
ASI CERTIFICATION
PERFORMANCE
STANDARD



PRESENTED TO

GRÄNGES FINSPÅNG AB

CERTIFICATE
NUMBER

116

ASI
STANDARD

PERFORMANCE
STANDARD
(V2 2017)

CERTIFICATION
LEVEL

FULL
CERTIFICATION

ASI
ACCREDITED
AUDITOR

DNV
BUSINESS
ASSURANCE
SERVICES UK
LTD.

DATE OF ISSUE

23 NOVEMBER 2021

DATE OF EXPIRY

22 NOVEMBER 2024

CERTIFIED SINCE

10 FEBRUARY 2021

AUTHORISED BY

A handwritten signature in black ink, appearing to be 'J. Hall', written over a white background.

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

CERTIFICATION SCOPE

Design and manufacture of rolled strip and sheet
aluminium at Gränges Finspång (Sweden).

SUMMARY AUDIT REPORT

PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Gränges AB
ENTITY NAME	Gränges Finspång AB
CERTIFICATION SCOPE	Design and manufacture of rolled strip and sheet of aluminium at Gränges Finspång (Sweden).
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">• Casthouses• Semi-Fabrication
ASI STANDARD	<ul style="list-style-type: none">• Performance Standard V2
AUDIT TYPE	<ul style="list-style-type: none">• Initial Certification Audit (18 – 19 November 2020)• Surveillance Audit (24 – 25 August 2021)
AUDIT FIRM	DNV Business Assurance Services UK Ltd.
AUDIT DATE	<ul style="list-style-type: none">• 18 – 19 November 2020 (Initial Certification Audit)• 24 – 25 August 2021 (Surveillance Audit)
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">• 14 January 2021 (Initial Certification Audit)• 15 October 2021 (Surveillance Audit)
AUDIT SCOPE	<p><u>Initial Certification Audit (18 – 19 November 2020)</u></p> <p>Gränges Finspång AB designs and manufactures rolled strip and sheet of aluminium at the site located in Finspång, Sweden. It has an annual capacity of 100,000 tonnes.</p> <p>Supply chain activities included in the audit scope:</p> <ul style="list-style-type: none">• Casthouses• Semi-Fabrication <p>All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.</p> <p>At the time of the Audit (November 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. In response to the</p>

desktop nature of this audit, the auditor had undertaken additional assessment activities prior to the November audit and were also considered in the auditor's overall assessment of conformance.

Surveillance Audit (24 – 25 August 2021)

The audit scope includes the design and manufacture of rolled strip and sheet of aluminium at Gränges Finspång (Sweden).

Supply chain activities included in the audit scope:

- Casthouses
- Semi-Fabrication

All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.

AUDIT
OUTCOME

Certification

AUDIT
METHODOLOGY
DECLARATION

The Auditors confirm that:

- 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

23 November 2021 – 22 November 2024

NEXT AUDIT
TYPE

Surveillance Audit

NEXT AUDIT
DUE DATE

22 May 2023

CERTIFICATE
NUMBER

116

SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	<p>The Entity demonstrated robust awareness and monitoring of Applicable Law and regulatory requirements. The Entity defined applicable procedures to monitor compliance, which includes:</p> <ul style="list-style-type: none"> • Regular legal updates from dedicated legal firm and local industry associations (on a quarterly basis) • Regular Management Reviews of compliance status against EHS regulatory requirements • Regular independent audits to maintain certification status against ISO14001 Collective Bargaining Agreement governing labour law requirements • Internal audits
1.2 Anti-Corruption	Conformance	<p>Gränges Finspång AB works against Corruption in all its forms, including Extortion and Bribery, consistent with Applicable Law and prevailing international standards. The Entity established adequate Anti-Corruption measures, such as policies, training, due diligence checks and a whistleblowing line, endorsed by senior management. The Entity undertakes regular internal audits of its Anti-Corruption Management System, undertaken by competent personnel.</p> <ul style="list-style-type: none"> • Employee training compliance is regularly monitored • Anti-Corruption policies are communicated to suppliers and third parties via Supplier Code of Conduct and supplier onboarding processes.
1.3 Code of Conduct	Conformance	<p>Gränges established a Code of Conduct which is publicly available via the link below: https://www.granges.com/globalassets/04.-hallbarhet/11.-policyer/granges_codeofconduct_2020.pdf</p> <p>Furthermore, internal and external Stakeholders can access the Entity's whistleblowing line to raise concerns and to report any potential breaches of the Code of Conduct in a confidential manner. Any interested party can access the whistleblowing line, operated by an independent third party: https://www.granges.com/about-granges/corporate-governance/whistleblower/</p>
PRINCIPLE 2 POLICY & MANAGEMENT		

CRITERION	RATING	COMMENT
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	<p>Gränges Finspång AB follows corporate standards and policies consistent with the environmental, social and governance practices included in the ASI Performance Standard. The Entity operates at an historic site, established in the 1920s and is well embedded in the local Community.</p> <p>The Entity conducted an analysis of ASI Principles and equivalent Policies and concluded all ASI Performance Standard Principles are covered. The Entity is regularly audited against ISO 14001:2015 by Lloyd's Register.</p>
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	<p>Gränges Finspång AB demonstrated senior management endorsement for its EHS and Employee Policies and secures resources to implement the Policies. The Policies are available at:</p> <p>https://www.granges.com/sustainability/policies/</p> <p>Key environmental, social and governance issues are regularly reviewed by senior management during the management reviews. The provision of environmental investments for 2020-2024 were reviewed during the Audit. For further information about the Entity's environmental and social goals and strategy, please see Sustainability Report 2020 on page 28:</p> <p>https://www.granges.com/globalassets/04.-hallbarhet/hallbarhetsrapportering/granges_sustainability_2020.pdf</p>
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	<p>The Entity's Policies related to environmental, social and governance aspects are communicated externally through its corporate website:</p> <p>https://www.granges.com/sustainability/policies/</p> <p>The Policies are also communicated to suppliers and subcontractors through various forms, such as Supplier Code of Conduct and onsite onboarding and Contractor training process.</p>
2.2 Leadership	Conformance	<p>Gränges Finspång AB nominated the Supply Chain Director the responsibility for implementing the ASI Performance Standard at the site. The nomination was communicated internally.</p>
2.3a Environmental and Social Management Systems (environmental)	Conformance	<p>Gränges Finspång AB operates an Integrated Management System which is certified to ISO 14001:2015 and is valid for the Entity's ASI Performance Standard Certification Scope and is recognised as meeting the requirements of Criterion 2.3a of the ASI Performance Standard. The Audit was carried out by independent third</p>

CRITERION	RATING	COMMENT
		party, Lloyds Register. Some observations and minor deviations were noted. The Entity has established a Corrective Action Plan to address these and since been closed out. The Entity also holds an ISO 50001:2011 certificate.
2.3b Environmental and Social Management Systems (social)	Conformance	<p>The Entity has documented and implemented an Integrated Social Management System. Gränges Finspång AB identified its key interested parties and material issues. At a corporate level, the stakeholder engagement approach is disclosed on page 113 of the Sustainability Report: https://www.granges.com/globalassets/04.-hallbarhet/hallbarhetsrapportering/granges_sustainability_2020.pdf</p> <p>The Entity identified local Community engagement processes and keeps track of monitoring actual and potential impacts. Labour Rights and Human Rights related matters are governed through the Gränges Finspång AB Collective Bargaining Agreement and consultations with Labour Unions.</p>
2.4 Responsible Sourcing	Conformance	Gränges operates a Supplier Code of Conduct across all its locations. The Sourcing Policy has been updated. The supply chain due diligence processes have been reviewed for local implementation. Partnerships have been established with preferred suppliers. Gränges adopted a supply chain risk assessment methodology to screen metal suppliers and requests EcoVadis assessments based on the suppliers' risk profile.
2.5 Impact Assessments	Conformance	The Entity has established systems and procedures to evaluate environmental, energy, safety, cultural and Human Rights impacts when performing major projects. The Entity is currently investing in a new project to automate coils production on the premises. Procurement of best available technologies and new equipment were integrated into the project to improve the environmental footprint.
2.6 Emergency Response Plan	Conformance	Gränges Finspång AB operates an Integrated Management System certified to ISO 14001:2015, covering the Entity's Certification Scope which is accepted as meeting the requirements of Criterion 2.6 Emergency Response Plan of the ASI Performance Standard.

CRITERION	RATING	COMMENT
2.7 Mergers and Acquisitions	Conformance	Gränges reviews environmental, social and governance issues in the Due Diligence process for mergers and acquisitions. Gränges, at a corporate level, recently completed acquiring a downstream site in Poland. Further information about the acquisition is available via the below press release: https://www.granges.com/newsroom/press-releases/2020/granges-completes-the-acquisition-of-aluminium-konin-and-finalizesthe-issue-in-kind/
2.8 Closure, Decommissioning and Divestment	Conformance	The Entity has plans to close down a mill in the parameters of the site. The decommissioning project is governed by Swedish law and the environmental permit requirements (e.g soil and concrete samples, hazardous material management). The Decommissioning of equipment and assets will be carried out by specialized partners and Contractors. The environmental and health and safety risk assessments are regularly updated.
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	Gränges publishes a Sustainability Report aligned with GRI G4 Sustainability Reporting Guidelines on an annual basis, which includes information and data from the Finspång site. The report is available via the link below: https://www.granges.com/globalassets/04.-hallbarhet/hallbarhetsrapportering/granges_sustainability_2020.pdf In addition, the Finspång site reports on its environmental indicators in line with Swedish law on a regular basis to the relevant authorities.
3.2 Non-compliance and liabilities	Conformance	The Entity has not received significant fines, judgments, penalties and non-monetary sanctions for failure to comply with Applicable Law since the Entity joined ASI. The Entity is obligated to report all non-compliances to the Swedish Environmental Authorities. Gränges AB is listed on the Swedish stock market and has obligations to immediately disclose any non-compliances to shareholders. The Entity's Sustainability Reporting disclosures are aligned with GRI Guidelines.
3.3a Payments to governments (legal and contractual)	Conformance	The Entity is subject to third party independent audits by local accountants on an annual basis which contains a review of payments to Governments. The Entity demonstrated compliance

CRITERION	RATING	COMMENT
		with local laws and regulations. The Entity's Anti-Corruption policies and instructions (e.g facilitation of payments) govern its compliance and due diligence checks to ensure all payments are made on a legal/contractual basis.
3.3b Payments to governments (disclosure - bauxite mining)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
3.4 Stakeholder complaints, grievances and requests for information	Conformance	Handling external complaints related to environment and health and safety are governed by the Entity's ISO 14001:2015 Management System, which is accepted as meeting the requirements of the ASI Performance Standard.
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	<p>The Entity has implemented its Environmental Management System and evaluates environmental aspects in a life cycle perspective. The Entity established a target to ensure 80% of Gränges products should have verified sustainability information available. Methodology is in line with ISO 14040 and ISO 14044 and scope boundaries were defined.</p> <p>A Life Cycle Assessment procedure has been developed and an Environmental Product Declaration (EPD), considering the products produced, is established and has undergone third party assessment.</p>
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	<p>The Entity is able to provide Environmental Life Cycle Assessment information to customers upon request and demonstrated its approach to communicate about its LCA approach during the audit. Further information is available in the Sustainability Report on page 30:</p> <p>https://www.granges.com/globalassets/04.-hallbarhet/hallbarhetsrapportering/granges_sustainability_2020.pdf</p>
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	<p>The Entity currently does not publicly disclose information on its Environmental Life Cycle Assessment results but the information is available upon request. The Entity set a target of 80 per cent of Gränges' products to have verified sustainability information available by 2025. Further information about the Entity's LCA approach and Product Disclosures can be found on page 30 of the Sustainability Report:</p>

CRITERION	RATING	COMMENT
		https://www.granges.com/globalassets/04.-hallbarhet/hallbarhetsrapportering/granges_sustainability_2020.pdf
4.2 Product design	Conformance	Gränges 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 project-based improvements can be found below: https://www.granges.com/trillium/ Further information on the Entity's strategy to provide sustainable product offerings is available on page 30 of its Sustainability Report 2020: https://www.granges.com/globalassets/04.-hallbarhet/hallbarhetsrapportering/granges_sustainability_2020.pdf
4.3a Aluminium Process Scrap (targets)	Conformance	The Entity established daily monitoring and controls to minimize the amount of scrap generated internally. The Entity defined scrap collection and recycling mechanisms based on the properties of the scrap produced. Scrap is recycled internally, very small quantities are sold to external partners.
4.3b Aluminium Process Scrap (alloy separation)	Conformance	The Entity has established systems and processes to separate Aluminium alloys and grades for recycling. Almost 100% of the scrap is recycled internally, with small quantities being sold for further processing. The Entity established key performance indicators to monitor yield and implements corrective actions to achieve continuous improvements in line with its quality policy and procedures.
4.4a Collection and recycling of products at end-of-life (strategy)	Conformance	The Entity established targets to increase the recycled content of end products, 20% of total sourced metal inputs to be recycled aluminium by 2025. At a Group-level, the Entity increased the share of recycled aluminium to 22,5% (19,8) of total sourced metal inputs. Further information is available in the Sustainability Report 2020 page 31: https://www.granges.com/globalassets/04.-hallbarhet/hallbarhetsrapportering/granges_sustainability_2020.pdf
4.4b Collection and recycling of products at end-of-life (engagement)	Conformance	Gränges is involved and engaged and supporting activities promoting collecting and recycling systems to increase recycling rates. This includes the Swedish Aluminium Association membership:

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		https://www.svensktaluminium.se/om-oss/ and European Aluminium Association membership: https://www.european-aluminium.eu/about-us/our-members/ The Entity is actively taking part in taskforces and committees to increase the recycling rates of end-of-life products.
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		
5.1 Disclosure of GHG emissions and energy use	Conformance	The Gränges Climate Strategy is available on page 28 of the Sustainability Report 2020: https://www.granges.com/globalassets/04.-hallbarhet/hallbarhetsrapportering/granges_sustainability_2020.pdf Gränges follows the Greenhouse Gas Protocol (GHG Protocol) guidelines to calculate its climate impact, from bauxite extraction to delivery of Gränges' products to customers. Material sources of GHG emissions and Energy use are disclosed on pages 31 - 32 of the Sustainability Report.
5.2 GHG emissions reductions	Conformance	The Gränges Climate Strategy is disclosed on page 28 of its Sustainability Report 2020: https://www.granges.com/globalassets/04.-hallbarhet/hallbarhetsrapportering/granges_sustainability_2020.pdf Carbon emissions intensity from own operations and purchased energy is to be reduced by 25% by 2025. In 2020, Gränges reduced its total greenhouse gas emissions by 8% versus 2019 to 3,510 ktonnes CO ₂ -e (3,910).
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	The Entity established robust systems and procedures to report on Emissions to Air to national authorities and established monitoring processes on Emissions to Air. The Entity demonstrated all conditions were under the permit thresholds. An environmental programme is established to minimise Emissions to Air further.

CRITERION	RATING	COMMENT
		Emission to Air data at a Group-level is disclosed in the Gränges Sustainability Report page 118: https://www.granges.com/globalassets/04.-hallbarhet/hallbarhetsrapportering/granges_sustainability_2020.pdf
6.2 Discharges to Water	Conformance	The Entity reports their water effluents to the environmental authority. The limits set by local and national authorities to water pollutants are adequately measured and controlled. For further information on Gränges water management, please see page 119 of the Sustainability Report (GRI 303: Water and effluents 2018): https://www.granges.com/globalassets/04.-hallbarhet/hallbarhetsrapportering/granges_sustainability_2020.pdf
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	The Entity is obliged to have a spill risk assessment and spill response plans for 'small' and 'significant' Spills as defined within its operating license. Spills are regulatory reported to the environmental authorities. The Entity maintains robust Standard Operating Procedures in case of Spills (e.g. most common aspect is rolling oil leakages from tanks), critical controls have been defined and mitigation measures identified. Regular training is provided to employees.
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	The Entity established robust critical controls and Standard Operating Procedures in case of Spills and Leakage that may contaminate air, soil or water. The environmental risk assessment is regularly updated as part of the Entity's Integrated Management System which is certified against ISO 14001:2015. External communication plans were reviewed during the audit.
6.4a Reporting of Spills (immediate disclosure)	Conformance	All Leakages must be reported to authorities even the smallest volumes of 5 litres according to Swedish law. No major Spills occurred at the site which would require publishing an impact assessment and remediation actions. The Entity's Environmental Management System is certified to ISO 14001:2015 which covers this aspect.
6.4b Reporting of Spills (regular reporting)	Conformance	The Entity is obliged to have a spill risk assessment and spill response plans for 'small' and 'large' Spills as defined within its operating license to local authorities, including any impacts on soil, water, air

CRITERION	RATING	COMMENT
		etc. and mitigation measures taken. No major Spills occurred at the site which would require publishing an impact assessment and remediation actions.
6.5a Waste management and reporting (strategy)	Conformance	The Entity has implemented a waste management plan in accordance with a Waste Mitigation Hierarchy. The Entity identified waste streams and associated waste disposal methods. Hazardous and Non-Hazardous Waste are disclosed to the local authorities on an annual basis. Waste management is included within the ISO 14001:2015 Management System.
6.5b Waste management and reporting (disclosure)	Conformance	Hazardous and Non-Hazardous Waste are disclosed to the local authorities on an annual basis according to environmental permit requirements.
6.6a Bauxite Residue (storage construction)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6b Bauxite Residue (integrity checks and controls)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6c Bauxite Residue (water discharge)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6d Bauxite Residue (marine and aquatic environments)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6e Bauxite Residue (state of the art technologies)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6f Bauxite Residue (remediation)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7a Spent Pot Lining (SPL) (storage and management)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7b Spent Pot Lining (SPL) (recovery and recycling)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7c Spent Pot Lining (SPL) (Untreated SPL)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7d Spent Pot Lining (SPL) (review of alternatives)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7e Spent Pot Lining (SPL) (marine and aquatic environments)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8a Dross (recovery)	Conformance	The Entity demonstrated it meets the ASI Performance Standard requirements related to

CRITERION	RATING	COMMENT
		Dross and makes investments to continuously improve yield and reduce the amount of Dross generated.
6.8b Dross (recycling)	Conformance	Salt slag is sent to a third party for recycling and there is a process for aluminium and alumina oxide to make concrete. No treated Dross residues are sent to landfill.
6.8c Dross (review of alternatives)	Conformance	Salt slag and other Dross residues are sent for further recycling in other industries. No Dross residues are sent to landfill from the Entity's operations.
PRINCIPLE 7 WATER STEWARDSHIP		
7.1a Water assessment (mapping)	Conformance	The Entity conducted a robust water risk assessment, identified its water withdrawal by source and type in consultation with relevant local stakeholders. The operational control and yearly environmental data collection is defined by the site.
7.1b Water assessment (risk assessment)	Conformance	The Entity's main water source is surface water, from the upstream Lake Bonern. The Entity is using some further water from the water municipality. Water usage and water discharge points were identified and mapped in its Area of Influence. The site has engaged with relevant stakeholders (e.g employees, shareholders and authorities) to define risks and stakeholder expectations. Further information on the Gränges water management plan and corporate performance is disclosed on page 34 of the Sustainability Report 2020: https://www.granges.com/globalassets/04.-hallbarhet/hallbarhetsrapportering/granges_sustainability_2020.pdf
7.2a Water management (management plans)	Conformance	The Entity, as part of its water management plan has set a target to reduce its water consumption by 20% by 2025. For further details, please see page 34 in the Sustainability Report 2020: https://www.granges.com/globalassets/04.-hallbarhet/hallbarhetsrapportering/granges_sustainability_2020.pdf
7.2b Water management (monitoring)	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 on the water management plan is

CRITERION	RATING	COMMENT
		regularly reviewed during the annual management reviews.
7.3 Disclosure of water usage and risks	Conformance	The Entity's water management approach as well as performance against established targets is available on page 34 of the Sustainability Report 2020 (GRI 103: Management Approach 2016; GRI 303: Water and effluents 2018): https://www.granges.com/globalassets/04.-hallbarhet/hallbarhetsrapportering/granges_sustainability_2020.pdf
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	As part of the 2018 permitting process, a biodiversity risk assessment was carried out for the Entity. The biodiversity assessment which was conducted by a competent third party concluded no material impacts on biodiversity as a result of the site's activities. This report was shared with the local authorities.
8.2a Biodiversity management (biodiversity action plans)	Not Applicable	The Entity's biodiversity risk assessment concluded that the site has no material impacts on biodiversity values, therefore this Criterion is not applicable.
8.2b Biodiversity management (consultation and mitigation hierarchy)	Not Applicable	The Entity's biodiversity risk assessment concluded that the site has no material impacts on biodiversity values, therefore this Criterion is not applicable.
8.2c Biodiversity management (reporting)	Not Applicable	The Entity's biodiversity risk assessment concluded that the site has no material impacts on biodiversity values, therefore this Criterion is not applicable.
8.3 Alien Species	Conformance	Packaging materials and wooden pallets, as a risk of introducing Alien Species, are controlled by the Entity according to Swedish law and EU legislation.
8.4a Commitment to "No Go" in World Heritage properties (exploration and new mines)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.4b Commitment to "No Go" in World Heritage properties (existing mines)	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		

CRITERION	RATING	COMMENT
9.1a Human Rights Due Diligence (policy)	Conformance	The Gränges' Code of Conduct and Supplier Code of Conduct cover Human Rights Principles and expectations. The Policies references the UN Global Compact Ten Principles and other international best practices. Please see below link to access these Policies: https://www.granges.com/sustainability/policies/
9.1b Human Rights Due Diligence (process)	Conformance	The Entity carries out regular due diligence checks as part of its EcoVadis assessments on the critical suppliers of Primary Aluminium. The Entity undertook an interested parties analysis in line with its certified ISO 14001 Management System. Gränges conducts regular stakeholder engagement to identify its material issues, including Human Rights expectations. For more details, please see page 120 of the Sustainability Report 2020: https://www.granges.com/globalassets/04.-hallbarhet/hallbarhetsrapportering/granges_sustainability_2020.pdf
9.1c Human Rights Due Diligence (remediation)	Conformance	Gränges operates a whistleblowing function where third parties can raise any concerns related to Human Rights impacts. To date, no complaints or other remediation claims were received related to Human Rights. For more information, please see Gränges whistleblowing function and ethical business practices page: https://www.granges.com/sustainability/ethical-business-practices/
9.2 Women's Rights	Conformance	Gränges adopted a Non-Discrimination Policy and has plans in place to increase gender diversity at the Entity in line with good practice. For further information, please see page 37 of the Sustainability Report 2020: https://www.granges.com/globalassets/04.-hallbarhet/hallbarhetsrapportering/granges_sustainability_2020.pdf
9.3 Indigenous Peoples	Not Applicable	There are no Indigenous minority groups in the Area of Influence of the Entity. Please see: https://www.sametinget.se/samer
9.4 Free, Prior, and Informed Consent (FPIC)	Not Applicable	There are no Indigenous minority groups in the Area of Influence of the Entity. Please see: https://www.sametinget.se/samer
9.5 Cultural and sacred heritage	Conformance	The protection of cultural and sacred heritage sites are governed by the Entity's environmental permitting process. There are historic industrial

CRITERION	RATING	COMMENT
		buildings onsite dating back to the 16th century, which are protected.
9.6a Resettlements (avoid or minimise)	Not Applicable	This Criterion is not applicable as no Resettlements took place.
9.6b Resettlements (where unavoidable)	Not Applicable	This Criterion is not applicable as no Resettlements took place.
9.7a Local Communities (rights and interests)	Conformance	The Entity's environmental permit was renewed in 2018, and no adverse impacts have been identified on the local Community. Furthermore, the Entity undertakes a regular interested parties analysis in line with its ISO 14001 Management System requirements. The Entity supports local livelihoods through its annual Corporate Social Responsibility (CSR) activities.
9.7b Local Communities (impacts)	Conformance	The Entity's environmental permit was renewed in 2018, and no adverse impacts have been identified on the local Community. Furthermore, the Entity undertakes a regular interested parties analysis in line with its ISO 14001 Management System requirements.
9.7c Local Communities (livelihoods)	Conformance	The Entity supports local livelihoods through its annual Corporate Social Responsibility (CSR) activities. For further details, please see page 112 of the Sustainability Report 2020: https://www.granges.com/globalassets/04.-hallbarhet/hallbarhetsrapportering/granges_sustainability_2020.pdf
9.8 Conflict-Affected and High-Risk Areas	Conformance	Gränges implemented a Supplier Code of Conduct and supplier risk assessments to ensure it is not sourcing materials from Conflict-Affected or High-Risk Areas. The Entity implemented a Supply Chain Due Diligence Programme to further manage risk from the supply chain related to the areas of anti-bribery and corruption, trade compliance, child and slave labor, criminal history, human trafficking and conflict minerals.
9.9 Security practice	Conformance	Gränges sets security standards in its arrangements with security providers, which includes considerations for Human Rights protection. The third party security personnel have been trained on the Entity's Code of Conduct as well as mandatory training for security personnel as required by Swedish law. A risk assessment for

CRITERION	RATING	COMMENT
		security arrangements is updated on a regular basis.
PRINCIPLE 10 LABOUR RIGHTS		
10.1a Freedom of Association and Right to Collective Bargaining (freedom of association)	Conformance	Freedom of association and right to collective bargaining is well organised under Swedish Law. The Entity has implemented a Code of Conduct committing to freedom of association and right to collective bargaining: https://www.granges.com/globalassets/04.-hallbarhet/11.-policyer/granges_codeofconduct_2020.pdf Trade Unions present at the Entity have agreed a Collective Bargaining Agreement.
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Conformance	Freedom of association and right to collective bargaining is well organised under Swedish Law. These agreements are regularly negotiated. The Entity's management holds regular reviews and meetings with the Labour Union representatives about production forecast and staff levels, updating the furlough scheme.
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Conformance	Swedish Law allows the freedom of association and collective bargaining.
10.2a Child Labour (minimum age)	Conformance	The Gränges Human Rights Policy and Code of Conduct both prohibit the use of Child Labour. The Entity does not employ anybody under the age of 18 as a function of Swedish law. Apprenticeships and related safety measures are strictly implemented.
10.2b Child Labour (hazardous)	Conformance	The Entity does not engage in or support Hazardous Child Labour. Apprenticeships and related safety measures are strictly implemented following Swedish law requirements.
10.2c Child Labour (worst forms)	Conformance	The Entity does not engage in or support the Worst Forms of Child Labour. This aspect is addressed via the Entity's Code of Conduct, Supplier Code of Conduct and Health and Safety Management System.
10.3a Forced Labour (human trafficking)	Conformance	The Collective Bargaining Agreement and internal human rights practices ensure the Entity meets its obligations to protect Workers from Forced Labour. The Entity hires indirect workforce via recruitment agencies and due diligence checks of recruitment agencies were carried out as required

CRITERION	RATING	COMMENT
		by the ASI Performance Standard. All Workers must have a Swedish social security number to be able to undertake work onsite.
10.3b Forced Labour (deposits, fees, advances)	Conformance	The Collective Bargaining Agreement and local employment policies ensure any form of deposit, recruitment fee or equipment in advance from Workers is not required. The Entity undertook due diligence reviews of its recruitment agencies to ensure they uphold these expectations and are compliant with Swedish law.
10.3c Forced Labour (migrant workers)	Conformance	The Collective Bargaining Agreement, Code of Conduct and internal routines, instructions and practices ensure that the Entity meets its obligations to protect Workers from Forced Labour in all aspects addressed in the ASI Performance Standard. A due diligence of recruitment agencies is carried out.
10.3d Forced Labour (debt bondage)	Conformance	The Collective Bargaining Agreement and internal human rights practices ensure that the Entity meets its obligations to protect Workers from Forced Labour. The Entity hires indirect workforce via recruitment agencies and due diligence checks of recruitment agencies were carried out as required by the ASI Performance Standard. All Workers must have a Swedish social security number to be able to undertake work onsite. The Entity does not provide any loans to Workers and it does not hold Workers in Debt Bondage or force them to work, in order to pay off a debt.
10.3e Forced Labour (freedom of movement)	Conformance	The Collective Bargaining Agreement and internal human rights practices ensure that the Entity meets its obligations to protect Workers from Forced Labour. The Entity hires indirect workforce via recruitment agencies and due diligence checks of recruitment agencies were carried out as required by the ASI Performance Standard. The Entity does not unreasonably restrict the freedom of movement of Workers. Employment contracts set out the conditions for the notice period aligned with the Collective Bargaining Agreement.
10.3f Forced Labour (retention of identity papers, permits, certificates)	Conformance	The Collective Bargaining Agreement and internal human rights practices ensure that the Entity meets its obligations to protect Workers from Forced Labour. The Entity hires indirect workforce via recruitment agencies and due diligence checks of recruitment agencies were carried out as required

CRITERION	RATING	COMMENT
		by the ASI Performance Standard. The Entity takes copies of Workers' identity documents for their personnel files, the Entity adheres to strict data protection rules.
10.3g Forced Labour (freedom to terminate employment)	Conformance	The Collective Bargaining Agreement and internal human rights practices ensure that the Entity meets its obligations to protect Workers from Forced Labour. The Entity hires indirect workforce via recruitment agencies and due diligence checks of recruitment agencies were carried out as required by the ASI Performance Standard. The notice period and conditions are governed by the Collective Bargaining Agreement and set out in employment contracts as per Swedish law.
10.4 Non-Discrimination	Conformance	<p>The Entity has developed and implemented an Equal Employment Opportunity Policy addressing zero tolerance to discrimination and a Code of Conduct publicly available: https://www.granges.com/globalassets/04.-hallbarhet/11.-policyer/granges_codeofconduct_2020.pdf</p> <p>Further information on the Entity's diversity performance is available on page 37 of the Sustainability Report: https://www.granges.com/globalassets/04.-hallbarhet/hallbarhetsrapportering/granges_sustainability_2020.pdf</p>
10.5 Communication and engagement	Conformance	The Entity operates a joint Health and Safety Committee where issues can be raised by Workers and discussed with senior management. Such mechanisms were established at department level per workshop. The Entity has an open and inclusive communication between management, Workers and union which is formalised within the Collective Bargaining Agreement. The Entity conducts regular employee surveys.
10.6 Disciplinary practices	Conformance	The Swedish labour laws define disciplinary procedures which are mirrored in the local Collective Bargaining Agreement. The Gränges corporate Code of Conduct relating to disciplinary practice shows strong compliance with international and best practice on this subject. The Entity implemented a grievance mechanism and has certified managers to conduct investigations into any breaches against the Code of Conduct.

CRITERION	RATING	COMMENT
10.7a Remuneration (living wage)	Conformance	The Collective Bargaining Agreement together with strong Swedish law assure compliance with this Criterion. All staff are under the Collective Bargaining Agreement which ensures that no pay is withheld and that all payments are made monthly directly to chosen bank accounts. There are no disciplinary processes which result in withholding of payment.
10.7b Remuneration (method of payment)	Conformance	Wage payments are made via bank transfers to Workers in a timely manner. A sample of employee records were inspected to verify this during the Audit.
10.8 Working Time	Conformance	Swedish Law and the Collective Bargaining Agreement 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. Shift patterns are agreed within the Collective Bargaining Agreement. Public holidays, Overtime hours, sick leave and annual leave are remunerated according to Swedish law.
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	The Entity has developed, implemented and communicated a Health and Safety Policy that is endorsed and supported by senior management. The Policy is available at: https://www.granges.com/globalassets/04.-hallbarhet/11.-policyer/gp07-ehs-policy-2020.04.29.pdf
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	The Health and Safety Policy covers all Workers and Visitors (e.g Contractors) undertaking work onsite and in premises under the Entity's control: https://www.granges.com/globalassets/04.-hallbarhet/11.-policyer/gp07-ehs-policy-2020.04.29.pdf
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Conformance	The Entity has developed, implemented and communicated a Health and Safety Policy that is in line with Swedish law and applicable standards.
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	The Entity has developed, implemented and communicated a Health and Safety Policy endorsed and supported by senior management. The Policy is a part of induction and is posted throughout the site. The Entity's Policy includes a reference to the right of Workers to stop unsafe work.

CRITERION	RATING	COMMENT
11.2 OH&S Management System	Conformance	The Entity's Health and Safety Management System is part of its overall integrated system which is held on a platform called 'FRAMEWORK'. It is a traditional three tier hierarchical system with policy, procedure and detailed work instruction where necessary. The series of 'Standard Operating Procedures' (SOP's) are comprehensive and are based on 'Critical Controls' to be identified for confined space entry, electrical and uncontrolled release of energy, control of molten metal, lifting operations, falling from heights and falling objects control and vehicular movement. Based on the risk assessment, the operational instructions and processes for operators are updated.
11.3 Employee engagement on health and safety	Conformance	The Entity engages Health and Safety Committees, a monthly joint meeting with all the Committees and Critical Controls Committee's. All employees are allowed to raise health and safety issues. Employee surveys support inclusion within health and safety issues.
11.4 OH&S performance	Conformance	Health and safety indicators are regularly monitored and also published via Granges Annual Sustainability Report. The Entity also participates in the European Aluminium Association's safety benchmarking every year. For further details, please see page 120 of the Sustainability Report: https://www.granges.com/globalassets/04.-hallbarhet/hallbarhetsrapportering/granges_sustainability_2020.pdf

Document Control and Version History

Revision	Date	Notes
0	10 February 2021	Issued (Provisional Certification)
1	23 November 2021	Surveillance Audit – Full Certification