



Sustainability Report 2019

About this Report

This report has been prepared in accordance with the GRI Standards (Core) for the reporting year 2019. All material topics, as determined by a materiality assessment, have been reported on. Furthermore, all requirements of the Aluminium Stewardship Initiative have also been reported to (see [Business Management Systems](#) for more information).

All data presented in this report was compiled and reviewed internally; no data has been predicated, estimated or assumed, unless otherwise stated. The report is approved by Bridgnorth Aluminium Limited's Board of Directors, and there are no restatements from the 2018 report. It is not externally assured.

This is Bridgnorth Aluminium Limited's second published Sustainability Report; our first report was published in November 2019 (for the previous year). We report yearly.

Previous years' reports can be found on [our website](#).



Introduction



About our Business

Bridgnorth Aluminium Limited is a trusted world-wide supplier of aluminium flat rolled products. Operating from our 27-hectare site in Bridgnorth, Shropshire, UK, we run an integrated aluminium rolling mill and in-house Research & Development Centre. We currently employ over 400 people, and have manufactured at our Bridgnorth site since 1957.

Our products are raw materials for customers in the printing, packaging, automotive and electrical sectors, and our processes span the initial melting of scrap and primary aluminium, casting slab, hot and cold rolling, and final finishing to customer specification.

The map below shows the countries that we sell to (highlighted in blue).



Our Values

Integrity

Trust and respect are at the heart of our business approach and our relationships with our stakeholders

Excellence

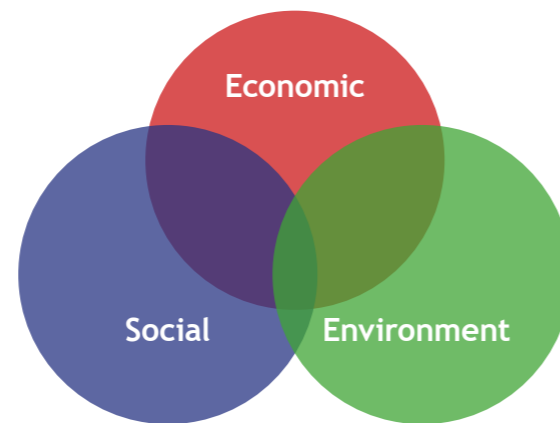
We strive for excellence in all areas of our business

People

We believe that effective teamwork and treating others with respect and dignity is required for a sustainable business

Sustainability Principles

In recognition of our ongoing commitment to sustainability, Bridgnorth Aluminium Limited is certified against the Aluminium Stewardship Initiative's Performance Standard. Our holistic approach to sustainability is based on the three pillar concept (i.e., sustainability consists of economic, environmental and social elements).



Message from our MD

I am pleased to present our second sustainability report, and the first under accreditation of the Aluminium Stewardship Initiative Performance Standard which we were proud to achieve at the end of 2018.

In 2019 we continued to pursue our ambition of operating the company more sustainably and developed our monitoring techniques and practices through the period. In this second edition we report on more areas of our performance, and you will be able to see our progress in more detail. We continue to evolve our techniques and understanding with the objective of improving our performance in all these areas.

Sustainability continues to be extremely important for us and we continue to try to be better.

“Sustainability continues to be extremely important for us and we continue to try to be better.”

Governance

Bridgnorth Aluminium Limited's shareholder structure has remained constant since 2009. We are jointly owned by Viohalco SA (75%) and UACJ Corporation (25%). Viohalco SA is a Belgium-based holding company, with sites across Europe, specialising in the production of aluminium, copper and steel products. It is quoted on the Brussels and Athens stock exchanges. UACJ Corporation is a leading Japanese aluminium manufacturer, quoted on the Tokyo stock exchange.

Bridgnorth Aluminium Limited's strategies and policies are developed, reviewed and agreed by our Board of Directors, which includes representatives from both shareholders. Our executive management team, based in Bridgnorth, implements these strategies and policies.





Materiality Assessment

Introduction

As a business, it is vital that we understand what is important (i.e., material) to our stakeholders. To capture stakeholders' interests, we conducted a materiality assessment. All material issues, as identified via the materiality assessment, are reported on in this report, with the aim of addressing stakeholders' interests.

Method

Sixteen of our senior and/or specialist employees are trained on what materiality means and how it applies to us as a business. This training helps to ensure that our materiality assessment is as accurate as possible, whilst educating our team on how our stakeholders actually or potentially affect/are affected by us.

Stakeholders, defined as individuals or groups whom are, or could be, significantly affected by our business activities and who, in turn, can affect or potentially affect our business, were identified via materiality assessment workshops.

STAKEHOLDER GROUPS	HOW WE COMMUNICATE WITH THEM	HOW THEY CAN COMMUNICATE WITH US
Employees	Internal quarterly newsletter, monthly communication meetings (where our Managing Director presents to employees), Union and/or internal representation	Union and/or internal representation, open-door policy, monthly communication meetings
Customers	Written and/or verbal communication (e.g., emails, calls, meetings)	Via their dedicated contact within our Sales team
Suppliers	Supplier Code of Conduct, written and/or verbal communication (e.g., emails, calls, meetings)	Via their dedicated contact within our Purchasing team
Shareholders	Board meetings, written and/or verbal communication (e.g., emails, calls, meetings)	Board meetings, written and/or verbal communication (e.g., emails, calls, meetings)
Local community	Social media, quarterly newsletter, written and/or verbal communication (e.g., emails, calls, meetings)	Written and/or verbal communication (e.g., emails, calls, meetings)
NGOs	Written and/or verbal communication (e.g., emails, calls, meetings)	Written and/or verbal communication (e.g., emails, calls, meetings)
Public and statutory bodies	Written and/or verbal communication (e.g., emails, calls, meetings)	Permits, site visits, assessment reports, written and/or verbal communication (e.g. emails, calls, meetings)

FIGURE 1: Our stakeholders and channels of communication

Participants

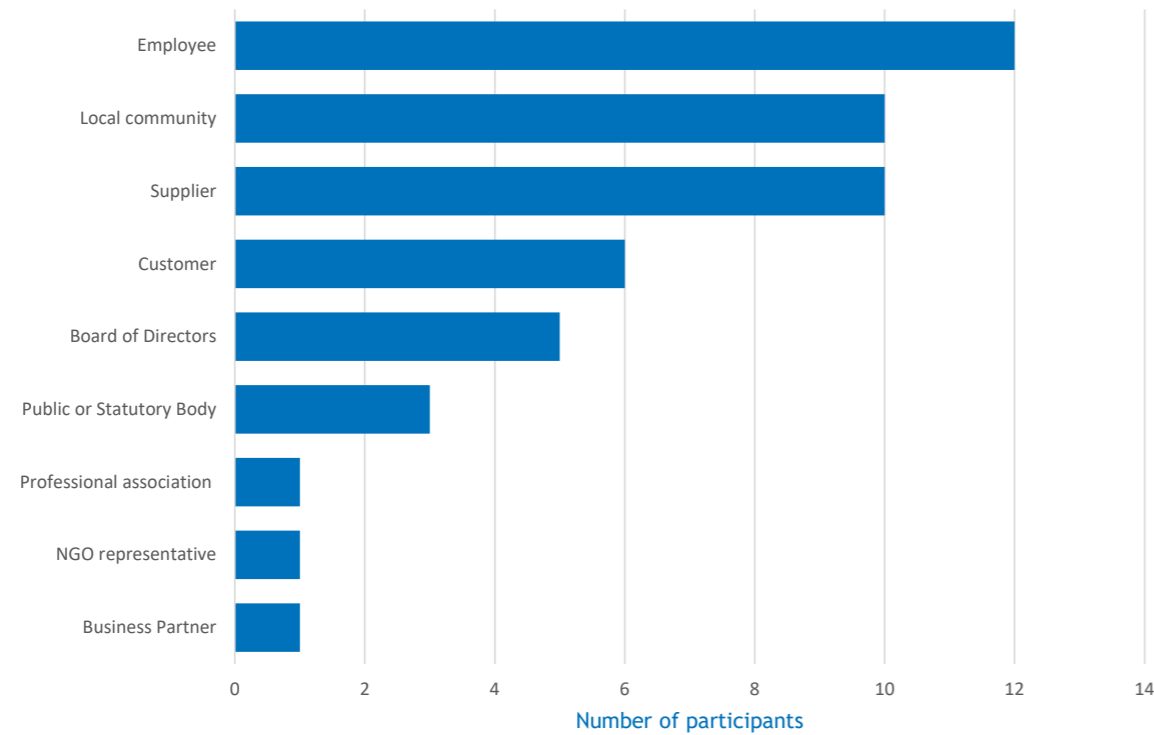


FIGURE 2: Materiality assessment participation by stakeholder group (2019)

Findings

Material issues determine what should be reported on. By identifying stakeholders' interests through a materiality assessment, our reporting was informed. The results of our materiality assessment (see Figure 2) highlight our stakeholders' greatest interests and topics that they perceived to have a significant impact on our business. For example, stakeholders considered the recycled content of our products to be of high interest and an important area for our business.

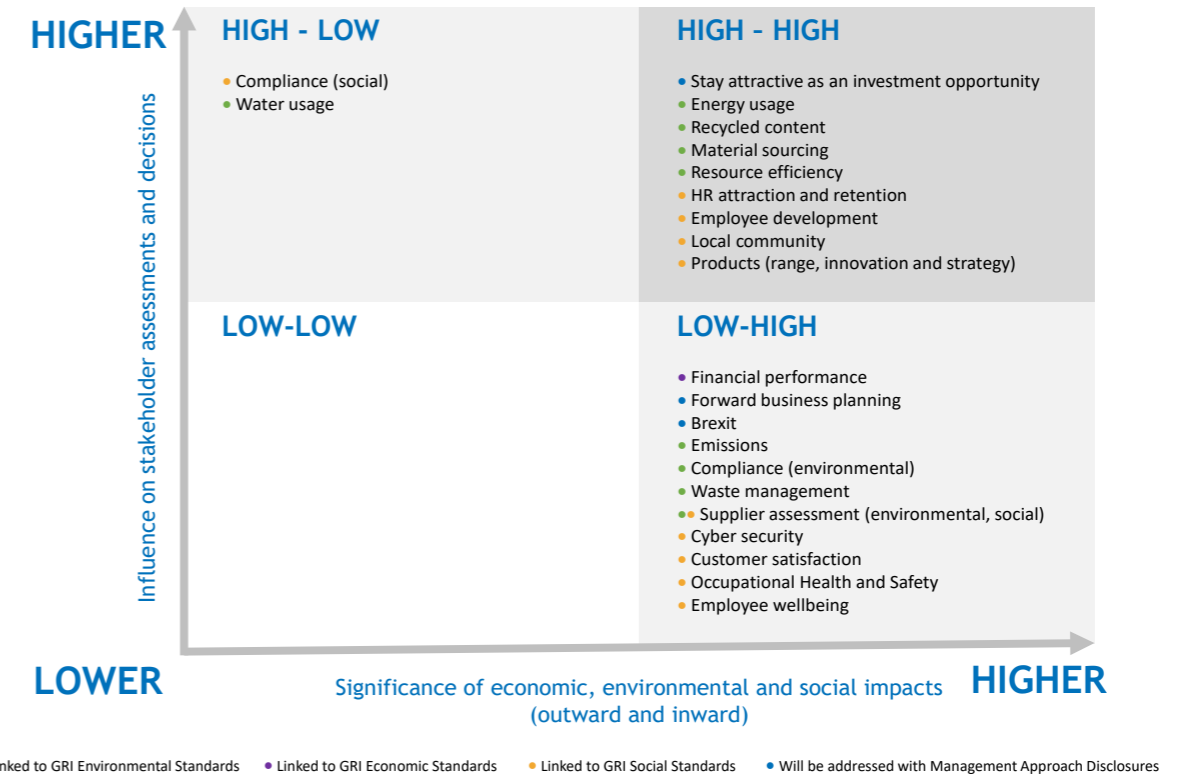


FIGURE 3: Topics by degree of stakeholder interest and perceived impact on our business (2019)*

* These results represent a snapshot in time and are expected to change over time. Figure 4 highlights the differences and overlap between material topics from 2018 to 2019.

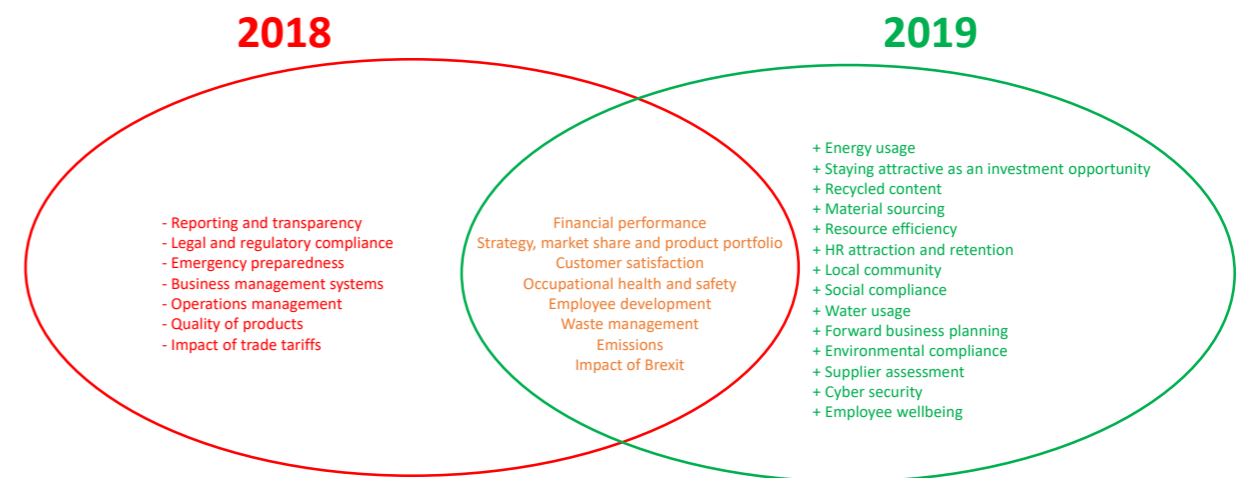


FIGURE 4: Differences and overlap between material topics in 2018 and 2019

	Raw materials	Alloy design	Manufacturing and finishing	Logistics	End of life
Linked to Economic Standards/management approach					
Stay attractive as an investment opportunity	•	•	•	n/a	•
Financial performance	•	•	•	•	n/a
Forward business planning	•	•	•	n/a	•
Brexit	•	n/a	•	•	•
Linked to Environmental Standards					
Emissions	•	•	•	•	n/a
Energy usage	•	•	•	•	n/a
Recycled content	•	•	n/a	n/a	n/a
Material sourcing	•	n/a	n/a	n/a	n/a
Resource efficiency	•	•	•	n/a	n/a
Supplier environmental assessment	•	n/a	n/a	•	n/a
Waste management	•	•	•	n/a	n/a
Water usage	•	•	•	n/a	n/a
Compliance (environmental)	•	n/a	•	•	n/a
Linked to Social Standards					
HR attraction and retention	n/a	•	•	n/a	n/a
Customer satisfaction	•	•	•	•	n/a
Employee development	n/a	•	•	n/a	n/a
Occupational Health and Safety	•	n/a	•	•	n/a
Local community	•	n/a	•	•	n/a
Cyber security	•	•	•	•	n/a
Supplier social assessment	•	•	•	•	n/a
Compliance (social)	•	n/a	•	•	n/a
Products (range, innovation and strategy)	•	•	•	n/a	n/a
Employee wellbeing	•	n/a	•	•	n/a

• = High • = Low n/a = Not applicable

FIGURE 5: Assessment of material topics against each boundary

Boundaries

Boundaries of reporting topics are defined by the Global Reporting Initiative (GRI) as a description of where the impacts occur for a material topic and the organisation’s involvement with those impacts.

Bridgnorth Aluminium Limited understands that its processes are directly responsible for impacts across all boundaries (e.g., bauxite extraction for raw material). Therefore, our boundaries span raw material production through manufacturing to end of life.

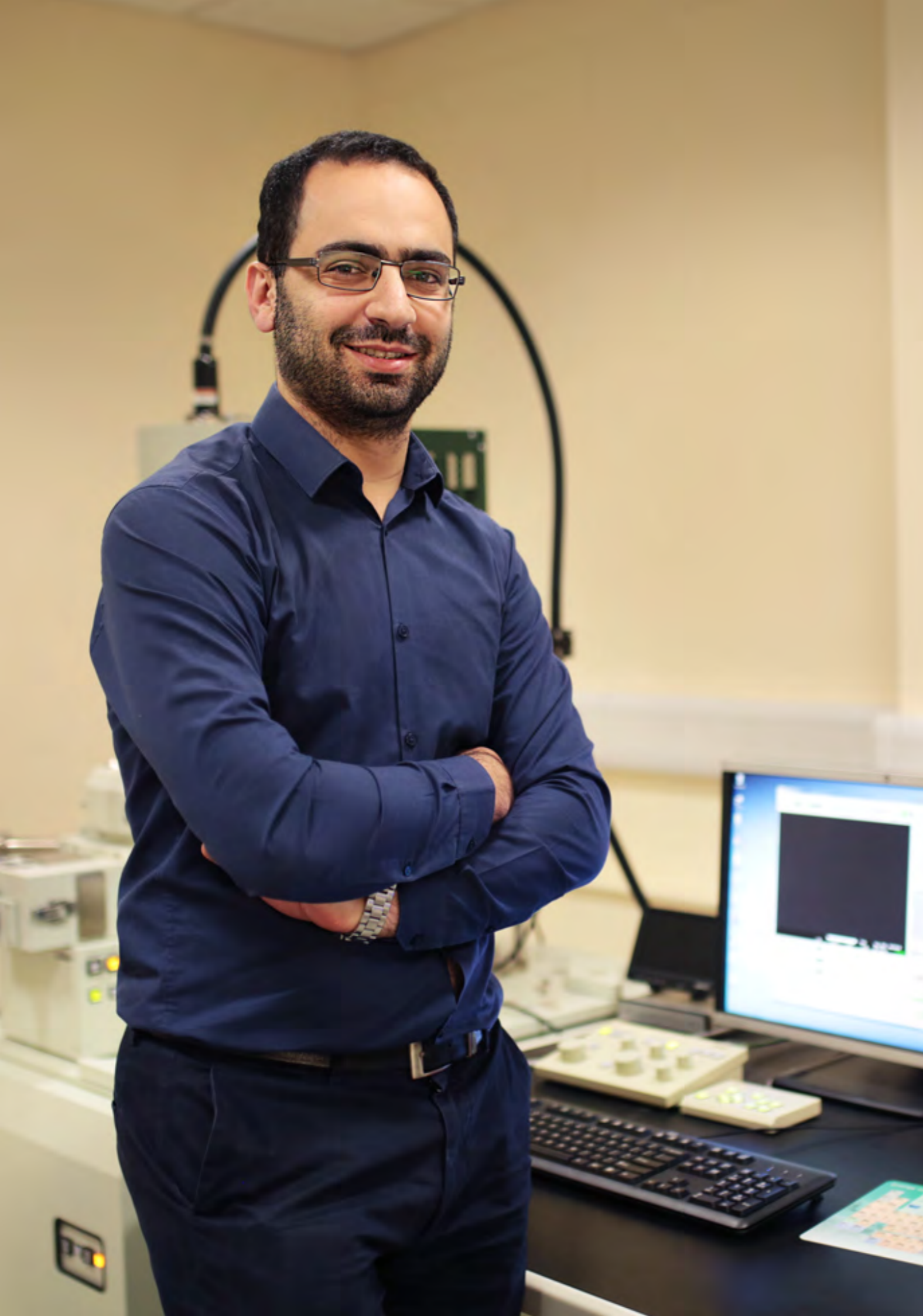
Based on this understanding, each material topic has been assessed on whether it is high, low or not applicable to each boundary. This process enabled us to see where the impacts of each material topic occur.

Sustainable Development Goals

The United Nations Sustainable Development Goals (SDGs) launched in 2015. This year, Bridgnorth Aluminium Limited aligned itself to the goals. Material issues were linked to the respective SDGs (pictured, right).

We regularly report internally on our progress towards meeting the goals, and provide training and resources for employees on the goals and what they mean to our business.





Economic

Financial Performance

Demand conditions in the aluminium flat rolled products industry deteriorated in 2019, compared to 2018; European demand declined, and the US market became overstocked.

In lithography, the addressable market declined, as some key customers closed capacity in Europe and USA, in favour of production in China. Brexit uncertainty also affected our business. Despite this, we were able to sell to new customers and maintain strong relationships with current customers, resulting in increased contracted volumes for 2020.

For more information, our financial reports can be found on [our website](#).

Payments to Governments

Bridgnorth Aluminium Limited only makes payments to governments (or payments on its behalf) that are required on a legal basis - e.g., environmental compliance schemes. In 2019, our payments to governments were limited to various taxes relating to our normal business activities.

	2017	2018	2019	% from 2018 to 2019
	£000	£000	£000	Change
Turnover	196,244	254,651	214,134	-16%
Gross profit	10,088	17,785	13,532	-24%
Operating profit	2,075	8,507	5,242	-38%
Profit after tax	629	7,477	5,106	-32%
EBITDA	9,520	15,853	12,517	-21%
Shareholders' funds	86,679	92,587	97,693	6%
Net debt/EBITDA	3.0	1.8	1.1	-38%

FIGURE 6: Summary of financial performance (2019)

Legal Compliance and Business Management Systems

Bridgnorth Aluminium Limited operates to ISO 14001:2015, ISO 9001:2015 and OHSAS 18001:2008. Our management system scope covers all employees and activities within our operations, including contractor and supplier control. Compliance with these business systems standards requires external auditing. In addition to external audits, we conduct regular internal audits across our business activities.

In 2019, we trained 16 employees to conduct internal audits to all three standards, plus ISO 50001:2018. Ten internal audits were conducted in 2019, a decrease of six from 2018.

Since December 2017, Bridgnorth Aluminium Limited has been a member of the Aluminium Stewardship Initiative (ASI). We successfully certified against ASI's Performance Standard in 2019, and are currently working towards certification against the Chain of Custody Standard.

The aims of ASI include demonstrating responsibility and promoting consumer and stakeholder confidence in aluminium throughout all areas of sustainability - these are principles that Bridgnorth Aluminium Limited supports and uphold.

In 2019, Bridgnorth Aluminium Limited did not receive any significant fines, judgements, penalties or non-monetary sanctions for failure to comply with applicable laws, including social or environmental compliance. Furthermore, we did not receive any complaints in regards to breaches of customer privacy, including leaks, theft, or loss of customer data.

Emergency Preparedness

Our on-site emergency response team are trained and equipped to deal with fires, rescues, and spill incidents. The team works closely with Shropshire Fire & Rescue Service to understand the specific hazards and details of the site, share best practice, and provide exposure to an industrial environment for the service's training needs.

In addition to our emergency response team, we also have first aid coverage across site, and conduct regular disaster recovery studies and exercises to ensure business continuity.

Our Role, Markets and Supply Chain

Bridgnorth Aluminium Limited's role is to transform commodity aluminium and scrap into high quality aluminium flat rolled products that provide solutions for society. Our products are strategic raw materials for customers in the following industries:

Graphic Arts



Our fully recyclable lithographic material is the main raw material for offset printing plates, enabling the image to be transferred onto paper in offset printing presses.

Electrical Applications



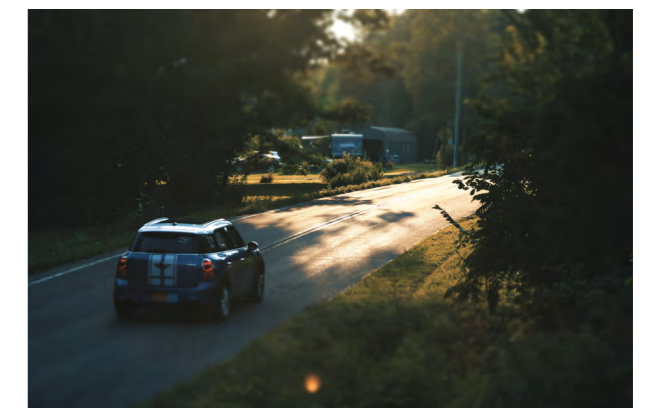
Our high purity alloy range lends itself to the production of highly conductive aluminium products, such as transformer windings in electrical applications.

Food, Beverage and Pharmaceutical Packaging



Our fully recyclable materials for the aluminium packaging industry allow food, beverages and pharmaceutical products to be packaged and distributed with excellent barrier resistance and tamper evidence.

Heat and Sound Deadening Applications in Transport



Our fully recyclable, highly formable materials for the automotive industry are pressed into heat and sound absorbing components for vehicles.

Our Supply Chain

With the aim of maximising resource efficiency and sustainability, Bridgnorth Aluminium Limited sources its main raw materials responsibly.

Our main raw material is primary and scrap aluminium. As primary aluminium is electro-intensive, we work with suppliers who demonstrate strong commitment to sustainability. In 2019, 82% of our primary aluminium purchases were sourced from aluminium smelters that meet ASI's Performance Standard and/or have renewable electricity supply. Furthermore, all of our scrap generation on site is recycled back into high quality products for our customers.

Regarding our non-metal suppliers, we have long-term collaborative partnerships with our key suppliers. Suppliers are classified by category (dependent on importance of product/service); we have 50 suppliers that are rated as critical, including businesses that are manufacturers and distributors, equating to 24% of non-metal purchases.

We assess all new suppliers against our social and environmental criteria before conducting business with them, regardless of the service they provide, and review the scorecards of Category A suppliers (most critical) regularly. Furthermore, we utilise an online platform to check suppliers social commitments and legal compliance.

In 2019, we assessed 1028 of our suppliers' social and environmental impacts; 52 suppliers were rated as having/having potential negative social and/or environmental impacts. Despite this rating, we consider these suppliers as suitable for use, so no supplier relationships have been terminated on the grounds of their social/environmental impacts.

Our non-metal suppliers are based in the UK, Europe and North America. Where appropriate, we use local suppliers. In 2019, 66% of non-metal purchases were made from local suppliers.

Bridgnorth Aluminium Limited's critical products include metal, oils and packaging. Our processes require use of a significant amount of non-renewable materials (e.g. alloys); through our Environmental Aspects and Impacts register, we have highlighted this use as a significant aspect. Whilst we are working to reduce our reliance on non-renewable resources, this is not practical or possible across all of our operations. However, we ask all our strategic suppliers to abide by our Supplier Code of Conduct.

FIGURE 7: Percentage of suppliers by social and environmental impact (2019)

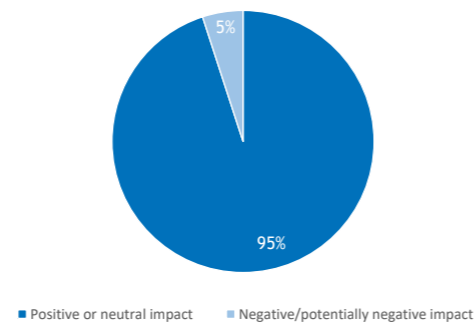
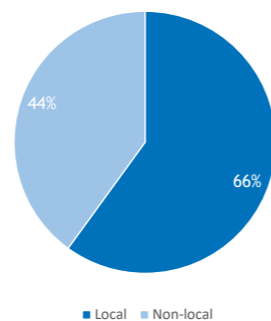


FIGURE 8: Percentage of non-metal purchases by locality (2019)



Keeping Customers Happy

To target new market sectors, we began several product developments in 2019, including the introduction of an aluminium sheet material, used after coating in advertising and specialised architectural applications. This product demands the highest surface quality, combined with consistency of bulk properties, both areas in which we have expertise in delivering to other market segments. We also developed the supply of an aluminium manganese alloy, suitable for use in various forming applications for the USA market.

In our better-developed markets, we increased the sales of our new litho alloy by 8%. This is used as the substrate for some of the latest and most demanding "processless" plate products. These types of printing plate technologies have been developed to have the lowest environmental impact through elimination of the main chemical developing step. This allows the plate to be taken directly to the printing press immediately after imaging and, in doing so, reducing waste and energy. Our product ensures that the print quality from these latest coating types has the highest performance in image reproduction and resolution.

We continue to work closely with all of our customers in finding new opportunities to deliver products, which are used in the most demanding applications whilst minimising their impact on the environment.

Research & Development

In 2019, we invested significantly in our Research and Development Centre, and developed a bespoke analytical technique, used to measure Al-carbide inclusion concentration in our final sheet product for the lithographic printing market. This development required the installation and development of a reaction vessel and long-path gas cell to measure gaseous products using the laboratory Mid-Infra-Red Spectrometer.

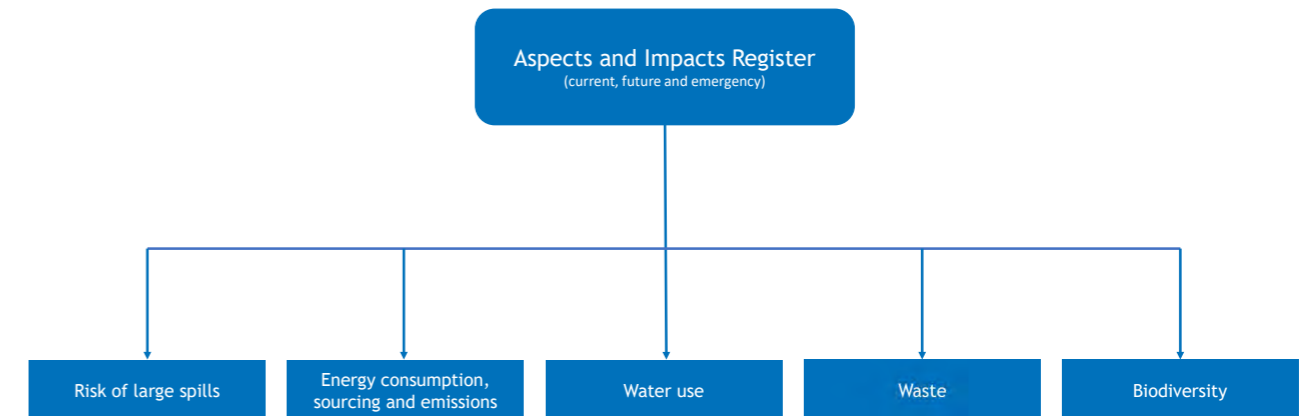
This included the purchase and commissioning of a Spectrophotometer to enable precise measurement of contamination in water waste streams to ensure optimum control of our on-site wastewater treatment plant.

Measurement systems have also been explored in the Research and Development Centre to support the development of our Airpure oil recovery system. The system captures oil from exhaust vapours from our rolling mills which can then be purified and re-used, reducing the amount of oily waste we produce. Methods to check the quality and properties of the recovered rolling oil are a vital aspect of this endeavour.

We have a number of active projects focussed on the development of new products, which are aimed at allowing us to enter the most demanding new and existing market sectors.



Environmental



Aspects and Impacts Register

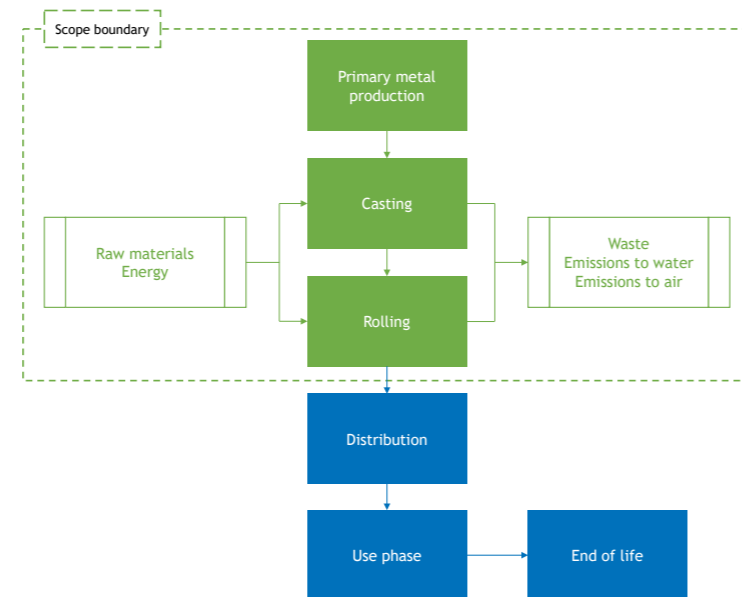
Bridgnorth Aluminium Limited evaluates all of its environmental risks via an Aspects and Impacts register. Through adopting the precautionary principle approach, we mitigate against potentially significant impacts (where the impact is not known with full scientific certainty).

Material Usage

With the exception of the aluminium scrap which arises on site and is recycled, we source all of our raw materials from external suppliers.

Lifecycle Assessment

We have undertaken life cycle assessments for our two major product lines, lithographic and foil stock material. For both assessments, a cradle-to-gate approach was taken. Our LCAs are available on request for our customers.



Energy

Bridgnorth Aluminium Limited's processes use large quantities of gas and electricity, particularly our casting and hot rolling activities. In 2019, we developed an in-house energy monitoring system that accurately depicts our energy use down to sub-meters and coil level.

In this report, we have reported on Scope 1 and 2 emissions, but not Scope 3 emissions (i.e. energy consumption outside of the organisation). All activities within the physical site boundary of the site are included in our account of Scope 1 GHG emissions, including those from combustion from owned or controlled furnaces, company owned vehicles.

Scope 2 and 3 emissions are, by definition, outside of the physical site boundary (e.g., emissions from a power plant producing electricity). Our baseline for energy comparisons is 2018, as this is the year we first externally reported on sustainability and produced LCAs for our products. We are aiming to develop our reporting system so that we can report on Scope 3 in 2020.

Both our Scope 1 and 2 yearly averages have decreased since 2018. Scope 1 and 2 emissions includes the following gases: CO₂, CH₄ and N₂O.

We are unable to yet report GHG emission or energy reduction as a direct result of reduction initiatives. From 2020, projects will be assessed on their impacts on energy usage.

We did not sell energy in 2019.

FIGURE 9: Total fuel consumption by source (2017-2019)

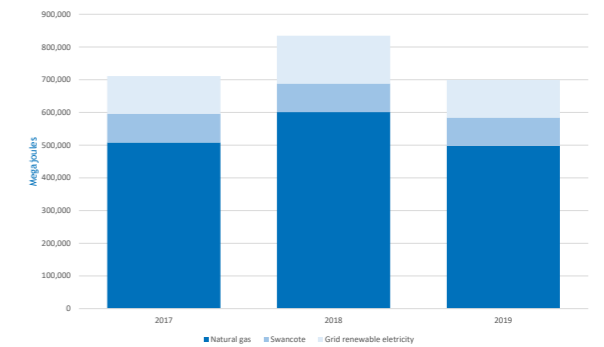


FIGURE 10: Average yearly GHG emission intensity (2017-2019)

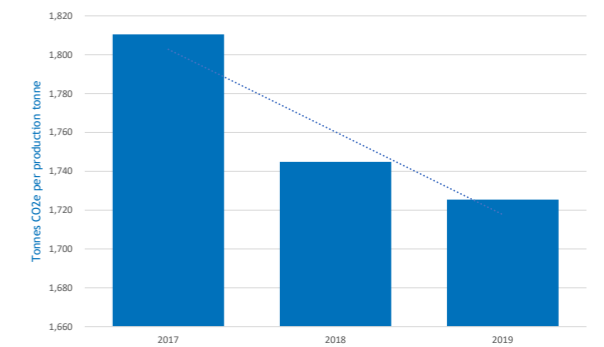
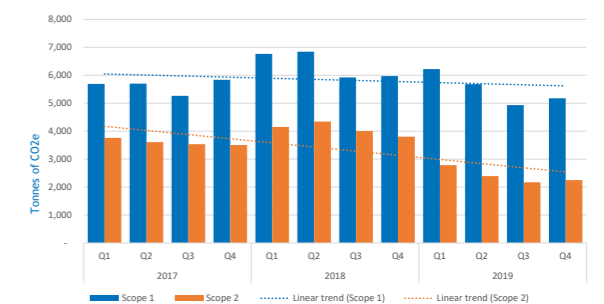


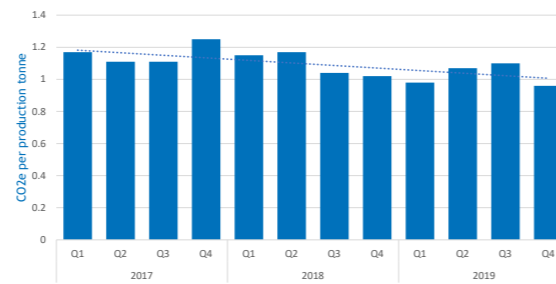
FIGURE 11: Scope 1 and 2 emissions (2017-2019)



Greenhouse Gas Emissions

Using our Aspects and Impacts Register, we have highlighted one significant risk associated with energy consumption, sourcing and emissions. All of our electricity supply is from renewable sources (both biomass and wind), but we remain reliant on using natural gas to operate most of our furnaces. At normal operating levels, we use a large volume of natural gas and this has an adverse impact on the environment, and is thus rated as a significant aspect.

FIGURE 12: CO2e per production tonne (GHG emissions intensity (2017- 2019))



Other Significant Emissions

Under the Environmental Permitting Regulations 2010, we must report publically on mass emissions from our Casthouse operations. Mass emission data is collected twice yearly using an MCERTS and UKAS stack emission testing specialist and reported on bi-basis.

FIGURE 13: Rate of significant air emissions (2017- 2019)

SIGNIFICANT AIR EMISSIONS	EMISSION RATE (KG/YEAR)		
	2017	2018	2019
Total Particulate Matter (PM)	4,998	1,783	1,830
CO2	11,430	16,716	4,743
Oxides of Nitrogen (NOx)	12,095	15,517	17,651
Volatile Organic Compounds (VOCs)	2,303	2,608	3,155
Sulphur dioxide	217	159	780
Hydrogen Chloride	2,614	1,109	9,643
Hydrogen Fluoride	45	68	203

We used ozone-depleting substance in our offices for cooling and in our finishing line for our industrial chillers.

Noise Management

Our operations on site have the potential to cause adverse noise for the local community. We are working hard to reduce the chance of an adverse noise event through the re-surfacing roads and driver training. We are also upgrading our fleet in 2020 with an automatic reporting system for fleet and road surface defects so that they can be fixed more quickly, reducing the possibility of a noise event.

Water Consumption

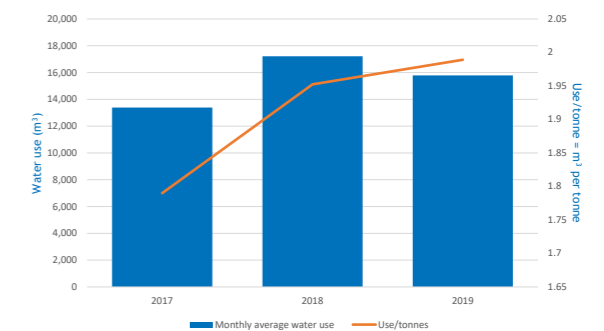
Using our Aspects and Impacts register we have identified three significant aspects related to water use and emissions.

Water is required throughout our process, primarily for cooling. All our water comes from mains supply. We do not collect water through rainwater attenuation or through abstraction on our land.

To be better water stewards we must understand our water use in the context of our catchment area. The Environment Agency rates our Local Water Authority area as a moderate stress classification. We were not given any targets in 2019 by our water supplier to reduce our consumption.

In 2019, we achieved our goal of developing our water monitoring system and began the process of analysing our water use against production to check for inconsistencies. This information can be used as a tool to check for leaks and provide a benchmark to set water usage targets against. In 2019, the monthly average of water used was 15,783m³. Our average water used per tonne of metal was 1.99m³/production tonne. We will continue to monitor water usage in 2020. A years' worth of data is required to benchmark our targets.

FIGURE 14: Water usage (2017- 2019)



Water Discharge

Across our site, we have discharge consents (priority substances of concern) that are issued by our Local Sewerage Undertaker and we operate in accordance with the consents. We had no consent breaches in 2019. We perform in-house testing and monitoring to detect early warning signs of potential limit breaches. In 2019, we began monthly routine sampling of our surface water interceptor to provide a benchmark of water quality and to inform our future water management approach. This data is validated by a third party laboratory.

Our surface water is discharged to the River Severn, which is located 500 meters from our site. We have assessed our water pollution impact to the river as low and have recorded mitigation measures in our Aspects and Impacts register. Please see 'Biodiversity Management' for details about protected species that are found in the river.

Our discharge consents for site measure the following parameters (priority substances of concern):

- » **Chemical Oxygen Demand**
- » **Maximum daily volume**
- » **Temperature**

- » **Detergents (non-ionic and anionic)**
- » **pH**
- » **NVM extract by light petroleum**
- » **Suspended soils**
- » **Sulphates**
- » **Organic content**
- » **Chlorides**

We have a close relationship with our water provider and update them if/when we are expecting a significant change in water discharge.

Reporting of Spills

We annually assess all water risks on site using our Aspects and Impacts register. Risks are categorised as current, future and emergency with regard to time frames. The register highlighted two potential significant risks related to water/spills under emergency operating levels. To mitigate these risks, we provide spill response training for all of our staff.

We class a significant spill as one that has the potential to leave our site by either land or water pathways. In 2019, there were no reportable/significant spills or leaks on site.

Waste

In 2019, we saw an overall decrease in our absolute waste production. This decrease is explained partly by improvements to process efficiencies and a decrease in overall metal production totals on some of our processes. Waste data is collected monthly via invoicing and weighbridge data, this data is analysed to check for inaccuracies and to measure against our benchmarks.

- » How are we reducing the waste we produce?
- » How are we reducing waste in our value chain?

We have worked hard to achieve 85% of our waste being either recycled or recovered (e.g. recovery of oils), and only 2% of waste being sent to landfill. Landfill is only used where there is not an alternative available. We follow the Waste Hierarchy as best available technique, by working with our waste contractors to reduce the amount of waste either being taken to landfill or used for energy recovery.

Using our Aspects and Impacts register we have highlighted one significant aspect related to waste; the potential for hazardous waste to spill in an emergency operating level. To reduce the likelihood of a waste related spill all our employees are required to do Waste Awareness Training to increase their understanding of our waste streams, to learn about waste management best practice and to reduce risks associated with waste. Spillage of hazardous waste could happen on site or via our waste contractors.

Licensed waste carriers dispose of all of our hazardous waste, with bi-annual checks of their Waste Carriers licences. Annual duty of care visits and checks are undertaken on all of our waste contractors. This allows us to check that they are following all legislative requirements.

We do not store or treat any waste on site, with 100% being treated by external companies. Our product does not require the use of exported hazardous waste to be used in the process.

FIGURE 15: Waste by type (2016 - 2019)

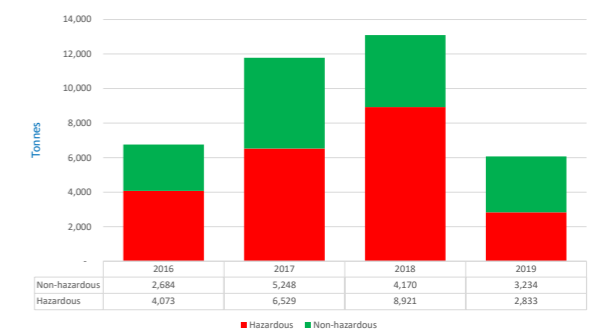


FIGURE 16: Non-hazardous waste disposal by type (2016 - 2019)

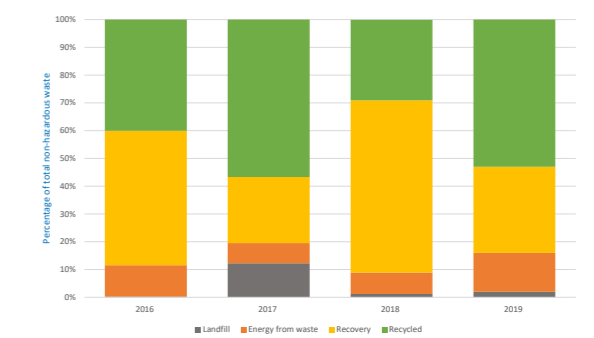


FIGURE 17: Hazardous waste by disposal route (2016 - 2019)

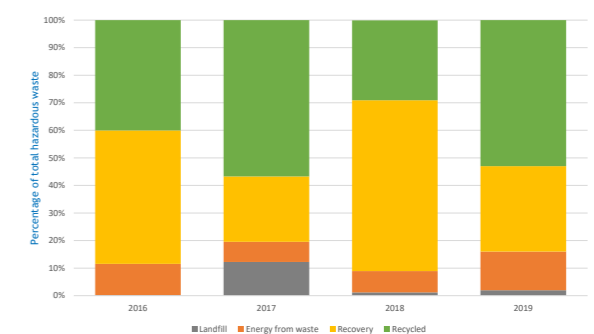
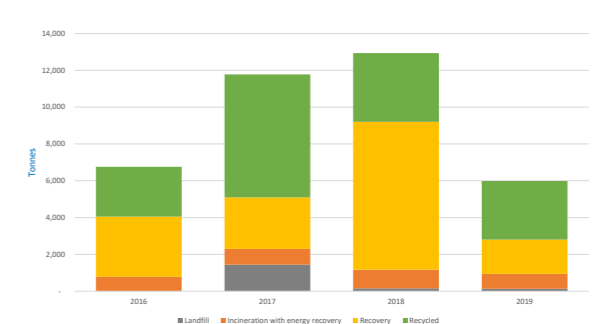


FIGURE 18: Disposal method by weight (2016 - 2019)



Biodiversity

In 2019, we initiated our Corporate Engagement program and developed our Biodiversity Action Plan. Together these include developing several areas on site for biodiversity, where our employees can interact with the environment around them. Within our site boundary, we do not have any areas that are protected or have high biodiversity value.

We have assessed our direct and indirect impacts on biodiversity through our Aspects and Impacts register and our Biodiversity Risk Assessment. We have one significant aspect related to biodiversity: production of raw materials e.g. aluminium and oils. Aluminium production requires mining and electrolysis of alumina, which is energy intensive and can cause changes to local ecological processes and environments. We cannot verify this impact as this is an indirect impact of our process; it is expected and encouraged of our suppliers to work towards mitigating their impact.

Our Biodiversity Action Plan focuses on improving the biodiversity we have on site through employee led initiatives. In April, we completed our first CSR project of the year, learning to weave willow to create a living wall. We collaborated with Shropshire Wildlife Trust who taught a team of staff volunteers how to create a living wall with willow. We are corporate members of Shropshire Wildlife Trust, who use our membership funds to protect and restore habitats across Shropshire. We completed our first litter pick in our local area with the aim of reducing litter and restoring hedges back to their natural state.

We actively prevent the introduction of alien species on site through fumigation of containers, using heat-treated pallets and planting non-invasive species. Our Biodiversity Action Plan promotes the planting of native plants on site.

IUCN Red list species that have the potential to be affected by our operational process (based on our Biodiversity Risk Assessment):

Eurasian otter (near threatened)



White-clawed crayfish (endangered)



Multiple bat species (least concern)





Social

Our Employees

On December 31st 2019, we had 410 employees - up from 398 in 2018. People are generally employed on a permanent basis, although there are some exceptions (e.g. apprentices), and are based at our Bridgnorth site. Part-time employees receive the same benefits as full-time staff, including annual bonuses, and all employees are entitled to parental leave. In 2019, 7 of our male employees took parental leave (all returned to work post-leave).

Code of Conduct

In 2019, we launched our employee Code of Conduct, which applies to all of our employees and anyone working in a similar capacity as an employee. All employees are trained on our Code of Conduct, available on our [website](#) for reference.

Gender Equality

In 2019, 10.17% of our employees were female. Over the past ten years, female representation has increased in both percentage and absolute terms. Two members of our senior team are female (16% of the team).

Our Gender Pay Reports are [available on our website](#).

FIGURE 23: Number of employees by gender (2017- 2019)

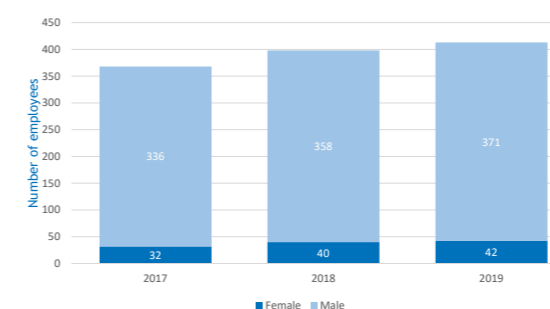


FIGURE 19: Number of new employees (2019)

AGE	MALE	FEMALE
<30	10	1
30-50	11	4
>50	9	0

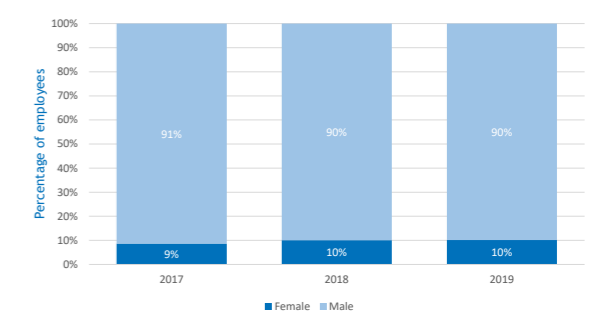
FIGURE 20: Employee turnover (2019)

AGE	MALE	FEMALE
<30	1	1
30-50	2	0
>50	2	0

FIGURE 21: Number of full- and part-time employees

	FULL TIME	PART TIME
MALE	373	2
FEMALE	32	6

FIGURE 22: Percentage of employees by gender (2017- 2019)



Health & Wellbeing Services

Bridgnorth Aluminium Limited goes to great extents to promote the health and wellbeing of our employees. We believe it is vital to provide healthcare services to our employees, to both reduce health risks and improve general health and fitness. Healthcare services are available to all our employees and freely accessible. Some of our initiatives include:

Work-life Balance

- » Flexible working arrangements for office-based staff
- » Family-friendly policies
- » Above statutory holiday entitlements

Healthcare Services

- » Paid leave for medical appointments
- » Annual flu vaccines
- » Cycle to Work Scheme
- » Generous sick pay scheme
- » Access to mental health services
- » Annual prostate checks for male employees over 50
- » Annual health checks
- » Membership of a Health Cash Plan

Human Rights Due Diligence

Bridgnorth Aluminium Limited is committed to preventing slavery and human trafficking from occurring in any of our activities. We seek to ensure that our supply chain is free from such practices - our Anti-Slavery Policy is on our website and shared with our suppliers. Managers and key decision makers undertake Child and Forced Labour, Trafficking and Equal Opportunities awareness training.

Employee Representation

All of our employees have the right to join a union, as per the Trade Union and Labour Relations Act 1992. Bridgnorth Aluminium Limited acknowledges that Trade Union membership and acting as a Union representative will not prejudice an employee's employment or career prospects. We recognise UNITE the Union as the sole negotiating body for our employees, and grant sole collective bargaining rights for the purpose of consultation and negotiation. In 2019, 198 (48%) of our employees were members of the Trade Union.

Information and Consultation

To meet our obligations under the Information and Consultation of Employees Regulations, we have an Information and Consultation Committee (ICC). The ICC meets regularly to ensure that representatives are kept informed of the Company's future developments, financial situation and to discuss health & safety related topics. Every ICC meeting starts with discussing recent adverse events that have occurred on site. The ICC also exchanges views and ideas, and discusses any potential problems.

The Committee consists of Chairperson, Secretary, Management representative (elected), office staff representative (elected), Union representatives. The ICC also includes a subcommittee for pensions to ensure they are covered separately and includes non-union representation.

Information Sharing Meetings

Alongside the ICC meetings, we have a monthly Information Sharing Meeting. The purpose of these meetings is to provide a clear time/opportunity for representatives to meet with senior management, to share information and maintain a dialogue between all at the company. All employees are invited to raise topics for discussion in these meetings, anonymously through their representative. Representatives share the outcomes of the meeting with all employees.

Occupational Health & Safety

At Bridgnorth Aluminium Limited, we aim for zero harm. For us this means that all our employees and our associates on our site will return home safely every single working day. To achieve zero harm, we set ourselves clear and smart targets to reduced recordable incidents and improve Health and Safety across site.

We identify work related hazards by completing risk assessments for each operation, completed by the process owner and reviewed by the Health and Safety team when required. The risk assessments highlight hazards and appropriate controls are put in place to minimize these hazards e.g. noise reduction, PPE. Health screenings of our employees allow us to detect potential risks they may face. Every employee undertakes an occupational health check every 2 years as a minimum, and more frequently for employees with health concerns. We undertake noise, vibration and air surveys in all operational areas to make sure we are under legal limits. If an employee has time off for a health reason, a return to work meeting is held to develop a comprehensive plan for their return to make sure measures are in place to make their return safe and successful.

We use an accident investigation reporting system to report accidents that may occur on site. We also use an online adverse event form that reports near misses and other incidents (including environmental and fire). Both processes require the incident to be assessed and the risk to be mitigated/minimized. All employees have access to the online forms. Both online reporting systems use a hierarchy of control (root cause analysis) to mitigate reoccurrences.

We have processes in place for all staff to whistle-blow if required without risk of reprisal. It is the duty of all employees to report any unsafe acts at the earliest opportunity and have the authority to refuse or stop unsafe work (signed by all Senior Managers and the Managing Director).

At the end of 2019, we held our first Health, Safety and Environment Committee with the aim to consult and engage with appropriate members of staff about health and safety related issues and topics. The committee consist of management and Union representation. The committee also meets to discuss, review and approve new procedures and policies related to health, safety and environment.

Our Goals for 2020

- » Increased employee consultation and communication on health, safety and wellbeing issues
- » Further implementation of Intelix, the Group's online Health and Safety reporting system
- » Implementation of a Management-employee Health and Safety Committee
- » Strengthening of our Health and Safety Committee and its influence on the workplace
- » Implementation of joint Health and Safety inspections with Union representatives
- » Strengthening Senior Management involvement in Health and Safety

	2017		2018		2019	
	Number	Rate	Number	Rate	Number	Rate
Recordable incident frequency	31	44.31	22	29.01	32	41.56
Fatalities as a result of work related injury	0	0	0	0	0	0
High-consequence work related injuries (excluding fatalities)	11	15.7	6	7.9	11	16
Lost time hours	2,072		628		1,456	
Number of hours worked	699,608		758,331		745,878	
Total fatalities as a result of work-related ill health	0		0		0	
Total cases of recordable work-related ill health	0		0		1	

FIGURE 24: Health and safety statistics (2017- 2019)

Every employee has a training matrix for their job role to ensure that they are trained and competent for their role. In 2019, we ran 24 courses associated with Health, Safety and Environment:

- » Asbestos Awareness
- » Asbestos Exam 405
- » Asbestos Management
- » ATEX and DSEAR Awareness
- » CDM Training
- » Chemdoc
- » CO2 Manual Drill
- » Compressed Cylinder Gases Safely
- » Confined Space training
- » COSHH Assessor
- » CPD First Aider session
- » Crane Operator Instructor Course
- » DIPHEX
- » Evac Chair Training
- » Fire Awareness
- » FLT Operator Safety Code
- » Gas Safe
- » IOSH Directing Safely
- » IEMA managing environmental sustainability
- » Key Principle H&S
- » Legionella Responsible Person
- » PPE Policy sign off
- » Spill Response Training
- » Substation Access and Low Voltage Auth

Training & Development

In 2019, Bridgnorth Aluminium Limited expanded its internal Training and Development team, increasing employees' access to training and development opportunities.

The Company has also increased the number of courses provided in 2019, with compliance remaining at excellent levels. Our courses now cover all EHS training topics on site, and personalised content writing and bespoke delivery allows us to tailor the courses to individual needs of the participant and their department. This increases engagement and retention of knowledge by our employees.

During 2019, we saw three new mandatory courses added to each training matrix. These were DSE Assessment and Learning, Code of Conduct and 6S. With additional focus on Anti-bribery and Equality & Diversity, we have been able to ensure that our values within the Code of Conduct are embedded to all areas of the business.

In 2019, employees participated in various external courses. External training helps us to ensure that our employees are trained to a high level and facilitate continued employability. Our employees participated in the following courses in 2019:

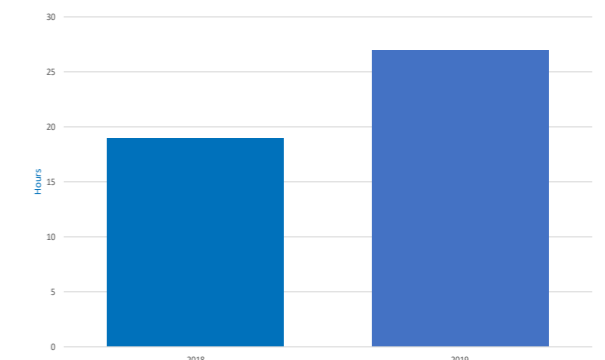
- » PhD in Aluminium Metallurgy and Material Sciences
- » MSc Manufacturing Systems Engineering Management
- » NEBOSH Diploma
- » CIPD Leading, Managing and Developing People
- » CIMA Management Level
- » BEng(Hons) Fire Engineering
- » MSc Psychology with a specialisation in Business
- » EngTech Level 3
- » Advanced Electrical Engineering
- » Business Admin Level 3
- » Business Improvement Level 3
- » Quality Technician Level 3

To ensure that we provide a high standard of training, attendees are asked to evaluate all training courses. Furthermore, meetings are conducted monthly with each departmental manager to ensure that their team's training needs are being met and discuss any new training requirements.

In 2019, the average hours of training per employee was 27 hours, up from 19 hours in 2018. In 2020, we will report on training by gender and employee category - data is not available for 2019. As there was no reporting system in place during 2017, training data for 2017 is unavailable and, therefore, omitted from this report.

Just under 10% of our employees receive regular performance and career development reviews, though we plan to increase this percentage in 2020.

FIGURE 25: Average hours of training per employee (2018- 2019)





Local Community

We support the local community by providing employment for over 400 people, widely sponsoring local not-for-profit organisations, and supporting community projects with local public sector services (e.g. Bridgnorth Town Council, local schools and Shropshire Fire & Rescue Service). In 2019, we donated £17,637 to local causes.

We also engage with the local community through representatives, such as town councilors and key members of local not-for-profits, who we interact closely with through support of their respective organizations (e.g. charitable donations and involvement in community projects). A sample of these representatives also contribute to our materiality assessment, ensuring that their views are accounted for in our reporting.

Local community development programs based on local communities' needs

We develop and implement an annual sponsorship plan that aims to enhance our positive impact on the community by supporting local not-for-profits, schools and public sector organizations. Through contact with representatives of these organizations, we identify opportunities and actions to further benefit the local community.

By the 2020 Sustainability Report, we will have developed and implemented a formal stakeholder engagement plan based on stakeholder mapping.

Broad based local community consultation committees and processes that include vulnerable groups

We do not have a community consultation committee, as we use alternate methods of engagement (outlined in the previous section) to consult the local community.

Stakeholder engagement plans based on stakeholder mapping

We do not currently have formal stakeholder engagement plans based on stakeholder mapping. However, we do engage with the local community via our quarterly external newsletter and social media accounts (Facebook, Twitter and LinkedIn). Our newsletter and social media presence aim to engage local residents by covering any topics that may be of interest to them, including:

- » Details of significant Company developments (e.g. major construction projects)
- » Recruitment information that may be of interest (e.g. current recruitment campaigns)
- » Details of significant environmental projects and results of site assessments
- » An overview of how we are supporting the local community
- » Signposts to more comprehensive information
- » Contact details for direct engagement

We need to do more work to include vulnerable groups in our processes, though we do support vulnerable groups through our Corporate Social Responsibility activities (e.g. sponsoring the junior section of our local cricket club, supporting local schools with educational initiatives, and supporting local not-for-profits with a wide demographic of members). Our external newsletter is available exclusively online at present, limiting access to people who can connect to the Internet and are computer literate. Whilst online is preferable for environmental and data handling reasons, we appreciate the need for greater accessibility and will work to create more accessible versions of these communications by the 2020 Sustainability Report.

We also engage with the local community through

FIGURE 26: Number of employee appraisals by gender (2019)

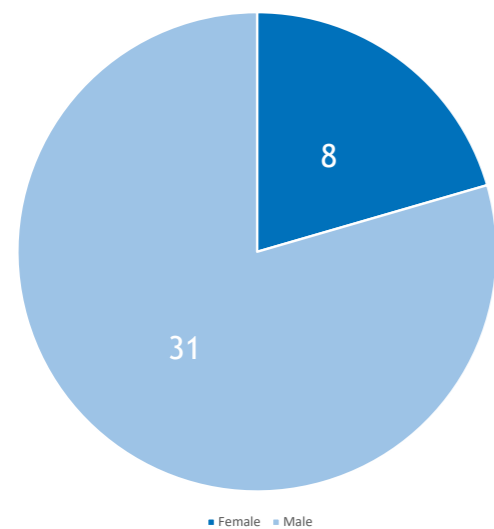


FIGURE 27: Number of employee appraisals by job category (2019)

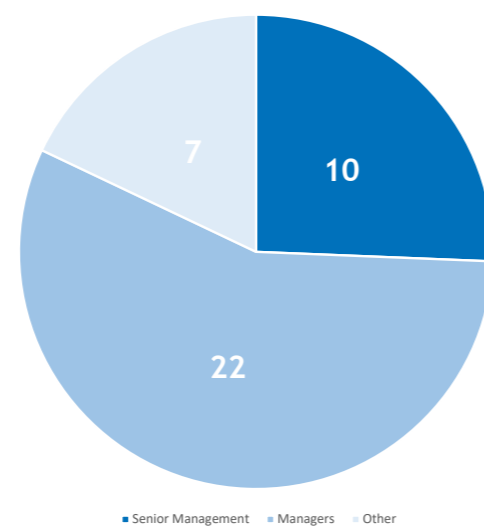




FIGURE 28: A team of employees who organised and participated in a local litter pick

Formal local community grievance processes

Members of the local community are encouraged to contact us via our Communications email address (communications@bridgnorthaluminium.co.uk) or telephone number (01746 788264) should they have a grievance. These contact details are published on our external newsletter, which is circulated via social media (Facebook, Twitter and LinkedIn). Communications through these channels are handled by our Marketing Analyst, who acknowledges receipt of the communication and directs it to the relevant department to look into and respond.

Our Memberships

Bridgnorth Aluminium Limited's commitment to maximising the contribution of aluminium to a sustainable society is highlighted by our membership of the Aluminium Stewardship Initiative, a global, non-profit standards-setting and certification organisation which aims to address sustainability issues in the aluminium value chain.

In addition to our membership of ASI, we are actively involved in the Aluminium Federation, European Aluminium, the Major Energy Users' Council, Make UK and Shropshire Chamber of Commerce and Enterprise.

Contact Us

If you have any questions regarding the contents of this report, or wish to receive a hard copy, please contact us via:

communications@bridgnorthaluminium.co.uk

