ASI CERTIFICATION
PERFORMANCE STANDARD

PRESENTED TO

LOGAN ALUMINUM, INC.

CERTIFICATE NUMBER	ASI STANDARD	CERTIFICATION LEVEL	ASI ACCREDITED AUDITOR
193	PERFORMANCE STANDARD (V2 2017)	FULL CERTIFICATION	DNV BUSINESS ASSURANCE SERVICES UK LTD.
DATE OF ISSUE	**DATE OF EXPIRY**	**CERTIFIED SINCE**	
23 MARCH 2022	22 MARCH 2025	23 MARCH 2022	

AUTHORISED BY

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

CERTIFICATION SCOPE

Remelting, recycling, casting, hot mill rolling, cold mill rolling, and coil finishing at the Logan Aluminum facility in Russellville, KY, USA.

SUMMARY AUDIT REPORT **PERFORMANCE STANDARD**

OVERVIEW

MEMBER NAME	Logan Aluminum, Inc.
ENTITY NAME	Logan Aluminum, Inc.
CERTIFICATION SCOPE	Remelting, recycling, casting, hot mill rolling, cold mill rolling, and coil finishing at the Logan Aluminum facility in Russellville, KY, USA.
SUPPLY CHAIN ACTIVITIES	• Aluminium Re-melting/Refining • Casthouses • Semi-Fabrication
ASI STANDARD	• Performance Standard V2
AUDIT TYPE	• Initial Certification Audit
AUDIT FIRM	DNV Business Assurance and Services UK Ltd.
AUDIT DATE	• 7 - 11 February 2022
AUDIT REPORT SUBMISSION	• 19 February 2022
AUDIT SCOPE	The audit scope included remelting, recycling, casting, hot mill rolling, cold mill rolling, and coil finishing at the Logan Aluminum facility in Russellville, KY, USA. Supply chain activities included in the Audit Scope: • Aluminium Re-melting/Refining • Casthouses • Semi-Fabrication All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.
AUDIT OUTCOME	• Certification
AUDIT METHODOLOGY DECLARATION	The Auditors confirm that:

	☑ The information provided by the Entity is true and accurate to the best knowledge of the Auditor(s) preparing this report. ☑ The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous. ☑ The Audit Scope and audit methodology are sufficient to establish confidence that the findings are indicative of the performance of the Entity's defined Certification Scope. ☑ The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.
CERTIFICATION PERIOD	23 March 2022 – 22 March 2025
NEXT AUDIT TYPE	Surveillance Audit
NEXT AUDIT DUE DATE	22 September 2023
CERTIFICATE NUMBER	193

SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity meets legal compliance requirements by executing the Code of Conduct Policy, Quality Management System, Conflict of Interest Policy and certification of the Environmental Management System and the Occupational Health and Safety Management System. The legal and regulatory requirements applicable to the Environmental, Health and Safety (EHS) aspects and hazards of the Entity's operations are determined, documented, and periodically evaluated and updated in conformance with the Regulatory Legal and Other Requirements Procedure.
1.2 Anti-Corruption	Conformance	The policies and processes identified in the Environmental and Safety Management Systems, along with training and awareness are enforced to manage Corruption.
1.3 Code of Conduct	Conformance	The Entity's Code of Conduct is reviewed regularly. The Entity's polices (including integrity, business activities, conflicts of interest and anti-corruption processes), employee training and awareness, relations with customers and suppliers, and compliance with Human Rights assist to enforce the Code of Conduct.
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	The Entity's policies, processes and employee engagement and awareness are designed and implemented to meet Environmental, Social and Governance objectives.
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	The Entity's senior management implements, endorses and supports an Environmental, Social, and Governance Policy through implementation of the ISO 14001 Environmental Management System, ISO 45001 OHS Management System, Work System Standards, Quality Fact Sheet, annual ISO audits and environmental and safety networks.
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	The Entity effectively communicates Environmental, Social, and Governance Policies both internally and externally by employee training and engagement.
2.2 Leadership	Conformance	The Environmental and Safety Management Business Unit Manager has been nominated as the Entity's representative to the Board of Directors and has the

CRITERION	RATING	COMMENT
		overall responsibility and authority for ensuring conformance with the ASI Performance Standard.
2.3a Environmental and Social Management Systems (environmental)	Conformance	The Entity has documented and implemented both an Environmental Management System in accordance to ISO 14001 and Energy Management System in accordance to ISO 50001. The Entity's Management System is certified by an accredited certification body.
2.3b Environmental and Social Management Systems (social)	Conformance	The Entity documents and implements a Social Management System which includes employee training and awareness of policies and processes.
2.4 Responsible Sourcing	Conformance	The Entity implements responsible sourcing principles throughout the procurement process which includes a Supplier Code of Conduct, purchasing procedures and supplier audits.
2.5 Impact Assessments	Conformance	Impact Assessments are conducted as needed and requested by conservation agencies and are undertaken in collaboration and coordination with conservation agencies.
2.6 Emergency Response Plan	Conformance	The Entity's Emergency Response Plans include risk identification and assessment for credible emergency scenarios and are developed in consultation with affected stakeholders such as Workers and their representatives, Communities and other relevant agencies. Employees are provided with training and test and drills are undertaken.
2.7 Mergers and Acquisitions	Not Applicable	This Criterion is not applicable as the Entity is a Joint Venture and as such mergers and acquisitions are not conducted by the Entity.
2.8 Closure, Decommissioning and Divestment	Conformance	The Entity has implemented processes and procedures to ensure conformance with the requirements for closure, decommissioning and divestment.
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	The Entity's sustainability data are available to the public through the US EPA, including GHG emissions reporting: https://ghgdata.epa.gov/ghgp/service/facilityDetail/2020?id=1002771&ds=E&et=&popup=true The Entity is a Joint Venture company and sustainability metrics and data are reported to both owners (Novelis and Tri-Arrows Aluminium) for disclosure in their Sustainability Reports.

CRITERION	RATING	COMMENT
3.2 Non-compliance and liabilities	Conformance	Detailed information on fines, judgments, penalties, and non-monetary sanctions for failure to comply with Applicable Law are provided on the EPA Enforcement and Compliance History Only (ECHO) website: https://echo.epa.gov/detailed-facility-report?fid=110043784982 And the Occupational Safety and Health Administration's (OSHA) Integrated Management Information System (IMIS): https://www.osha.gov/pls/imis/establishment.search?p_logger=1&establishment=Logan+Aluminum&State=KY&officetype=all&Office=all&sitezip=&p_case=all&p_violations_exist=all&startmonth=03&startday=15&startyear=2017&endmonth=03&endday=15&endyear=2022
3.3a Payments to governments (legal and contractual)	Conformance	The Entity complies with the local legislation and has implemented policies and procedures to conform to this requirement. To prevent Corruption, detailed requirements are described in the Entity's Code of Conduct and Supplier Code of Conduct. It is precisely regulated regarding which payments are made to government authorities.
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 is certified to ISO 14001:2015 and ISO 45001:2018 and has implemented a Complaints Resolution Mechanism. A whistleblowing hotline is in place.
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	The Entity has implemented and certified its Environmental Management System and evaluates environmental aspects in a life cycle perspective. Life Cycle Assessments have been developed and implemented and the requirements of ISO 14040 fulfilled. The Entity has Environmental Product Declarations (EPD's) for cold-rolled aluminium, hot-rolled aluminium and secondary aluminium ingot, certified to ISO 14044.
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	The Entity contributes life cycle inventory data to regional initiatives (e.g. Aluminum Association). Environmental Product Declarations (EPD's) for cold-rolled aluminium, hot-rolled aluminium and secondary aluminium ingot are certified to ISO 14044.

CRITERION	RATING	COMMENT
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	The Entity contributes life cycle inventory data to regional initiatives (e.g. Aluminum Association). Environmental Product Declarations (EPD's) for cold-rolled aluminium, hot-rolled aluminium and secondary aluminium ingot are certified to ISO 14044. Life Cycle Assessments (LCA's) and EPD's are available to the public via the Aluminum Association website: https://www.aluminum.org/
4.2 Product design	Not Applicable	This Criterion is not applicable as the Entity is not involved in the end product design and development. The final consumer product design and development is determined by the product manufacturer. The rolled aluminium sheet provided by the Entity to the final manufacturer of the end consumer product is 100% recyclable.
4.3a Aluminium Process Scrap (targets)	Conformance	The Entity has implemented a recovery system for scrap. Aluminium Process Scrap is reduced to a minimum, if scrap is generated it is 100% recycled or reused.
4.3b Aluminium Process Scrap (alloy separation)	Conformance	There is a closed-loop production. Aluminium alloys and grades are recorded separately and recycled according to type.
4.4a Collection and recycling of products at end-of-life (strategy)	Conformance	The Entity has implemented a recycling strategy. Corporate goals are fulfilled to continuously increase the recycling rate. The recycling strategy captures the product from the beginning to end-of-life. The Entity works with its Joint Venture owners, the Aluminum Association, and local government to collaborate on closed loop recycling initiatives.
4.4b Collection and recycling of products at end-of-life (engagement)	Conformance	An aluminum recycling strategy is in place. The set goals are fulfilled and thus a continuous increase of the recycling rate. The recycling strategy captures the product from the beginning to end of life. The entity works with its owners, the Aluminum Association, and local government to collaborate on closed-loop recycling initiatives.
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		
5.1 Disclosure of GHG emissions and energy use	Conformance	The Entity provides monthly data to both Joint Venture owners on environmental, social and governance performance. Results are compiled and published through the owners' individual sustainability reporting activities. The Entity provides information on environmental sustainability at: https://www.logan-aluminum.com

CRITERION	RATING	COMMENT
		Additional information on the Entity's Greenhouse Gas (GHG) emissions reporting can be found on the US EPA website: https://www.epa.gov/ghgreporting The Entity monitors and analyses GHG and energy performance. The Executive Leadership has committed to a net-zero carbon reduction goal for 2050.
5.2 GHG emissions reductions	Minor Non-Conformance	The Entity demonstrated a commitment to address global climate change. Greenhouse Gas (GHG) emission data are communicated and reported in a number of ways to stakeholders. The Entity reports GHG data to Joint Venture owners which is published through the owners' individual sustainability reporting activities. The Entity reports GHG data to the US EPA as required by local law, available to the public on the US EPA website: https://www.epa.gov/ghgreporting Scope 1 and Scope 2 GHG data are also reported to the public at: https://www.logan-aluminum.com/ The Entity monitors and analyses GHG and energy performance. The Entity's Executive Leadership has committed to a net-zero carbon reduction goal for 2050. The Entity is researching projects on energy reduction and carbon capture to incorporate into their overall carbon reduction plan. However, the Entity has not published their emission reduction objectives with their action plans. Although the Entity is in the process of developing a reduction plan and forecasts, it does not currently conform entirely to this Criterion.
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	The Entity monitors, controls and reduces the Emissions to Air. The Entity's Emissions to Air are under tight control according to local regulations and permits.
6.2 Discharges to Water	Conformance	The Entity manages Discharges to Water according to local regulations and permits. Contamination of water

CRITERION	RATING	COMMENT
		is reported to the authority in accordance with federal and local laws, and permits. Internal processes and procedures manage wastewater treatment systems and monitor water quality.
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	The Entity has developed a Spill Prevention, Control, and Countermeasures (SPCC) Plan in accordance with federal law. The Entity has undertaken risk assessments and implemented measures to prevent and detect contamination of air, water and soil.
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	The Entity has developed a Spill Prevention, Control, and Countermeasures (SPCC) Plan in accordance with federal law. The Entity has undertaken risk assessments and implemented measures to prevent and detect contamination of air, water and soil. Regular internal audits are conducted to verify the effectiveness and adherence to defined actions. Training on the SPCC Plan is undertaken annually.
6.4a Reporting of Spills (immediate disclosure)	Conformance	Spill reporting is conducted according to federal, state, and local laws and established policies and procedures. Training on policies and procedures is provided annually. External reporting is initiated immediately as required by law.
6.4b Reporting of Spills (regular reporting)	Conformance	Spill reporting is conducted according to federal, state, and local laws and established policies and procedures. Training on policies and procedures is provided annually. External reporting is initiated immediately as required by law. There have been no Spills.
6.5a Waste management and reporting (strategy)	Conformance	The Entity has implemented a waste management strategy and there has been a reduction of the waste streams. The Entity's waste management strategy has been completed in accordance with the Waste Mitigation Hierarchy.
6.5b Waste management and reporting (disclosure)	Conformance	The Entity is required by federal and local law to report the quantity of Hazardous and Non-Hazardous Waste generated and the associated waste disposal methods on an annual basis. Information is available to the public via the US EPA Toxic Release Inventory (TRI) website: https://www.epa.gov/toxics-release-inventory-tri-program#trisearch
6.6a Bauxite Residue (storage construction)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
6.6b Bauxite Residue (integrity checks and controls)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6c Bauxite Residue (water discharge)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6d Bauxite Residue (marine and aquatic environments)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6e Bauxite Residue (state 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 collects 100% of Dross, stores and transports it to a third party recycling facility. The Aluminium recovered from the Dross is sent back to the Entity for the use as an input into the process.
6.8b Dross (recycling)	Conformance	The Entity collects 100% of Dross, stores and transports it to a third party recycling facility. The Aluminium recovered from the Dross is sent back to the Entity for the use as an input into the process.
6.8c Dross (review of alternatives)	Conformance	The Entity collects 100% of Dross, stores and transports it to a third party recycling facility. The Aluminium recovered from the Dross is sent back to the Entity for the use as an input into the process. The Entity continuously seeks alternatives to improve sustainability performance. The Entity is currently experimenting with new technology that would allow for the recycling and recovery of Dross onsite to reduce Scope 3 GHG emissions from transportation and to improve recovery.
PRINCIPLE 7 WATER STEWARDSHIP		

CRITERION	RATING	COMMENT
7.1a Water assessment (mapping)	Conformance	The Entity monitors its water usage according to local regulations. An overview of the water inputs, various consumers and different wastewater flows are described and regularly reviewed.
7.1b Water assessment (risk assessment)	Conformance	The Entity has implemented targets for water management. These targets are regularly reviewed during visits by authorities and annually during the Environmental Management System review.
7.2a Water management (management plans)	Conformance	The Entity's Environmental Management System implements its water management. Consumption data and water quality performance limits are regularly monitored and reviewed.
7.2b Water management (monitoring)	Conformance	The Entity does not have a formal water management plan as it has not identified material risks relating to water management. The Entity has implemented water trackers and has plans for improving water resource consumption.
7.3 Disclosure of water usage and risks	Conformance	The requirements of Applicable Law are checked by state environmental authorities, regularly monitored and reported monthly on the government's Kentucky Electronic Submittals website.
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	A detailed biodiversity risk assessment has been conducted based on land use and activities to assess impact on the identified Area of Influence. The Entity incorporates a biodiversity risk assessment for new projects as part of the Entity's Management of Change process.
8.2a Biodiversity management (biodiversity action plans)	Conformance	The Entity's biodiversity actions are included and reviewed in the Environmental Action Plan as required.
8.2b Biodiversity management (consultation and mitigation hierarchy)	Conformance	The Entity has a small Area of Influence and the conservation of sensitive ecological systems is highly regulated by local laws.
8.2c Biodiversity management (reporting)	Conformance	The Entity has not identified any material impacts on Biodiversity and reviews this during regular annual Management Review meetings. Any impacts identified are reported to the local agencies with jurisdiction.
8.3 Alien Species	Conformance	The Entity prevents the accidental or deliberate introduction of Alien Species that may have significant adverse impacts on biodiversity through its Environmental Management System.

CRITERION	RATING	COMMENT
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 mines)	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 committed to respect Human Rights and subscribes to this principle in the Code of Conduct. The Entity has also committed to the United Nations Guiding Principles in the Supplier Code of Conduct (Labour and Human Rights), which includes a commitment to respect Human Rights: https://www.logan-aluminum.com/wp-content/uploads/2022/02/Supplier-Code-of-Conduct-2022.pdf
9.1b Human Rights Due Diligence (process)	Conformance	The Entity has committed to respect Human Rights and subscribes to this principle in the Code of Conduct and to the United Nations Guiding Principles in the Supplier Code of Conduct (Labour and Human Rights), with a commitment to respect Human Rights. All suppliers are required to respect the Entity's Code of Conduct.
9.1c Human Rights Due Diligence (remediation)	Conformance	The Entity has defined a Human Rights Due Diligence process that seeks to identify, prevent, mitigate and account for how it addresses its impacts on Human Rights.
9.2 Women’s Rights	Conformance	The Entity has implemented policies and processes to ensure respect for the rights and interests of women that are consistent with the legal requirements of the United States of America. The policies are enforced through the business with regular reporting required.
9.3 Indigenous Peoples	Not Applicable	This Criterion is not applicable as there are no current or previous settlements by Indigenous Peoples in the vicinity of the Entity.
9.4 Free, Prior, and Informed Consent (FPIC)	Not Applicable	This Criterion is not applicable as there are no current or previous settlements by Indigenous Peoples in the vicinity of the Entity.

CRITERION	RATING	COMMENT
9.5 Cultural and sacred heritage	Not Applicable	This Criterion is not applicable as there are no current or previous settlements by Indigenous Peoples in the vicinity of the Entity.
9.6a Resettlements (avoid or minimise)	Not Applicable	This Criterion is not applicable as there are no current or previous settlements by Indigenous Peoples in the vicinity of the Entity.
9.6b Resettlements (where unavoidable)	Not Applicable	This Criterion is not applicable as there are no current or previous settlements by Indigenous Peoples in the vicinity of the Entity.
9.7a Local Communities (rights and interests)	Conformance	The Entity has established and implemented a process for relevant parties to respect the legal and traditional rights of local Communities in respect of their land, livelihoods and use of natural resources, while exploring opportunities to respect and support Community livelihoods.
9.7b Local Communities (impacts)	Conformance	The Entity respects legal and customary rights and interests of local Communities in their lands and livelihoods and their use of natural resources. There is a community engagement process implemented by the Entity intended to serve the interests of its local and regional stakeholders.
9.7c Local Communities (livelihoods)	Conformance	The Entity has a close relationship with local Communities. The Entity actively supports community-based and community-led solutions that strengthen the cornerstones for a good quality of life, including education, financial stability and public health.
9.8 Conflict-Affected and High-Risk Areas	Not Applicable	This Criterion is not applicable as the Entity is not located in a Conflict-Affected or High-Risk Area.
9.9 Security practice	Conformance	The Entity has established and implemented security standards in its arrangements with security providers, which includes considerations for Human Rights protection consistent with federal, state, and local laws.
PRINCIPLE 10 LABOUR RIGHTS		
10.1a Freedom of Association and Right to Collective Bargaining (freedom of association)	Conformance	The Entity respects the rights of Workers to associate freely in labour unions, seek representation and join Workers' councils without interference to the extent possible under Applicable Law, in line with the ILO Conventions C87 and C98. It is governed by federal law, state law, and corporate policy.

CRITERION	RATING	COMMENT
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Conformance	The Entity respects the rights of Workers to Collective Bargaining, to participate in any Collective Bargaining process in good faith to the extent possible under Applicable Law and adhere to Collective Bargaining agreements where such agreements exist.
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Not Applicable	The Entity allows Freedom of Association and Collective Bargaining consistent with federal and state law, hence this Criterion is not applicable.
10.2a Child Labour (minimum age)	Conformance	The Entity neither uses nor supports the use of Child Labour as defined in ILO Conventions C138 and C182, and complies with related federal law in this regard. The Entity's onboarding process is strictly controlled by a government mandated database and a minimum working age of 18 years is verified upon employment.
10.2b Child Labour (hazardous)	Conformance	The Entity has implemented policies and procedures that prevent the use or support of Child Labour as defined in ILO Conventions C138 and C182. There is a process in place to comply with related national and international law including not engaging in or supporting Hazardous Child Labour, or Worst Forms of Child Labour.
10.2c Child Labour (worst forms)	Conformance	The Entity neither uses nor supports the use of Child Labour as defined in ILO Conventions C138 and C182, and complies with related federal law in this regard. The Entity's onboarding process is strictly controlled by a government mandated database and a minimum working age of 18 years is verified upon employment. There is a process in place to comply with related national and international law including not engaging in or supporting Hazardous Child Labour, or Worst Forms of Child Labour.
10.3a Forced Labour (human trafficking)	Conformance	The Entity neither engages nor supports the use of Forced Labour as defined in ILO Conventions C29, along with Protocol P29 (2014) to this Convention, and C105. There is a corporate Human Rights Policy and Code of Conduct that prohibit Forced Labour and locally implemented processes that reduce the risk of engaging in or supporting forms of Forced Labour including Human Trafficking.
10.3b Forced Labour (deposits, fees, advances)	Conformance	The Entity does not require any form of deposit, recruitment fee or equipment advance from Workers and does not use recruitment agencies.

CRITERION	RATING	COMMENT
10.3c Forced Labour (migrant workers)	Not Applicable	The Entity does not employ Migrant Workers.
10.3d Forced Labour (debt bondage)	Conformance	The Entity does not hold Workers in Debt Bondage or force them to work in order to pay off a debt.
10.3e Forced Labour (freedom of movement)	Conformance	There were no instances of Forced Labour observed at the Entity site and Workers are free to leave their working places.
10.3f Forced Labour (retention of identity papers, permits, certificates)	Conformance	The Entity does not keep Workers' original identity papers. Only copies of identity documents are stored.
10.3g Forced Labour (freedom to terminate employment)	Conformance	The conditions for termination of working contracts are defined by state law. The Workers' right to terminate employment is communicated during new hire training. The Human Resources Business Unit ensures that applicable state law is enforced.
10.4 Non-Discrimination	Conformance	The Entity has implemented processes that ensure equal opportunities and that there is no engagement or support of Discrimination in hiring, salary, promotion, training, advancement opportunities or termination of any Worker on the basis of gender, race, national or social origin, religion or age.
10.5 Communication and engagement	Conformance	The Entity has open communication and direct engagement with Workers and their representatives regarding working conditions and resolution of workplace and compensation issues. This is delivered through a number of mechanisms that ensure there is no threat of reprisal, intimidation or harassment.
10.6 Disciplinary practices	Conformance	The Entity neither engages in nor tolerates the use of corporal punishment, mental or physical coercion, harassment, and gender-based violence including sexual harassment, or verbal abuse of workers. This is enforced by the Workplace Harassment Policy.
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 at least a legal or industry minimum standard.
10.7b Remuneration (method of payment)	Conformance	The Entity respects the rights of Workers to a living wage and ensures that wages paid for a normal working week meet at least a legal or industry minimum standard. Payments are timely, in legal tender and fully documented.

CRITERION	RATING	COMMENT
10.8 Working Time	Conformance	The Entity complies with Applicable Law and industry standards on Working Time, public holidays and paid annual leave. A clock-in system is in place and records are available.
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	The Entity has an Occupational Health, Safety and Environment Policy, which has been signed by the Entity's President and is available to all employees and the general public. Training on the Policy is provided during orientation and during periodical training. The Entity has ISO 45001:2018 certification.
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	The Entity applies the Occupational Health and Safety Policy to all Workers and Visitors present in any area or activities under their control.
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Conformance	The Entity's Occupational Health and Safety Policy includes a commitment to comply with all applicable environmental, health and safety laws and regulations.
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	The Entity has established an Occupational Health and Safety Management System, certified to ISO 45001:2018. The documented Occupational Health and Safety Policy states that Workers have the right to understand the hazards and safe practices for their work, and the authority to refuse or stop unsafe work.
11.2 OH&S Management System	Conformance	The Entity has a documented Occupational Health and Safety Management System that is routinely independently audited for conformance with applicable international standards. The Entity is certified to ISO 45001.
11.3 Employee engagement on health and safety	Conformance	The Entity is ISO 45001:2018 certified and has a process in place to discuss Occupational Health and Safety issues with the management (safety representatives from workforce and a Joint Health and Safety Committee).
11.4 OH&S performance	Conformance	The Entity maintains certification to ISO 45001:2018. The Entity evaluates its Occupational Health and Safety performance using leading and lagging indicators.

Document Control and Version History

Revision	Date	Notes
0	23 March 2022	Initial Certification Audit – Full Certification