

# ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

# ASSAN ALÜMİNYUM

CERTIFICATE  
NUMBER

118

ASI  
STANDARD

PERFORMANCE  
STANDARD  
(V2 2017)

CERTIFICATION  
LEVEL

CERTIFICATION

ASI  
ACCREDITED  
AUDITOR

LIBERO  
ASSURANCE

DATE OF ISSUE

2 FEBRUARY 2022

DATE OF EXPIRY

1 FEBRUARY 2025

CERTIFIED SINCE

3 MARCH 2021

AUTHORISED BY

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

Aluminium Stewardship Initiative Ltd  
ACN 606 661 125, Australia  
info@aluminium-stewardship.org

*Validity of this Certificate is subject to continued  
conformance with the applicable ASI Standard  
and can be verified at  
[www.aluminium-stewardship.org](http://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 (Production and Transformation)

ASI STANDARD

- Performance Standard V2

AUDIT TYPE

- Initial Certification Audit (14 – 23 December 2020)
- Surveillance Audit (1 – 3 December 2021)

AUDIT FIRM

- TÜV Rheinland Cert GmbH (Initial Certification Audit)
- LiberoAssurance (Surveillance Audit)

AUDIT DATE

- 14 – 23 December 2020 (Initial Certification Audit)
- 1 – 3 December 2021 (Surveillance Audit)

AUDIT REPORT SUBMISSION

- 25 January 2021 (Initial Certification Audit)
- 7 January 2022 (Surveillance Audit)

AUDIT SCOPE Initial Certification Audit (14 – 23 December 2020)  
The audit scope included the Tuzla and Dilovasi production facilities located in Turkey.

The supply chain activities included in the audit scope:

- Aluminium Re-melting/ Refining
- Casthouses
- Semi-Fabrication
- Material Conversion (Production and Transformation)

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

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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.

Surveillance Audit (1 – 3 December 2021)

The audit scope included the Tuzla and Dilovasi production facilities located in Turkey.

The supply chain activities included in the audit scope:

- Aluminium Re-melting/ Refining
- Casthouses
- Semi-Fabrication
- Material Conversion (Production and Transformation)

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

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AUDIT  
OUTCOME

Certification

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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.

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CERTIFICATION  
PERIOD

2 February 2022 – 1 February 2025

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NEXT AUDIT  
TYPE

Surveillance Audit

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NEXT AUDIT  
DUE DATE

2 August 2023

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CERTIFICATE  
NUMBER

118

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## SUMMARY OF FINDINGS

| CRITERION  | RATING      | COMMENT   |
|--|-------------|---|
| PRINCIPLE 1 BUSINESS INTEGRITY   |             |   |
| 1.1 Legal Compliance   | Conformance | There are independent legal and compliance functions at the Entity. The legal compliance risks identified implement 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 | The Entity has a bi-lingual (English and Turkish) Code of Conduct:<br><a href="https://www.kibar.com/en/holding/codes-of-conduct">https://www.kibar.com/en/holding/codes-of-conduct</a><br>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 and Safety Management System, adequate resources for effective implementation of environmental, social and governance policies are provided and Policies are regularly reviewed. Both Facilities hold a 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:<br><a href="https://www.assanaluminyum.com/en/about-us/our-company-policies">https://www.assanaluminyum.com/en/about-us/our-company-policies</a>   |
| 2.2 Leadership   | Conformance | There is demonstrable commitment by the General Manager, as the nominated person responsible for  |

| CRITERION  | RATING      | COMMENT   |
|--|-------------|---|
|  |             | both Facilities, to implement the ASI Performance Standard.   |
| 2.3a Environmental and Social Management Systems (environmental) | Conformance | The Entity has maintained Third Party certification for its Environmental Management System (ISO 14001:2015) since 2006, with the latest audit conducted in June 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. Periodic management reviews are undertaken and important items are tracked for completion.  |
| 2.4 Responsible Sourcing   | Conformance | The Entity implements responsible sourcing, having an established Procurement Code of Conduct: <a href="https://www.assanaluminyum.com/en/sustainability/responsible-sourcing">https://www.assanaluminyum.com/en/sustainability/responsible-sourcing</a><br>Commitment on ethical rules and legal obligations, generally in line with ASI requirements, is also declared. The Entity has conducted a 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. A sustainability-oriented investment program (US\$ 95 million to 2024) includes investment in an air purification system, new casting lines and new energy efficient rolling mills. |
| 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 publishes a Sustainability Report in accordance with GRI (Global Reporting Initiative) Guidelines:<br><a href="https://www.assanaluminyum.com/~media/files/surdurulebilirlik/2020/assan-aluminyum-2019-surdurulebilirlik-raporu.pdf">https://www.assanaluminyum.com/~media/files/surdurulebilirlik/2020/assan-aluminyum-2019-surdurulebilirlik-raporu.pdf</a>   |
| 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:<br><a href="https://www.assanaluminyum.com/~media/files/surdurulebilirlik/2021/12/28/assan-aluminyum-2020-sustainability-report.pdf?la=en">https://www.assanaluminyum.com/~media/files/surdurulebilirlik/2021/12/28/assan-aluminyum-2020-sustainability-report.pdf?la=en</a> |
| 3.3a Payments to governments (legal and contractual)                | Conformance    | The Entity implements policies, systems, procedures and processes that conform to Anti-Corruption requirements related to payments to governments and facilitation of payments. The financial audit report indicates that 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 can lodge complaints via the online communication form available on the website:<br><a href="https://www.assanaluminyum.com/en/contact/contact-form">https://www.assanaluminyum.com/en/contact/contact-form</a>  |
| PRINCIPLE 4 MATERIAL STEWARDSHIP                                    |                |  |
| 4.1a Environmental Life Cycle Assessment (life cycle impacts)       | Conformance    | The Entity has undertaken Life Cycle Assessment of its major product lines including sheet, foil and coated sheet, in accordance with ISO 14040, ISO 14044 and ISO 14025.  |
| 4.1b Environmental Life Cycle Assessment (cradle to gate)           | Conformance    | The Entity has undertaken cradle-to-gate Life Cycle Assessment (LCA) of its major product lines. The inventory for the LCA is based on production figures  |

| CRITERION   | RATING      | COMMENT  |
|---|-------------|--|
|   |             | from both the Tuzla and Dilovasi manufacturing plants.   |
| 4.1c Environmental Life Cycle Assessment (public communication)       | Conformance | The Entity has made public the Sustainability Report and communicates the results of the Life Cycle Assessment via an Environmental Product Declaration (consistent with EN 15084), available via the links:<br><a href="https://www.assanaluminyum.com/~media/files/surdurulebilirlik/2021/12/28/assan-aluminyum-2020-sustainability-report.pdf?la=en">https://www.assanaluminyum.com/~media/files/surdurulebilirlik/2021/12/28/assan-aluminyum-2020-sustainability-report.pdf?la=en</a><br><a href="https://www.assanaluminyum.com/~media/files/surdurulebilirlik/2020/assan-aluminyum-2019-surdurulebilirlik-raporu.pdf">https://www.assanaluminyum.com/~media/files/surdurulebilirlik/2020/assan-aluminyum-2019-surdurulebilirlik-raporu.pdf</a> |
| 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 targets (Key Performance Indicators) 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 in a rotary furnace. 100% 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.   |
| <b>PRINCIPLE 5 GREENHOUSE GAS EMISSIONS</b>                           |             |  |
| 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 Dilovasi Facilities in the Sustainability Report, page 79:<br><a href="https://www.assanaluminyum.com/~media/files/surdurulebilirlik/2021/12/28/assan-aluminyum-2020-sustainability-report.pdf?la=en">https://www.assanaluminyum.com/~media/files/surdurulebilirlik/2021/12/28/assan-aluminyum-2020-sustainability-report.pdf?la=en</a>  |

| CRITERION   | RATING         | COMMENT  |
|---|----------------|--|
| 5.2 GHG emissions reductions                                      | Conformance    | 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 Sustainability Report: <a href="https://www.assanaluminyum.com/~media/files/surdurulebilirlik/2021/12/28/assan-aluminyum-2020-sustainability-report.pdf?la=en">https://www.assanaluminyum.com/~media/files/surdurulebilirlik/2021/12/28/assan-aluminyum-2020-sustainability-report.pdf?la=en</a><br>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. |
| 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, emissions are within prescribed legal limits.   |
| 6.2 Discharges to Water   | Conformance    | Water balance diagrams for both Facilities 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) | Conformance    | The Entity periodically identifies and evaluates major risk areas of operations where Spills and Leakage may contaminate air, water or soil.   |
| 6.3b Assessment and Management of Spills and Leakage (management) | Conformance    | The Entity has established management and external communication plans, compliance controls and a monitoring program to prevent and detect Spills and Leakage. Minor Spills are managed as per pre-existing control measures.  |
| 6.4a Reporting of Spills (immediate disclosure)                   | Conformance    | The Entity has developed a procedure and a management response plan to deal with significant Spills immediately upon occurrence.   |
| 6.4b Reporting of Spills (regular reporting)                      | Conformance    | The Entity reports on the status of significant Spills in its sustainability and other Government reporting. There were no significant spills, which is disclosed in the Sustainability Report:  |

| CRITERION   | RATING         | COMMENT   |
|---|----------------|---|
|   |                | <a href="https://www.assanaluminyum.com/~media/files/surdurulebilirlik/2021/12/28/assan-aluminyum-2020-sustainability-report.pdf?la=en">https://www.assanaluminyum.com/~media/files/surdurulebilirlik/2021/12/28/assan-aluminyum-2020-sustainability-report.pdf?la=en</a>   |
| 6.5a Waste management and reporting (strategy)                | Conformance    | 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)              | Conformance    | The Entity discloses the quantity of Hazardous and Non-Hazardous Waste generated and its disposal method in a Government portal and also maintains internal monitoring.<br>The Entity discloses the quantity of Hazardous and Non-Hazardous Waste generated and its disposal method in the Sustainability Report, page 67:<br><a href="https://www.assanaluminyum.com/~media/files/surdurulebilirlik/2021/12/assan-aluminyum-2020-sustainability-report.pdf?la=en">https://www.assanaluminyum.com/~media/files/surdurulebilirlik/2021/12/assan-aluminyum-2020-sustainability-report.pdf?la=en</a> |
| 6.6a Bauxite Residue (storage construction)                   | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope.   |
| 6.6b Bauxite Residue (integrity checks and controls)          | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope.   |
| 6.6c Bauxite Residue (water discharge)                        | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope.   |
| 6.6d Bauxite Residue (marine and aquatic environments)        | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope.   |
| 6.6e Bauxite Residue (state of the art technologies)          | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope.   |
| 6.6f Bauxite Residue (remediation)                            | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope.   |
| 6.7a Spent Pot Lining (SPL) (storage and management)          | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope.   |
| 6.7b Spent Pot Lining (SPL) (recovery and recycling)          | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope.   |
| 6.7c Spent Pot Lining (SPL) (Untreated SPL)                   | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope.   |
| 6.7d Spent Pot Lining (SPL) (review of alternatives)          | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope.   |
| 6.7e Spent Pot Lining (SPL) (marine and aquatic environments) | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope.   |

| CRITERION                                | RATING      | COMMENT   |
|--|-------------|---|
| 6.8a Dross (recovery)                    | Conformance | The Entity maximizes the recovery of Aluminium by treatment of Dross and Dross residues. Records are up to date and in conformance with the ASI Performance Standard.   |
| 6.8b Dross (recycling)                   | Conformance | The records relating to Dross are up to date and in conformance with the ASI Performance Standard. Dross generated at Tuzla is transported to Dilovasi for Aluminium recovery.  |
| 6.8c Dross (review of alternatives)      | Conformance | The records relating to Dross are up to date and in conformance with the ASI Performance Standard. Dross is not sent to landfill.   |
| PRINCIPLE 7 WATER STEWARDSHIP            |             |   |
| 7.1a Water assessment (mapping)          | Conformance | The Entity has developed water mapping for both the Tuzla and Dilovasi Facilities, 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) | Conformance | The Entity has developed water management plans for the Tuzla and Dilovasi Facilities. In 2021, 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 Performance Standard.  |
| 7.2b Water management (monitoring)       | Conformance | Metering/flow stations are in working condition. The records relating to water management are up to date and in conformance with the ASI Performance Standard. The Entity's water-related performance is disclosed in the Sustainability Report, page 64: <a href="https://www.assanaluminyum.com/~media/files/surdurulebilirlik/2021/12/28/assan-aluminyum-2020-sustainability-report.pdf?la=en">https://www.assanaluminyum.com/~media/files/surdurulebilirlik/2021/12/28/assan-aluminyum-2020-sustainability-report.pdf?la=en</a> |
| 7.3 Disclosure of water usage and risks  | Conformance | The Entity reports on water withdrawal and use in the Sustainability Report, pages 64 and 79: <a href="https://www.assanaluminyum.com/~media/files/surdurulebilirlik/2021/12/28/assan-aluminyum-2020-sustainability-report.pdf?la=en">https://www.assanaluminyum.com/~media/files/surdurulebilirlik/2021/12/28/assan-aluminyum-2020-sustainability-report.pdf?la=en</a>   |
| PRINCIPLE 8 BIODIVERSITY                 |             |   |
| 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  |

| CRITERION   | RATING         | COMMENT  |
|---|----------------|--|
|   |                | Influence. A documented biodiversity assessment report has been prepared.  |
| 8.2a Biodiversity management (biodiversity action plans)                            | Conformance    | Based on the biodiversity assessment, it has been determined that the Entity does not need to implement a biodiversity action plan. There will be periodic 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, page 60: <a href="https://www.assanaluminyum.com/~media/files/surdu rulebilirlik/2021/12/28/assan-aluminyum-2020-sustainability-report.pdf?la=en">https://www.assanaluminyum.com/~media/files/surdu rulebilirlik/2021/12/28/assan-aluminyum-2020-sustainability-report.pdf?la=en</a> |
| 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.  |
| <b>PRINCIPLE 9 HUMAN RIGHTS</b>   |                |  |
| 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: <a href="https://www.assanaluminyum.com/en/~media/files/politikalarimiz/2020/12/08/human-resources-policy.pdf">https://www.assanaluminyum.com/en/~media/files/politikalarimiz/2020/12/08/human-resources-policy.pdf</a>                   |
| 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 mitigation measures. The security activities are outsourced. There are no Syrian refugees working in the Entity.   |

| CRITERION                                     | RATING         | COMMENT  |
|---|----------------|--|
| 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 Entity's holding company (Kibar Holding) to the United Nations Global Compact confirming human rights policies and outcomes as well as alignment with the UN SDGs (Sustainable Development Goals). |
| 9.2 Women's Rights                            | Conformance    | Policies covering women's rights are established in accordance with Turkey and ILO convention. Kibar Holding, the Entity's parent company, is working on a project to further promote women hiring and empowerment, including at the Entity.   |
| 9.3 Indigenous Peoples                        | Not Applicable | There is no presence of Indigenous Peoples or their lands, territories and resources in the Entity's business activities or 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 the Entity's business activities and plant area.   |
| 9.5 Cultural and sacred heritage              | Not Applicable | The Entity's business activities and plant area 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 the Entity's establishment or its business activities.  |
| 9.6b Resettlements (where unavoidable)        | Not Applicable | There are no Indigenous Peoples involved and thereby no Resettlement during the Entity's establishment or its business activities.   |
| 9.7a Local Communities (rights and interests) | Conformance    | 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 Performance Standard. Community representatives interviewed shared the positive contribution of the Entity in overall community development through employment generation, support health and education and economic growth of the area.          |
| 9.7b Local Communities (impacts)              | Conformance    | The Entity identifies the impact of its business activities, such as emissions, on Local Communities as part of the corporate risk assessment processes. Local Community representatives are engaged to  |

| CRITERION  | RATING         | COMMENT  |
|--|----------------|--|
|  |                | <p>understand and address any issues or concerns. Records relating to Local Communities are up to date and in conformance with the ASI Performance Standard.</p> <p>Programs that support the community include supporting student and young artists, a plantation drive with a university, offsetting against wooden pallets and Kibar volunteer projects, and are communicated on via the Sustainability Report: <a href="https://www.assanaluminyum.com/~media/files/surdurulebilirlik/2021/12/28/assan-aluminyum-2020-sustainability-report.pdf?la=en">https://www.assanaluminyum.com/~media/files/surdurulebilirlik/2021/12/28/assan-aluminyum-2020-sustainability-report.pdf?la=en</a></p> |
| 9.7c Local Communities (livelihoods)   | Conformance    | 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 Performance Standard.  |
| 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  | Conformance    | The Entity has carried out Human Rights risk assessment and Due Diligence processes to cover security practices. Written contracts with security agencies (ISS for Tuzla plant) 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 Performance Standard.   |
| PRINCIPLE 10 LABOUR RIGHTS   |                |  |
| 10.1a Freedom of Association and Right to Collective Bargaining (freedom of association) | Conformance    | <p>The Entity establishes the Freedom of Association and Right to Collective Bargaining in its Human Resources Policy: <a href="https://www.assanaluminyum.com/en/~media/files/politikalarimiz/2020/12/08/human-resources-policy.pdf">https://www.assanaluminyum.com/en/~media/files/politikalarimiz/2020/12/08/human-resources-policy.pdf</a></p> <p>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 Performance Standard.</p>                               |
| 10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)  | Conformance    | <p>The Entity respects the right of Collective Bargaining and has made commitment in its Human Resources Policy: <a href="https://www.assanaluminyum.com/en/~media/files/politikalarimiz/2020/12/08/human-resources-policy.pdf">https://www.assanaluminyum.com/en/~media/files/politikalarimiz/2020/12/08/human-resources-policy.pdf</a></p>   |

| CRITERION   | RATING         | COMMENT   |
|---|----------------|---|
|   |                | <p>The Workers' representative elections are conducted in a democratic manner. The Entity implements the Collective Bargaining Agreement agreed between the sectoral trade unions and the association of sectoral companies (MESS).</p> <p>Records relating to Freedom of Association and Collective Bargaining are up to date and in conformance with the ASI Performance Standard.</p>  |
| 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)  | Conformance    | <p>The Entity outlines in its Human Resources Policy the minimum age of 18 years for Workers and Subcontractors:</p> <p><a href="https://www.assanaluminyum.com/en/~media/files/politikalarimiz/2020/12/08/human-resources-policy.pdf">https://www.assanaluminyum.com/en/~media/files/politikalarimiz/2020/12/08/human-resources-policy.pdf</a></p> <p>Records relating to Child Labour are up to date and in conformance with the ASI Performance Standard. Workers interviewed confirm there are no child Workers.</p>  |
| 10.2b Child Labour (hazardous)  | Conformance    | <p>The Entity does not support nor involve any child or young Workers below 18 years of age in any hazardous process.</p> <p>Records relating to Child Labour are up to date and in conformance with the ASI Performance Standard. Workers interviewed confirm there are no child Workers.</p>  |
| 10.2c Child Labour (worst forms)  | Conformance    | <p>The Entity does not engage in or support Worst Forms of Child Labour:</p> <p><a href="https://www.assanaluminyum.com/en/~media/files/politikalarimiz/2020/12/08/human-resources-policy.pdf">https://www.assanaluminyum.com/en/~media/files/politikalarimiz/2020/12/08/human-resources-policy.pdf</a></p> <p>Records relating to Child Labour are up to date and in conformance with the ASI Performance Standard. Workers interviewed confirm there are no child Workers.</p>  |
| 10.3a Forced Labour (human trafficking)   | Conformance    | <p>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:</p> <p><a href="https://www.assanaluminyum.com/en/~media/files/politikalarimiz/2020/12/08/human-resources-policy.pdf">https://www.assanaluminyum.com/en/~media/files/politikalarimiz/2020/12/08/human-resources-policy.pdf</a></p> <p>Records relating to Forced Labour are up to date and in conformance with the ASI Performance Standard. Workers interviewed confirm there is no Forced Labour.</p> |

| CRITERION   | RATING      | COMMENT  |
|---|-------------|--|
| 10.3b Forced Labour (deposits, fees, advances)                            | Conformance | 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 Performance Standard. Workers interviewed confirm there is no Forced Labour.   |
| 10.3c Forced Labour (migrant workers)                                     | Conformance | 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 Performance Standard. Workers interviewed confirm there is no Forced Labour.   |
| 10.3d Forced Labour (debt bondage)  | Conformance | 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 Performance Standard. Workers interviewed confirm there is no Forced Labour.                 |
| 10.3e Forced Labour (freedom of movement)                                 | Conformance | The Entity allows Workers free movement within plant area. Records relating to Forced Labour are up to date and in conformance with the ASI Performance Standard. Workers interviewed confirm there is no Forced Labour.   |
| 10.3f Forced Labour (retention of identity papers, permits, certificates) | Conformance | 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 Performance Standard. Workers interviewed confirm there is no Forced Labour.   |
| 10.3g Forced Labour (freedom to terminate employment)                     | Conformance | 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 Performance Standard. Workers interviewed confirm there is no Forced Labour.                                    |
| 10.4 Non-Discrimination   | Conformance | 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 |

| CRITERION   | RATING      | COMMENT   |
|---|-------------|---|
|   |             | orientation, marital status, family responsibilities, age, or any other condition that could give rise to discrimination, in line with ILO Conventions C100 and C111:<br><a href="https://www.assanaluminyum.com/en/~media/files/politikalarimiz/2020/12/08/human-resources-policy.pdf">https://www.assanaluminyum.com/en/~media/files/politikalarimiz/2020/12/08/human-resources-policy.pdf</a><br>Records relating to Non-Discrimination are up to date and in conformance with the ASI Performance Standard. |
| 10.5 Communication and engagement                           | Conformance | 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 Performance Standard.   |
| 10.6 Disciplinary practices                                 | Conformance | 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 Performance Standard.  |
| 10.7a Remuneration (living wage)                            | Conformance | 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 Performance Standard.   |
| 10.7b Remuneration (method of payment)                      | Conformance | Records relating to remuneration are up to date and in conformance with the ASI Performance Standard. Remuneration is paid via bank transfer.   |
| 10.8 Working Time   | Conformance | 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 Performance Standard.  |
| <b>PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY</b>          |             |   |
| 11.1a Occupational Health and Safety (OH&S) Policy (policy) | Conformance | The Entity has developed and implements an Occupational Health and Safety Policy, signed by the General Manager and last updated in June 2020:<br><a href="https://www.assanaluminyum.com/en/sustainability/life-safety-and-environment/occupational-health-safety-and-environment-policy">https://www.assanaluminyum.com/en/sustainability/life-safety-and-environment/occupational-health-safety-and-environment-policy</a>   |

| CRITERION   | RATING      | COMMENT  |
|---|-------------|--|
| 11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)         | Conformance | The Entity has developed and implements an Occupational Health and Safety Policy covering Workers including Subcontractors and Visitors: <a href="https://www.assanaluminyum.com/en/sustainability/life-safety-and-environment/occupational-health-safety-and-environment-policy">https://www.assanaluminyum.com/en/sustainability/life-safety-and-environment/occupational-health-safety-and-environment-policy</a><br>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 implements an Occupational Health and Safety Policy which respects applicable national OHS laws and includes a target of zero accidents: <a href="https://www.assanaluminyum.com/en/sustainability/life-safety-and-environment/occupational-health-safety-and-environment-policy">https://www.assanaluminyum.com/en/sustainability/life-safety-and-environment/occupational-health-safety-and-environment-policy</a>  |
| 11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)    | Conformance | The Entity has developed and implements 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: <a href="https://www.assanaluminyum.com/en/sustainability/life-safety-and-environment/occupational-health-safety-and-environment-policy">https://www.assanaluminyum.com/en/sustainability/life-safety-and-environment/occupational-health-safety-and-environment-policy</a>                            |
| 11.2 OH&S Management System   | Conformance | The Entity is certified to ISO 45001:2018, valid to November 2022. The Entity has implemented and communicated its OHS Policy as required by the ASI Performance Standard: <a href="https://www.assanaluminyum.com/~/_media/files/certificates/2020/11/iso-45001-sertifikasi-2020-en.pdf?la=en">https://www.assanaluminyum.com/~/_media/files/certificates/2020/11/iso-45001-sertifikasi-2020-en.pdf?la=en</a>   |
| 11.3 Employee engagement on health and safety                                     | Conformance | The Entity has developed a procedure on employee communication, including engagement on health and safety.<br>The Workers' representatives actively participate in the Health and Safety Committee meetings and contribute to remediation and corrective action plans.   |
| 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 |
| 1        | 2 February 2022 | Surveillance Audit – Certification.                     |