ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

SPEEDLINE ALUMINIUM-GIEßEREI GmbH

CERTIFICATE NUMBER

90

ASI STANDARD

PERFORMANCE STANDARD (V2 2017) CERTIFICATION LEVEL

FULL CERTIFICATION ASI ACCREDITED AUDITOR

TÜV RHEINLAND CERT GMBH

DATE OF ISSUE

DATE OF EXPIRY

CERTIFIED SINCE

16 SEPTEMBER 2020 15 SEPTEMBER 2023 16 SEPTEMBER 2020

AUTHORISED BY

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

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

CERTIFICATION SCOPE

Production of extrusion billets from Recycled Aluminium scrap. The Entity is part of Alu-Met GmbH.

SUMMARY AUDIT REPORT PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Alu-Met GmbH (Austria)
ENTITY NAME	Speedline Aluminium-Gießerei GmbH
CERTIFICATION SCOPE	 Production of extrusion billets from Recycled Aluminium scrap. The Entity is part of Alu-Met GmbH.
SUPPLY CHAIN ACTIVITIES	Aluminium Re-melting/RefiningCasthouses
ASI STANDARD	Performance Standard V2
AUDIT TYPE	Certification Audit
AUDIT FIRM	TÜV Rheinland Cert GmbH
AUDIT DATE	• 23 - 24 June 2020
AUDIT REPORT SUBMISSION	• 5 August 2020
AUDIT SCOPE	The Audit Scope covered the production of extrusion billets from Recycled Aluminium scrap.
	Supply chain activities included in the Audit Scope:
	Aluminium Re-melting/Refining
	Casthouses
	All relevant supply chain activities, and Criteria in the 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 Entitys defined Certification Scope.					
	The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.					
CERTIFICATION PERIOD	16 September 2020 . 15 September 2023					
NEXT AUDIT TYPE	Surveillance Audit					
NEXT AUDIT DATE	15 March 2021					
CERTIFICATION NUMBER	90					

SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT	
PRINCIPLE 1 BUSINESS INTEGRITY			
1.1 Legal Compliance	Conformance	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 an ISO 14001, ISO 45001 and ISO 50001 Certificates from an accredited Certification body to ensure Compliance with Applicable Law.	
1.2 Anti-Corruption	Conformance	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). The financial System is annually audited by an external tax Auditor. The Entity is not directly active on the market, but all purchasing and sales of metals are done by the parent company ALU-MET. Annual financial Audits (conducted by licensed external tax Auditor) demonstrate correct financial behaviour of the Entity. Transparency International's "Corruption Perceptions Index 2019" of Austria, where the Entity is located, is 77 (Rank 12).	
1.3 Code of Conduct	Conformance	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/ . The Documents are subject to an annual review.	
PRINCIPLE 2 POLICY	& MANAGEMEN	Г	
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	The Entity has issued and communicated 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/Unternehmen_spolitik.pdf .	
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, ISO 50001 and ISO	

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		45001 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 GmbH company Policy internally (intranet) and externally as appropriate (company website: https://www.alu-met.com/fileadmin/daten/pdf/Werte_und_Handeln/20200615_Unternehmenspolitik_SLAG_Neu.pdf). Note: All purchase and sales are 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 Alu-Met GmbH.
2.3a Environmental and Social Management Systems (environmental)	Conformance	The Entity has documented and implemented an integrated Management System, with Certified facets according ISO 14001:2015 and ISO 50001:2018. There are no overdue open actions from the latest Audit Report of the Certification body.
2.3b Environmental and Social Management Systems (social)	Conformance	The Entity has documented and implemented an integrated Management System and holds Certificate according ISO 45001:2018. The facets human & labour rights are also managed, but the practice is not yet formalized to the same extent as the System for environment, energy and occupational health & safety.
2.4 Responsible Sourcing	Conformance	Alu-Met GmbH 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/Beschaffungs-politik_pdf .
2.5 Impact Assessments	Conformance	Bigger projects or Major Changes to existing Facilities did not take place since the Entity joined ASI. The site is located in a highly regulated country (Austria), where relevant projects and changes (linked to construction activities) must undergo a thorough analysis and authorization Process and the Entity has Systems in place to manage this effectively.
2.6 Emergency Response Plan	Conformance	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 and ISO 45001 Certifications which are current to the Entity's Certification Scope under ASI Performance Standard. As confirmed during the site visit, emergency equipment is in place.

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2.7 Mergers and Acquisitions	Conformance	The Entity did not undergo or plan a merger or acquisition (M&A) since the Entity joined ASI. However, a Process has been defined to manage M&As, should it become relevant.
2.8 Closure, Decommissioning and Divestment	Conformance	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. The site is a well established site (ca. 40 years of usage, thereof 12 years of aluminium remelting); no plans for Closure/Decommissioning are known. The site is located in a highly regulated country (Austria), 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.
PRINCIPLE 3 TRANSF	PARENCY	
3.1 Sustainability Reporting	Conformance	Alu-Met GmbH 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 "Aluminium Gießerei Nachrodt" plant. The Report is based on GRI G4 Criteria. The Report is published on the ALU-MET website: https://www.alu-met.com/fileadmin/daten/pdf/Werte_und_Handeln/Nachhaltigkeit_sbericht.pdf .
3.2 Non-Compliance and liabilities	Conformance	In its sustainability Report (section 3.8 page 26, https://www.alumet.com/fileadmin/daten/pdf/Werte_und_Handeln/Nachhaltigkeit_sbericht.pdf), the Entity's parent company has publicly disclosed information on fines and alike of Alu-Met GmbH. As testified by management, there were no fines or similar paid in the reporting period or the current year of this Audit.
3.3a Payments to governments (legal and contractual)	Conformance	Information about significant fines, judgments, penalties and non-monetary sanctions is included in the ALU-MET sustainability Report 2019. The Report is published on the ALU-MET website (https://www.alu-met.com/fileadmin/daten/pdf/Werte_und_Handeln/Nachhaltigkeit_sbericht.pdf).
3.3b Payments to governments (disclosure . Bauxite Mining)	Not Applicable	This criterion is Not applicable to the Entityos Certification Scope.
3.4 Stakeholder complaints, grievances	Conformance	The Entity has established accessible Complaints Resolution Mechanisms, adequate to address stakeholder complaints, grievances and requests for information relating to its

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and requests for information		operations. A dedicated E-Mail address has been established (help@alu-met.com), accessible for all Stakeholders. A complaint mailbox has opened the possibility for anonymous Worker complaints. Due to the size and nature of the business, Stakeholders can also easily reach out to top management directly.
PRINCIPLE 4 MATERI	AL STEWARDSH	I P
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	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_Aluminium-Strangpressbolzen.pdf
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_Alu-met_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, is available from the website https://www.alu-met.com/fileadmin/daten/pdf/Zertifikate/EPD_Alu-met_Aluminium-Strangpressbolzen.pdf , which has been published by Alu-Met GmbH, contains details of the boundaries, underlying assumptions and data sources.
4.2 Product design	Not Applicable	This criterion is Not applicable to the Entityos 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 Alu-Met GmbH or at external partners.
4.3b Aluminium Process Scrap (alloy separation)	Conformance	The Entity has developed and implemented Processes that allow for the physical separation of different alloys and grades of aluminium. All scrap is being recycled. The effectiveness of these Processes have been observed during the site tour.
4.4a Collection and recycling of Products at end-of-life (strategy)	Conformance	As a recycler & remelter of aluminium, the Entity has clearly defined strategy to maximise the use of scrap. Management is monitoring the status of implementation of the strategy on a weekly basis by updating and discussing related performance indicators.

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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.
PRINCIPLE 5 GREEN	HOUSE GAS EMI	SSIONS
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. Greenhouse gas emissions are determined and published in the annual sustainability Report (pp. 20 ff.). Site specific data is provided for Scope 1 and Scope 2 (direct/indirect emissions), the Report can be accessed via this link: https://www.alu-met.com/fileadmin/daten/pdf/Werte_und_Handeln/Nachhaltigkeit_sbericht.pdf . Speedline Aluminium-Gießerei has implemented and maintains an energy Management System according to ISO 50001:2018 (https://www.alu-met.com/fileadmin/daten/pdf/Zertifikate/Schlins/DIN_EN_ISO_50_001_2018_2019-08-07_2022-08-06_DE.pdf).
5.2 GHG emissions reductions	Conformance	The Entity has defined specific reduction targets as part of its annual environmental-/energy program. The program is reviewed on an annual basis internally and by the Auditor of the accredited Certification body. GHG emissions reduction targets are published in the groups sustainability Report on page 23 (https://www.alu-met.com/fileadmin/daten/pdf/Werte_und_Handeln/Nachhaltigkeit_sbericht.pdf).
5.3a Aluminium Smelting (Management System)	Not Applicable	This criterion is Not applicable to the Entityos Certification Scope.
5.3b Aluminium Smelting (up to and including 2020)	Not Applicable	This criterion is Not applicable to the Entityos Certification Scope.
5.3c Aluminium Smelting (after 2020)	Not Applicable	This criterion is Not applicable to the Entityos Certification Scope.
PRINCIPLE 6 EMISSIONS, EFFLUENTS AND WASTE		
6.1 Emissions to Air	Conformance	The Entity has published the summary of the CO2 data in the sustainability Report 2019 (pp 20-22). The Report can be found on the ALU-MET website https://www.alu-met.com . In line with its Certified Environmental Management System according to ISO 14001:2015, the Entity is working to continually

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		minimize adverse effects to the environment. Projects are planned to reduce Emissions to Air in the future.
6.2 Discharges to Water	Conformance	The Entity does not directly discharge effluents into waters (creeks or rivers). Instead, effluents are treated in the publicly owned Waste water treatment plant. The Entity has disclosed its Discharges to Water in its sustainability Report 2019 (pp 17-18), which can be accessed via the following link: https://www.alu-met.com .
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. Their environmental aspects register is periodically reviewed to adapt to changes within the site.
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	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. Emergency Equipment is in place.
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 regarding the volume, type and potential impact of significant spills immediately after an incident. As reported in the sustainability Report 2019 on page 23 (https://www.alumet.com), there was no significant release of substances in the 2019 reporting year.
6.4b Reporting of Spills (regular reporting)	Conformance	The Entity reports annually about spills or release of harmful substances in their annual Sustainability Report. As reported in the 2019 issue on page 23 (https://www.alu-met.com), there was no significant release of substances in the 2019 reporting year.
6.5a Waste management and reporting (strategy)	Conformance	In line with its Environmental Management System according 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	The Entity has publicly disclosed the quantity of their generated Waste (hazardous and non-hazardous) in the Alu-Met GmbH annual sustainability Report 2019, page 25 (https://www.alu-met.com).
6.6a Bauxite Residue (storage construction)	Not Applicable	This criterion is Not applicable to the Entityos Certification Scope.
6.6b Bauxite Residue (integrity checks and controls)	Not Applicable	This criterion is Not applicable to the Entityos Certification Scope.

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6.6c Bauxite Residue (water discharge)	Not Applicable	This criterion is Not applicable to the Entityos Certification Scope.
6.6d Bauxite Residue (marine and aquatic environments)	Not Applicable	This criterion is Not applicable to the Entityos Certification Scope.
6.6e Bauxite Residue (start of the art technologies)	Not Applicable	This criterion is Not applicable to the Entity Certification Scope.
6.6f Bauxite Residue (remediation)	Not Applicable	This criterion is Not applicable to the Entityos Certification Scope.
6.7a Spent Pot Lining (SPL) (storage and management)	Not Applicable	This criterion is Not applicable to the Entityos Certification Scope.
6.7b Spent Pot Lining (SPL) (recovery and recycling)	Not Applicable	This criterion is Not applicable to the Entityos Certification Scope.
6.7c Spent Pot Lining (SPL) (Untreated SPL)	Not Applicable	This criterion is Not applicable to the Entityos Certification Scope.
6.7d Spent Pot Lining (SPL) (review of alternatives)	Not Applicable	This criterion is Not applicable to the Entityos Certification Scope.
6.7e Spent Pot Lining (SPL) (marine and aquatic environments)	Not Applicable	This criterion is Not applicable to the Entityos 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. 100% of the Dross is being collected and shipped for recovery of the aluminium content.
6.8b Dross (recycling)	Conformance	The Entity ships all recovered Dross to a recycling Facility. Residues from the Dross recycling (Salt slag) is recycled as well by another recycler. Recovered aluminium is fed back into the Process of the Entity.
6.8c Dross (review of alternatives)	Not Applicable	This criterion is Not applicable to the Entity, as the Entity does not dispose Dross residues in a landfill. All recovered Dross is shipped for recycling.
PRINCIPLE 7 WATER STEWARDSHIP		

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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. Consumption of groundwater is reported annually (see sustainability Report 2019, page 17; link: https://www.alumet.com).
7.1b Water assessment (risk assessment)	Conformance	Water-related risks in Watersheds have been assessed by the Entity. The evaluation did not identify a Significant Risk, as the annual extraction of groundwater is less than 100.000 cubic meters per annum and the production site is located in a water rich area (annual precipitation ca. 1900 mm).
7.2a Water management (management plans)	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.
7.2b 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/Nachhaltigkeit_sbericht.pdf).
PRINCIPLE 8 BIODIVE	ERSITY	
8.1 Biodiversity assessment	Conformance	The Entity has asked a specialized external consultancy firm to conduct a biodiversity assessment. The assessment was carried out in the summer of 2020 and a Report was issued for the Entity's management.
8.2a Biodiversity management (Biodiversity Action Plans)	Minor Non- Conformance	As a result from the very recent biodiversity assessment, a proposal for a Biodiversity Action Plan is available. However, the action plan has not yet been endorsed and funded by site or group management.
8.2b Biodiversity management (Consultation and mitigation hierarchy)	Minor Non- Conformance	The proposed Biodiversity Action Plan is designed in accordance with the Biodiversity Mitigation Hierarchy. As this plan has been issued very recently, the consultative Process with Stakeholders in the development, implementation and review of the plan is still due.
8.2c Biodiversity management (reporting)	Minor Non- Conformance	Due to the fact that the biodiversity assessment was carried only very recently and actions from the Biodiversity Action Plan are not yet implemented, the Entity did not record any biodiversity achievements and hence, these havend been shared with Stakeholders or made publicly available.
8.3 Alien Species	Conformance	The Entity works to prevent and mitigate the introduction of Alien Species. During the Entity's thermal processing of the aluminium

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		scrap, all species which hide in the scrap are destroyed. As a measure to protect their site and the surrounding area against neophytes (which may be brought in by vehicles), the factory area is cleaned of neophytes annually.
8.4a Commitment to %No Go+in World Heritage properties (exploration and new mines)	Not Applicable	This criterion is Not applicable to the Entityos Certification Scope.
8.4b Commitment to %No Go+in World Heritage properties (existing operations)	Not Applicable	This criterion is Not applicable to the Entityos Certification Scope.
8.5a Mine Rehabilitation (best available techniques)	Not Applicable	This criterion is Not applicable to the Entityos Certification Scope.
8.5b Mine Rehabilitation (financial provisions)	Not Applicable	This criterion is Not applicable to the Entityos 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. The Documents can be accessed via the following links: https://www.alu-met.com/fileadmin/daten/pdf/Werte_und_Handeln/Soziale_Stan_dards.pdf .
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). As an opportunity for improvement, Consultation of external Stakeholders should be systematically documented. The assessment did not identify any salient issues with regard to Human Rights, which was confirmed by interviews of Stakeholders and management during the Audit. Indigenous Peoples are not present in the region.
9.1c Human Rights Due Diligence (remediation)	Conformance	As witnessed by management and according to the HRDD study, the Human Rights assessments have confirmed that there are no salient adverse Human Rights impacts present at the audited Entity. This was confirmed in interviews during the

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		Audit. The Entity has not caused or contributed to adverse Human Rights impacts. Therefore, no remediation is needed.
9.2 Womenc Rights	Conformance	The Entity has developed and implemented Policies, Systems, Procedures and Processes that conform to the womence rights requirements. During the site tour, interviews and Document review, no indication for deliberate Discrimination of women was identified. Gender related information is made publicly available in the sustainability Report (page 27), which can be accessed via the following link: https://www.alu-met.com/ .
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 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, as sacred or cultural heritage sites and values within the Entity 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 are 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)	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 issues with Local Communities and therefore there is no need for action.
9.7b Local Communities (impacts)	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 issues with Local Communities and therefore there is no need for action.
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

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		conducted has confirmed that there are no issues with Local Communities and therefore there is no need for action.
9.8 Conflict-Affected and High-Risk Areas	Minor Non- Conformance	The Entity does not purchase metals, but gets all raw materials from their parent company ALU-MET. 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	Not Applicable	This criterion of the ASI Performance Standard is Not applicable, as there is no security staff employed at all at the site.
PRINCIPLE 10 LABOU	R 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. However, an elected Worker representation is not in place. As confirmed by interviews with Workers and management, the Entity takes an open attitude towards the election of a works council.
10.1b Freedom of Association and Right to Collective Bargaining (Collective Bargaining)	Conformance	The Entity respects the rights of Workers to Collective Bargaining and adheres to Collective Bargaining Agreements where and as far as such Agreements exist. The Entity is a Member of the employers industry association (Wirtschaftskammer) and they have negotiated Collective Bargaining Agreements with the union and Workers association (Arbeiterkammer). However, at the site there is no Worker representation (works council).
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Not Applicable	This criterion of the ASI Performance Standard is Not applicable to the Entity, as the right to Freedom of Association and Collective Bargaining is not restricted in Austria, the country where the Entity operates.
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. The site does not employ underage apprentices.
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 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.

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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 a site tour, 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 a 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 a 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 a 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 a Document review. The site does not employ any security staff.
10.3f Forced Labour (retention of identity papers, permits, Certificates)	Conformance	The Entity does neither engage in, nor support the use of Forced Labour. The Entity does not retain original copies of Workersq identity papers, work permits, travel documents or training Certificates, as confirmed by interviews and a document review. Only copies of a driver's licence, passport and Certificates are kept in the personnel files.
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 (6 weeks - 5 months), as confirmed by interviews and a document review.
10.4 Non-Discrimination	Conformance	The Entity is committed to Non-Discrimination and communicates this commitment in its company Policy. As confirmed by interviews and a document review, the Entity does not engage in, or support discrimination for the grounds mentioned in this Criterion.
10.5 Communication and engagement	Conformance	As confirmed by interviews and a Document review, the Entity does ensure open communication and direct engagement with Workers. Nominated Workers act as Safety Representatives (Sicherheitsvertauenspersonen), a joint Health & Safety

CRITERION	RATING	COMMENT
		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 a 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)	Conformance	The Entity does respect the rights of Workers to having a living wage and ensures that wages paid for a normal working week meet the industry Standard, as confirmed by a Document review and Worker interviews. Pay is according to the industry wide Collective Bargaining Agreement and is always above national minimum wage.
10.7b Remuneration (method of payment)	Conformance	As has been verified by a 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 employeesqbank accounts and pay slips are provided to employees, which are detailed and understandable.
10.8 Working Time	Conformance	The Entity does comply with Applicable Law and industry Standards on Working Time, public holidays and paid annual leave. Working Time is part of the Collective Bargaining Agreement and is part of each employment contract. Clocking-in System is in place. Records are available. Overtime is voluntary and due to the shift System very limited. The average Working Time of production Workers is 40 hrs/week.
PRINCIPLE 11 OCCUI	PATIONAL HEAL	TH AND SAFETY
11.1a Occupational Health and Safety (OH&S) Policy (Policy)	Conformance	The Entity is ISO 45001:2018 Certified by an accredited Certification body, therefore it is eligible for harmonization (recognition of external Certification Scheme). The Entity has implemented and communicated its Occupational Health & Safety Policy as required by the ASI Performance Standard.
11.1b Occupational Health and Safety (OH&S) Policy (Workers and Visitors)	Conformance	The Entity is ISO 45001:2018 Certified by an accredited Certification body, therefore it is eligible for harmonization (recognition of external Certification Scheme). The Entity applies the Policy to all Workers and Visitors present in any area or activities under the Entitys Control.
11.1c Occupational Health and Safety (OH&S) Policy	Conformance	The Entity is ISO 45001:2018 Certified by an accredited Certification body, therefore it is eligible for harmonization (recognition of external Certification Scheme).

CRITERION	RATING	COMMENT
(Applicable Law and Standards)		The Entity's Policy includes a commitment to comply with Applicable Law.
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	The Entity is ISO 45001:2018 Certified by an accredited Certification body, therefore it is eligible for harmonization (recognition of external Certification Scheme). Interviewed Workers confirmed that they 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	Minor Non- Conformance	The Entity is ISO 45001:2018 Certified by an accredited Certification body, therefore it is eligible for harmonization (recognition of external Certification Scheme). Yet, one minor non-conformity was identified regarding periodic evacuation drills.
11.3 Employee engagement on health and safety	Conformance	The Entity is ISO 45001:2018 Certified by an accredited Certification body, therefore it is eligible for harmonization (recognition of external Certification Scheme). The Entity has mechanisms in place to discuss Occupational Health & Safety issues with the management (safety representatives from workforce ("Sicherheitsvertauenspersonen") and a joint health & safety committee).
11.4 OH&S performance	Conformance	The Entity is ISO 45001:2018 Certified by an accredited Certification body, therefore it is eligible for harmonization (recognition of external Certification Scheme). The Entity evaluates its Occupational Health and Safety performance periodically.

Document Control and Version History

Revision	Date	Notes
0	16 September 2020	Issued (Initial Certification)