte-handeln/</p> <p>The documents are subject to annual review.</p>
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	<p>The Entity has issued and communicated internally and publicly a company policy statement addressing environmental, social and governance facets. The document can be accessed via the following link: https://www.alu-met.com/fileadmin/daten/pdf/Werte_und_Handeln/Unternehmenspolitik.pdf</p>

CRITERION	RATING	COMMENT
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	In accordance with the ASI Performance Standard as well as their Environmental and Health & Safety Management System, the auditee has senior management endorsement and support through provision of resources and regular review of the policies. The Entity obtained ISO 14001 and ISO 50001 Certification which is consistent with their ASI Performance Standard certification scope.
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	The Entity has communicated the ALU-MET group's company Policy internally (intranet) and externally as appropriate (company website: https://www.alu-met.com/fileadmin/daten/pdf/Werte_und_Handeln/Unternehmenspolitik.pdf) Note: All purchase and sales is done via the parent company ALU-MET.
2.2 Leadership	Conformance	The Entity's Managing Director has the ultimate responsibility and authority for ensuring conformance with this Standard and to ensure sufficient resources to support the implementation of the Standard. He is supported by the Head of Quality as ASI representative for the ALU-MET group.
2.3a Environmental and Social Management Systems (environmental)	Conformance	The Entity has documented and implemented an integrated management system, with certified facets according to ISO 14001:2015 and ISO 50001:2018 (The certificates are available on the ALU-MET website (please see https://www.alu-met.com/verkauf/zertifikate/)). There are no overdue open actions from the latest audit report of the certification body.
2.3b Environmental and Social Management Systems (social)	Minor Non-Conformance	Although not yet formalised to the same extent as the system for environment and energy (for these facets the Entity holds certificates according ISO 14001 and ISO 50001), the facets occupational health & safety (OHS) as well as human & labour rights are managed. However, the social management system is still not yet fully formalised and certain elements of a management system are missing (goals, action plan, internal audit, review). Note: The Entity aims for certification of its OHS management system according ISO 45001 and preparation is ongoing. Please see also Criterion 11.2.

CRITERION	RATING	COMMENT
2.4 Responsible Sourcing	Conformance	<p>The ALU-MET group has issued its sourcing policy in a document named "Verantwortungsvolle Beschaffung" (Responsible Sourcing) in German language. It is available on their website https://www.alu-met.com/fileadmin/daten/pdf/Werte_und_Handeln/Beschaffungspolitik_.pdf</p> <p>A supplier due diligence process has been implemented and is applied.</p> <p>The audited Entity is not directly active on the market but all purchasing and sales of metals is done by parent company ALU-MET.</p>
2.5 Impact Assessments	Conformance	<p>A procedure specifying how to manage bigger projects is in place. Since the Entity's parent company joined ASI, there were no project ongoing, which required the Entity to assess cultural and human rights impacts.</p> <p>The projects undertaken needed an assessment of environmental and health & safety aspects, which was demonstrated and was also part of the ongoing permitting process.</p>
2.6 Emergency Response Plan	Conformance	<p>The Entity has site specific emergency response plans developed, in collaboration with relevant stakeholders such as the local fire brigade. The auditee also holds ISO 14001 Certification which are current to the Entity's Certification Scope under ASI Performance Standard.</p>
2.7 Mergers and Acquisitions	Conformance	<p>The Entity did not undergo or plan a merger or acquisition (M&A) since the Entity's parent company ALU-MET joined ASI.</p> <p>However, a process has been defined to manage M&As, should it become relevant.</p>
2.8 Closure, Decommissioning and Divestment	Conformance	<p>The Entity is not the owner of the production facility but does rent the site from another company of the owner. Therefore the closure terms are defined in the rental agreement.</p> <p>The site is a well-established site; there no known plans for closing/decommissioning.</p> <p>The site is located in a highly regulated country (Germany), where relevant projects and changes (including closure and decommissioning) must undergo a thorough analysis and authorization process and the Entity has systems in place to manage this effectively.</p>

CRITERION	RATING	COMMENT
3.1 Sustainability Reporting	Conformance	<p>The ALU-MET group has prepared its Sustainability Report 2019 to report about its governance approach and its material environmental, social and economic impacts for the audited Entity and its "Speedline Aluminium" (Schlins) plant. The report is based on GRI G4 Criteria.</p> <p>The report is published on the ALU-MET website: https://www.alu-met.com/fileadmin/daten/pdf/Werte_und_Handeln/Nachhaltigkeitsbericht.pdf</p>
3.2 Non-compliance and liabilities	Conformance	<p>In its Sustainability Report (section 3.8 page 26, https://www.alu-met.com/fileadmin/daten/pdf/Werte_und_Handeln/Nachhaltigkeitsbericht.pdf), the Entity's parent company has publicly disclosed information on fines and alike of the ALU-MET group. As testified by management, there were no fines or similar paid in the reporting period or the current year of this audit.</p>
3.3a Payments to governments (legal and contractual)	Conformance	<p>According to the Entity's tax auditor's report 2019 as well as testified by management, all payments to Governments were made on a legal and/or contractual basis.</p>
3.3b Payments to governments (disclosure – bauxite mining)	Not Applicable	<p>This Criterion is not applicable to the Entity's Certification Scope.</p>
3.4 Stakeholder complaints, grievances and requests for information	Conformance	<p>The Entity has established accessible complaints resolution mechanisms, adequate to address stakeholder complaints, grievances and requests for information relating to its operations. A dedicated E-Mail address has been established (help@alu-met.com), accessible for all stakeholders. A physical complaint mailbox has opened the possibility for anonymous worker complaints. Due to the size and nature of the business, stakeholders can also easily reach top management directly.</p>
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	<p>The Entity has evaluated its life cycle impacts of its products and published the data in an Environmental Product Declaration (accessible from the following websites: www.ibu-epd.com and https://www.alu-met.com/fileadmin/daten/pdf/Zertifikate/EPD_Alu-met_Aluminium-Strangpressbolzen.pdf)</p>

CRITERION	RATING	COMMENT
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	The Entity has evaluated its life cycle impacts of its products and published the data in an Environmental Product Declaration (EPD), accessible from the following websites: www.ibu-epd.com and https://www.alu-met.com/fileadmin/daten/pdf/Zertifikate/EPD_Alumet_Aluminium-Strangpressbolzen.pdf . The EPD is based on a cradle-to-gate approach and underlying norms are ISO 14025, EN 15804+A1 and ISO 14044.
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	The Environmental Product Declaration (Nr. EPD-ALU-20200021-IBB1-DE, available from the website https://www.alu-met.com/fileadmin/daten/pdf/Zertifikate/EPD_Alumet_Aluminium-Strangpressbolzen.pdf , which has been published by the ALU-MET group, contains details of the boundaries, underlying assumptions and data sources.
4.2 Product design	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.3a Aluminium Process Scrap (targets)	Conformance	As confirmed by interviews, document review and the site tour, the Entity has systems and a robust program in place to recycle about 100% of its aluminium process scrap, either within its own site, within the ALU-MET group or at external partners.
4.3b Aluminium Process Scrap (alloy separation)	Conformance	The Entity has developed and implemented processes that allow for the separation of different grades of aluminium. The effectiveness of these processes have been demonstrated through document review and (virtual) site tour.
4.4a Collection and recycling of products at end-of-life (strategy)	Conformance	As a remelter of aluminium, the Entity has the clearly defined strategy to maximise the use of scrap. Management is monitoring the status of implementation of the strategy on a daily basis by updating and discussing related performance indicators.
4.4b Collection and recycling of products at end-of-life (engagement)	Conformance	The Entity closely co-operates with collection and recycling systems to support accurate measurement and efforts to increase recycling rates for their products. As a recycling/remelting operation, the Entity has close contacts with recycling systems, as confirmed by their supplier list.

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5.1 Disclosure of GHG emissions and energy use	Conformance	The Entity does account for and publicly discloses its material GHG emissions and energy use by source on an annual basis see the Entity's Sustainability Report (pages 20-23): https://www.alu-met.com/fileadmin/daten/pdf/Werte_und_Handeln/Nachhaltigkeitsbericht.pdf . The Entity has implemented and maintains an energy management system according ISO 50001:2018 (https://www.alu-met.com/fileadmin/daten/pdf/Zertifikate/AGN/01112020/960402_Aluminium_GmbH_Nachrodt_50001_2UEA_20_fp_DE.pdf).
5.2 GHG emissions reductions	Conformance	In line with its certified energy management system according ISO 50001, the Entity has published GHG emissions reduction targets (page 23 of ALU-MET's Sustainability Report 2019 (https://www.alu-met.com/fileadmin/daten/pdf/Werte_und_Handeln/Nachhaltigkeitsbericht.pdf)) and established a plan to achieve these targets.
5.3a Aluminium Smelting (management system)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.3b Aluminium Smelting (up to and including 2020)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.3c Aluminium Smelting (after 2020)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
PRINCIPLE 6 EMISSIONS, EFFLUENTS AND WASTE		
6.1 Emissions to Air	Conformance	In the ALU-MET Sustainability Reports, the Entity periodically reports on its emissions to air that have adverse effects on humans or the environment. As requested by the relevant authority, measurements are carried by an accredited independent laboratory every three years.
6.2 Discharges to Water	Conformance	The Entity discharges only cooling water directly into waters (creeks or rivers). The other effluents (storm water and sanitary water) are treated in the publicly owned waste water treatment plant. The directly discharged water does not have adverse effects on humans or the environment (the discharged quantity of the cooling water is less than 0,001% of the river's flow rate). The Entity regularly analyses the characteristics of the water.

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6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	As part of its certified Environmental Management System according to ISO 14001, the Entity has a systematic approach to risk assessment which includes prevention and detection of spills and leakage.
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	As part of its certified Environmental Management System according to ISO 14001, the Entity has established management and external communication plans, compliance controls and has a monitoring programme in place to prevent and detect spills and leakage (daily inspection, systematic maintenance).
6.4a Reporting of Spills (immediate disclosure)	Conformance	As part of the certified Environmental Management System, the Entity has procedures in place to ensure disclosure to affected parties the volume, type and potential impact of significant spills immediately after an incident. As reported in the Sustainability Report 2019 on page 26 (https://www.alu-met.com), there was no significant release of substances in the 2019 reporting year.
6.4b Reporting of Spills (regular reporting)	Not Applicable	This Criterion is currently not applicable, as there were no relevant spills or uncontrolled release of hazardous material at the site since the parent company ALU-MET bought the Entity in 1999.
6.5a Waste management and reporting (strategy)	Conformance	In line with its Environmental Management System according to ISO 14001, the Entity has implemented a waste management strategy which is based on the waste mitigation hierarchy (avoid, re-use, reduce, recycle).
6.5b Waste management and reporting (disclosure)	Conformance	In line with its environmental management system according ISO 14001, the Entity has collected data on waste generation and disposal. The quantity of hazardous and non-hazardous waste generated by the Entity, and associated waste disposal methods, are reported in the publicly available sustainability report 2019 pages 24 (see: https://www.alu-met.com/fileadmin/daten/pdf/Werte_und_Handeln/Nachhaltigkeitsbericht.pdf).
6.6a Bauxite Residue (storage construction)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6b Bauxite Residue (integrity checks and controls)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

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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 works continually to maximise the recovery of aluminium by treatment of dross and dross residues. Key factors are trained workers, technical parameters of the furnace and the remelting process. All dross is being sent to recycling.
6.8b Dross (recycling)	Conformance	The Entity ships all recovered dross to a recycling facility.
6.8c Dross (review of alternatives)	Conformance	As the Entity does send all recovered dross to specialised recycling companies, there are no dross residues on site and therefore no landfill.
PRINCIPLE 7 WATER STEWARDSHIP		
7.1a Water assessment (mapping)	Conformance	The Entity has a system in place to identify and map its water withdrawal and use by source and type.
7.1b Water assessment (risk assessment)	Not Applicable	This Criterion is not applicable, as the Entity does not extract water from watersheds but only small amount of municipal water.
7.2a Water management (management plans)	Not Applicable	The evaluation did not identify a significant risk, as the annual usage of spring water is ca. 30.000

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		cubic meters per annum and the production site is not located in a water scarce area (annual precipitation ca. 800-1100 mm). Therefore, this Criterion is not applicable to the Entity.
7.2b Water management (monitoring)	Not Applicable	This Criterion is not applicable, as the water risk assessment (see Criterion 7.1b) did not identify a material risk that would need to be managed.
7.3 Disclosure of water usage and risks	Conformance	The Entity has publicly disclosed its water consumption in the Sustainability Report 2019 (pages 18-20, see https://www.alu-met.com/fileadmin/daten/pdf/Werte_und_Handeln/Nachhaltigkeitsbericht.pdf).
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Major Non-Conformance	A biodiversity assessment has been ordered, but due to current COVID-19 pandemic, the assessment has not been conducted.
8.2a Biodiversity management (biodiversity action plans)	Minor Non-Conformance	A Biodiversity Action Plan is not yet available. The Entity has ordered a biodiversity assessment (written confirmation was provided). However, the assessment was not yet carried out at the time of the audit and hence no action plan established. Note: Rated as minor non-conformity, as the Entity has provided written confirmation, that it has already ordered such assessment by a specialised service provider.
8.2b Biodiversity management (consultation and mitigation hierarchy)	Minor Non-Conformance	A Biodiversity Action Plan is not in place as the underlying assessment has not yet been conducted.
8.2c Biodiversity management (reporting)	Minor Non-Conformance	A Biodiversity Action Plan is not in place as the underlying assessment has not yet been conducted.
8.3 Alien Species	Conformance	During the Entity's thermal processing of the aluminium scrap, all species are destroyed. Relevant remaining relevant risk are the supplied wooden pallets, which are externally incinerated (with heat recovery). The factory area is regularly cleaned of neophytes (during summer time).
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.

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8.4b Commitment to “No Go” in World Heritage properties (existing operations)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.5a Mine rehabilitation (best available techniques)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.5b Mine rehabilitation (financial provisions)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
PRINCIPLE 9 HUMAN RIGHTS		
9.1a Human Rights Due Diligence (policy)	Conformance	The Entity's parent company ALU-MET has issued its company policy and a "social standards" document, expressing a commitment to respect human rights. Both documents apply to the Entity in full (see https://www.alu-met.com/de/werte-handeln/).
9.1b Human Rights Due Diligence (process)	Conformance	The Entity has conducted a documented human rights due diligence assessment based on the "CSR Risk Check" of MVO Nederland (https://www.mvorisicochecker.nl/en).
9.1c Human Rights Due Diligence (remediation)	Conformance	As witnessed by management and according to the Human Rights due diligence study, the human rights assessments has confirmed that there are no salient adverse Human Rights impacts present at the audited Entity. This was confirmed during interviews during the audit. The Entity has not caused or contributed to adverse Human Rights impacts. Therefore, no remediation is needed.
9.2 Women's Rights	Unable to Rate	The Entity has developed and implemented policies, systems, procedures and processes that conform to the Women's Rights requirements. During the audit, no indication for deliberate discrimination of women was identified. Unable to rate, as due to current force majeure situation (Covid-19 pandemic), on-site interviews and site tour were not possible
9.3 Indigenous Peoples	Not Applicable	This Criterion of the ASI Performance Standard does not apply to the Entity (which is located in central Europe), as Indigenous Peoples or their lands, territories and resources are not directly affected by the Entity's operations.
9.4 Free, Prior, and Informed Consent (FPIC)	Not Applicable	This Criterion of the ASI Performance Standard does not apply to the Entity (which is located in central Europe), as Indigenous Peoples or their

CRITERION	RATING	COMMENT
		lands, territories and resources are not directly affected by the Entity's operations.
9.5 Cultural and sacred heritage	Not Applicable	This Criterion of the ASI Performance Standard does not apply to the Entity (which is located in central Europe), as Indigenous Peoples or their lands, territories and resources or sacred or cultural heritage sites and values within the Entity's Area of Influence are not directly affected by the Entity's operations.
9.6a Resettlements (avoid or minimise)	Not Applicable	This Criterion of the ASI Performance Standard does not apply to the Entity, as no resettlements being considered or taking place during the period since joining ASI, or expected to occur during the certification period. Indigenous Peoples are not directly affected by the Entity's operations.
9.6b Resettlements (where unavoidable)	Not Applicable	This Criterion of the ASI Performance Standard does not apply to the Entity, as no resettlements being considered or taking place during the period since joining ASI, or expected to occur during the certification period. Indigenous Peoples are not directly affected by the Entity's operations.
9.7a Local Communities (rights and interests)	Conformance	The Entity respects the legal and customary rights and interests of Local Communities. All relevant activities are subject to a permitting process and the Entity maintains adequate contact to community officials.
9.7b Local Communities (impacts)	Conformance	The Entity prevents any adverse impacts on Local Community livelihoods. Noise caused by unloading operations and production processes is the most relevant adverse impact. The Entity works continually to reduce these emissions and demonstrated compliance with related legal requirements.
9.7c Local Communities (livelihoods)	Not Applicable	This Criterion of the ASI Performance Standard does not apply to the Entity, as the outcome of the Human Rights due diligence conducted has confirmed that there are no salient issues with local communities and therefore no need for action.
9.8 Conflict-Affected and High-Risk Areas	Minor Non-Conformance	During the assessment, there were no indications observed that the entity would contribute to armed conflict or human rights abuses in conflict-affected and high-risk areas. The Entity does not purchase metals, but gets all raw materials from their parent company ALU-MET.

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		However, it was not demonstrated that the Entity or ALU-MET have defined their understanding of "Conflict Affected and High Risk Area" and acted accordingly to ensure that they don't contribute directly or indirectly to armed conflict or human rights abuses.
9.9 Security practice	Conformance	The Entity does only employ unarmed guards. Document review and worker interviews confirmed that the private security provider respects 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 unite freely in the unions and seek representation without interference. A freely elected Worker representation is in place. As confirmed by interviews with Workers and management, the Entity takes an open attitude towards the election of a works council. However, the Entity is not bound by Collective Bargaining Agreements negotiated between the employer association and the relevant union.
10.1b Freedom of Association and Right to Collective Bargaining (Collective Bargaining)	Unable to Rate	A freely elected Worker representation is in place and several collective agreements have been negotiated between the works council and the Entity's management. The Entity is not bound by Collective Bargaining Agreements negotiated between the employer association and the relevant union. Unable to rate, as due to Covid-19 pandemic, the Audit was conducted using remote techniques and this Criterion was not covered in full.
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Not Applicable	In Germany, the country, in which the Entity operates, applicable law does neither restrict the right to Freedom of Association nor collective bargaining. The Company has an open position on employee representation.
10.2a Child Labour (minimum age)	Conformance	The Entity does neither use nor support the use of Child Labour. Minimum working age of 15 years is respected. The youngest worker was 20 years old at the time of the audit, as confirmed by interviews and the employee roster.
10.2b Child Labour (hazardous)	Conformance	As confirmed by interviews with Workers and Management, the Entity does not employ minors under the age of 15 years. The youngest Worker

CRITERION	RATING	COMMENT
		employed was 20 years old at the time of the audit. Hence, the Entity is not engaging in hazardous Child Labour.
10.2c Child Labour (worst forms)	Conformance	As confirmed by interviews with Workers and Management, the Entity does not employ minors under the age of 15 years. The youngest Worker employed was 20 years old at the time of the Audit. Hence, the Entity is not engaging in any Child Labour.
10.3a Forced Labour (Human trafficking)	Conformance	The Entity does neither engage in nor support the use of Forced Labour. The Entity does not engage in or support human trafficking either directly or through any employment or recruitment agencies, as confirmed by interviews with Workers and Management as well as a document review.
10.3b Forced Labour (deposits, fees, advances)	Conformance	The Entity does neither engage in nor support the use of Forced Labour. The Entity does not require any form of deposit, recruitment fee or equipment advance from workers either directly or through employment or recruitment agencies, as confirmed by interviews and document review.
10.3c Forced Labour (migrant workers)	Conformance	The Entity does neither engage in nor support the use of Forced Labour. The Entity does not require workers to lodge deposits or security payments at any time, as confirmed by interviews and document review.
10.3d Forced Labour (debt bondage)	Conformance	The Entity does neither engage in nor support the use of Forced Labour. The Entity does not hold Workers in debt bondage or force them to work in order to pay off a debt, as confirmed by interviews and document review.
10.3e Forced Labour (freedom of movement)	Conformance	The Entity does neither engage in nor support the use of Forced Labour. The Entity does not unreasonably restrict the freedom of movement of Workers in the workplace, as confirmed by interviews and document review. The site does not employ any armed security staff.
10.3f Forced Labour (retention of identity papers, permits, certificates)	Unable to Rate	From the gathered evidence it appears that the Entity does neither engage in nor support the use of Forced Labour. The Entity also does not engage in or support human trafficking either directly or through any employment or recruitment agencies, as confirmed by interviews and review of the Entity's human

CRITERION	RATING	COMMENT
		rights due diligence assessment. However, due to the Force Majeure situation caused by the Covid-19 pandemic, the Audit was conducted using remote auditing techniques and therefore several Criteria, including this one, were not covered in full.
10.3g Forced Labour (freedom to terminate employment)	Conformance	The Entity does neither engage in nor support the use of Forced Labour. The Entity does not deny workers the freedom to terminate their employment at any time without penalty, given notice of reasonable length, as confirmed by interviews and document review.
10.4 Non-Discrimination	Unable to Rate	The Entity is committed to non-discrimination and communicates this commitment in its Company Policy. As confirmed by interviews and document review, the Entity does not engage in or support discrimination for the grounds mentioned in this Criterion. Nevertheless, unable to rate. Due to the Force Majeure situation caused by the Covid-19 pandemic, the audit was conducted using remote auditing techniques. An onsite-visit is necessary to confirm that the requirement of this Criterion is fully met.
10.5 Communication and engagement	Conformance	As confirmed by interviews and document review, the Entity does ensure open communication and direct engagement with Workers. Nominated workers act as Safety Representatives (Sicherheitsbeauftragte), a joint Health & Safety committee is established, an anonymous letter box for raising suggestions or concerns is available. Workers meet daily with their superiors to discuss work related issues. Due to the small number of Workers, the Entity practices an "Open Door" policy rather than institutionalized systems for employee engagement.
10.6 Disciplinary practices	Conformance	As confirmed by interviews and document review, the Entity does neither engage in nor tolerate the use of inadequate and unacceptable treatment of Workers as mentioned in the requirements of this Criterion.
10.7a Remuneration (living wage)	Unable to Rate	As verified by document review (pay slips, time records), the Entity does respect the rights of Workers to a living wage. Due to the force majeure situation caused by the Covid-19 pandemic, the Audit was conducted using

CRITERION	RATING	COMMENT
		remote techniques and this Criterion was not covered in full, therefore unable to rate.
10.7b Remuneration (method of payment)	Conformance	As has been verified by document review and interviews during the assessment, the Entity's wage payments are timely, in legal tender and fully documented. Payments are made via transfer to employee's bank accounts and pay slips are provided to employees, which are detailed and understandable.
10.8 Working Time	Conformance	Working time is part of each employment contract. Clocking-in system is in place. Records are on hand. Overtime is voluntary and due to the shift system is very limited.
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy (Policy)	Conformance	The Entity's parent company has issued and made publicly available its Management Policy, which includes occupational health & safety (https://www.alu-met.com/fileadmin/daten/pdf/Werte_und_Handeln/Unternehmenspolitik.pdf).
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	As confirmed by interviews with Workers and Management, the Entity applies its occupational health & safety policy to all workers and visitors present at the site.
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Conformance	The Management Policy does include the commitment to comply with all applicable legislation.
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Minor Non-Conformance	The Entity has issued and communicated its Policy regarding Occupational Health & Safety. However, in the policy it is not stated expressis verbis, that workers have the right to understand the hazards and safe practices for their work, and the authority to refuse or stop unsafe work. Note: The Entity is preparing for ISO 45001 Certification, which will trigger a revision of the Policy.
11.2 OH&S Management System	Major Non-Conformance	Entity is committed to provide safe and healthy work places. However, 1) it was not demonstrated that a documented Occupational Health and Safety Management System that is conformant with applicable national and international standards is in place;

CRITERION	RATING	COMMENT
		2) the Entity did not demonstrate that regular evacuation drills were conducted. Note: The Entity is currently preparing for ISO 45001 Certification.
11.3 Employee engagement on health and safety	Conformance	The Entity has mechanisms in place to discuss Occupational Health & Safety issues with the Management and Workers (meetings between worker representatives, appointed safety representatives from the workforce. ("Sicherheitsbeauftragte" and a joint health & safety committee).
11.4 OH&S performance	Conformance	As confirmed by documented evidence, the Entity has developed and monitors various leading and lagging indicators on a monthly basis in accordance with the requirements of the ASI Performance Standard.

Document Control and Version History

Revision	Date	Notes
0	5 January 2021	Initial Certification Audit