

ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

ASSAN ALÜMİNYUM

CERTIFICATE
NUMBER

118

ASI
STANDARD

PERFORMANCE
STANDARD
(V2 2017)

CERTIFICATION
LEVEL

PROVISIONAL
CERTIFICATION

ASI
ACCREDITED
AUDITOR

TÜV
RHEINLAND
CERT GMBH

DATE OF ISSUE

3 MARCH 2021

DATE OF EXPIRY

2 MARCH 2022

CERTIFIED SINCE

3 MARCH 2021

AUTHORISED BY

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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

Tuzla and Dilovasi production facilities located in
Turkey.

SUMMARY AUDIT REPORT

PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME Assan Alüminyum

ENTITY NAME Assan Alüminyum

CERTIFICATION SCOPE Tuzla and Dilovası production facilities located in Turkey.

SUPPLY CHAIN ACTIVITIES

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

ASI STANDARD

- Performance Standard V2

AUDIT TYPE

- Initial Certification Audit

AUDIT FIRM TÜV Rheinland Cert GmbH

AUDIT DATE 14 - 23 December 2020

AUDIT REPORT SUBMISSION 25 January 2021

AUDIT SCOPE The audit scope included the Tuzla and Dilovası production facilities located in Turkey.

The supply chain activities included in the audit scope:

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

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

At the time of the Audit (December 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 ASI Interim Policy regarding Audits, Audit-Related Travel and Coronavirus (v4), and included a remote review of relevant documentation.

AUDIT OUTCOME	Provisional Certification
AUDIT METHODOLOGY DECLARATION	<p>The Auditors confirm that:</p> <ul style="list-style-type: none"><input checked="" type="checkbox"/> The information provided by the Entity is true and accurate to the best knowledge of the Auditor(s) preparing this report.<input checked="" type="checkbox"/> The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous.<input checked="" type="checkbox"/> The Audit Scope and audit methodology are sufficient to establish confidence that the findings are indicative of the performance of the Entity's defined Certification Scope.<input checked="" type="checkbox"/> The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.
CERTIFICATION PERIOD	3 March 2021 - 2 March 2022
NEXT AUDIT TYPE	Surveillance Audit
NEXT AUDIT DUE DATE	2 September 2021
CERTIFICATE NUMBER	118

SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	There are independent legal & compliance functions at Assan Alüminyum. The legal compliance risks identified and checked during internal audit is a risk based approach. The Entity has effective processes to identify, comply and monitor compliance with legal requirements. The internal Document Management System, captures applicable legal compliance requirements with current monitoring status.
1.2 Anti-Corruption	Conformance	The Entity has a Code of Conduct for employees and service providers. There is an oversight function via an Ethical Committee at group level (Kibar Holding). There is a central database to record incidents or notifications made via email, the hotline or in person. There are no complaints related to Corruption or other ethical behaviours.
1.3 Code of Conduct	Conformance	There is a bi-lingual (English and Turkish) Code of Conduct documented: https://www.kibar.com/en/holding/codes-of-conduct The Code of Conduct is applicable to all employees including subcontractors.
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	The Entity has implemented and maintains Policies consistent with the environmental, social and governance practices included in the ASI Performance Standard. The Policies are subject of periodic employee training.
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	In accordance with the ASI Performance Standard and the Entity's Environmental and Health & Safety Management System, adequate resources for effective implementation of environmental, social and governance policies are provided and policies are regularly reviewed. The site holds current ISO 14001:2015 and ISO 45001:2018 certification.
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	Policies are communicated internally and externally as appropriate (company website, intranet). The Supplier Code of Conduct is communicated to Suppliers: https://www.assanaluminyum.com/en/about-us/our-company-policies

CRITERION	RATING	COMMENT
2.2 Leadership	Conformance	There is demonstrable commitment by the General Manager, as the nominated person responsible for both Facilities, to implement ASI Performance Standards.
2.3a Environmental and Social Management Systems (environmental)	Conformance	The Entity has maintained third party certification for its Environmental Management System since 2006 and the current ISO 14001:2015 certification is valid to September 2021.
2.3b Environmental and Social Management Systems (social)	Conformance	The Entity has documented and implemented Social Management System requirements with policies, procedures, implementation records, monitoring records and management review provisions. There are periodic management reviews carried out and any important items are tracked for completion.
2.4 Responsible Sourcing	Conformance	The Entity implements responsible sourcing, having an established Procurement Code of Conduct: https://www.assanaluminyum.com/en/sustainability/responsible-sourcing Commitment on ethical rules and legal obligations, generally in line with ASI requirements, is also declared. The company has conducted risk evaluation of significant parts of its supply chain.
2.5 Impact Assessments	Conformance	The Entity conducts impact assessments arising from investment projects such as capacity expansion and efficiency improvements. Impact assessments cover potential impact on employee health and safety, communities and the environment, considering the economic analysis, SWOT analysis and risk analysis. The Entity demonstrates good practice by developing annual investment plans at both Facilities.
2.6 Emergency Response Plan	Conformance	The Entity has an Emergency Response Plan for both the Tuzla and Dilovasi Facilities. Worker representatives are engaged in the development of site specific Emergency Response Plans.
2.7 Mergers and Acquisitions	Conformance	The Entity did not undergo or plan a merger or acquisition since joining ASI. However, a due diligence process is defined to manage mergers and acquisitions should it become relevant.

CRITERION	RATING	COMMENT
2.8 Closure, Decommissioning and Divestment	Conformance	The Entity did not undergo or plan a closure, decommissioning or divestment since joining ASI. However, a planning process has been defined to manage a closure, decommissioning or divestment should it become relevant.
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	The Entity had developed its first Sustainability Report (draft version) in accordance with GRI (Global Reporting Initiative) Guidelines: https://www.assanaluminyum.com/~media/files/surdurulebilirlik/2020/assan-aluminyum-2019-surdurulebilirlik-raporu.pdf
3.2 Non-compliance and liabilities	Conformance	There have been no significant fines, judgments, penalties or non-monetary sanctions for any violation of Applicable Law. The Entity discloses this information in its Sustainability Report: https://www.assanaluminyum.com/~media/files/surdurulebilirlik/2020/assan-aluminyum-2019-surdurulebilirlik-raporu.pdf
3.3a Payments to governments (legal and contractual)	Conformance	The Entity has developed and implemented policies, systems, procedures and processes that conform to anti-corruption requirements related to payments to governments and facilitation of payments. As witnessed by the Entity's management and confirmed by the report of the financial audit, the Entity did not make government payments other than taxes, fees and social insurance.
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	The Entity has a Complaints Resolution Mechanism in place for handling stakeholder complaints. Stakeholders are able to lodge complaints via the online communication form available on the website: https://www.assanaluminyum.com/en/contact/contact-form
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	The Entity has carried out Life Cycle Assessments of its major product categories like sheet, foil, coated sheet, through external agency in accordance with ISO 14040, 14044 and 14025.

CRITERION	RATING	COMMENT
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	The Entity has undertaken cradle-to-gate Life Cycle Assessment of its major product lines with the expertise of an external agency. The inventory for the LCA was based on production figures from both the Tuzla and Dilovası manufacturing plants.
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	The Entity has made public the 2019 Sustainability Report and commits itself to communicating the results of the Life Cycle Assessment via an EN 15084 consistent Environmental Product Declaration in the future: https://www.assanaluminyum.com/~media/files/surdurulebilirlik/2020/assan-aluminyum-2019-surdurulebilirlik-raporu.pdf
4.2 Product design	Conformance	The design and development process for products include consideration to enhance sustainability, including life cycle impacts of the end product. Product design for continuous casting experimented with magnesium levels with the end product resulting in a reduction of magnesium content.
4.3a Aluminium Process Scrap (targets)	Conformance	The Entity has established KPI's to minimize aluminium process scrap generation through quality improvement and oversight and targets 100% of scrap for collection to be recycled or reused.
4.3b Aluminium Process Scrap (alloy separation)	Conformance	Aluminium process scrap is collected for recycling with a colour coding system used to separate aluminium alloys and grades.
4.4a Collection and recycling of products at end-of-life (strategy)	Conformance	The Entity has developed and implemented a recycling strategy. The input material (internal scrap, external scrap, dross from melting furnace) is processed to rotary furnace. 100 per cent of process scrap is recycled.
4.4b Collection and recycling of products at end-of-life (engagement)	Conformance	The Entity closely co-operates with collection and recycling systems to support accurate measurement and efforts to increase recycling rates for their products.
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		
5.1 Disclosure of GHG emissions and energy use	Conformance	The Entity discloses its Scope 1 and Scope 2 GHG emissions for both the Tuzla and Dilovası Facilities in the Sustainability Report on page 63: https://www.assanaluminyum.com/~media/files/surdurulebilirlik/2020/assan-aluminyum-2019-surdurulebilirlik-raporu.pdf

CRITERION	RATING	COMMENT
5.2 GHG emissions reductions	Conformance	<p>The Entity has developed a GHG emissions reduction plan to target a reduction in energy intensity by 5% (from 2017 – 2019 average) by 2025, disclosed in the Kibar Holdings Sustainability Report on pages 34 – 35:</p> <p>https://www.kibar.com/en/~media/files/pdf/surdurul ebilirlik-raporu/2020/surdurulebilirlik-raporu-2019-en.pdf</p> <p>Projects included in the annual investment plans are linked to energy efficiency, energy use and process modernization and will contribute towards the 2025 reduction target.</p>
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 conducts testing and reports Emissions to Air in accordance with government requirements. Recent on-site monitoring, conducted over a period during September to October 2020, determined emissions were within prescribed legal limits.
6.2 Discharges to Water	Conformance	Water balance diagrams for both plants indicating intake, usages and discharge have been developed. Water discharge is tested by local authorities on a monthly basis.
6.3a Assessment and Management of Spills and Leakage (assessment)	Unable to Rate	The Entity periodically identifies and evaluates major risk areas of operations where spills and leakage may contaminate air, water or soil. A physical assessment of the management of spills and leakages will be undertaken during the onsite component of the audit.
6.3b Assessment and Management of Spills and Leakage (management)	Unable to Rate	As part of its Environmental Management System, the Entity has established management and external communication plans, compliance controls and a monitoring program to prevent and detect spills and leakage. A physical assessment of the management of spills and leakages will be undertaken during the onsite component of the audit.

CRITERION	RATING	COMMENT
6.4a Reporting of Spills (immediate disclosure)	Conformance	The Entity has developed a procedure and a management response plan to deal with significant spillage immediately after its occurrence.
6.4b Reporting of Spills (regular reporting)	Conformance	The Entity reports on spills and leakage to government as required and discloses in its Sustainability Report on page 68: https://www.assanaluminyum.com/~media/files/surdurulebilirlik/2020/assan-aluminyum-2019-surdurulebilirlik-raporu.pdf
6.5a Waste management and reporting (strategy)	Unable to Rate	The Entity has developed a waste management strategy in accordance with the waste mitigation hierarchy at both Facilities.
6.5b Waste management and reporting (disclosure)	Unable to Rate	The Entity discloses the quantity of hazardous and non-hazardous waste generated and its disposal method in the Sustainability Report on page 68: https://www.assanaluminyum.com/~media/files/surdurulebilirlik/2020/assan-aluminyum-2019-surdurulebilirlik-raporu.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.
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.

CRITERION	RATING	COMMENT
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)	Unable to Rate	The Entity maximises the recovery of aluminium by treatment of dross and dross residues. Records were up to date and in conformance with the ASI Standard, however, the physical assessment will be undertaken during the onsite component of the audit.
6.8b Dross (recycling)	Unable to Rate	Records relating to the dross were up to date and in conformance with the ASI Standard, however, the physical assessment will be undertaken during the onsite component of the audit.
6.8c Dross (review of alternatives)	Unable to Rate	Records relating to the dross were up to date and in conformance with the ASI Standard, however, the physical assessment will be undertaken during the onsite component of the audit.

PRINCIPLE 7 WATER STEWARDSHIP

7.1a Water assessment (mapping)	Conformance	The Entity has developed water mapping for both the Tuzla and Dilovasi plants, identifying water withdrawal by source, use and disposal.
7.1b Water assessment (risk assessment)	Conformance	The Entity has assessed water related risks in its area of influence from business, legal and environmental perspectives as part of the Environmental Management System.
7.2a Water management (management plans)	Unable to Rate	The Entity has developed water management plans for the Tuzla and Dilovasi plants. In 2020, water improvement projects implemented have resulted in improved water efficiency. Records relating to water management are up to date and in conformance with the ASI Standard, however, a physical assessment will be undertaken during the onsite component of the audit.
7.2b Water management (monitoring)	Unable to Rate	Records relating to water management are up to date and in conformance with the ASI Standard, however, a physical assessment will be undertaken during the onsite component of the audit.
7.3 Disclosure of water usage and risks	Conformance	The Entity reports on water withdrawal and use in the Sustainability Report on pages 54 and 64: https://www.assanaluminyum.com/~media/files/sur-durulebilirlik/2020/assan-aluminyum-2019-surdurulebilirlik-raporu.pdf

PRINCIPLE 8 BIODIVERSITY

CRITERION	RATING	COMMENT
8.1 Biodiversity assessment	Conformance	The Entity has systematically assessed the risks and materiality of the impacts on biodiversity from the land use and activities in the Entity's area of influence. A documented biodiversity assessment report is available.
8.2a Biodiversity management (biodiversity action plans)	Conformance	Based on the biodiversity assessment, it has been determined that the company does not need to implement a biodiversity action plan. There will be periodical reviews of the assessment.
8.2b Biodiversity management (consultation and mitigation hierarchy)	Conformance	The Entity used external agency expertise to hold a stakeholder consultative process related to the biodiversity assessment.
8.2c Biodiversity management (reporting)	Conformance	The Entity has disclosed its impact and mitigation measures in the Sustainability Report on page 50: https://www.assanaluminyum.com/~media/files/surdurulebilirlik/2020/assan-aluminyum-2019-surdurulebilirlik-raporu.pdf
8.3 Alien Species	Conformance	The Entity has processes in place, such as purchase of heat treated pallets, to prevent the introduction of Alien Species.
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		
9.1a Human Rights Due Diligence (policy)	Conformance	The Entity has established a Human Resources Policy which includes a commitment to respect Human Rights and carry out due diligence: https://www.assanaluminyum.com/en/~media/files/politikalarimiz/2020/12/08/human-resources-policy.pdf
9.1b Human Rights Due Diligence (process)	Conformance	The Entity has conducted a Human Rights due diligence and risk assessment as part of the overall business risk process. There is a corporate risk register covering human rights risk, boundary and

CRITERION	RATING	COMMENT
		mitigation measures. The security activities are outsourced. There are no Syrian refugees working in the company.
9.1c Human Rights Due Diligence (remediation)	Conformance	The Entity has identified and implemented remediation measures for potential human rights risks. The risk register has been updated to cover security services and logistics. A Communication on Progress is submitted by the holding company to the United Nations Global Compact confirming human rights policies and outcomes as well as alignment with UN SDG's.
9.2 Women's Rights	Conformance	Policies covering Women's Rights are established in accordance with Turkey and ILO convention. Kibar Holding is working on a project to further promote women hiring and empowerment across all group companies including Assan Alüminyum.
9.3 Indigenous Peoples	Not Applicable	There is no presence of Indigenous Peoples or their lands, territories and resources in Assan Alüminyum's business activities and plant area.
9.4 Free, Prior, and Informed Consent (FPIC)	Not Applicable	There is no presence of Indigenous Peoples or their lands, territories and resources in Assan Alüminyum's business activities and plant area.
9.5 Cultural and sacred heritage	Not Applicable	The Entity's plants and business activities are not located in Indigenous Peoples sacred or cultural heritage sites.
9.6a Resettlements (avoid or minimise)	Not Applicable	There are no Indigenous Peoples involved and thereby no physical and/or economic displacement during Assan Alüminyum's plant establishment or business activities.
9.6b Resettlements (where unavoidable)	Not Applicable	There are no Indigenous Peoples involved and thereby no re-settlement during Assan Alüminyum's plant establishment and business activities.
9.7a Local Communities (rights and interests)	Unable to Rate	The Entity identifies and engages with local communities and respects their legal rights. Records relating to local communities are up to date and in conformance with the ASI Standard, however, physical observations will be undertaken during the onsite component of the audit.
9.7b Local Communities (impacts)	Unable to Rate	The Entity identifies the impact of its business activities, such as emissions, on local communities as part of the corporate risk assessment processes. Local communities' representatives are engaged to understand and address any issues or concerns.

CRITERION	RATING	COMMENT
		Records relating to local communities are up to date and in conformance with the ASI Standard, however, physical observations will be undertaken during the onsite component of the audit.
9.7c Local Communities (livelihoods)	Unable to Rate	The Entity supports local communities through offering job opportunities and other livelihood activities. The majority of the workforce are part of the local communities. Records relating to local communities are up to date and in conformance with the ASI Standard, however, physical observations will be undertaken during the onsite component of the audit.
9.8 Conflict-Affected and High-Risk Areas	Not Applicable	The Entity's Facilities are not located in Conflict-Affected and High-Risk Areas.
9.9 Security practice	Unable to Rate	The Entity has carried out human rights risk assessment and due diligence processes to cover security practices. Written contracts with security agencies are in accordance with local laws and training for security personnel is provided. Records relating to security practices are up to date and in conformance with the ASI Standard, however, a physical assessment will be undertaken during the onsite component of the audit.
PRINCIPLE 10 LABOUR RIGHTS		
10.1a Freedom of Association and Right to Collective Bargaining (freedom of association)	Unable to Rate	Assan Alüminyum establishes the Freedom of Association and Right to Collective Bargaining in its Human Resources Policy: https://www.assanaluminyum.com/en/~media/files/politikalarimiz/2020/12/08/human-resources-policy.pdf In February 2020, the Entity received a 'Great Place To Work' certification, the first within the Kibar Holding group and first in the metal sector in Turkey. Records relating to freedom of association and collective bargaining are up to date and in conformance with the ASI Standard, however, a physical assessment will be undertaken during the onsite component of the audit.
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Unable to Rate	The Entity respects the right of collective bargaining and has made commitment in its Human Resources Policy: https://www.assanaluminyum.com/en/~media/files/politikalarimiz/2020/12/08/human-resources-policy.pdf The workers representative elections were conducted in democratic manner. The Entity

CRITERION	RATING	COMMENT
		implements the Collective Bargaining Agreement agreed between the sectoral trade unions and the association of sectoral companies (MESS). Records relating to freedom of association and collective bargaining are up to date and in conformance with the ASI Standard, however, a physical assessment will be undertaken during the onsite component of the audit.
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Not Applicable	Turkish Law does not restrict the right to Freedom of Association and Collective Bargaining.
10.2a Child Labour (minimum age)	Unable to Rate	The Entity outlines in its Human Resources Policy the minimum age of 18 years for Workers and Subcontractors: https://www.assanaluminyum.com/en/~media/files/politikalarimiz/2020/12/08/human-resources-policy.pdf Records relating to child labour are up to date and in conformance with the ASI Standard, however, a physical assessment will be undertaken during the onsite component of the audit.
10.2b Child Labour (hazardous)	Unable to Rate	The Entity does not support nor involve any child or young workers below 18 years of age in any hazardous process. Records relating to child labour are up to date and in conformance with the ASI Standard, however, a physical assessment will be undertaken during the onsite component of the audit.
10.2c Child Labour (worst forms)	Unable to Rate	The Entity does not engage in or support Worst Forms of Child Labour: https://www.assanaluminyum.com/en/~media/files/politikalarimiz/2020/12/08/human-resources-policy.pdf Records relating to child labour are up to date and in conformance with the ASI Standard, however, a physical assessment will be undertaken during the onsite component of the audit.
10.3a Forced Labour (human trafficking)	Unable to Rate	The Entity does not engage in nor support the use of Forced Labour as defined in ILO Conventions C29, along with Protocol P29 (2014) to this Convention, and C105. The Human Resources Policy outlines this commitment and also applies to subcontractors: https://www.assanaluminyum.com/en/~media/files/politikalarimiz/2020/12/08/human-resources-policy.pdf

CRITERION	RATING	COMMENT
		Records relating to forced labour are up to date and in conformance with the ASI Standard, however, a physical assessment will be undertaken during the onsite component of the audit.
10.3b Forced Labour (deposits, fees, advances)	Unable to Rate	The Entity does not engage in nor support the use of Forced Labour as defined in ILO Conventions C29, along with Protocol P29 (2014) to this Convention, and C105. Records relating to forced labour are up to date and in conformance with the ASI Standard, however, a physical assessment will be undertaken during the onsite component of the audit.
10.3c Forced Labour (migrant workers)	Unable to Rate	The Entity does not engage or use Migrant Workers and does not require any deposit or security payments. Records relating to forced labour are up to date and in conformance with the ASI Standard, however, a physical assessment will be undertaken during the onsite component of the audit.
10.3d Forced Labour (debt bondage)	Unable to Rate	The Entity does not hold Workers in debt bondage or force them to work in order to pay off a debt as verified during review of employees file, interviews and discussions with management. Records relating to forced labour are up to date and in conformance with the ASI Standard, however, a physical assessment will be undertaken during the onsite component of the audit.
10.3e Forced Labour (freedom of movement)	Unable to Rate	The Entity allows Workers free movement within plant area. Records relating to forced labour are up to date and in conformance with the ASI Standard, however, a physical assessment will be undertaken during the onsite component of the audit.
10.3f Forced Labour (retention of identity papers, permits, certificates)	Unable to Rate	The Entity does not collect and retain original copies of Workers' identity papers, educational certificates, work permits or training certificates. Records relating to forced labour are up to date and in conformance with the ASI Standard, however, a physical assessment will be undertaken during the onsite component of the audit.
10.3g Forced Labour (freedom to terminate employment)	Unable to Rate	The Entity gives Workers freedom to terminate their employment at any time without penalty, given advance notice as per employment contract conditions mutually agreed. Records relating to forced labour are up to date and in conformance with the ASI Standard, however, a physical

CRITERION	RATING	COMMENT
		assessment will be undertaken during the onsite component of the audit.
10.4 Non-Discrimination	Unable to Rate	<p>The Entity documents its policy on non-discrimination as part of Human Resources Policy, providing equal opportunities and not engaging in discrimination in hiring, salary, promotion, training and advancement opportunities or termination of any Worker on the basis of gender, race, national or social origin, religion, disability, political affiliation, sexual orientation, marital status, family responsibilities, age, or any other condition that could give rise to discrimination, in line with ILO Conventions C100 and C111:</p> <p>https://www.assanaluminyum.com/en/~media/files/politikalarimiz/2020/12/08/human-resources-policy.pdf</p> <p>Records relating to non-discrimination are up to date and in conformance with the ASI Standard, however, a physical assessment will be undertaken during the onsite component of the audit.</p>
10.5 Communication and engagement	Unable to Rate	<p>The procedure for internal communication is described in detail in the Communication Policy. The Entity conducts surveys amongst the employees and directly engages with workers and their representative via monthly meetings. Records relating to communication and engagement are up to date and in conformance with the ASI Standard, however, a physical assessment will be undertaken during the onsite component of the audit.</p>
10.6 Disciplinary practices	Unable to Rate	<p>The Entity has established a disciplinary procedure, and disciplinary practices are reflected under the employment policy and in line with local laws. Deductions from wages associated with disciplinary action are not made. Records relating to disciplinary practices are up to date and in conformance with the ASI Standard, however, a physical assessment will be undertaken during the onsite component of the audit.</p>
10.7a Remuneration (living wage)	Unable to Rate	<p>The Entity has established a Remuneration and Wages Policy and wages are paid above the living wage, as calculated by the Entity. Records relating to remuneration are up to date and in conformance with the ASI Standard, however, a physical assessment will be undertaken during the onsite component of the audit.</p>

CRITERION	RATING	COMMENT
10.7b Remuneration (method of payment)	Unable to Rate	Records relating to remuneration are up to date and in conformance with the ASI Standard, however, a physical assessment will be undertaken during the onsite component of the audit.
10.8 Working Time	Unable to Rate	Working time records are recorded by the Entity through magnetic card readers, with working hours in compliance with local laws. Records relating to working time are up to date and in conformance with the ASI Standard, however, a physical assessment will be undertaken during the onsite component of the audit.
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	Assan Alüminyum has developed and implemented an Occupational Health and Safety Policy, signed by the General Manager and last updated in June 2020: https://www.assanaluminyum.com/en/sustainability/life-safety-and-environment/occupational-health-safety-and-environment-policy
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	The Entity has developed and implemented an Occupational Health and Safety Policy covering Workers including Subcontractors and Visitors: https://www.assanaluminyum.com/en/sustainability/life-safety-and-environment/occupational-health-safety-and-environment-policy Visitors, upon arrival, are shown a brief safety film and provided with personal protective equipment.
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Conformance	The Entity has developed and implemented an Occupational Health and Safety Policy which respects applicable national OHS laws and includes a target of zero accidents: https://www.assanaluminyum.com/en/sustainability/life-safety-and-environment/occupational-health-safety-and-environment-policy
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	The Entity has developed and implemented an Occupational Health and Safety Policy confirming Workers right to understand the hazards and safe practices for their work, and the authority to refuse or stop unsafe work: https://www.assanaluminyum.com/en/sustainability/life-safety-and-environment/occupational-health-safety-and-environment-policy
11.2 OH&S Management System	Conformance	The Entity is ISO 45001:2018, valid to November 2022. The Entity has implemented and

CRITERION	RATING	COMMENT
		communicated it's OHS Policy as required by the ASI Performance Standard: https://www.assanaluminyum.com/~media/files/certificate/2020/11/iso-45001-sertifikasi-2020-en.pdf?la=en
11.3 Employee engagement on health and safety	Unable to Rate	The Entity has developed a procedure on employee communication, including engagement on health and safety. Records relating to remuneration are up to date and in conformance with the ASI Standard, however, a physical assessment will be undertaken during the onsite component of the audit.
11.4 OH&S performance	Conformance	The Entity evaluates its occupational health and safety performance regularly and several key performance indicators are maintained. The Entity has several tools for evaluating performance and continuously improves its OH&S management system e.g. lagging indicators, accident statistics, lost time incident (LTI).

Document Control and Version History

Revision	Date	Notes
0	3 March 2021	Initial Certification Audit (Provisional Certification)