
ASI CERTIFICATION
PERFORMANCE
STANDARD



PRESENTED TO

ALUMINIUM DUFFEL BV

CERTIFICATE
NUMBER

31

ASI
STANDARD

PERFORMANCE
STANDARD
(V2 2017)

CERTIFICATION
LEVEL

FULL
CERTIFICATION

ASI ACCREDITED
AUDITOR

BUREAU
VERITAS
CERTIFICATION

DATE OF ISSUE

31 JULY 2022

DATE OF EXPIRY

30 JULY 2025

CERTIFIED SINCE

31 JULY 2018

AUTHORISED BY

A handwritten signature in black ink, appearing to be 'J. de Vries', written over a green background.

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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

Sales, Co-engineering, Production and Dispatch
of rolled products in aluminium and aluminium
alloys (Belgium).

SUMMARY AUDIT REPORT PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Aluminium Duffel BV
ENTITY NAME	Aluminium Duffel BV
CERTIFICATION SCOPE	Sales, Co-engineering, Production and Dispatch of rolled products in aluminium and aluminium alloys (Belgium).
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">• Aluminium Re-melting/Refining• Casthouses• Semi-Fabrication
ASI STANDARD	<ul style="list-style-type: none">• Performance Standard V2
AUDIT TYPE	<ul style="list-style-type: none">• Initial Certification Audit (24 – 25 April 2019)• Surveillance Audit (24 January 2022) (Following acquisition of the Entity (formerly Aleris Aluminum Duffel BVBA) by Alvanco Aluminium Duffel BV on 30 September 2020)• Re-Certification Audit (18 – 19 May 2022)• Surveillance Audit (31 January 2023) (Following acquisition of the Entity formerly Alvanco Aluminium Duffel BV by Aluminium Duffel BV on 14 June 2022)
AUDIT FIRM	Bureau Veritas Certification
AUDIT DATE	<ul style="list-style-type: none">• 24 – 25 April 2019 (Initial Certification Audit)• 24 January 2022 (Surveillance Audit)• 18 – 19 May 2022 (Re-Certification Audit)• 31 January 2023 (Surveillance Audit)
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">• 17 May 2019 (Initial Certification Audit)• 4 March 2022 (Surveillance Audit)• 5 July 2022 (Re-Certification Audit)• 28 March 2023 (Surveillance Audit)
AUDIT SCOPE	<u>Initial Certification Audit (24 – 25 April 2019)</u> Aleris Aluminum Duffel BVBA is a mill in Belgium that provides automotive body sheet and General coil and sheet products.

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.

Surveillance Audit (24 January 2022)

Alvance Aluminium Duffel BV is a mill in Belgium that provides automotive body sheet and general coil and sheet products.

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.

The Surveillance Audit was undertaken as a 'desktop' exercise due to the close proximity to the scheduled Re-Certification Audit (July 2022) and ongoing COVID-19 travel limitations present at the time of the audit.

Re-Certification Audit (18 – 19 May 2022)

The Alvance Aluminium Duffel BV is a mill in Belgium that provides automotive body sheet and general coil and sheet products.

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.

Surveillance Audit (31 January 2023)

Aluminium Duffel BV is a mill in Belgium that provides automotive body sheet and general coil and sheet products.

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:

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- ☑ The information provided by the Entity is true and accurate to the best knowledge of the Auditor(s) preparing this report.
 - ☑ The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous.
 - ☑ The Audit Scope and audit methodology are sufficient to establish confidence that the findings are indicative of the performance of the Entity's defined Certification Scope.
 - ☑ The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.
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CERTIFICATION PERIOD 31 July 2022 – 30 July 2025

NEXT AUDIT TYPE Re-Certification Audit

NEXT AUDIT DATE 30 July 2025

CERTIFICATION NUMBER 31

SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity has a legal department and annual audits are conducted. A complete economic and financial information report is available on the website of the National Bank of Belgium.
1.2 Anti-Corruption	Conformance	The Entity has a detailed Code of Conduct that contains business practices and procedures relating to Corruption and Bribery. All office-based workers must participate in and pass regular e-learnings. A global compliance hotline exists. The Code of Conduct is available at: https://aluminiumduffel.com/downloads
1.3 Code of Conduct	Conformance	The Entity has a Code of Conduct and refers to the Code on the website and in the Sustainability Report. Both documents are available at: https://aluminiumduffel.com/downloads
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	The Entity has an Integrated Management System for environmental, social and governance compliance. Several Policies exist, including the Code of Conduct, Health, Safety, Security and Environment Policy, and implementation is monitored through the internal auditing system. The policies are available at: https://aluminiumduffel.com/downloads
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	The Entity has a commitment from management to the implementation of the Management Systems. External audits and evaluations are undertaken to verify the effective implementation of the systems, both by certification bodies and public authorities. Certificates are available at: https://aluminiumduffel.com/downloads
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	The Entity has communicated its policies externally on the website and internally at the plant. The main achievements are communicated in the Sustainability Report. The policies are available at: https://aluminiumduffel.com/downloads
2.2 Leadership	Conformance	The Director of Quality and Environment, Health and Safety (EHS) has overall responsibility for ASI at the Entity; the responsibility for implementation is delegated to the Sustainability Manager.

CRITERION	RATING	COMMENT
2.3a Environmental and Social Management Systems (environmental)	Conformance	The Entity holds a valid ISO 14001:2015 certificate, based on the implemented Environmental Management System. The certificate is publicly available at: https://aluminiumduffel.com/downloads
2.3b Environmental and Social Management Systems (social)	Conformance	The Entity has implemented Social Management Systems, which address health and safety as well as work-related issues. Several trade unions are present at the Entity and Worker representatives participate in meetings and committees. Periodic external audits are conducted by public authorities.
2.4 Responsible Sourcing	Conformance	The Entity has evaluated all suppliers against risks concerning social, safety, governance and environmental issues. Suppliers are required to comply with the Entity's Code of Conduct: https://aluminiumduffel.com/downloads
2.5 Impact Assessments	Conformance	The Entity's Impact Assessments are addressed via risk analysis, which is part of the Environmental and Occupational Health and Safety Management System. The risk analysis is performed regularly and in the case of an occurrence or change.
2.6 Emergency Response Plan	Conformance	The Entity has developed and implemented an effective Emergency Response Plan. The plan was developed together with internal and external experts in consent with local operational forces.
2.7 Mergers and Acquisitions	Conformance	Mergers and Acquisitions are the responsibility of the owner of Aluminium Duffel BV, a private equity. Aluminium Duffel is working under the rules of the Belgian law that guarantees, that environmental, social and governance rules are strictly followed in the case of mergers and acquisitions.
2.8 Closure, Decommissioning and Divestment	Conformance	The Closure, Decommissioning and Divestment are the responsibility of the owners of Aluminium Duffel BV, a private equity. As the site is located in Belgium, Belgian law has to be applied. That includes the requirements that environmental, social and governance issues must be addressed.
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	The Entity has published its Sustainability Report for 2021 at: https://aluminiumduffel.com/downloads
3.2 Non-compliance and liabilities	Conformance	The Entity registers and provides follow-up on incidents, non-compliance and internal and external complaints. It communicates its approach in the

CRITERION	RATING	COMMENT
		Sustainability Report 2021, page 35: https://aluminiumduffel.com/downloads
3.3a Payments to governments (legal and contractual)	Conformance	The Entity complies with national and international laws and regulations relevant to the industry, and broader regulations on preventing Corruption, breaches of trust, fraud or money laundering, as disclosed in the Sustainability Report. It reports its compliance approach in the Sustainability Report 2021 page 8: https://aluminiumduffel.com/downloads
3.3b Payments to governments (disclosure - bauxite mining)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
3.4 Stakeholder complaints, grievances and requests for information	Conformance	The Entity has identified its main Stakeholders and interested parties with their main requirements in its Sustainability Report. The Entity has responded to complaints with actions to minimise noise and odour levels. Neighbours can contact the Entity 24 hours a day by phone or email (e.g., info.duffel@aluminiumduffel.com). Complaints are included in the management review process and are published in the Sustainability Report, page 32: https://aluminiumduffel.com/downloads
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	Life Cycle Assessments (LCAs) are available for automotive and non-automotive products and can be requested by clients. Information on LCAs is available in the Sustainability Report 2021 (page 51), where the cradle-to-gate and gate-to-gate data are published both for Automotive and Non-Automotive. https://aluminiumduffel.com/downloads
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	Life Cycle Assessments (LCAs) are available for automotive and non-automotive products and can be requested by clients. Information on LCAs is available in the Sustainability Report 2021 on (page 51), where the cradle-to-gate and gate-to-gate data are published both for Automotive and Non-Automotive. https://aluminiumduffel.com/downloads
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	The Entity has conducted Life Cycle Assessments (LCA) for its exterior automotive parts 'Superlite', interior automotive parts 'Ecolite' and for non-automotive products. The LCAs were conducted and reported in compliance with ISO 14040:2006 and ISO 14044:2006. The main results are published in the Sustainability Report 2021, pages 51-52, available at: https://aluminiumduffel.com/downloads

CRITERION	RATING	COMMENT
4.2 Product design	Conformance	The Entity has applied its Customer To Design (CTD) tool during the design process to inform product designers of a product's estimated Global Warming Potential (GWP) at an early stage.
4.3a Aluminium Process Scrap (targets)	Conformance	The Entity has established targets for the recycling of Aluminium Process Scrap and has implemented a plan to recover scrap from customers (closed-loop recycling). The target of the customer input scrap rate is planned to reach 35% (compared with 18% in 2019). See Sustainability Report 2021, pages 44-47: https://aluminiumduffel.com/downloads
4.3b Aluminium Process Scrap (alloy separation)	Conformance	The Entity has implemented a procedure for recycling and Aluminium Process Scrap is separated by Aluminium alloys and grades for recycling.
4.4a Collection and recycling of products at end-of-life (strategy)	Conformance	The Entity has established targets and implemented a plan to recover scrap from customers (closed-loop recycling). The Entity is working together with the European Aluminium Association (EAA) to promote End of Life recycling.
4.4b Collection and recycling of products at end-of-life (engagement)	Conformance	The Entity is an active member of the European Aluminium Association (EAA) to promote the collection of End of Life vehicle scrap. Various cooperation with EAA and universities is ongoing.
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		
5.1 Disclosure of GHG emissions and energy use	Conformance	Greenhouse Gas (GHG) Emissions are accounted for and tracked by the Entity and reported as required in the EU Emissions Trading System (EU ETS) Statement. The Entity reports in its Sustainability Report 2021 on its GHG Emissions, pages 35–37: https://aluminiumduffel.com/downloads
5.2 GHG emissions reductions	Conformance	The Entity reports its GHG Emissions reductions measures and targets Goal 2025 in the Sustainability Report 2021, page 20 (https://aluminiumduffel.com/downloads) and on the website (https://aluminiumduffel.com/sustainability). The goal is a 10% reduction of CO ₂ emissions on site by 2025 (e.g., 5 kg CO ₂ /kg aluminium for Automotive products), minus 12% CO ₂ footprint of the automotive products by 2025 and a 10% reduction of the energy consumption at the site. The measurements are included in the Sustainability Report 2021, pages 34-36: https://aluminiumduffel.com/downloads
5.3a Aluminium Smelting (management system)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
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	Relevant air emissions are reported to the government on an annual basis and published in the Sustainability Report 2021, page 38: https://aluminiumduffel.com/downloads
6.2 Discharges to Water	Conformance	Water is primarily used for cooling as part of the production process. Water discharges are monitored monthly. To mitigate adverse impacts on the environment and human health from Discharges to Water, the Entity implemented a water treatment process. The environmental program also includes measures to reduce wastewater impact. For further information, see Sustainability Report 2021 on water use, page 47: https://aluminiumduffel.com/downloads
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	Risk analysis is integral to the Environmental Management System and covers Emissions to Air, land and water for the rolling mill and Casthouse. Areas with high risk have been identified and plans for reducing risk are implemented.
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	The Entity has implemented an emergency plan that includes Spills and Leakage. A preventive maintenance system is implemented for regular and risk-based checks of systems and equipment for Leakage and Spills.
6.4a Reporting of Spills (immediate disclosure)	Conformance	The Entity has established a procedure for the handling and reporting of Spills. Environmental incidents are reported to the applicable governmental department. Significant environmental incidents including Spills will lead to informing neighbours and other important Stakeholders. The only known Spill at the Entity which occurred in 2017 was disclosed to the relevant governmental department.
6.4b Reporting of Spills (regular reporting)	Conformance	The reporting of spills is addressed via the Entity's ISO 14001:2015 Management System and disclosed in the annual environmental reporting.
6.5a Waste management and reporting (strategy)	Conformance	The Entity's waste management framework has been designed according to the Waste Management Hierarchy. The Entity reports its Waste data to the legal authority annually and also publishes it in the

CRITERION	RATING	COMMENT
		Sustainability Report 2021, pages 44-47: https://aluminiumduffel.com/downloads
6.5b Waste management and reporting (disclosure)	Conformance	The Entity has reported its types and volumes of Waste and method of disposal in an annual report (IMJV) to the government. The report contains data for both Hazardous and Non-Hazardous Waste. Information about waste composition is included in the Sustainability Report 2021, pages 44-47: https://aluminiumduffel.com/downloads
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.
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 has implemented a procedure for the handling of Dross and containers are available for each type of Dross for collection in the Casthouse. The collected Dross is sent to a company in Germany for recycling. The resulting salt slag of the recycling process is sent to a subcontractor to be recycled.

CRITERION	RATING	COMMENT
6.8b Dross (recycling)	Conformance	The Entity has implemented a procedure for the handling of Dross and collected Dross is sent to a company in Germany for recycling. The resulting salt slag of the recycling process is sent to a subcontractor to be recycled.
6.8c Dross (review of alternatives)	Not Applicable	This Criterion is not applicable as no Dross is sent to landfill, and all Dross is recycled.
PRINCIPLE 7 WATER STEWARDSHIP		
7.1a Water assessment (mapping)	Conformance	The Entity has identified and mapped its water withdrawal and use by source and type.
7.1b Water assessment (risk assessment)	Conformance	The Entity has conducted a risk assessment to address water-related risks in its Area of Influence as part of the Environmental Management System. There are no significant material water-related risks identified.
7.2a Water management (management plans)	Not Applicable	This Criterion is not applicable as there are no material water-related risks identified. However, water management is incorporated into the Environmental Management System.
7.2b Water management (monitoring)	Not Applicable	This Criterion is not applicable as there are no material water-related risks identified. However, monitoring the effectiveness of the plan is scheduled for the next management review.
7.3 Disclosure of water usage and risks	Conformance	The Entity has disclosed its water usage and wastewater in the annual report (IMJV Water) to the government and in the Sustainability Report 2021, page 47: https://aluminiumduffel.com/downloads A company-wide water management study has been planned for completion in 2023.
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	A risk assessment and investigation on biodiversity impacts from the Entity's activities and within the Entity's Area of Influence was conducted by an external party. A detailed improvement plan was developed.
8.2a Biodiversity management (biodiversity action plans)	Conformance	Based on the results of the Biodiversity Assessment Report, the Entity has prepared a Biodiversity Action Plan which included targets from 2018 to 2023. The Entity has implemented various activities to improve the site's Biodiversity. A highlight was the planting of a forest in December 2022, where a group of 80 people from the company, neighbours and Bosgroep

CRITERION	RATING	COMMENT
		- Forest group (a Non-Government Organisation (NGO)) planted 450 trees and bushes. For more information refer to: https://aluminiumduffel.com/aluminium-duffel-plants-a-forest
8.2b Biodiversity management (consultation and mitigation hierarchy)	Conformance	The Biodiversity Action Plan was developed via a consultative approach and designed in accordance with the Biodiversity Mitigation Hierarchy by an external specialist.
8.2c Biodiversity management (reporting)	Conformance	The biodiversity assessment and Biodiversity Action Plan were last presented to the public and internal Stakeholders in January 2021.
8.3 Alien Species	Conformance	The Entity conducted a Biodiversity study that identified the presence of Alien Species. The Entity implemented an Action Plan to eliminate Alien Species and prevent reintroduction of the plant species in the future.
8.4a Commitment to “No Go” in World Heritage properties (exploration and new mines)	Not Applicable	This Criterion is not applicable to the Entity’s Certification Scope.
8.4b Commitment to “No Go” in World Heritage properties (existing operations)	Not Applicable	This Criterion is not applicable to the Entity’s Certification Scope.
8.5a Mine rehabilitation (best available techniques)	Not Applicable	This Criterion is not applicable to the Entity’s Certification Scope.
8.5b Mine rehabilitation (financial provisions)	Not Applicable	This Criterion is not applicable to the Entity’s Certification Scope.
PRINCIPLE 9 HUMAN RIGHTS		
9.1a Human Rights Due Diligence (policy)	Conformance	The Entity communicates in the Sustainability Report 2021, in its Code of Conduct and the Policy on People, its commitment to support the protection of internationally proclaimed Human Rights and with the same expectations of its suppliers. All documents are available at: https://aluminiumduffel.com/downloads
9.1b Human Rights Due Diligence (process)	Conformance	The Entity requests its suppliers to comply with the Code of Conduct. The Entity has introduced processes to comply with the conflict mineral disclosure obligations. The Entity conducted a supplier survey to identify potential risks and the negative impact of its suppliers on Human Rights. The Entity has identified and addressed the topics of its main stakeholder groups in the Sustainability

CRITERION	RATING	COMMENT
		Report. The main suppliers of material to the Entity are ASI Certified.
9.1c Human Rights Due Diligence (remediation)	Conformance	The Entity communicates in the Sustainability Report and in its Code of Conduct its commitment to comply with the European Convention on Human Rights and expects that suppliers do the same. The Entity conducted a supplier survey to identify potential risks and negative impacts of its suppliers on Human Rights, and no adverse Human Rights impacts were identified. See Sustainability Report 2021, pages 14 and 26: https://aluminiumduffel.com/downloads
9.2 Women's Rights	Conformance	The Entity has implemented a Code of Conduct and a Policy on People, which address the commitment to not tolerate any form of Discrimination and to respect gender diversity. Issues and actions related to diversity are reported in the Sustainability Report 2021, page 27: https://aluminiumduffel.com/downloads
9.3 Indigenous Peoples	Not Applicable	This Criterion is not applicable, as there are no Indigenous Peoples in Belgium.
9.4 Free, Prior, and Informed Consent (FPIC)	Not Applicable	This Criterion is not applicable, as there are no Indigenous Peoples in Belgium.
9.5 Cultural and sacred heritage	Not Applicable	This Criterion is not applicable, as there are no Indigenous Peoples in Belgium and there is no cultural and sacred heritage affected.
9.6a Resettlements (avoid or minimise)	Not Applicable	This Criterion is not applicable, as no Resettlements have taken place and no residents are affected by the Entity.
9.6b Resettlements (where unavoidable)	Not Applicable	This Criterion is not applicable, as no Resettlements have taken place and no residents are affected by the Entity.
9.7a Local Communities (rights and interests)	Conformance	The Entity is in close contact with its neighbours and conducts periodic consultations (e.g., over 300 families received an invitation to participate in neighbour consultations). Stakeholders and their interests are identified and mapped in the Sustainability Report. All rights of the neighbours are covered by Belgian law.
9.7b Local Communities (impacts)	Conformance	The Entity has identified its neighbours as important Stakeholders and installed a Project Leader in 2020 to engage with the Local Community. Neighbours can contact the Entity 24 hours a day via telephone or email (info.duffel@aluminiumduffel.com). The

CRITERION	RATING	COMMENT
		contacts are published in the Sustainability Report 2021, page 32: https://aluminiumduffel.com/downloads
9.7c Local Communities (livelihoods)	Conformance	The Entity identified its neighbours as important Stakeholders and mapped their interests in the Sustainability Report. The Entity is in close contact with its neighbours and conducts periodic consultations to identify and solve issues of negative impact on the livelihoods of the Local Community. It lists noise and odour as the main reasons for complaints in the Sustainability Report 2021, page 32: https://aluminiumduffel.com/downloads
9.8 Conflict-Affected and High-Risk Areas	Conformance	There are no activities in Conflict-Affected and High-Risk Areas. The Entity implements policies that prohibit activities in conflict zones.
9.9 Security practice	Not Applicable	This Criterion is not applicable as security is provided through the Entity's staff, who have trained accordingly and are required to pass an exam. The Entity implements a Code of Conduct for security personnel.
PRINCIPLE 10 LABOUR RIGHTS		
10.1a Freedom of Association and Right to Collective Bargaining (freedom of association)	Conformance	The Entity has established Social and Ethical Management Standards which include a policy on the rights of Workers to associate freely in Labour Unions in line with ILO Conventions C87 and C98. The employee handbook is provided to all employees as part of training, which includes these policies and procedures.
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Conformance	The Entity respects the rights of Workers to Collective Bargaining, they participate in the Collective Bargaining process and adhere to collective bargaining agreements.
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Not Applicable	The rights of Workers to seek representation are regulated by Belgian law. Several trade unions are present at the Entity and are included in the representation of the Workers' rights (e.g., Workers Council, Health and Safety Committee). The Entity has communicated its commitment to the Freedom of Association in the Sustainability Report 2021, pages 21 and 38: https://aluminiumduffel.com/downloads
10.2a Child Labour (minimum age)	Conformance	Child Labour is prohibited in Belgium and the minimum working age is 15 years. Teenagers as young as 15 can only work in Non-Hazardous

CRITERION	RATING	COMMENT
		administrative positions under the supervision of a team leader. The Entity prohibits the hiring of persons under 18 years for positions requiring hazardous work. See Sustainability Report 2021, page 33: https://aluminiumduffel.com/downloads
10.2b Child Labour (hazardous)	Conformance	Child Labour is prohibited in Belgium and the minimum working age is 15 years. Teenagers as young as 15 can only work in non-hazardous administrative positions under the supervision of a team leader, the Entity prohibits the hiring of persons under 18 years for positions requiring hazardous work. See Sustainability Report 2021, page 33: https://aluminiumduffel.com/downloads
10.2c Child Labour (worst forms)	Conformance	Child Labour is prohibited in Belgium and the minimum working age is 15 years. Teenagers as young as 15 can only work in Non-Hazardous administrative positions under the supervision of a team leader. The Entity communicates in its Code of Conduct, that it does not tolerate Forced Labour, Compulsory Labour or Child Labour. See Sustainability Report 2021, page 33 or Code of Conduct, available at https://aluminiumduffel.com/downloads
10.3a Forced Labour (human trafficking)	Conformance	Forced Labour is prohibited in Belgium. The Entity communicates its position in the Sustainability Report 2021, page 26 and in the Supplier Code of Conduct. The Entity requires its suppliers to be compliant with these standards, available at https://aluminiumduffel.com/sustainability
10.3b Forced Labour (deposits, fees, advances)	Conformance	Forced Labour is prohibited in Belgium. The Entity does not require any deposits, fees or advances from its employees. The Entity requires its suppliers to address Forced Labour and Modern Slavery.
10.3c Forced Labour (migrant workers)	Conformance	Forced Labour is prohibited in Belgium. The Entity has communicated its position in the Sustainability Report and the Supplier Code of Conduct. The Entity requires its suppliers to address Forced Labour and modern slavery.
10.3d Forced Labour (debt bondage)	Conformance	Forced Labour is prohibited in Belgium. The Entity does not hold Workers in Debt Bondage. The Entity requires its suppliers to fight Forced Labour and Modern Slavery.

CRITERION	RATING	COMMENT
10.3e Forced Labour (freedom of movement)	Conformance	The Entity is not involved in Forced Labour. There is no restriction on the freedom of movement at the site.
10.3f Forced Labour (retention of identity papers, permits, certificates)	Conformance	The Entity is not involved in Forced Labour. The Entity does not retain Workers' original documents and only copies of identity papers and passports are kept.
10.3g Forced Labour (freedom to terminate employment)	Conformance	The Entity is not involved in Forced Labour. Notification for the termination of the working contract is regulated by Belgian law.
10.4 Non-Discrimination	Conformance	Discrimination is prohibited by Belgian law. The Entity does neither tolerate Discrimination at the site nor by its suppliers and communicates this commitment in the Sustainability Report and Code of Conduct. https://aluminiumduffel.com/downloads
10.5 Communication and engagement	Conformance	The Entity has established direct communication channels between management and workers and their representatives. Workers can contact their representatives or five nominated trust persons to discuss issues on their behalf. A hotline for reporting issues exists and its availability is communicated internally and externally. Further information is available in the Sustainability Report, page 32: https://aluminiumduffel.com/downloads
10.6 Disciplinary practices	Conformance	Coercion and harassment are forbidden under Belgian law. The Entity has documented the permitted disciplinary procedures in the work rules. Implementation of these procedures was verified during the interviews with the workers, independent worker representatives and Human Resources managers.
10.7a Remuneration (living wage)	Conformance	The Entity's wages are regulated through the Collective Bargaining agreement of the sector. The Entity provides additional financial and non-financial benefits for the employees. The Entity requires its suppliers to pay at least minimum wages in accordance with local law and to ensure the compensation of living wages according to the local living conditions.
10.7b Remuneration (method of payment)	Conformance	All payments are documented and submitted on a monthly basis to the employees' bank accounts.

CRITERION	RATING	COMMENT
10.8 Working Time	Conformance	Working hours are recorded electronically and paid with the relevant bonus payments. Working schedules are part of the Entity's work rules.
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	The Entity's policies on Environmental, Health and Safety (EHS) are available at different locations throughout the plant and on the Entity's website. See https://aluminiumduffel.com/downloads
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	The Entity has implemented a policy on EHS, that is available at different places in the plant and on the website and applied to Workers and Visitors.
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Conformance	The Entity has implemented a policy on EHS. It contains the commitment to comply with all applicable Environmental, Health and Safety laws.
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	The Entity has implemented a policy on EHS and communicates in the policy that employees will not perform any work action or task that they consider unsafe.
11.2 OH&S Management System	Conformance	The Entity has an Occupational Health and Safety (OH&S) Management System that is certified against ISO 45001. Health and Safety performance is addressed in the Sustainability Report 2021, pages 21-25: https://aluminiumduffel.com/downloads
11.3 Employee engagement on health and safety	Conformance	The Entity conducts monthly Safety Committee meetings to review incidents and observations. The Safety Committee consists of representatives of 'blue-collar' and 'white-collar' Workers, Human Resources Departments and other members of the management team.
11.4 OH&S performance	Conformance	The Entity has evaluated its OH&S performance and compared it against other facilities using leading and lagging indicators. Departments receive feedback on these indicators every month.

Document Control and Version History

Revision	Date	Notes
0	3 August 2020	Initial Certification Audit – Full Certification
1	18 August 2021	Transfer of Certification to Alvance Aluminium Duffel BV from Novelis Duffel (formerly Aleris Duffel) – Provisional Certification Next Audit Type and Next Audit Date revised to Surveillance Audit (29 December 2021)
2	11 March 2022	Surveillance Audit
3	15 August 2022	Re-Certification Audit – Full Certification Revised the Certification Scope to align with the Entity's ISO certifications. Note: Following the Re-Certification Audit and prior to the issue of the Full Certification, the Entity was acquired by American Industrial Partners on 14 June 2022 and the facility name was changed to Aluminium Duffel BV.
4	16 August 2022	Transfer of Certification to Aluminium Duffel BV following acquisition of Alvance Aluminium Duffel BV – Provisional Certification
5	25 May 2023	Surveillance Audit - Full Certification (revert to existing Certification Period as per ASI requirement for acquisitions)