
ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

HAMMERER ALUMINIUM INDUSTRIES SANTANA SRL

CERTIFICATE
NUMBER

101

ASI
STANDARD

PERFORMANCE
STANDARD
(V2 2017)

CERTIFICATION
LEVEL

PROVISIONAL
CERTIFICATION

ASI
ACCREDITED
AUDITOR

TÜV
RHEINLAND
CERT GMBH

DATE OF ISSUE

11 NOVEMBER 2020

DATE OF EXPIRY

10 NOVEMBER 2021

CERTIFIED SINCE

11 NOVEMBER 2020

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

Production of extrusion billets and rolling ingots
from recycled aluminium scrap.

SUMMARY AUDIT REPORT

PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Hammerer Aluminium Industries
ENTITY NAME	Hammerer Aluminium Industries Santana SRL
CERTIFICATION SCOPE	Production of extrusion billets and rolling ingots from recycled aluminium scrap.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthouses
ASI STANDARD	<ul style="list-style-type: none">Performance Standard V2
AUDIT TYPE	<ul style="list-style-type: none">Certification Audit
AUDIT FIRM	TÜV Rheinland Cert GmbH
AUDIT DATE	<ul style="list-style-type: none">17 August 2020 . 18 August 2020
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">15 October 2020
AUDIT SCOPE	<p>The Audit Scope includes the production of extrusion billets and rolling ingots from recycled aluminium scrap. Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthouses <p>All relevant supply chain activities, and Criteria in the Performance Standard were included in the Audit Scope.</p> <p>At the time of the Audit (August 2020), access to the site was not possible, due to COVID-19 related travel restrictions. The Audit has been undertaken as a desktop exercise, in accordance with the ASI Interim Policy regarding Audits, Audit-Related Travel and Coronavirus (v4), and included a remote review of relevant documentation.</p>
AUDIT OUTCOME	<ul style="list-style-type: none">Provisional Certification
AUDIT METHODOLOGY DECLARATION	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	11 November 2020 . 10 November 2021
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NEXT AUDIT TYPE	Surveillance Audit
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NEXT AUDIT DATE	10 May 2021
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CERTIFICATION NUMBER	101
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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. There are systems in place (e.g. legal databases) to maintain awareness of and to ensure compliance with applicable law. The Entity holds ISO 14001, ISO 45001 and ISO 50001 certifications from an accredited certification body. HAI group supports the site with legal counsel.
1.2 Anti-Corruption	Conformance	The Entity works against corruption in all its forms. Among the instruments, there are an anti-corruption policy as well as a code of conduct (link: https://www.hai-aluminium.com/wp-content/uploads/2016/11/CoC-Lieferanten-EN.pdf) issued and communicated internally and externally. Risks of corruption have been assessed. The Entity has provided training to employees with regards to business ethics. HAI group operates a whistleblowing hotline where potential breaches or suspected corruption can be reported confidentially. The financial system is periodically audited by an external tax auditor.
1.3 Code of Conduct	Conformance	The Entity has published and communicated a code of conduct for their employees in English (https://www.hai-aluminium.com/en/wp-content/uploads/2016/11/200224_CoC_EN.pdf) and local language. There, it is clearly stated, that the entity in no way tolerates corruption, antitrust violations, bribes, money laundering, unfair advantages, corruption or prohibited agreements.
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	The Entity has implemented and maintains policies consistent with the environmental, social and governance practices included in the ASI Performance Standard. The policies are subject of periodic employee training. The site holds certificates according ISO 14001, ISO 45001 and ISO 50001 from an accredited certification body which is current for the Entity's certification scope.
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	In accordance with the ASI Performance Standard as well as the Entity's Environmental and Health & Safety Management System, the auditee has senior management endorsement and support through provision of resources and annual review of the policies. The Entity obtained ISO 14001, ISO 45001 and ISO 50001 certifications which are consistent with their ASI Performance Standard certification scope.

CRITERION	RATING	COMMENT
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	The HAI group has communicated the policies internally and externally as appropriate (company website, intranet). Their supplier code of conduct is actively communicated to their relevant suppliers. Workers received training regarding environmental, social, and governance policies.
2.2 Leadership	Conformance	The Entity's Chief Operating Officer (technical managing director) has the overall 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 his local team as well as by the staff from HAI group. Responsibilities are reflected in the organization charts and job descriptions.
2.3a Environmental and Social Management Systems (environmental)	Conformance	The Entity has documented and implemented an environmental management system according to ISO 14001 and an energy management system according to ISO 50001. These systems are certified by an accredited certification body, please see the following link: https://www.hai-aluminium.com/downloads/ . During the recent external audit of these management system, full compliance with said standards was confirmed and no non-conformity was raised.
2.3b Environmental and Social Management Systems (social)	Conformance	The Entity has documented and implemented an accredited H&S management system (ISO 45001). No non-conformities open from latest audit. The facets human & labour rights are also managed, but no accredited certification available. Although the elements are present, the social management system is still not yet fully formalized.
2.4 Responsible Sourcing	Conformance	The Entity has issued its sourcing policy in a "code of conduct for suppliers", please find the link below: https://www.hai-aluminium.com/wp-content/uploads/2016/11/CoC-Lieferanten-EN.pdf The Entity's sourcing process is documented and it is in accordance with the requirements of the ASI Performance Standard. Regular due diligence and supplier evaluation takes place, which is done by the central metal management department in Ranshofen, Austria, which conduct all metal purchase for the Entity.
2.5 Impact Assessments	Conformance	Bigger projects or major changes to existing facilities did not take place since the Entity joined ASI. For the time being, no major changes/projects are foreseen. A procedure to ensure that social, cultural and human rights impact assessments, including a gender analysis, will be conducted for new projects or major changes to existing facilities (same as HAI Ranshofen) is present in Romanian language).

CRITERION	RATING	COMMENT
2.6 Emergency Response Plan	Conformance	The Entity has site specific emergency response plans developed, in collaboration with relevant stakeholders such as the relevant authority and industrial neighbours. The auditee also holds ISO 14001 and ISO 45001 certifications which are current to the Entity's certification scope under ASI Performance Standard.
2.7 Mergers and Acquisitions	Conformance	The Entity did not undergo or plan a merger or acquisition (M&A) since the company 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 did not undergo or plan a closure, decommissioning or divestment since the entity joined ASI. However, a process has been defined to manage closure, decommissioning or divestment, should it become relevant. It is defined that environmental, social and governance issues shall be reviewed in such a case.
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	The Entity has disclosed its governance approach and its material environmental, social and economic impacts by issuing its sustainability report 2019, based on GRI G4 Guidelines. This report is issued for the HAI group. It is available via the following link: https://www.hai-aluminium.com/wp-content/uploads/2019/11/FINAL-DE-Sustainability-report-2019.pdf
3.2 Non-Compliance and liabilities	Conformance	Information about significant fines, judgments, penalties and non-monetary sanctions is included in the sustainability report 2019 on page 34, see https://www.hai-aluminium.com/en/wp-content/uploads/2020/02/FINAL-EN-Sustainability-report-2019.pdf As witnessed by the Entity's management, there were no significant fines, judgments, penalties and non-monetary sanctions enforced in 2018 and 2019 YTD.
3.3a Payments to governments (legal and contractual)	Conformance	The Entity has developed and implemented policies, systems, procedures and processes that conform to anti-corruption requirements related to payments to governments and facilitation of payments (Via the following link the codes of conduct for employees and for suppliers can be accessed: https://www.hai-aluminium.com/downloads/). As witnessed by the Entity's management and confirmed by the report of the financial audit 2019, the Entity did not make government payments other than taxes, fees and social insurance. All payments are subject to annual external financial audit.
3.3b Payments to governments	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
(disclosure . Bauxite Mining)		
3.4 Stakeholder complaints, grievances and requests for information	Conformance	In the code of conduct, stakeholders are made aware of the contact details of the legal counsel. Also, in the sustainability report 2019, stakeholders are encouraged to raise their concern and a dedicated email address has been set-up: sustainability@hai-aluminium.com . A complaints resolution mechanism has been established, as well as a register of complaints/grievances (Email and anonymous "Letter box". No cases recorded so far.
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	The Entity has evaluated its life cycle impacts of its products with help from the company "denkstatt", which is specialized in such assessment.
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	The Entity has a life cycle assessment in place (prepared by a specialised external service provider). Until the time of the audit, there were no customer requests yet for a cradle-to-gate life cycle assessment on its products.
4.1c Environmental Life Cycle Assessment (public communication)	Not Applicable	For the time being, the Entity did not publicly communicate about Life Cycle Assessment (LCA), as this assessment was finalized after the issue of the latest sustainability report. It is planned to communicate about as of the next version of the sustainability report.
4.2 Product design	Not Applicable	This criterion is not applicable to the Entity's Certification Scope.
4.3a Aluminium Process Scrap (targets)	Conformance	The Entity has systems and a robust program in place to recycle 100% of its aluminium process scrap onsite. The minimization of internally generated scrap is a management priority and it is monitored on monthly basis. The Entity's waste balance is reported in their sustainability report 2019 on page 35 (https://www.hai-aluminium.com/wp-content/uploads/2019/11/FINAL-DE-Sustainability-report-2019.pdf).
4.3b Aluminium Process Scrap (alloy separation)	Conformance	The Entity has developed and implemented processes that allow for the separation of different grades of aluminium. Due to quality reasons, it is in the best own interest of the site, to separate the various alloys and grades.
4.4a Collection and recycling of Products at end-of-life (strategy)	Conformance	As a recycler of aluminium, the Entity has the clearly defined strategy to maximise the use of scrap. Management is monitoring the status of implementation of the strategy on a monthly basis. The HAI group works with national and international scrap dealers.

CRITERION	RATING	COMMENT
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.
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		
5.1 Disclosure of GHG emissions and energy use	Conformance	The Entity has disclosed its material greenhouse gas emissions and energy use by source in its Sustainability Report 2019,p.32, which can be accessed via the following link: https://www.hai-aluminium.com/en/wp-content/uploads/2020/02/FINAL-EN-Sustainability-report-2019.pdf
5.2 GHG emissions reductions	Conformance	In line with its certified energy management system according ISO 50001, the Entity has published GHG emissions reduction targets (page 21 of HAI Group Sustainability Report 2019 (https://www.hai-aluminium.com/en/wp-content/uploads/2020/02/FINAL-EN-Sustainability-report-2019.pdf) and implemented a plan to achieve these targets. The targets cover direct GHG emissions but not yet the indirect ones, due to the nature of the business.
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	Emissions data is published in the sustainability report 2019, page 32, (https://www.hai-aluminium.com/wp-content/uploads/2019/11/FINAL-DE-Sustainability-report-2019.pdf).
6.2 Discharges to Water	Conformance	The Entity reports quantitative data on its discharges to water in its sustainability report 2019, page 26 (https://www.hai-aluminium.com/en/wp-content/uploads/2020/02/FINAL-EN-Sustainability-report-2019.pdf). Wastewater from production and sanitary is treated on site. After treatment the water is discharged to a local natural canal (as well is storm water, which is going through an oil separator first).
6.3a Assessment and Management of Spills	Conformance	Within the scope of its certified environmental management system according to ISO 14001, the Entity periodically assesses

CRITERION	RATING	COMMENT
and Leakage (assessment)		the major risks areas related to spills and leakages. The ISO 14001 certificate can be accessed via the following link: https://www.hai-aluminium.com/wp-content/uploads/2017/09/ISO_14001_HAI_Santana_GmbH_EN.pdf
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	The Entity has implemented an environmental management system, including emergency, monitoring and communication procedures, to deal with the major risks of spills and leakage.
6.4a Reporting of Spills (immediate disclosure)	Conformance	The requirement to disclose to affected parties the volume, type and (potential) impact of significant spills is already be covered by ISO 14001 certification. Information to the public is made via the annual sustainability report 2019, page 34 (https://www.hai-aluminium.com/en/wp-content/uploads/2020/02/FINAL-EN-Sustainability-report-2019.pdf) No major spill reported so far.
6.4b Reporting of Spills (regular reporting)	Conformance	As reported in the sustainability report 2019 (page 36), there was no significant release of substances in the 2019 reporting year (https://www.hai-aluminium.com/wp-content/uploads/2019/11/FINAL-DE-Sustainability-report-2019.pdf)
6.5a Waste management and reporting (strategy)	Conformance	In line with its certified environmental management system according ISO 14001, the Entity implemented a waste management strategy according to the waste mitigation hierarchy. This has been confirmed by interviews and review of the Entity's annual environmental report 2019).
6.5b Waste management and reporting (disclosure)	Conformance	The Entity has publicly disclosed the quantity of their generated waste in the sustainability report 2019, page 33 (https://www.hai-aluminium.com/en/wp-content/uploads/2020/02/FINAL-EN-Sustainability-report-2019.pdf).
6.6a Bauxite Residue (storage construction)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6b Bauxite Residue (integrity checks and controls)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
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.

CRITERION	RATING	COMMENT
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	100% of the gathered dross is recycled on-site. No dross is landfilled. The Entity works continuously 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.
6.8b Dross (recycling)	Conformance	100% of the gathered dross is recycled internally. No dross is landfilled. All dross residues (salt slag) is sent for recycling (to either domestic or international treatment plants).
6.8c Dross (review of alternatives)	Conformance	100% of the gathered dross is recycled internally. The Entity does not dispose dross residues in landfill. Dross residues are recycled by specialized recycling companies.
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. The documented water mapping identifies the source, use and destination of the water streams and quantifies them (stating 2019 data).
7.1b Water assessment (risk assessment)	Conformance	The Entity has assessed water-related risks in watersheds in their area of influence. As confirmed by the local authority, the Entity's activities do not create stress to the watershed.

CRITERION	RATING	COMMENT
7.2a Water management (management plans)	Not Applicable	This criterion of the ASI Performance Standard is not applicable, as the water assessment did not identify material risks related to water withdrawal. A written statement from the local authority has confirmed the Entity's evaluation.
7.2b Water management (monitoring)	Not Applicable	This criterion of the ASI Performance Standard is not applicable, as the water assessment did not identify material risks related to water withdrawal. A written statement from the local authority has confirmed the Entity's evaluation.
7.3 Disclosure of water usage and risks	Conformance	The Entity has disclosed its water withdrawal and use in the sustainability report 2019, p. 28 (https://www.hai-aluminium.com/en/wp-content/uploads/2020/02/FINAL-EN-Sustainability-report-2019.pdf). The site did not identify water-related risks as material, therefore there is no according statement in the sustainability report.
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	Based on the biodiversity assessment (conducted by a specialized consultant), the Entity has implemented a biodiversity action plan. Its implementation is monitored periodically.
8.2a Biodiversity management (Biodiversity Action Plans)	Minor Non-conformance	The Entity has set-up a biodiversity action plan, but as the biodiversity assessment was only completed very recently, time-bound targets are not yet defined and no evidence, which targets are endorsed by management.
8.2b Biodiversity management (Consultation and mitigation hierarchy)	Minor Non-conformance	The biodiversity action plan was established recently. There is ongoing consultation with external stakeholders (e.g. local community) about the management plans and controls. The plan reflects the biodiversity mitigation hierarchy. Still, as the action plan has not yet been endorsed by management, it is not yet ensured that it will be effectively implemented.
8.2c Biodiversity management (reporting)	Minor Non-conformance	Since the Entity has established its biodiversity action plan only recently, a reporting mechanism is not yet in place.
8.3 Alien Species	Conformance	The Entity's assessment of the legal requirements regarding wooden packaging material as well as the biodiversity assessment, which included the topic of alien species, did not identify any need for action. During the Entity's thermal processing of the aluminium scrap, all species, which might be brought to the site and are hiding in the scrap, are destroyed.
8.4a Commitment to No Go+in World Heritage properties	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
(exploration and new mines)		
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	<p>The Entity has issued its codes of conduct for employees and suppliers, expressing a commitment to respect human rights. These documents have been communicated to employees (postings, training, intranet) and other stakeholders (letters, internet).</p> <p>The codes can be accessed via the following link: https://www.hai-aluminium.com/en/downloads/</p>
9.1b Human Rights Due Diligence (Process)	Conformance	<p>The Entity has conducted a documented human rights due diligence assessment but consultation of external stakeholders was not systematic.</p> <p>According to the assessment, there are no salient human rights issues identified, related to the Entity.</p> <p>Nevertheless, it is suggested that the situation of women and the situation of national minorities are considered more specifically in the next assessment, as these topics could be relevant for the Entity's activities.</p>
9.1c Human Rights Due Diligence (remediation)	Conformance	The Entity's human rights assessments has confirmed that there are no salient adverse human rights impacts present at the audited site. Indigenous peoples are not present in the region or in the area of influence of the Entity.
9.2 Women's Rights	Conformance	The Entity has developed and implemented policies, systems, procedures and processes that conform to the women's rights requirements. During interviews and document review, no indication for deliberate discrimination of women was observed. However, only 12 out of 125 employees are females, as in production area, required physical abilities make it difficult for women to work there. In accordance with national law, the Entity grants up to two years paid maternity leave.
9.3 Indigenous Peoples	Not Applicable	This criterion of the ASI Performance Standard does not apply to the Entity (which is located in eastern Europe), as indigenous

CRITERION	RATING	COMMENT
		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 eastern 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 (which is located in eastern Europe), as indigenous peoples or their lands, territories and resources are not directly affected by the Entity's operations.
9.6a Resettlements (avoid or minimise)	Not Applicable	This criterion of the ASI Performance Standard does not apply to the Entity, as no resettlements being considered or taking place during the period since joining ASI, or expected to occur during the certification period. Indigenous peoples are not directly affected by the Entity's operations.
9.6b Resettlements (where unavoidable)	Not Applicable	This criterion of the ASI Performance Standard does not apply to the Entity, as no resettlements being considered or taking place during the period since joining ASI, or expected to occur during the certification period. Indigenous peoples are not directly affected by the Entity's operations.
9.7a Local Communities (rights and interests)	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 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 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 conducted has confirmed that there are no issues with local communities and therefore no need for action.
9.8 Conflict-Affected and High-Risk Areas	Conformance	<p>The site is not located in or near a Conflict Affected or High Risk Area (CAHRA). Regarding supply chain, see criterion 2.4</p> <p>The Entity follows the definition of CAHRAs from the "Armed Conflict Location Event Data Project" (www.acleddata.com) and Peace Direct (www.peacedirect.org). According to list of suppliers, no supply from a CAHRA. Metal supply is completely managed from Headquarters in Ranshofen (Austria).</p> <p>All new suppliers undergo a due diligence process. During the assessment, there were no indications observed that the Entity would contribute to armed conflict or human rights abuses in conflict-affected and high-risk areas.</p>

CRITERION	RATING	COMMENT
9.9 Security practice	Conformance	The site does not employ armed security forces. During the Entity's human rights risk assessment, no specific risks related to security practices were identified. Unable to rate. Due to the Force Majeure situation caused by the Covid-19 pandemic, the audit was conducted using remote auditing techniques and therefore several criteria were not covered in full.
PRINCIPLE 10 LABOUR RIGHTS		
10.1a Freedom of Association and Right to Collective Bargaining (Freedom of Association)	Conformance	As confirmed by interviews with worker representative, workers and management as well as by document review, the Entity respects the rights of workers to unite freely in the unions, seek representation and join the works council without interference. A freely elected worker representation is in place. Note that a union is not represented at the Entity.
10.1b Freedom of Association and Right to Collective Bargaining (Collective Bargaining)	Conformance	The Entity does respect the right of collective bargaining. Worker representatives and management negotiated a comprehensive collective bargaining agreement (CBA) site level. The HAI Group supports the labour rights as defined by the International Labor Organization (ILO), see https://www.hai-aluminium.com/wp-content/uploads/2019/11/CoC_HAI_GmbH_2019.pdf .
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 Romania, where the Entity operates/is located/seated.
10.2a Child Labour (minimum age)	Conformance	"As per the Entity's code of conduct, child labour is prohibited (see https://www.hai-aluminium.com/wp-content/uploads/2019/11/CoC_HAI_GmbH_2019.pdf). The Entity does neither use nor support the use of child labour. Minimum working age of 15 years is respected. The youngest worker was 21 years old. There are robust practices in place to ensure then children are not employed."
10.2b Child Labour (hazardous)	Unable to Rate	Unable to rate. Due to the Force Majeure situation caused by the Covid-19 pandemic, the audit was conducted using remote auditing techniques and therefore several criteria were not covered in full.
10.2c Child Labour (worst forms)	Conformance	As confirmed by interviews with workers, worker representative and management, the Entity does neither use nor support the use of child labour and does not engage in or supporting worst forms of child labour.
10.3a Forced Labour (Human trafficking)	Unable to Rate	The Entity does neither engage in nor support the use of forced labour. The Entity also does not engage in or support human trafficking either directly or through any employment or

CRITERION	RATING	COMMENT
		recruitment agencies, as confirmed by interviews and review of the entity's human rights due diligence assessment. However, due to the Force Majeure situation caused by the Covid-19 pandemic, the audit was conducted using remote auditing techniques and therefore several criteria, including this one, were not covered in full.
10.3b Forced Labour (deposits, fees, advances)	Unable to Rate	From interviews with workers, worker representative and management it was derived that the auditee 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. However, due to the Force Majeure situation caused by the Covid-19 pandemic, the audit was conducted using remote auditing techniques and therefore several criteria, including this one, were not covered in full.
10.3c Forced Labour (Migrant Workers)	Unable to Rate	Unable to rate. Due to the Force Majeure situation caused by the Covid-19 pandemic, the audit was conducted using remote auditing techniques and therefore several criteria, including this one, were not covered in full.
10.3d Forced Labour (Debt Bondage)	Unable to Rate	Unable to rate. Due to the Force Majeure situation caused by the Covid-19 pandemic, the audit was conducted using remote auditing techniques and therefore several criteria, including this one, were not covered in full.
10.3e Forced Labour (freedom of movement)	Unable to Rate	Unable to rate. Due to the Force Majeure situation caused by the Covid-19 pandemic, the audit was conducted using remote auditing techniques and therefore several criteria, including this one, were not covered in full.
10.3f Forced Labour (retention of identity papers, permits, Certificates)	Unable to Rate	Unable to rate. Due to the Force Majeure situation caused by the Covid-19 pandemic, the audit was conducted using remote auditing techniques and therefore several criteria, including this one, were not covered in full.
10.3g Forced Labour (freedom to terminate employment)	Unable to Rate	Unable to rate. Due to the Force Majeure situation caused by the Covid-19 pandemic, the audit was conducted using remote auditing techniques and therefore several criteria, including this one, were not covered in full.
10.4 Non-Discrimination	Unable to Rate	Unable to rate. Due to the Force Majeure situation caused by the Covid-19 pandemic, the audit was conducted using remote auditing techniques and therefore several criteria, including this one, were not covered in full.
10.5 Communication and engagement	Conformance	As confirmed by interviews and document review, the Entity does ensure open communication and direct engagement with workers and their representatives regarding working conditions

CRITERION	RATING	COMMENT
		and resolution of workplace and compensation issues, without threat of reprisal, intimidation or harassment.
10.6 Disciplinary practices	Conformance	As confirmed by interviews and document review, the Entity does neither engage in nor tolerate the use of corporal punishment, mental or physical coercion, harassment, and gender-based violence including sexual harassment, or verbal abuse of workers. A formal procedure to manage grievances is in place.
10.7a Remuneration (living wage)	Conformance	The Entity does respect the rights of workers to a living wage and ensures that wages paid for a normal working week meet the industry standard, as confirmed by document review and worker interviews. The wages paid are substantially above the legal minimum. Working time, payment and leave are negotiated in a site specific collective bargaining agreement.
10.7b Remuneration (method of payment)	Unable to Rate	Unable to rate. Due to the Force Majeure situation caused by the Covid-19 pandemic, the audit was conducted using remote auditing techniques and therefore several criteria, including this one, were not covered in full.
10.8 Working Time	Conformance	As confirmed by interviews with workers, worker representative and management, 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 site-specific collective bargaining agreement. Clocking-in system is in place.
PRINCIPLE 11 OCCUPATIONAL HEALTH 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. The Entity has implemented and communicated its OHS policy as required by the ASI Performance Standard. At the time of the audit, the certificate was not yet posted on the Hammerer website, but please check the following link: https://www.hai-aluminium.com/en/downloads/
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. The Entity has implemented and communicated (postings, intranet) it's OHS policy as required by the ASI Performance Standard. At the time of the audit, the OHS policy was not yet posted on the Hammerer website, but please check the following link: https://www.hai-aluminium.com/en/downloads/
11.1c Occupational Health and Safety (OH&S) Policy	Conformance	The Entity has included in its policy statement related to occupational health & safety or in their codes of conduct respectively, a commitment to comply with applicable law on

CRITERION	RATING	COMMENT
(Applicable Law and Standards)		workers health and safety, international standards, and ILO Conventions on occupational health and safety.
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	The Entity has included in its policy statement related to occupational health & safety or in their codes of conduct respectively, a commitment to comply with applicable law on workers health and safety, international standards, and ILO Conventions on occupational health and safety. At the time of the audit, the OHS policy of the Entity was not yet available on the Hammerer website, but check https://www.hai-aluminium.com/en/downloads/ from time to time.
11.2 OH&S Management System	Conformance	The Entity is ISO 45001:2018 certified by an accredited certification body, therefore it is eligible for harmonization.
11.3 Employee engagement on health and safety	Conformance	"The Entity has established a joint health & safety committee, which meets periodically (four times per year). Additional mechanisms are in place, such as interdepartmental workshops, where workers can raise, discuss and participate in the resolution of Occupational Health and Safety issues with management. The Entity holds a certification according ISO 45001.
11.4 OH&S performance	Conformance	The Entity evaluates its occupational health & safety (OH&S) performance regularly and several key performance indicators (leading and lagging) are related to OH&S. The Entity has several tools for evaluating performance and continuously improves its OH&S management system.

Document Control and Version History

Revision	Date	Notes
0	11 November 2020	Issued (Provisional Certification)