

ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

Gränges Konin SA

CERTIFICATE NUMBER
314

ASI STANDARD
**PERFORMANCE
STANDARD
(V3 2022)**

CERTIFICATION
LEVEL
**FULL
CERTIFICATION**

ASI ACCREDITED
AUDITING FIRM
**TÜV RHEINLAND
CERT GMBH**

DATE OF ISSUE
11 OCTOBER 2023

DATE OF EXPIRY
10 OCTOBER 2026

CERTIFIED SINCE
11 OCTOBER 2023

AUTHORISED BY

A handwritten signature in black ink, appearing to be 'J. Hall', 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

The design and manufacture of
rolled aluminium strips and sheets
at the Gränges facility located in
Konin, Poland.

AUDIT REPORT PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Gränges
ENTITY NAME	Gränges Konin SA
CERTIFICATION SCOPE	The design and manufacture of rolled aluminium strips and sheets at the Gränges facility located in Konin, Poland.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthousesSemi-Fabrication
ASI STANDARD	<ul style="list-style-type: none">Performance Standard V3
AUDIT TYPE	<ul style="list-style-type: none">Initial Certification Audit
AUDIT FIRM	TÜV Rheinland Cert GmbH
AUDIT DATE	<ul style="list-style-type: none">21 – 22 February 2023
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">1 August 2023
AUDIT SCOPE	<p>The audit scope included the design and manufacture of rolled aluminium strips and sheets at the Gränges facility located in Konin, Poland.</p> <p>Supply Chain Activities included in the audit scope:</p> <ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthousesSemi-Fabrication <p>All relevant criteria in the ASI Performance Standard were included in the audit scope.</p>
AUDIT OUTCOME	<ul style="list-style-type: none">Certification
AUDIT METHODOLOGY DECLARATION	<p>The Auditors confirm that:</p> <ul style="list-style-type: none"><input checked="" type="checkbox"/> The information provided by the Entity is true and accurate to the best knowledge of the Auditor(s) preparing this report.<input checked="" type="checkbox"/> The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous.<input checked="" type="checkbox"/> 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.<input checked="" type="checkbox"/> The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.

CERTIFICATION PERIOD	11 October 2023 – 10 October 2026
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NEXT AUDIT TYPE	Surveillance Audit
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NEXT AUDIT DATE	11 October 2025
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CERTIFICATE NUMBER	314
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If you have an inquiry or complaint about this Certification, go to the third-party EthicsPoint portal at: <https://aluminium-stewardship.ethicspoint.com/>

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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 Konin facility has been in operation for over 50 years with production commencing in 1966 with both primary smelting and rolling operations as a state owned enterprise. The Entity, which currently employs over 700 personnel, was privatised in 1995 and in 2008 it was merged with Impexmetal. The primary smelter was closed in 2009 due to high energy prices but the aluminium rolling mill continued operations. In 2020 the rolling mill and remelting facility was acquired by Gränges AB. In 2021 and 2022 additional investments have been conducted in the factory by adding additional casting capacity, an additional cold rolling mill as well as annealing furnaces and also a new thick gauge slitter. Capacity has been increased from 100 000 tonnes to 140 000 tonnes by these investments. The majority of Gränges Konin S.A.'s products are used in the automotive, packaging, electrical engineering, and construction industries.

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	High	High	High
RISKS	Medium	Low	Low	Low
PERFORMANCE	Medium	High	High	High
OVERALL	MEDIUM			

FINDINGS

CRITERION	RATING	COMMENT
1. BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity has identified legal requirements relevant to its scope of business operations. There are persons responsible for monitoring changes in local and international legislation. Specialists responsible for relevant business areas monitor changes in the legislation and initiate changes in processes and procedures if needed. Through interviews, it was confirmed that all managers and Workers were competent to understand legal obligations and act accordingly.
1.2 Anti-Corruption	Conformance	The Entity has implemented processes to ensure adequate awareness of personnel to avoid Bribery and Corruption in the business processes. There is a whistle-blowing procedure in place to report any grievance.
1.3a-e Code of Conduct	Conformance	The Entity has developed a Code of Conduct that covers principles of responsible Code of Conduct, including but not limited to the prevention of Corruption and Bribery, prevention of conflict of interests, protection of the environment and protection of Human Rights as defined in the UN Guiding Principles and fundamental ILO conventions. The Code of Conduct has been endorsed by senior management and is displayed publicly and is available in the local language. It is presented to all new employees during the onboarding process, and through interviews during the audit, it was confirmed, that the personnel of the Entity are aware of the ethical principles of this Entity. https://www.granges.com/globalassets/04.-hallbarhet/02.-strategy-and-governance/08.-policies/coc_23/coc_2023_english.pdf
2. POLICY AND MANAGEMENT		
2.1a-f Environmental, Social, and Governance Policy	Conformance	The Entity has implemented an Integrated Management System, based on international management standards. Senior management has endorsed Policies that provide guidelines and set targets for the Entity with respect to environmental, social and governance aspects. Relevant managers and specialists develop action plans to achieve targets, which are monitored on a regular basis and reviewed at least annually during the management review. If needed, Policies can be updated after the management review in order to be aligned with the Entity's strategy. Non-financial targets have an impact on the production and development of less environmentally harmful production methods, with a special focus on minimising the carbon footprint of its products.
2.2a-c Leadership	Conformance	The Entity's management has declared its full support for the implementation of the Integrated Management System. It has developed an organisational structure with specialist personnel responsible for production and non-production aspects of business operations. The Entity has appointed a representative, who is enabled to manage the Integrated Management System aimed to meet the requirement of this standard.
2.3a Environmental and Social Management Systems - Environmental	Conformance	The Entity has established an Integrated Management System (IMS). In accordance with ISO 9001 and ISO 14001, refer to: https://www.granges.com/sustainability/certifications/

CRITERION	RATING	COMMENT
2.3b Environmental and Social Management Systems – Social	Conformance	The Entity has established an Integrated Management System to provide compliance within the scope of social aspects, including Human Rights in the workplace and based on the local law and the ASI Performance Standard. Adequate processes, Policies, procedures and personnel are in place.
2.4a-e Responsible Sourcing	Conformance	<p>The Entity has established procedures to monitor risks in the supply chain. There is a process of risk desktop screening and suppliers are obliged to recognise the Entity's Suppliers Code of Conduct. The process is managed and coordinated by the parent Entity, which is responsible for the assurance of the sustainable value chain.</p> <p>A Responsible Sourcing Policy and Supplier Code of Conduct are available at: https://www.granges.com/sustainability/responsible-and-sustainable-sourcing/responsible-sourcing/</p>
2.5a-g Environmental and Social Impact Assessments	Not Applicable	This Criterion is not applicable, as the Facility has not recently implemented a New Project or Major Change, which would require a related Impact Assessment. However, the Entity has a process in place that covers the requirement of standard related to Environmental and Social Impact Assessments.
2.6a-h Human Rights Impact Assessment	Conformance	The Entity has established processes to assess risks to Human Rights in the supply chain, and as required for any new projects or major changes. This process is managed by a responsible person at the parent Entity. There are processes in place to mitigate risks, e.g., training, capacity building and employer branding programs aimed to increase the number of female Workers employed at all levels of the organisation, including at a managerial level.
2.7a-f Emergency Response Plan	Conformance	As confirmed by document review and interviews, the Entity has site specific Emergency Response Plans (ERP) in place. The ERP is available on request to Stakeholders after management approval.
2.8a-d Suspended Operations	Conformance	The Entity has developed plans to address risk and Force Majeure situations. Financial and organisational resources were assured to address risks such as lack of Workers during the COVID-19 pandemic. No evidence of suspension of activities in the last 12 months was identified.
2.9a-b Mergers and Acquisitions	Conformance	The Entity is not responsible for Mergers and Acquisitions as this activity is the responsibility of the parent Entity, which decides and monitors this kind of activity. If any Merger or Acquisition activity were to occur in future, it would be managed by the parent Entity.
2.10a-b Closure, Decommissioning and Divestment	Conformance	The Entity is not responsible for Closure, Decommissioning and Divestment as this activity is the responsibility of the parent Entity, which decides and monitors this kind of activity. If any Closure or Divestment activity were to occur in future, it would be managed by the parent Entity.
3. TRANSPARENCY		
3.1a-b Sustainability Reporting	Conformance	The Entity has a process in place to collect data and report in accordance with the Global Reporting (GRI) Guidelines. The Entity's

CRITERION	RATING	COMMENT
		Sustainability reports are publicly available at: https://www.granges.com/investors/reports-and-presentations/
3.2 Non-compliance and Liabilities	Conformance	The Entity has established processes to assurance compliance with local law. No evidence of fines, judgments, penalties and non-monetary sanctions was found. The status of the Entity can be verified in the National Court Register under No 0000003679 (search at https://wyszukiwarka-krs.ms.gov.pl/)
3.3a-c Payments to Governments	Conformance	The Entity has established transparent financial processes, which are traceable. The annual financial report is reviewed by an independent auditor. According to information publicly available in the National Court Register, the Entity does not have any arrears. The information can be checked at https://wyszukiwarka-krs.ms.gov.pl/ under No 0000003679.
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	The Entity has established a procedure to allow Stakeholders to report any grievances. There is a third party whistle-blower agent who operates a Grievance Mechanism accessible online under https://granges.trumpet-whistleblowing.eu/ .
4. MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment	Conformance	Environmental Product Declarations are available. The Entity has a developed tool with IVL Swedish Environmental Research Institute for LCA /CF.
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	The Entity provides information to its customers on the Life Cycle Assessment (LCA) of its products as requested. The Entity has not yet published the LCA on the webpage.
4.2 Product Design	Conformance	The Entity has established a strategy to increase sustainable product offerings through product life cycle improvement, through circular economy models with customers, and joint innovation and collaboration to develop low-carbon and sustainable alloys. Further information on the Entity's strategy to provide sustainable product offerings is available in Sustainability Report 2022 in the Chapter 'Sustainable innovation and sales', page 33: https://www.granges.com/investors/reports-and-presentations/
4.3a-b Aluminium Process Scrap	Minor Non-Conformance	The Entity has established daily monitoring and controls to minimise the amount of scrap generated internally. The Entity has defined scrap collection and recycling mechanisms based on the properties of the scrap produced. However, due to unstable production, the Entity has some difficulties in using all scrap to date. There are also some issues relating to the storage of multi-layer scrap to ensure proper usage in the foundry.
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.

CRITERION	RATING	COMMENT
4.4d Collection and Recycling of Products at End of Life	Conformance	The Entity has established targets to increase the recycled content of end products and 45 per cent of total sourced metal inputs to be Recycled Aluminium by 2025. Further information is available in the Entity's Sustainability Report 2022: https://www.granges.com/investors/reports-and-presentations/
5. GREENHOUSE GAS EMISSIONS		
5.1a-b Disclosure of GHG Emissions and Energy Use	Conformance	The Entity has issued and publicly disclosed Material Greenhouse Gases (GHG) emissions and energy use on an annual basis in its Sustainability Report 2022, page 31: https://www.granges.com/investors/reports-and-presentations/ . GHG data has been independently verified by the Swedish independent unit IVL Swedish Environmental Research Institute.
5.2a Aluminium Smelter GHG Emissions Intensity - Started production after 2020	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.2b Aluminium Smelter GHG Emissions Intensity - In production up to and including 2020	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.3a-e GHG Emissions Reduction Plans	Conformance	The Entity has issued its GHG emissions reduction plan, of which key information has been made publicly available at: https://www.granges.com/sustainability/strategy-and-governance/climate-and-decarbonization/ and the Entity's Annual and Sustainability report 2022 at: https://www.granges.com/globalassets/annual-reports/2022/07.-sustainability/granges-ar2022-sustainability-and-notes.pdf (pages, 35-42). A specific GHG Emissions Reduction Pathway has been developed and posted on the Entity's website at: https://www.granges.com/sustainability/climate-strategy/
5.4 GHG Emissions Management	Conformance	The Entity works systematically to achieve performance aligned to the GHG Emissions Reduction Plan and targets. The main directions of the strategy are related to the modification of alloys' chemical composition to increase recycling levels, a closed loop recycling system, strong cooperation with customers, recycling of both post-produced and Post-Consumer Scrap and establishing strategic partnerships to secure long term access to Recycled Aluminium, Pre-Consumer Scrap and end-of-life scrap.
6. EMISSIONS, EFFLUENTS AND WASTE		
6.1a-f Emissions to Air	Conformance	The Entity concluded that its emissions (other than CO ₂ e) are not material and therefore did not publish such data in their Sustainability Report. However, the Entity has established systems and procedures to report on Emissions to Air to national authorities and established monitoring processes on Emissions to Air.

CRITERION	RATING	COMMENT
6.2a-g Discharges to Water	Conformance	The Entity has made publicly available its consumption and Discharges to Water in its Sustainability Report 2022, page 129: https://www.granges.com/investors/reports-and-presentations/ The Entity does not discharge directly into water.
6.3a-g Assessment and Management of Spills and Leakages	Conformance	The Entity has developed and implemented Policies, systems, procedures and processes that relate to the detection, assessment and management of Spills and Leakages. During the audit, controls were reviewed to prevent contamination of air, soil and water due to major Spills and Leakages. No major Spills or incidents were reported since the Entity joined ASI.
6.4a-b Public Disclosure of Spills and Leakages	Conformance	The Entity has provided information on any Spills and incidents publicly available in its Sustainability Report 2022, page 37: https://www.granges.com/investors/reports-and-presentations/
6.5a-c Waste Management and Reporting	Conformance	Within the frame of its Environmental Management System, the Entity has developed a waste management plan and identified key waste streams generated during production (such as used chemicals, wood, and filter cake). The type and quantity of the disposed waste is stated in the Entity's Sustainability Report 2022, on pages 39 and 128: https://www.granges.com/investors/reports-and-presentations/
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)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8a-d Dross	Conformance	At the site, Dross is only generated, and the Entity works to minimise the Aluminium content in it. The Dross is stored under a roof or in closed containers to prevent release into the environment. All Dross is sent to an external recycling facility.

7. WATER STEWARDSHIP

7.1a-b Water Assessment and Disclosure	Conformance	The Entity has identified and mapped all water consumption on site via its water intake risk assessment. The Entity's water withdrawal, return and consumption have been made publicly available in the Sustainability Report 2022, pages 39 and 129: https://www.granges.com/investors/reports-and-presentations/
7.2a-e Water Management	Conformance	The Entity has established operational controls and an environmental monitoring plan. The governance of the Water Stewardship Plan was well defined, with relevant experts from the environmental, as well as external communications functions. The progress of the Water Management Plan is regularly reviewed via the Entity's annual management reviews. The Entity's water management approach as well as performance against established targets is available in the Sustainability Report 2022, pages 39 and 129: https://www.granges.com/investors/reports-and-presentations/

8. BIODIVERSITY AND ECOSYSTEM SERVICES

CRITERION	RATING	COMMENT
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	As part of the 2011, 2013-2015 and 2018-2019 permitting process, a biodiversity risk assessment has been undertaken by the Entity. The biodiversity assessment which was conducted by a competent third party concluded that there were no Material impacts on biodiversity as a result of the Entity's activities. This report was shared with the local authorities.
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Not Applicable	This Criterion is not applicable to the Entity as the biodiversity assessment determined the Entity's impact as low. There was no observation made during the audit that the Entity's impact on Ecosystem Services in its Area of Influence would be Material.
8.2a-g Biodiversity Management	Not Applicable	This Criterion is not applicable to the Entity as the biodiversity assessment determined the Entity's impact as low.
8.3a-c Management of Priority Ecosystem Services	Not Applicable	This Criterion is not applicable to the Entity as the biodiversity assessment determined the Entity's impact as low.
8.4 Alien Species	Conformance	The biodiversity assessment conducted as a part of the IPPC application process, did not recommend any action related to invasive species. There is a very low risk of accidental or deliberate introduction of Alien Species.
8.5a-b Commitment to 'No Go' in World Heritage Properties	Conformance	The Entity does not operate in, nor plan to explore or develop New Projects in or close to World Heritage Properties. The Entity's production site is not adjacent to a World Heritage Property.
8.6a-d Protected Areas	Conformance	The Entity does not operate in, nor plan to explore or develop New Projects in or close to Protected Areas. The nearest protected landscape area is over one kilometre from the Entity and outside the Entity's Area of Influence.
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	Conformance	<p>The Entity has developed a Human Rights Due Diligence system. It is supported by a third party service provider. It is based on the Entity's Code of Conduct, which refers to the UN Guiding Principles and the Entity's approach to Human Rights. The Entity provides various training to increase Workers' and managers' awareness about Human Rights in the workplace. Audit interviews confirmed that Human Rights in the workplace are protected and people are treated with respect and dignity.</p> <p>Human Rights is specifically included in the company's Code of Conduct. Also majority of our human rights risks are present in our supply chain, and we include human rights requirements on our suppliers in our Supplier Code of Conduct, which can be found at: https://www.granges.com/globalassets/04.-hallbarhet/02.-</p>

CRITERION	RATING	COMMENT
		<u>strategy-and-governance/08.-policies/gp2.11-supplier-code-of-conduct-2023-07-05.pdf</u>
9.2a-e Gender Equity and Women's Empowerment	Conformance	The Entity has recognised diversity and inclusion principles as crucial for the culture and employment strategy. The Entity subsidises educational programs to empower workers of both genders to be promoted, but there are targets set to include more women in managerial positions. Maternity and paternal rights are protected and women are provided with maternity and paternal leave as per local legislation. The promotion of Gender Equity within the Entity is discussed in the Entity's Code of Conduct.
9.3a-l Indigenous Peoples	Not Applicable	This Criterion is not applicable, as Indigenous Peoples or their lands, territories and resources are not directly affected by the Entity's operations.
9.4a Free, Prior, and Informed Consent (FPIC)- New Projects or Major Changes	Not Applicable	This Criterion is not applicable, as Indigenous Peoples or their lands, territories and resources are not directly affected by the Entity's operations.
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, as Indigenous Peoples or their lands, territories and resources are not directly affected by the Entity's operations.
9.5a Cultural and Sacred Heritage- Identification	Not Applicable	This Criterion is not applicable, as no sacred or cultural heritage sites and values within the Entity's Area of Influence are present.
9.5b Cultural and Sacred Heritage- Impacts	Not Applicable	This Criterion is not applicable, as no sacred or cultural heritage sites and values within the Entity's Area of Influence are present. Indigenous Peoples or their lands, territories and resources are not directly affected by the Entity's operations.
9.6a-i Displacement	Not Applicable	This Criterion is not applicable, as the Entity did not require people to resettle/to be displaced. This was confirmed via interviews undertaken during the audit, The Entity's senior management confirmed that any displacement is not planned for New Projects or Major Changes.
9.7a-h Affected Populations and Organisations	Conformance	The Entity has developed supporting programs for the Local Community in order to support vulnerable persons. There is cooperation with the local orphanage and a social support institution. Although persons supported by those institutions are not directly affected by the Entity, support to the community is a part of employer branding activities showing the plant as a good employer and citizen.
9.8a Conflict-Affected and High-Risk Areas - Strong Management Systems	Conformance	Through management testimonials it was confirmed that the Entity was proactively engaged in support of Ukrainian business partners in various forms including but not limited to preferential purchasing conditions. No evidence of supporting armed conflicts was found.

CRITERION	RATING	COMMENT
		https://www.granges.com/sustainability/responsible-and-sustainable-sourcing/ and the Entity's Supplier Code of Conduct GPI7.
9.8b Conflict-Affected and High-Risk Areas - Identify and assess risks	Conformance	The Russian invasion in Ukraine in 2022 was identified as a case of risk for Human Rights in the conflict area. Through management testimonials it was confirmed that the Entity was proactively engaged in support of Ukrainian business partners in various forms including but not limited to preferential purchasing conditions. No evidence of supporting armed conflicts was found.
9.8c Conflict-Affected and High-Risk Areas - Strategy to respond to risks	Conformance	Through management testimonials it was confirmed that the Entity was proactively engaged in support of Ukrainian business partners in various forms including but not limited to preferential purchasing conditions. No evidence of supporting armed conflicts was found.
9.8d Conflict-Affected and High-Risk Areas - Audit of due diligence	Conformance	Appropriate to its size and circumstances, the Entity has developed risk scanning (auditing) procedures, which are coordinated by the responsible manager in the parent Entity, that relate to the assessment of the Entity's supply chains.
9.8e Conflict-Affected and High-Risk Areas - Report annually	Conformance	The Entity reports risks on an annual basis in the Sustainability Report available at: https://www.granges.com/globalassets/annual-reports/2022/07.-sustainability/granges-ar2022-sustainability-and-notes.pdf
9.9 Security practice	Conformance	The Entity employs security workers only for the purpose of security monitoring of the plant. Security guards do not perform body searches nor carry weapons. If needed, security guards can call the police to perform an investigation.
10. LABOUR RIGHTS		
10.1a-c Freedom of Association and Right to Collective Bargaining	Conformance	The Entity allows workers to freely associate and negotiate Collective Bargaining agreements. There are two active trade unions, which engage the majority of the Entity's plant employees. The last changes in the freely negotiated Collective Bargaining Agreement were implemented in 2023.
10.1d Freedom of Association and Right to Collective Bargaining - Alternative means in context of Applicable Law	Not Applicable	This Criterion is not applicable, as the right to Freedom of Association and Collective Bargaining are not restricted in the country where the Entity operates and is located.
10.2a Child Labour	Conformance	The Entity has declared in its Code of Conduct to respect children's right to personal development and education and employ Workers who are at least 15 years of age or the applicable minimum legal age, whichever is higher. It has declared to protect young Workers, who are between 15 and 18, by limiting their schedules and tasks including heavy work, hazardous work and night shifts. Occupational hazards are assessed and documented. HR verifies age through review of an ID documents as well as copies of school and professional certificates. Vocational students (apprentices) work under the supervision of trained senior Workers, who are responsible for coaching and safety of these young people.

CRITERION	RATING	COMMENT
10.3a-c Forced Labour	Minor Non-Conformance	The Entity has declared in its Code of Conduct that it will not tolerate any form of Forced Labour. The employment process, from recruitment to termination of employment, is free from indicators of Forced Labour. Whilst Modern Slavery is referenced in existing documentation and procedures, there is currently no stand-alone annual Modern Slavery Statement made publicly available.
10.4a-c Non-Discrimination	Conformance	The Entity has declared to prevent Discrimination and implemented recruitment and employment procedures to assure equal treatment in recruitment, employment, Remuneration and access to training.
10.5 Communication and engagement	Conformance	The Entity has established a communication process aimed at informing Workers about their Rights and obligations and about the Entity's legal and financial situation. Regular meetings with Worker representatives are a form of effective dialogue in the workplace. There is a Worker satisfaction survey tool used to anonymously collect Workers' feedback. Daily communication is supported by intranet, email, information boards and bulletin.
10.6a-g Violence and Harassment	Conformance	The Entity has established disciplinary procedures aimed at assuring a safe and secure workplace free of violence and harassment. According to the Code of Conduct individuals under the influence of alcohol or drugs may be subject to disciplinary actions up to and including termination, and must be quickly addressed for the health, safety and well-being of all Workers. Disciplinary measures can be imposed in line with the local law, including written and oral warnings and termination of the employment agreement. Financial penalties can be imposed only in case of serious breaches of health and safety procedures and only in line with local law legislation, which does not allow to reduce wages below the value of wage protected by the state. Interviews confirmed that termination of employment agreements for disciplinary purposes are always consulted with the trade unions. Disclosure of the Entity's commit to preventing violence and harassment is specifically addressed in Section 2.1 of the Entity's Code of Conduct at: https://www.granges.com/globalassets/04.-hallbarhet/02.-strategy-and-governance/08.-policies/coc_23/coc_2023_english.pdf
10.7a-c Remuneration	Conformance	The Entity has freely negotiated a Collective Bargaining agreement which is a base for the monthly remuneration of workers. Wages are paid on a monthly basis and detailed information on payments are available to Workers.
10.8a-c Working Time	Conformance	The Entity has implemented a production process that is planned based on the availability of Workers and the number of Workers on site. Working hours are not excessive and on average no more than 8 hours a day and 40 hours a week. Overtime work is sporadic.
10.9a-b Informing Workers of Rights	Conformance	The Entity has established a process to inform Workers about their Rights and obligations. Every Worker is informed in writing about details of terms and conditions of employment as well as about risks in their workstations, the scope of use of their personal data and equal treatment in the workplace, as per local labour law requirements. The onboarding process is aimed at assuring that workers are well informed about their rights and obligations. The Entity provides training about communication with special training on communication skills to leaders. There is an online training platform

CRITERION	RATING	COMMENT
		and training are delivered as per global and individual needs, and on company values.
11. OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Management System	Conformance	<p>The Entity has issued and internally communicated its Integrated System Policy including the Occupational Health and Safety (OH&S) Policy. It is publicly available upon request as at the time of the audit, the new OH&S Policy (version 3.0, GP2.08) had not been updated on the Entity's website. It is currently available on the Entity's intranet.</p> <p>The Entity has implemented an active OH&S Management System, as confirmed by site tours, interviews and document review. Audits and management review have been demonstrated.</p>
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Conformance	The Entity has implemented a process to review its Management System for OH&S. The Entity conducts internal audits and management review. A description of the effectiveness of the OH&S Management System has been made publicly available on the Entity's website.
11.2 Employee engagement on Health and Safety	Conformance	The Entity has mechanisms in place to discuss Occupational Health and Safety issues with management and Workers such as meetings between Worker Representatives and a joint Health and Safety Committee.

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DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	11 October 2023	Certification Audit - Full Certification