
ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

IMPOL GROUP (SLOVENIA)

CERTIFICATE
NUMBER

91

ASI
STANDARD

PERFORMANCE
STANDARD
(V2 2017)

CERTIFICATION
LEVEL

FULL
CERTIFICATION

ASI ACCREDITED
AUDITOR

BUREAU
VERITAS
CERTIFICATION

DATE OF ISSUE

20 AUGUST 2020

DATE OF EXPIRY

19 AUGUST 2023

CERTIFIED SINCE

20 AUGUST 2020

AUTHORISED BY

A handwritten signature in black ink, appearing to be 'J. Polak', written over a horizontal line.

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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 production of rolled, extruded and drawn semi-product of aluminium alloys. Products of the Impol d.o.o plant (Slovenia) include: Rolling slabs and extrusion billets, sheets, strips, circles, trade plates, plain foils, extruded and drawn rods, tubes and wires, extruded profiles mechanical components and forged parts.

SUMMARY AUDIT REPORT PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Impol d.o.o.
ENTITY NAME	IMPOL Group (Slovenia)
CERTIFICATION SCOPE	Design and production of rolled, extruded and drawn semi-product of aluminium alloys. Products of the Impol d.o.o plant (Slovenia) include: Rolling slabs and extrusion billets, sheets, strips, circles, trade plates, plain foils, extruded and drawn rods, tubes and wires, extruded profiles mechanical components and forged parts.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">• Aluminium Re-melting/Refining• Casthouses• Semi-Fabrication
ASI STANDARD	<ul style="list-style-type: none">• Performance Standard V2
AUDIT TYPE	<ul style="list-style-type: none">• Initial Certification Audit (2 – 4 and 23 June 2020)• Surveillance Audit (10 – 31 May 2021)
AUDIT FIRM	Bureau Veritas Certification
AUDIT DATE	<ul style="list-style-type: none">• 2 – 4 June and 23 June 2020 (Initial Certification Audit)• 10 – 31 May 2021 (Surveillance Audit)
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">• 6 August 2020 (Initial Certification Audit)• 19 August 2021 (Surveillance Audit)
AUDIT SCOPE	<p><u>Initial Certification Audit (2 – 4 and 23 June 2020)</u></p> <p>Design and production of rolled, extruded and drawn semi-product of aluminium alloys. Rolling slabs and extrusion billets, sheets, strips, circles, trade plates, plain foils, extruded and drawn rods, tubes and wires, extruded profiles mechanical components and forged parts.</p> <p>Supply chain activities included in the audit scope:</p> <ul style="list-style-type: none">• Aluminium Re-melting/Refining• Casthouses• Semi-Fabrication

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

At the commencement of the audit, access to the site was not possible, due to COVID-19 related travel restrictions. The audit was initially undertaken as a 'desktop' exercise in early June 2020, in accordance with the ASI Interim Policy regarding Audits, Audit-Related Travel and Coronavirus (v4), and included a remote review of relevant documentation. The audit was later completed on-site on 23 June 2020.

Surveillance Audit (10 – 31 May 2021)

The audit scope covers the design and production of rolled, extruded and drawn semi-product of aluminium alloys. Products of the Impol d.o.o plant (Slovenia) include: Rolling slabs and extrusion billets, sheets, strips, circles, trade plates, plain foils, extruded and drawn rods, tubes and wires, extruded profiles mechanical components and forged parts.

Supply chain activities included in the audit scope:

- Aluminium Re-melting/Refining
- Casthouses
- Semi-Fabrication

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

At the time of the audit (May 2021), access to all the sites 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 on-site observations for relevant criteria.

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

20 August 2020 - 19 August 2023

NEXT AUDIT TYPE

Re-Certification Audit

NEXT AUDIT
DUE DATE 19 August 2023

CERTIFICATE
NUMBER 91

SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	IMPOL has systems in place to maintain awareness of and ensure compliance with applicable law.
1.2 Anti-Corruption	Conformance	A Code of Business Conduct of IMPOL Group and a Code of Business Conduct for Suppliers are in place. IMPOL committed itself to work against Corruption in all its forms, including extortion and bribery, consistent with applicable law and prevailing international standards, see: https://www.impol.com/supplier-portal/
1.3 Code of Conduct	Conformance	IMPOL implemented a Code of Business Conduct and a Suppliers Code of Conduct. The Suppliers Code of Conduct can be downloaded from the website at: https://www.impol.com/supplier-portal Suppliers are requested to accept the Code of Conduct.
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	IMPOL implemented and maintains an integrated group policy that contains the commitments towards environment, health and safety and governance. The Policy can be downloaded from the website: https://www.impol.com/quality/impol-group-policies/
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	IMPOL has a strong commitment from management for the implementation of the management systems. External audits and internal evaluations take place to verify the effective implementation of the systems. Certificates can be found on the website at: https://www.impol.com/quality/certificates/
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	Both the overall Policy and the Sustainable Development Policy of IMPOL Group are communicated internally at the company and externally through the IMPOL website: https://www.impol.com/quality/impol-group-policies
2.2 Leadership	Conformance	IMPOL established a team for ASI implementation and identified all responsible persons for the different clauses of the ASI

CRITERION	RATING	COMMENT
		Performance Standard. Overall responsibility for the ASI implementation is with top management.
2.3a Environmental and Social Management Systems (environmental)	Conformance	IMPOL has an integrated policy that contains its commitment to environment and energy. IMPOL Group is certified against ISO 14001:2015, the certificate is publicly available on the website: https://www.impol.com/quality/certificates External audits confirm the effectiveness of the systems.
2.3b Environmental and Social Management Systems (social)	Conformance	IMPOL Group has social management systems implemented, covering health and safety as well as work related issues. Trade unions are present on plant level, worker representatives participate in meetings and committees. Periodic external audits are conducted by public authorities.
2.4 Responsible Sourcing	Conformance	IMPOL Group has a Code of Business Conduct for Suppliers, that covers environmental, social and governance issues. It has to be signed together with general purchasing conditions by the suppliers and is therefore an essential part of the daily business. All suppliers are evaluated on their performance against these aspects.
2.5 Impact Assessments	Conformance	IMPOL Group conducts impact assessments on several levels. The environmental impact analysis is covered by the ISO 14001 certified management system, monitored on a monthly basis and reviewed as part of the management review. An annual review is part of the management review, specific aspects are part of feasibility studies.
2.6 Emergency Response Plan	Conformance	IMPOL implemented an emergency response plan with involvement of the community. The effectiveness of the emergency response plan is checked and trained regularly.
2.7 Mergers and Acquisitions	Conformance	IMPOL has a process in place to review environmental, social and governance issues in the due diligence process for mergers and acquisitions.
2.8 Closure, Decommissioning and Divestment	Conformance	For IMPOLs Slovenian site an environmental permit is needed, this permit includes the mandatory procedure for a potential closure of the site.

CRITERION	RATING	COMMENT
3.1 Sustainability Reporting	Conformance	<p>IMPOL publishes its Annual Report (within contains the Sustainability Report) on the website: https://www.impol.com/materials IMPOL reports according to GRI guidelines.</p>
3.2 Non-compliance and liabilities	Conformance	<p>Reference is made in the Annual Report to Global Reporting Initiative (GRI) 307, that there were no non-compliances with the environmental legislation in 2019. Please see Annual Report, page 76 at: https://www.impol.com/app/uploads/2020/05/LP_2019-SKUPINA-IMPOL_an_web.pdf This was confirmed by representatives of the company.</p>
3.3a Payments to governments (legal and contractual)	Conformance	<p>IMPOL is following the Anti-Corruption Policy in its Code of Business Conduct. The financial administration of the Republic of Slovenia is auditing the Entity regularly.</p>
3.3b Payments to governments (disclosure – bauxite mining)	Not Applicable	<p>This Criterion is not applicable to the Entity's Certification Scope.</p>
3.4 Stakeholder complaints, grievances and requests for information	Conformance	<p>IMPOL has an external communication process in place to handle stakeholder grievances and requests for information. It communicates in its Code of Business Conduct, that all unethical behaviour, non-compliance, etc. should be reported directly through the website.</p>
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	<p>Six different Life Cycle Assessments were elaborated by an external institution, covering all types of IMPOL products. These assessments follow the cradle to gate approach.</p>
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	<p>Six different Life Cycle Assessments, based on the cradle to gate approach, were elaborated by an external institution, covering all types of IMPOL products. They are submitted to the clients upon request.</p>
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	<p>Six different Life Cycle Assessments, based on the cradle to gate approach, were elaborated by an external institution, covering all types of IMPOL products. The assessments include the underlying assumption and boundaries and are sent to clients upon request.</p>

CRITERION	RATING	COMMENT
4.2 Product design	Conformance	IMPOL communicates in the Sustainability Report and in the sustainability policy the advantage of Aluminium for sustainable products. For all new projects the impact on the environment is investigated.
4.3a Aluminium Process Scrap (targets)	Conformance	IMPOL has a target to collect 100% of process scrap. It established process scrap as a KPI and monitors the progress monthly.
4.3b Aluminium Process Scrap (alloy separation)	Conformance	The Entity has detailed procedures in place to collect internal and external process scrap by alloys and grades. Whenever possible, internal scrap is reused at the IMPOL plants.
4.4a Collection and recycling of products at end-of-life (strategy)	Conformance	IMPOL aims to continuously increase the amount of recycled material. With its main customers it follows a closed loop strategy where the company tries to recycle more and more process scrap for the production of the same products.
4.4b Collection and recycling of products at end-of-life (engagement)	Conformance	Clear targets for the use of secondary aluminium exist, they are monitored monthly. Contracts for the procurement of secondary aluminium exist with scrap metal collectors.
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		
5.1 Disclosure of GHG emissions and energy use	Conformance	IMPOL publicly discloses its Greenhouse Gas (GHG) emissions in the Annual Report, page 61, for the plants in Slovenia, Serbia and Croatia: https://www.impol-group.de/app/uploads/2020/05/LP_2019-SKUPINA-IMPOL_an_web.pdf The Slovenian plant is committed to trade with CO ₂ emissions.
5.2 GHG emissions reductions	Conformance	IMPOL publishes time-bound GHG emissions reduction targets and implemented a plan to achieve these targets, see the website: https://www.impol.com/sustainability/caring-for-the-environment and the Annual Report, page 61: https://www.impol.com/app/uploads/2020/05/LP_2019-SKUPINA-IMPOL_an_web.pdf
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.

CRITERION	RATING	COMMENT
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	IMPOL has a monitoring plan in place to quantify emissions to air, noise, water and waste. A regular risk evaluation and environmental impact assessment is documented.
6.2 Discharges to Water	Conformance	IMPOL quantifies discharges to water and has to report these annually to governmental authorities. A reduction plan following the procedure on how to evaluate environmental goals and how to investigate and evaluate environmental impacts, is in place.
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	IMPOL identified the risks of spills and implemented an emergency plan based on the identified risks.
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	IMPOL identified risks of spills and implemented an emergency plan based on the identified risks.
6.4a Reporting of Spills (immediate disclosure)	Conformance	IMPOL identified risks of spills and implemented an emergency plan based on the identified risks.
6.4b Reporting of Spills (regular reporting)	Conformance	IMPOL identified risks of spills and implemented an emergency plan based on the identified risks. No spills occurred in the last years.
6.5a Waste management and reporting (strategy)	Conformance	IMPOL has implemented a waste management strategy to reduce waste in accordance with the waste mitigation hierarchy.
6.5b Waste management and reporting (disclosure)	Conformance	IMPOL reports the annual amount and type of waste to the government and publishes it in the Annual Report (within contains the Sustainability Report), pages 62 and 63: https://www.impol.com/app/uploads/2020/05/LP_2019-SKUPINA-IMPOL_an_web.pdf
6.6a Bauxite Residue (storage construction)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6b Bauxite Residue (integrity checks and controls)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6c Bauxite Residue (water discharge)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
6.6d Bauxite Residue (marine and aquatic environments)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6e Bauxite Residue (start of the art technologies)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6f Bauxite Residue (remediation)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7a Spent Pot Lining (SPL) (storage and management)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7b Spent Pot Lining (SPL) (recovery and recycling)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7c Spent Pot Lining (SPL) (Untreated SPL)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7d Spent Pot Lining (SPL) (review of alternatives)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7e Spent Pot Lining (SPL) (marine and aquatic environments)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8a Dross (recovery)	Conformance	IMPOL is collecting all created dross for further external recovery.
6.8b Dross (recycling)	Conformance	The Entity maximizes the recovery of treated dross residues. All skimming/dross are weighed and sold to the processor for recovery.
6.8c Dross (review of alternatives)	Conformance	Dross is collected and sold for recovery by external processor. Dross is not used for landfill.
PRINCIPLE 7 WATER STEWARDSHIP		
7.1a Water assessment (mapping)	Conformance	IMPOL documents its water balance showing water inputs and output flows, sources and destinations in the annual report on water pollution. Industrial water and potable water are communicated in the Annual Report as KPIs, pages 62 and 63: https://www.impol.com/app/uploads/2020/05/LP_2019-SKUPINA-IMPOL_an_web.pdf
7.1b Water assessment (risk assessment)	Conformance	IMPOL includes water in the environmental management system and covers water related risks as part of the environmental risk analysis. Water consumption is a KPI, IMPOL realized great reductions in the water consumption in the last years through closed water cycles.

CRITERION	RATING	COMMENT
7.2a Water management (management plans)	Conformance	<p>IMPOL includes water in the environmental management system. Water consumption is reported as a KPI in the Annual Report, pages 62 and 63: https://www.impol.com/app/uploads/2020/05/LP_2019-SKUPINA-IMPOL_an_web.pdf</p> <p>Great reductions in water consumption could be gained in the last years through monitoring, closed water cycles, change of pipes.</p>
7.2b Water management (monitoring)	Conformance	<p>Water consumption is a KPI that is monitored on plant and process level. The consumption is reported in the Annual Report, pages 62 and 63: https://www.impol.com/app/uploads/2020/05/LP_2019-SKUPINA-IMPOL_an_web.pdf</p> <p>Great reductions in water consumption could be gained in the last years through effective monitoring, closed water cycles, change of pipes etc.</p>
7.3 Disclosure of water usage and risks	Conformance	<p>IMPOL publishes the annual consumption of industry water and potable water together with the plan in the Annual Report as KPIs, pages 62 and 63: https://www.impol.com/app/uploads/2020/05/LP_2019-SKUPINA-IMPOL_an_web.pdf</p>
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	<p>Responsibility towards nature is one of seven sustainable pillars of IMPOL's sustainability strategy. The site is located in an industrial area, but close to a region of high conservation value ("Natura 2000"). IMPOL supports local activities for the protection of the environment. An external institute conducted an assessment of the biodiversity and the influence of the site on the biodiversity.</p> <p>There are several meadows where the grass is no longer cut as frequently as the flowers in the meadows are important for bees. Information signs have been installed.</p>
8.2a Biodiversity management (biodiversity action plans)	Conformance	<p>The biodiversity assessment of IMPOL did not show any areas of material risk that require biodiversity actions. Nevertheless, IMPOL undertakes activities like planting trees and provides support for a beekeeper and a local NGO. Several activities have been implemented since the previous certification audit (e.g. flower meadows).</p>

CRITERION	RATING	COMMENT
8.2b Biodiversity management (consultation and mitigation hierarchy)	Conformance	The biodiversity assessment of IMPOL did not show areas of material risk that require biodiversity actions. The impact of changes on the biodiversity of projects is explored in the permitting process for each planned change of Entity, both internally (planning) and together with the authorities (permits).
8.2c Biodiversity management (reporting)	Conformance	A biodiversity assessment was conducted prior to the ASI Performance Standard Certification Audit. It did not show any areas of material risk that require biodiversity actions. It is available to the public upon request. IMPOL communicates part of its activities on the website or on a local level. Several activities have been implemented since the previous certification audit (e.g. flower meadows).
8.3 Alien Species	Conformance	A biodiversity assessment was conducted prior to the ASI Performance Standard Certification Audit. Alien species were evaluated using the Global Invasive Species Database. There were no risks found or the risk was rated as very low.
8.4a Commitment to “No Go” in World Heritage properties (exploration and new mines)	Not Applicable	This Criterion is not applicable to the Entity’s Certification Scope.
8.4b Commitment to “No Go” in World Heritage properties (existing operations)	Not Applicable	This Criterion is not applicable to the Entity’s Certification Scope.
8.5a Mine rehabilitation (best available techniques)	Not Applicable	This Criterion is not applicable to the Entity’s Certification Scope.
8.5b Mine rehabilitation (financial provisions)	Not Applicable	This Criterion is not applicable to the Entity’s Certification Scope.
PRINCIPLE 9 HUMAN RIGHTS		
9.1a Human Rights Due Diligence (policy)	Conformance	IMPOL is committed to the requirements of the Universal Declaration of Human Rights and expresses this in pillar 5 of its Sustainable Development Policy and its Sustainability Report (contained within the Annual Report), page 71. Both documents are available on the website: https://www.impol.com/materials It expects the same from its suppliers, who have to sign the Code of Business Conduct for Suppliers.

CRITERION	RATING	COMMENT
9.1b Human Rights Due Diligence (process)	Conformance	<p>IMPOL is committed to the requirements of the Universal Declaration of Human Rights, the ILO core conventions and expresses its commitment in its Sustainable Development Policy and its Sustainability Report (contained within the Annual Report), page 71. Both documents are available on the website: https://www.impol.com/materials</p> <p>It expects the same from its suppliers, who have to provide answers through a sustainability questionnaire and have to sign the IMPOL Group Code of Business Conduct for Suppliers.</p>
9.1c Human Rights Due Diligence (remediation)	Conformance	<p>Within IMPOL Group various means exist to report human rights violation cases like union, workers council, office for mobbing prevention and the representatives for mobbing prevention. In the Code of Business Conduct for Suppliers, IMPOL asks to report any inappropriate practices. This can be reported through the company website.</p>
9.2 Women's Rights	Conformance	<p>IMPOL is committed to fair and equal opportunities and expresses this in the sustainable development policy, in the sustainability report and in the Code of Business Conduct for Suppliers. Key figures are reported in the annual sustainability report. No cases of discrimination were reported for 2019.</p>
9.3 Indigenous Peoples	Not Applicable	<p>Not applicable, as the production sites of IMPOL are not located on or near lands, territories or resources of Indigenous Peoples.</p>
9.4 Free, Prior, and Informed Consent (FPIC)	Not Applicable	<p>Not applicable, as the production sites of IMPOL are not located on or near lands, territories or resources of Indigenous Peoples.</p>
9.5 Cultural and sacred heritage	Not Applicable	<p>Not applicable, as the production sites of IMPOL are not located on or near lands, territories or resources of Indigenous Peoples. There is no cultural and sacred heritage affected by IMPOL.</p>
9.6a Resettlements (avoid or minimise)	Not Applicable	<p>Not applicable, as IMPOL is located in an industrial area and the land for expansion is approved by the local government.</p>
9.6b Resettlements (where unavoidable)	Not Applicable	<p>Not applicable, as IMPOL is located in an industrial area and the land for expansion was approved by the local authorities. No displacement took place.</p>

CRITERION	RATING	COMMENT
9.7a Local Communities (rights and interests)	Conformance	<p>IMPOL is in close relationship with the local community. IMPOL describes its involvement in the local community on its website: https://www.impol.com/sustainability/involvement-in-the-local-environment/</p> <p>It supports local sports activities and is the sponsor of IMPOL Judo Club, which is successful on both national and international level.</p>
9.7b Local Communities (impacts)	Conformance	<p>IMPOL identifies its neighbours as important stakeholders and mapped their interests in the sustainability report. Part of their expectation is the provision of support in the development of the local community and the reduction of disturbing factors for the environment. Please see the Sustainability Report (contained within the Annual Report), page 58: https://www.impol.com/materials</p> <p>IMPOL regularly reduces the negative impacts on the environment and organises open days for the public, to view the premises.</p>
9.7c Local Communities (livelihoods)	Conformance	<p>IMPOL identifies its neighbours as important stakeholders. It is aware of the significant impact on the quality of life of the local community and therefore sponsors associations and local events, see the Sustainability Report (contained within the Annual Report), page 58: https://www.impol.com/materials</p>
9.8 Conflict-Affected and High-Risk Areas	Conformance	<p>IMPOL defined in the Code of Conduct, that it is not sourcing material from conflict-affected and high-risk areas. IMPOL asked suppliers providing tin to fill out the conflict mineral reporting template CMRT. All used tin originates from confirmed manufacturers from Indonesia and Malaysia, see the Sustainability Report (contained within the Annual Report), page 71: https://www.impol.com/materials/</p>
9.9 Security practice	Conformance	<p>Plant security is provided by an external company. A contractual agreement exists, regulating the conditions of the service. The service provider has to act in accordance with the private security act and other applicable regulations.</p>

CRITERION	RATING	COMMENT
10.1a Freedom of Association and Right to Collective Bargaining (freedom of association)	Conformance	IMPOL commits itself to respect the workers' rights and expects the same from its suppliers, who have to sign this commitment in the Code of Business Conduct for Suppliers, see: https://www.impol.com/app/uploads/2020/01/kod_eks_dobaviteljev_2021_en.pdf Worker councils and unions are present at the company.
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Conformance	IMPOL respects the freedom of association and the employees' right to collective bargaining and expects the same from its suppliers. This is communicated in the Sustainable Development Policy and in the Code of Business Conduct for Suppliers, see: https://www.impol.com/app/uploads/2020/01/kod_eks_dobaviteljev_2021_en.pdf
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Not Applicable	Not applicable, as IMPOL does not operate in countries where the freedom of association or the right to collective bargaining are restricted by law.
10.2a Child Labour (minimum age)	Conformance	Child Labour is prohibited in Slovenia. IMPOL does not employ young workers, the youngest workers are at least 18 years old. IMPOL condemns in its sustainable development policy the use of Child Labour and expects its suppliers to protect human rights and not to employ children under the legal age limit for employment, see the Code of Business Conduct for Suppliers, page 3: https://www.impol.com/app/uploads/2020/01/kod_eks_dobaviteljev_2021_en.pdf
10.2b Child Labour (hazardous)	Conformance	Child Labour is prohibited in Slovenia. IMPOL does not employ young workers, the youngest workers are at least 18 years old. IMPOL condemns in its sustainable development policy the use of Child Labour and expects its suppliers to protect human rights and not to employ children under the legal age limit for employment, see the Code of Business Conduct for Suppliers, page 3: https://www.impol.com/app/uploads/2020/01/kod_eks_dobaviteljev_2021_en.pdf
10.2c Child Labour (worst forms)	Conformance	Child Labour is prohibited in Slovenia. IMPOL does not employ young workers, the youngest workers are at least 18 years old. IMPOL condemns in its sustainable development policy

CRITERION	RATING	COMMENT
		<p>the use of Child Labour and expects its suppliers to protect human rights and not to employ children under the legal age limit for employment. see the Code of Business Conduct for Suppliers, page 3: https://www.impol.com/app/uploads/2020/01/kod_eks_dobaviteljev_2021_en.pdf</p>
10.3a Forced Labour (human trafficking)	Conformance	<p>IMPOL commits itself to respect human rights and labour rights - and expects its suppliers - to do the same, see the Code of Business Conduct for Suppliers, page 3: https://www.impol.com/app/uploads/2020/01/kod_eks_dobaviteljev_2021_en.pdf IMPOL employs workers directly at the company and not through agencies.</p>
10.3b Forced Labour (deposits, fees, advances)	Conformance	<p>IMPOL commits itself to respect human rights and labour rights - and expects its suppliers - to do the same and not to require any deposits, fees or payments from its employees, see the Code of Business Conduct for Suppliers, page 3: https://www.impol.com/app/uploads/2020/01/kod_eks_dobaviteljev_2021_en.pdf IMPOL employs workers directly at the company and not through agencies.</p>
10.3c Forced Labour (migrant workers)	Conformance	<p>Forced Labour is prohibited in Slovenia. IMPOL employs its workers directly and not through agencies, it does not require to lodge any deposits and expects from its suppliers to implement the same standards, see the Code of Business Conduct for Suppliers, page 3: https://www.impol.com/app/uploads/2020/01/kod_eks_dobaviteljev_2021_en.pdf</p>
10.3d Forced Labour (debt bondage)	Conformance	<p>Forced Labour and bonded labour are prohibited in Slovenia. IMPOL does not provide any loans to its employees.</p>
10.3e Forced Labour (freedom of movement)	Conformance	<p>IMPOL is not involved in Forced Labour. Besides limitations regarding the access to the site and for security reasons, there are no restrictions in the freedom of movement at the site and to leave the site.</p>
10.3f Forced Labour (retention of identity papers, permits, certificates)	Conformance	<p>IMPOL is not involved in Forced Labour. The HR department does not hold original documents, but only copies of ID's, passports etc. in the workers' files.</p>

CRITERION	RATING	COMMENT
10.3g Forced Labour (freedom to terminate employment)	Conformance	IMPOL is not involved in Forced Labour. It defined a policy that allows workers to terminate their employment at any time without penalty, given notice of reasonable length.
10.4 Non-Discrimination	Conformance	IMPOL is committed to non-discrimination at the workplace and communicates this requirement also in the Code of Business Conduct for Suppliers, page 4: https://www.impol.com/app/uploads/2020/01/kod_eks_dobaviteljev_2021_en.pdf
10.5 Communication and engagement	Conformance	Direct and frequent communication with workers, worker representatives and unions is established (e.g. development discussions, focus groups, suggestion box etc.). IMPOL has a Representative Body of Employees of the IMPOL Group (PTDSI), that is composed of members elected by the employees who also elect a worker-director.
10.6 Disciplinary practices	Conformance	IMPOL highlights in its sustainability policy the respect for human rights and its workers. Disciplinary practice is based on Slovenian law and requires under certain circumstances the involvement of the worker representatives or lawyers of the union.
10.7a Remuneration (living wage)	Conformance	Wages are regulated through the collective bargaining agreement. IMPOL provides to its employees additional financial and non-financial benefits (average salaries are higher than average national salaries, profit participation, and employee rewards).
10.7b Remuneration (method of payment)	Conformance	All payments are documented and made on time. They are submitted in two parts to the employees' bank accounts. The first part is paid on the 1st of the following month, the second part (including bonus and other payments) on the 18th of the following month.
10.8 Working Time	Conformance	Working hours are recorded electronically and paid with the relevant bonus payments. Working hours are controlled and are according to Slovenian worktime law with 40 hours per week.
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	IMPOL is certified against ISO 45001 and published its policy on quality, environment and

CRITERION	RATING	COMMENT
		<p>energy, health and safety and the protection of information on its website: https://www.impol.com/quality/impol-group-policies All staff are trained on the policies on a regular basis.</p>
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	All employees are trained about the workplace related risks. Visitors are informed about policies, procedures and safety rules before entering the production areas and have to approve their understanding of the policies with their signature.
11.1c Occupational Health and Safety (OH&S) Policy (Applicable Law and standards)	Conformance	<p>The IMPOL Group policy includes a commitment to comply with applicable law and to create an organisational culture in which health and safety of the employees is a priority: https://www.impol.com/quality/impol-group-policies</p>
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	<p>IMPOL commits itself to create an organisational culture where health and safety are a priority: https://www.impol.com/quality/impol-group-policies/ It implemented a procedure that entitled employees to refuse or stop unsafe work. Those who work for, or on behalf of the organisation are aware of these policies and procedures.</p>
11.2 OH&S Management System	Conformance	<p>IMPOL is certified against ISO 45001 and has a documented occupational health and safety management system in place. Since December 2020, IMPOL is certified against ISO 45001 (before against OHSAS 18001). Please see certificate at: https://www.impol.com/quality/certificates</p>
11.3 Employee engagement on health and safety	Conformance	Safety committees are implemented at each site. The members of the committees are workers, managers and workers' representatives. Meetings are held at least every year. Suggestions can be made via mailboxes or computer based.
11.4 OH&S performance	Conformance	IMPOL evaluates its occupational health and safety performance on a regular basis. Monthly reports are shared via email and big screens at the site. Accidents and incidents are reported in the published Annual Report, page 69:

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		https://www.impol.com/app/uploads/2020/01/kod_eks_dobaviteljev_2021_en.pdf

Document Control and Version History

Revision	Date	Notes
0	20 August 2020	Issued (Initial certification audit)
1	15 September 2021	Surveillance Audit; update to combine audit dates recorded separately for the desktop and on-site components for the Initial Certification Audit.