

ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

Alvance British Aluminium Ltd

CERTIFICATE NUMBER
143

ASI STANDARD
PERFORMANCE
STANDARD
(V3 2022)

CERTIFICATION LEVEL
FULL
CERTIFICATION

ASI ACCREDITED
AUDITING FIRM
DNV BUSINESS
ASSURANCE
SERVICES UK LTD.

DATE OF ISSUE

29 NOVEMBER 2023

DATE OF EXPIRY

28 NOVEMBER 2026

CERTIFIED SINCE

29 NOVEMBER 2021

AUTHORISED BY

A handwritten signature in black ink, appearing to be 'J. H.', with a long horizontal line extending to the right.

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

Primary aluminium smelting from alumina and production/casting of slab ingot alloys and sow pans at the Lochaber Smelter, United Kingdom.

AUDIT REPORT PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	ALVANCE British Aluminium
ENTITY NAME	Alvance British Aluminium Ltd
CERTIFICATION SCOPE	Primary aluminium smelting from alumina and production/casting of slab ingot alloys and sow pans at the Lochaber Smelter, United Kingdom.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Aluminium SmeltingCasthouses
ASI STANDARD	<ul style="list-style-type: none">Performance Standard V3
AUDIT TYPE	<ul style="list-style-type: none">Initial Certification Audit (Initial Certification Audit (remote)) (28 – 29 April 2021)Follow up on-site Audit (14 October 2021)Re-Certification and Scope Change Audit (5 September – 7 September 2023)
AUDIT FIRM	DNV Business Assurance Services UK Ltd.
AUDIT DATE	<ul style="list-style-type: none">28 – 29 April 2021 (Initial Certification Audit (remote))14 October 2021 (Follow up on-site Audit)5 September – 7 September 2023 (Re-Certification and Scope Change Audit)
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">16 June 2021 (Initial Certification Audit (remote))15 November 2021 (Follow up on-site Audit)22 November 2023 (Re-Certification and Scope Change Audit)
AUDIT SCOPE	<p><u>Initial Certification Audit (remote) 28 - 29 April 2021 and 14 October 2023 (on-site)</u></p> <p>The audit scope covers ALVANCE British Aluminium's Lochaber Smelter's operations, comprising of aluminium smelting and casting.</p> <p>Supply chain activities included in the audit scope:</p> <ul style="list-style-type: none">Alumina SmeltingCasthouses <p>All applicable criteria in the ASI Performance Standard were included in the audit scope.</p> <p>At the commencement of the Audit (April 2021), access to the site was not possible, due to COVID-19 related travel restrictions. The Audit has been undertaken as a combined 'desktop' and on-site exercise, in accordance with ASI Interim Policy regarding Audits, Audit-Related Travel and Coronavirus (v4), and included a remote review of relevant documentation and an on-site audit (14 October).</p> <p><u>5 September – 7 September 2023 (Re-Certification and Scope Change Audit)</u></p> <p>The audit scope covers ALVANCE British Aluminium's Lochaber Smelter's operations, comprising of aluminium smelting and casting.</p>

Supply chain activities included in the audit scope:

- Alumina Smelting
- Casthouses

All applicable criteria in the ASI Performance Standard were included in the audit scope.

AUDIT OUTCOME

- Certification

AUDIT METHODOLOGY
DECLARATION

The Auditors confirm that:

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

CERTIFICATION PERIOD

29 November 2023 – 28 November 2026

NEXT AUDIT TYPE

Surveillance Audit

NEXT AUDIT DATE

29 November 2024

CERTIFICATE NUMBER

143



If you have an inquiry or complaint about this Certification, go to the third-party EthicsPoint portal at: <https://aluminium-stewardship.ethicspoint.com/>

EthicsPoint is a comprehensive and confidential reporting tool that enables complaints to be securely raised, managed and responded to. This enables anonymity to be maintained where desired by complainants, or as relevant to whistleblowing situations.

Information is available in five languages – English, French, Chinese, German and Portuguese (Brazil). Translation services provided by EthicsPoint enable complaints and correspondence to be managed in multiple languages.

ENTITY OVERVIEW

The Lochaber smelter, operated by Alvalance British Aluminium, is a primary aluminium smelter located approximately two kilometres northeast of Fort William, Scotland. It is the United Kingdom's (UK) only aluminium smelter and is powered by a hydro-electric station located on the slopes of Ben Nevis, the UK's highest mountain. It has a capacity to produce approximately 48,000 tonnes of cast aluminium per annum. The electricity for this process is provided by a neighbouring hydroelectric power station with a small percentage of national grid power used when necessary.

Loch Treig is the main source of water. Water is taken from the loch via a 24 kilometres long pipe and additional water is collected from the surrounding hills and introduced to the pipe. Alumina is brought to Fort William by train after being processed, from bauxite in Ireland. The landholding now known as JAHAMA Highland Estates was originally acquired to secure water catchments.

The Entity currently employs 180 people and holds ISO 14001:2015 Environmental Management Systems and ISO 45001:2018 Occupational Health and Safety (OH&S) Management Systems certifications. Alvalance British Aluminium is a member of the GFG Alliance, a worldwide organisation specialising in heavy industrial processes. For more information about their Business context, please see pages 4-5: <https://alvalancebritishaluminium.com/wp-content/uploads/2023/09/Alvalance-British-Aluminium-Sustainability-Report-2022.pdf>

MATURITY RATINGS

A rating of maturity (low, medium or high) determined by the Auditor that provides a general assessment in terms of systems, Residual Risk and performance assigned to a Sustainability Component.

Maturity ratings are not a direct assessment of conformance to the Standard.

	GOVERNANCE	ENVIRONMENT	SOCIAL	COMBINED RATING
SYSTEMS	Medium	Medium	High	Medium
RISKS	Medium	Medium	High	Medium
PERFORMANCE	Medium	Medium	High	Medium
OVERALL				Medium

FINDINGS

CRITERION	RATING	COMMENT
1. BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity has developed and implemented a legal register for health, safety and environmental regulations. As regulations change, these are evaluated and recorded within the Management System and discussed at management meetings and the annual management review.
1.2 Anti-Corruption	Conformance	The Entity combats Corruption, including Extortion and Bribery, through the implementation of their ALVANCE Working Principles and Procurement Policies. These principles are communicated to all employees through mandatory online training, ensuring widespread awareness and adherence throughout the Entity.
1.3a-e Code of Conduct	Minor Non-Conformance	The Entity has implemented the ALVANCE Working Principles as the Code of Conduct, which integrates principles relevant to environmental, social and governance performance. The Code is communicated to employees during induction, is provided via email and is made permanently available on the company intranet. However, the Entity has not currently publicly disclosed the Code of Conduct.
2. POLICY AND MANAGEMENT		
2.1a-f Environmental, Social, and Governance Policy	Conformance	The Entity has implemented an Environmental Policy, which is adopted in all its operations. They have adopted international standards ISO 45001: 2018, ISO 9001:2015 and ISO 14001:2015 as a framework to implement and maintain the Integrated Management System for Health, Safety, Environment and Quality.
2.2a-c Leadership	Conformance	The Entity's Managing Director has been appointed as the senior Management Representative, with the overarching responsibility and authority to ensure compliance with the ASI Performance Standard, with these roles explicitly documented within the Management System.
2.3a Environmental and Social Management Systems - Environmental	Conformance	The Entity operates an Environmental Management System which is certified to ISO 14001:2015. Independent audits are undertaken by an external auditor and the certificate is currently valid for the Entity's ASI Certification Period. The Entity has established a documented Integrated Management System, which includes significant environmental aspects and impacts, environmental risk assessment, monitoring and measurement, action planning, and alignment with local regulatory requirements.
2.3b Environmental and Social Management Systems - Social	Conformance	The Entity operates an Integrated Management System which is certified to ISO 9001:2015 and ISO 45001:2018. The Entity has established an Integrated Management System, including the identification of significant social aspects and impacts, risk assessment, monitoring and measurement and action planning, in line with local regulatory requirements.

CRITERION	RATING	COMMENT
2.4a-e Responsible Sourcing	Conformance	<p>The Entity has implemented Responsible Sourcing Policy requirements covering environmental, social and governance issues in the current Policy framework and is managed by the Managing Director of the Entity. The Policy covers ethical standards, supplier and Contractor compliance, health, safety and environment, sustainable supply chain, social responsibility, anti-Corruption, and supplier evaluation. The Responsible Procurement Policy is available at: https://alvancebritishaluminium.com/legals</p>
2.5a-g Environmental and Social Impact Assessments	Conformance	<p>The Entity has conducted Impact Assessments for the proposed Recycling and Billet Casting Facility development. The Environmental Impact Assessment (EIA) report covers various issues such as Landscape and Visual Access, Hydrology and Hydrogeology, Ecology - Air Quality, Noise, Socio-economic effects, Climate Change and Major Accidents and Disasters. The Impact Assessment Report is publicly available on the Highland Council Planning website: https://www.highland.gov.uk/directory_record/1875297/smelter_site_expansion</p> <p>The Impact Assessment report was reviewed during the audit. The report is also publicly disclosed on their website: https://alvancebritishaluminium.com/the-future</p>
2.6a-h Human Rights Impact Assessment	Conformance	<p>The Entity is currently conducting a public consultation and Impact Assessment for the proposed Recycling and Billet Casting Facility development. The results of the impact assessment are included in the Environmental Impact Assessment (EIA) Report submitted with the planning application. The EIA includes information on Landscape and Visual, Access Traffic and Transport, Hydrology and Hydrogeology, Ecology, Air Quality, Noise, Socio-economic effects, Climate Change and Major Accidents and Disasters.</p>
2.7a-f Emergency Response Plan	Conformance	<p>The Entity has established a detailed emergency response procedure including a Site Main Controller Procedure, which provides information and guidance on the protocols to be observed when undertaking the responsibilities of the site main controller. Additionally, the Control of Major Accident Hazards (COMAH) Safety Report provides details of the safety measures and procedures implemented at the Lochaber Smelter site. The Emergency Response Plan is reviewed every five years by the Scottish ambulance service, police, and local fire brigade. It is mandated to conduct a Facility-level emergency drill every three years.</p>
2.8a-d Suspended Operations	Conformance	<p>The Entity maintains a business resilience plan that includes current obligations on land remediation of the historic Spent Pot Lining (SPL) storage on the outskirts of the site's boundary. The site is classified as an upper-tier Control of Major Accident Hazards (COMAH) site and is subject to requirements of the Control of Major Accident Hazard Regulation 2015. The Entity has established resilience and recovery plans for emergencies.</p>
2.9a-b Mergers and Acquisitions	Conformance	<p>The Entity is 100% owned by GFG Alliance and all decisions related to Mergers and Acquisitions are made at that level. The Entity has established a Mergers and Acquisitions Guiding Principles Policy to outline key considerations and steps that the business would take in such an instance where we were looking at this, while still</p>

CRITERION	RATING	COMMENT
		understanding that all final approvals would sit above the Alvalance management structure.
2.10a-b Closure, Decommissioning and Divestment	Conformance	The Entity closure, decommissioning and divestment activities are managed at the corporate owner level and are not under the control of the Entity. In the case of a Facility closure or divestment, a project team would be established to ensure ongoing Compliance with Applicable Law.
3. TRANSPARENCY		
3.1a-b Sustainability Reporting	Conformance	The Entity has published its first stand-alone Sustainability Report for 2022, which is published on their website at: https://alvalancebritishaluminium.com/about-us/sustainability
3.2 Non-compliance and Liabilities	Conformance	The Entity's site is designated as an Upper Tier COMAH site (Control of Major Hazard Regulations 2015), and the Entity rigorously adheres to stringent protocols, including transparent public disclosures and the prospect of enforcement measures by the Health and Safety Executive (HSE). Robust mechanisms have been established to ensure the public disclosure of information on fines, judgments, penalties, and non-monetary sanctions arising from any lapses in Compliance with Applicable Law in the Sustainability Report.
3.3a-c Payments to Governments	Minor Non-Conformance	The Entity has established requirements to ensure that any payments to governments made by, or on its behalf, have a legal and/or contractual basis. As management interviews confirmed, the Entity does not pay financial and/or in-kind political contributions to political parties. However, it was identified payments to governments have not been publicly disclosed and are not subject to a financial independent audit.
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Minor Non-Conformance	The Entity follows established procedures to investigate and address complaints, grievances, and information requests related to its operations. The Entity's internal intranet/People Hub website allows for the Entity to request feedback and encourage questions. Additional channels include a site suggestion box, monthly health and safety briefings, reporting to line managers, or Human Resource (HR) Managers, or confidentially to safety and union representatives. However, it was identified the Entity currently lacks a formal third-party agency or hotline for communities to report grievances anonymously and in a confidential setting.
4. MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment	Conformance	The Entity has undertaken Environmental Life Cycle Assessments (LCA) for their major product lines. The Environmental Life Cycle Analysis has been developed in accordance with ISO 14040:2006 and ISO 14044:2006 methodology.
4.1b-c Environmental Life Cycle Assessment - Disclosure	Minor Non-Conformance	The Entity has not yet communicated that LCA information is available upon customer request. LCA Studies were conducted in accordance with ISO 14040:2006 and ISO 14044:2006 methodology. It was completed in 2023 and the results will be included in the Entity's 2023 Sustainability Report.

CRITERION	RATING	COMMENT
4.2 Product Design	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.3a-b Aluminium Process Scrap	Conformance	<p>The Entity has implemented a plan for reducing and recycling Aluminium Process Scrap, ensuring that 100% of Internally Generated Scrap is recycled. A continuous improvement program, in accordance with the ISO 9001 Management System, aims to reduce the overall amount of scrap generated. During the audit, metal inventory and scrap balance sheets were reviewed. The Entity holds regular internal meetings to oversee re-melting targets and track progress.</p> <p>Additionally, the Entity adheres to the ISO 9001 Management System maintaining strict controls in its Aluminium Process Scrap recycling plan. Training materials that provide guidance on re-melting for workshop Workers were also reviewed during the audit.</p>
4.4a-c Collection and Recycling of Products at End of Life - Material Conversion and other Manufacturing	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.4d Collection and Recycling of Products at End of Life	Conformance	The Entity does not have any initiatives to collect scrap from outside to recycle because the site does not have a re-melting furnace for external scrap. However, there is a proposed plan for the commissioning of the billet Casting Facility.
5. GREENHOUSE GAS EMISSIONS		
5.1a-b Disclosure of GHG Emissions and Energy Use	Minor Non-Conformance	<p>The Entity reports Greenhouse Gases (GHG) emissions and energy use by source regularly to the Scottish Environment Protection Agency (SEPA). The Entity's GHG emissions under its UK Emissions Trading System (ETS) permit are Third Party verified annually, however, energy use and GHG Scope 3 emissions are not covered by this assurance engagement. At the time of the publication of the 2022 Sustainability Report, the Entity has disclosed its GHG Scope 1 and 2 emissions and energy use by source, however Material Indirect, GHG Scope 3 emissions were not available. These emissions have been investigated by the Entity and will be disclosed in the 2023 Sustainability Report. Please see the Annual Sustainability Report 2022, pages 6-8:</p> <p>https://alvancebritishaluminium.com/about-us/sustainability</p>
5.2a Aluminium Smelter GHG Emissions Intensity - Started production after 2020	Not Applicable	The Criterion is not applicable, the Aluminium Smelter has been in operation since 1929.
5.2b Aluminium Smelter GHG Emissions Intensity - In production up to and including 2020	Conformance	The Entity has demonstrated their Mine to Metal Emissions intensity is currently 3.93 tonnes of CO ₂ e per tonne of Aluminium based on 2022 data, conducted by qualified GHG emissions Specialists. The methodology used is in line with the Greenhouse Gas Protocol, Corporate Accounting and Reporting Standard (Greenhouse Gas Protocol, 2015), GHG Protocol Scope 2 Guidance (Greenhouse Gas Protocol, 2015), Corporate Value Chain (Scope 3) Accounting and Reporting Standard (Greenhouse Gas Protocol, 2011) and Technical Guidance for Calculating Scope 3 Emissions (Greenhouse Gas Protocol, 2013).

CRITERION	RATING	COMMENT
5.3a-e GHG Emissions Reduction Plans	Minor Non-Conformance	<p>The Entity has engaged an independent specialist to develop an initial GHG reduction plan for the Lochaber Smelter which is consistent with a 1.5°C global warming scenario and uses an ASI-endorsed methodology for achieving the reduction in emissions required to limit global warming to 1.5°C. Currently, the only Aluminium sector-specific methodology available is the IAI 1.5 Degrees Scenario, A Model to Drive Emissions Reduction (International Aluminium Institute, 2021). The Entity plans to use the IAI methodology as the basis for setting targets and developing an appropriate emissions reduction pathway to meet those targets. The Entity has identified key abatement options, including the replacement of prebaked carbon anodes with inert carbon anodes and working to reduce indirect emissions from purchased goods and services.</p> <p>However, at the time of the audit, the Entity's GHG Emissions Reduction Plans were not publicly disclosed. Based on the outcomes of the independent consultancy work, they have not yet defined their GHG Emissions Reduction Pathway and the Intermediate Target covering a period of no greater than five years.</p>
5.4 GHG Emissions Management	Conformance	<p>The Entity maintains a Monitoring and Data Flows for GHG Emissions procedure and Greenhouse Gas Emissions Procedure' and commissioned GHG Emissions Specialists to review their current Management Systems. The Entity is currently working on integrating the recommendations from this project into their wider Management System.</p>
6. EMISSIONS, EFFLUENTS AND WASTE		
6.1a-f Emissions to Air	Conformance	<p>The Entity has developed and implemented Policies, systems, procedures and processes that conform to the ASI Performance Standard air emissions requirements and are in compliance with the legal permit thresholds on air emissions. Emissions to Air are also disclosed to the Scottish Environment Protection Agency (SEPA) regularly. The Entity has implemented continuous monitoring and daily assessment of Material Emissions to Air, such as fluoride emissions, and measures emissions based on stack sampling. The Entity has implemented abatement projects, (e.g. bag filter installation), to achieve continuous improvement and to continue to reduce Emissions to Air. Emissions to Air data are included in the Annual Sustainability Report 2022: https://alvancebritishaluminium.com/about-us/sustainability</p>
6.2a-g Discharges to Water	Conformance	<p>The Entity has implemented Policies, systems, and procedures to adhere to the ASI Performance Standard for Discharges to Water. Additionally, the Entity holds a certificate in Management System in accordance with ISO 14001:2015 requirements. Discharge from the Smelter was tested for Fluoride, Total Suspended Solids (TSS), and Biological Oxygen Demand (BOD). The discharge limits were well within license limits in 2022. The site has recorded a non-compliance for 2023 and a detailed report has already been submitted to SEPA for further review. The Entity will publish the details of the non-compliance in their 2023 Sustainability Report.</p>
6.3a-g Assessment and Management of Spills and Leakages	Conformance	<p>The Entity has implemented systems, procedures, and processes for assessing and managing Spills and Leakage. The local authority SEPA is currently reviewing a soil and groundwater monitoring plan. The assessment and management of Spills and Leakages are also</p>

CRITERION	RATING	COMMENT
		<p>governed by the Entity's ISO 14001 certified Environmental Management System. There have been no reports of major Spills or Leakages.</p> <p>Furthermore, the Entity maintains a hazardous substance register and a contamination and waste management control procedure. The Entity's external communication plans are outlined in its Emergency Response Plan and are regularly reviewed internally and with input from external Stakeholders.</p>
6.4a-b Public Disclosure of Spills and Leakages	Conformance	The Entity has established an incident reporting procedure for Spills and Leakages, outlining internal and external notification processes in its Emergency Response Plan. No major Spills or Leakage events have been reported. The Entity consistently communicates its environmental performance to local authorities, including SEPA. In the event of a major Spill, the Emergency Response Plan's notification flow for major incidents is activated for reporting purposes.
6.5a-c Waste Management and Reporting	Conformance	The Entity has established a waste management procedure that aligns with the Waste Mitigation Hierarchy. Regularly scheduled internal audits assess the implementation and effectiveness of this procedure. To ensure compliance with agreed contracts and operating licenses, verification assessments of Contractors responsible for transporting or recycling waste, as well as external Facilities for waste treatment, storage, and disposal, are conducted regularly. The Entity maintains transparency in its waste management practices through the disclosure of the quantity of both Hazardous and Non-Hazardous Waste generated. This information, along with associated waste disposal methods, is disclosed to the local authority and is reported to SEPA's Scottish Pollutant Release Inventory (SPRI). Additionally, these details are included in the Sustainability Report, page 14: https://advancebritishaluminium.com/about-us/sustainability
6.6a-g Bauxite Residue	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7a-f Spent Pot Lining (SPL)	Conformance	The used material from Spent Pot Lining (SPL), is securely stored in a covered and dry material transfer building, in accordance with the Entity's Pollution Prevention and Control (PPC) license. The Entity conducted an environmental risk assessment, with input from external consultants. SPL operations are outsourced to third-party contractors, and monthly audits ensure proper control of activities in and around the building. The Entity has initiated collaboration with external experts and is exploring alternative providers to recycle SPL for applications in various industries like steel and cement. Pilot programs with third-party expert partners are ongoing, involving the processing of waste to become a raw material for cement companies.
6.8a-d Dross	Conformance	The Entity has established tolling arrangements with external Dross processors. The contracts with these external partners were checked during the audit. Collaborating closely with these external partners, the Entity is working to optimise Aluminium recovery from both Dross and Dross residues. The Entity does not dispose of any Dross or Dross residues in landfills.

7. WATER STEWARDSHIP

CRITERION	RATING	COMMENT
7.1a-b Water Assessment and Disclosure	Minor Non-Conformance	<p>The Entity receives all water inputs for operational processes from the hydroelectric power station. The hydroelectric plant feed water quantities are reported to the local authority as per the Entity's license requirements. SEPA regulates water abstraction for cast cooling at the power station, enforcing a specified limit including annual reporting.</p> <p>Major risks must be publicly disclosed which the Entity has not fulfilled. Since the assessment was completed only in June 2023, it has not yet been included in the 2022 sustainability report. However, the information on risk assessment will be published in the 2023 Sustainability Report.</p>
7.2a-e Water Management	Minor Non-Conformance	<p>The Entity has identified significant water-related risks and has developed a water management plan with a review period of five years.</p> <p>However, the plan has not been made publicly available. Due to the substantial risks identified in the assessment, the Entity is obligated to disclose this management plan publicly.</p>
8. BIODIVERSITY AND ECOSYSTEM SERVICES		
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	The Entity has engaged qualified Specialists to conduct a Biodiversity risk assessment. This assessment replaces a prior evaluation undertaken in the land use management plan. The assessment did not identify any significant Biodiversity and ecosystem risks resulting from its activities.
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Not Applicable	This Criterion is not applicable to the Entity, as it did not identify any significant Biodiversity and ecosystem risks from the risk assessment conducted.
8.2a-g Biodiversity Management	Not Applicable	This Criterion is not applicable to the Entity, as it did not identify any significant Biodiversity and ecosystem risks from the risk assessment conducted.
8.3a-c Management of Priority Ecosystem Services	Not Applicable	This Criterion is not applicable to the Entity, as it did not identify any significant Biodiversity and ecosystem risks from the risk assessment conducted.
8.4 Alien Species	Conformance	The Entity has implemented measures to prevent the accidental or deliberate introduction of Alien Species that could have a significant adverse impact on Biodiversity, with a focus on wooden pallets used for transporting anodes.
8.5a-b Commitment to "No Go" in World Heritage Properties	Not Applicable	No land within the control of the Entity or its direct shared Entities (i.e. JAHAMA, SIMEC) is within World Heritage Properties and the Entity does not conduct any business outside of the landholding.
8.6a-d Protected Areas	Conformance	Land Use Management Plans have identified Protected Areas within the Entity's Area of Influence. The Entity has also identified some risks after commissioning the Billet Casting plant, however, the Environmental Impact Assessment (EIA) demonstrates a commitment to protecting these areas. The current operations do not present any risk to the protected site as per the Biodiversity Risk Assessment.

CRITERION	RATING	COMMENT
8.6e Protected Areas - Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.7a-i Mine Rehabilitation	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9. HUMAN RIGHTS		
9.1a-d Human Rights Due Diligence	Minor Non-Conformance	<p>The Entity demonstrates a commitment to respect Human Rights primarily through the ALVANCE Working Principles and the Anti-Slavery Policy. These Policies are communicated to employees during the induction process and to suppliers through the procurement Policies and procedures. The Entity has implemented a Human Rights commitment and related Policies. Please refer to the 2022 Sustainability Report, page 27: https://alvancebritishaluminium.com/about-us/sustainability</p> <p>However, the Entity could not provide evidence that a Human Rights Due Diligence process has been conducted to identify, document and assess the potential for Human Rights-related issues resulting from its activities. The Entity has incorporated Human Rights in its ALVANCE Working Principles Policy. Whilst it has not had any Human Rights complaints to date, it has the mechanisms in place to manage those if they arise, notably the Community Complaints Procedure and the Employee Grievance Procedure.</p>
9.2a-e Gender Equity and Women's Empowerment	Conformance	<p>The ALVANCE Working Principles and the Equality, Diversity and Inclusion Policy outline the Entity's commitment to enhancing Women's Rights: https://alvancebritishaluminium.com/legals</p> <p>The Entity is also highly involved in a Women's Network, has internal mechanisms to ensure equality for all employees, has women in senior management positions and is actively promoting the role of females in engineering at local schools. The Entity disclosed the percentage of female employees in the 2022 Sustainability Report: https://alvancebritishaluminium.com/about-us/sustainability</p>
9.3a-i Indigenous Peoples	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples, lands, territories or resources in the Area of Influence of the Entity.
9.4a Free, Prior, and Informed Consent (FPIC) - New Projects or Major Changes	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples, lands, territories or resources in the Area of Influence of the Entity.
9.4b Free, Prior, and Informed Consent (FPIC) - Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9.4c Free, Prior, and Informed Consent (FPIC) - Demonstrate support	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples, lands, territories or resources in the Area of Influence of the Entity.
9.5a Cultural and Sacred Heritage - Identification	Conformance	The Entity has implemented a Land Use Management Plan that appropriately identifies Sites of Special Scientific Interest (SSSI) and has provisions to take action to avoid or remedy any impacts. For

CRITERION	RATING	COMMENT
		further information on the new Billet Facility permitting process, please see: https://wam.highland.gov.uk/wam/applicationDetails.do?activeTab=summary&keyVal=QTAQIEIHHI00
9.5b Cultural and Sacred Heritage - Impacts	Not Applicable	The current Impact Assessment for the new Billet Facility did not identify significant impacts relating to cultural, historical or spiritual heritage.
9.6a-i Displacement	Not Applicable	Management interviews were conducted and multiple Historical Ordnance Survey maps from the Land Use Management Plan were reviewed, which confirm there have been no Resettlements as a result of the Entity's establishment or operation. There have been no Resettlements as a result of the Entity's establishment or operation.
9.7a-h Affected Populations and Organisations	Conformance	The Entity has identified Local Communities as Stakeholders and undertakes meaningful engagement regarding existing and proposed developments. Consultation and information events are held where feedback on proposals is gathered, analysed and taken into consideration. Successful examples include the Pre-Application Consultation (PAC) for the proposed Recycling and Billet Casting Facility. The Entity explores opportunities with Local Communities to respect and support their livelihoods. It does so notably through consultations for development projects that affect Local Communities, and which include public consultation processes. Examples include the Pre-Application Consultation (PAC) for the proposed Recycling and Billet Casting facility: https://wam.highland.gov.uk/wam/applicationDetails.do?activeTab=summary&keyVal=QTAQIEIHHI00
9.8a Conflict-Affected and High-Risk Areas - Strong Management Systems	Conformance	The Entity has established systems to ensure it does not contribute to armed conflict or Human Rights abuses in Conflict-Affected and High-Risk Areas (CAHRAs), notably through the ALVANCE Working Principles, the Procurement Procedure and the Supplier Evaluation and Management Procedure.
9.8b Conflict-Affected and High-Risk Areas - Identify and assess risks	Conformance	The Entity systematically collects critical data from potential suppliers through a comprehensive questionnaire during the onboarding process consisting of key information such as Continuous improvement commitment, Company Code of Ethics, compliance with ISO 9001, ISO 14001, ASI Performance Standard, Industrial Emissions License, environmental compliance and supplier's sustainability performance.
9.8c Conflict-Affected and High-Risk Areas - Strategy to respond to risks	Conformance	The Entity has developed a strategy to address risks identified through its supply chain Due Diligence process, including Risk Mitigation, Management of Existing Suppliers, and undertaking enhanced Due Diligence of its Alumina supplier. The site is managing performance indicators through its quarterly business reviews with key suppliers and through the development of Supplier Performance Plans.
9.8d Conflict-Affected and High-Risk Areas - Audit of due diligence	Conformance	Every five years, the Entity conducts an on-site assessment of key suppliers. Supplier records were reviewed on a sample basis, including Alumina suppliers, rail freight operators, and anode suppliers. This was confirmed during interviews with both the Alumina supplier and rail freight operator during the Re-Certification Audit.

CRITERION	RATING	COMMENT
9.8e Conflict-Affected and High-Risk Areas - Report annually	Minor Non-Conformance	The 2022 Sustainability Report does not public disclosure of Due Diligence efforts on the Aluminium value chain (policies, risk assessments and mitigation plans). The Entity is planning to publish further information about their Due Diligence assessment in next year's report.
9.9 Security practice	Conformance	The Entity respects Human Rights in line with recognised standards and good practices, in its involvement with public and private security providers. This is ensured by the implementation of the provider's Security Assignment Instructions.
10. LABOUR RIGHTS		
10.1a-c Freedom of Association and Right to Collective Bargaining	Conformance	The Entity has a strong union presence on site and Employees and Management have a positive working relationship with the Union. The Entity demonstrates its commitment to respecting the rights of Workers to associate freely in Labour Unions through its approach outlined in the ALVANCE Working Principles and the Union Partnership Agreement. Those Policies and procedures are based on the UN Guiding Principles for Business and Human Rights and are in line with Applicable Law. The Entity respects the rights of Workers to Collective Bargaining. Principles are outlined in the Union Partnership Agreement.
10.1d Freedom of Association and Right to Collective Bargaining - Alternative means in context of Applicable Law	Not Applicable	This Criterion is not applicable to the Entity as there are no restrictions on the right to Freedom of Association and Collective Bargaining in in Scotland.
10.2a Child Labour	Conformance	The Entity does not use, nor support the use of Child Labour as defined in ILO Conventions and complies with related national and international law. This commitment is stated in the ALVANCE Working Principles and there are strong processes implemented during recruitment to prevent this risk. The Entity does not engage in, nor support Hazardous Child Labour. This commitment is stated in the ALVANCE Working Principles. The Entity works with apprentices and processes are implemented to ensure they do not carry out hazardous tasks. The Entity does not engage in or support Worst Forms of Child Labour. This commitment is stated in the ALVANCE Working Principles and reinforced by internal processes.
10.3a-c Forced Labour	Minor Non-Conformance	<p>The Entity does not engage in or support Human Trafficking as defined in ILO Conventions C29, Protocol P29 (2014) to this Convention, and C105. The Entity's commitment is outlined in the ALVANCE Working Principles, and processes are implemented during recruitment and throughout employment. The Entity does not require any form of deposit, security payments, recruitment fee or equipment advance from Workers. The Entity's Employment contracts include a Termination of Employment section which clearly outlines the Workers' rights and duties in line with legislation. The Entity's commitment to combat Forced Labour in all its forms is outlined in the ALVANCE Working Principles, and processes are implemented during recruitment to prevent this.</p> <p>However, it was identified the Entity has not developed a stand-alone Modern Slavery Statement.</p>

CRITERION	RATING	COMMENT
10.4a-c Non-Discrimination	Conformance	The Entity's Equality, Diversity and Inclusion Policy outlines its commitment to encouraging equality, diversity and inclusion among the workforce and eliminating unlawful Discrimination in hiring, salary, promotion, training, advancement opportunities or termination. Human Resources Managers also encourage diversity in the workforce, in particular the recruitment of additional female Workers, through the promotion of the Entity's activities through diverse channels including local schools.
10.5 Communication and engagement	Conformance	The Entity ensures open communication and direct engagement with Workers through the 'Daily Information Centre' updates, regular meetings (Union, Safety representatives, HSEQ) and comprehensive newsletters which are accessible through multiple channels, including 'Townhall' meetings led by the Managing Director, to improve transparency and understanding of business performance with employees. Through the internal intranet/People Hub website where feedback is often asked and encouraged questions, a site suggestion box, weekly employee update newsletters sent to all staff via email, and monthly health and safety briefings.
10.6a-g Violence and Harassment	Conformance	The Entity's Disciplinary Policy details the disciplinary process, and the ALVANCE Working Principles confirm the Entity's commitment to respecting Human Rights. It was confirmed that the Entity does not engage in or tolerate the use of corporal punishment, mental or physical coercion, harassment, and gender-based violence including sexual harassment, or verbal abuse of Workers. This Disciplinary Policy is available at: https://alvancebritishaluminium.com/legals/
10.7a-c Remuneration	Conformance	Both the Collective Bargaining Agreement (CBA) and UK regulations assure compliance with this requirement. Remuneration Policies are regularly benchmarked against the industry average to ensure the Entity remains a competitive employer in the market. All workshop Workers are under the CBA, which assures that no pay is withheld and that all payments are made monthly directly to bank accounts. There are no Disciplinary processes that result in withholding of payment.
10.8a-c Working Time	Conformance	Both Scottish Applicable Law and the Collective Bargaining Agreement (CBA) have resulted in a rigorous on-site process whereby staff are not allowed to exceed the maximum extra shifts and total working hours per month. A fatigue management process is in place to manage any potential adverse impacts. Public holidays, Overtime hours, sick leave and annual leave are remunerated according to Scottish Law.
10.9a-b Informing Workers of Rights	Conformance	The Entity informs Workers about their Rights via multiple channels, including the Code of Conduct and ALVANCE Business Working Principles, and works with Labour Union representatives to provide counsel and information to Workers if they have any questions. To ensure the principles are understood by all Workers, the Entity has introduced an eLearning platform to deliver internal training. All Workers complete training on multiple topics surrounding central themes such as health and well-being, the environment and Corruption. The Entity's internal Policies are readily available for all employees on the site's internal intranet, including Policies on Anti-Slavery, Equality, Diversity and Inclusion,

CRITERION	RATING	COMMENT
11. OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Management System	Conformance	The Entity has a documented Occupational Health and Safety (OH&S) Management System that is conformant with applicable national and international standards. The Entity has implemented an Integrated Management System which is certified to ISO 45001. The latest surveillance audit, undertaken by an independent audit firm was undertaken in July 2022.
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Minor Non-Conformance	<p>Whilst the Entity has developed a benchmarking review of its health and safety performance with Liberty Health and Safety Report July 2023, a Comparative analysis of performance with peer Businesses and leading practices was not published in its Sustainability Report.</p> <p>The Entity sets strategic Health and Safety objectives on an annual basis based on the previous year's performance and identified risk areas. The Entity has implemented a major accident hazards safety program for the site (COMAH, Process Safety, and Emergency Response Planning) including a strategic initiative to improve safety performance to reduce the Recordable Injury Frequency Rate (RIFR) and maintain external accreditations to the International Management System Standards to (ISO) 45001:2018, 14001:2015 and 9001:2015. The Entity discloses key performance indicators on health and safety in the 2023 Sustainability Report, page 23: https://alvancebritishaluminium.com/about-us/sustainability</p>
11.2 Employee engagement on Health and Safety	Conformance	The Entity provides Workers with a mechanism including a joint health and safety committee, where they can raise, discuss and participate in the resolution of Occupational Health and Safety issues with management. The Entity operates an Integrated Management System which is certified to ISO 45001.

ASI LIMITATION OF LIABILITY DISCLAIMER

Organisations that make ASI-related claims are each responsible for their own compliance with Applicable Law, including laws and regulations related to labelling, advertisement, and consumer protection, and competition or antitrust laws, at all times. ASI does not accept liability for any violations of Applicable Law or any infringement of third-party rights (each a Breach) by other organisations, even where such Breach arises in relation to, or in reliance upon, any ASI Standard, document or other material, recommendation or directive issued by or on behalf of ASI. ASI gives no undertaking, representation or warranty that compliance with an ASI Standard, document or other material, recommendation or directive issued by or on behalf of ASI will result in compliance with any Applicable Law, or will avoid any Breach from occurring.

DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	29 November 2021	Initial Certification Audit - Provisional Certification
1	12 December 2023	Re-Certification Audit and Scope Change - Full Certification, Scope Change to apply Performance Standard V3. The Entity held a second one-year Provisional Certification for the period 29 November 2022 - 28 November 2023