

ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

ASAŞ ALÜMİNYUM SAN. VE TIC. A.Ş.

CERTIFICATE
NUMBER

238

ASI
STANDARD

PERFORMANCE
STANDARD
(V2 2017)

CERTIFICATION
LEVEL

FULL
CERTIFICATION

ASI
ACCREDITED
AUDITOR

LIBERO
ASSURANCE

DATE OF ISSUE

9 DECEMBER 2022

DATE OF EXPIRY

8 DECEMBER 2025

CERTIFIED SINCE

9 DECEMBER 2022

AUTHORISED BY

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*

CERTIFICATION SCOPE

Manufacture of Aluminium Flat Products, Aluminium Profile & Composite Panels and PVC Profile & Shutter Products at the Akyazi and Karapürçek facilities, Turkey.

SUMMARY AUDIT REPORT

PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	ASAŞ Alüminyum San. Ve Tic. A.Ş.
ENTITY NAME	ASAŞ Alüminyum
CERTIFICATION SCOPE	Manufacture of Aluminium Flat Products, Aluminium Profile & Composite Panels and PVC Profile & Shutter Products at the Akyazi and Karapürçek facilities, Turkey.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Material Conversion (Production and Transformation)
ASI STANDARD	<ul style="list-style-type: none">Performance Standard V2
AUDIT TYPE	<ul style="list-style-type: none">Initial Certification Audit
AUDIT FIRM	LiberoAssurance
AUDIT DATE	<ul style="list-style-type: none">22 – 29 August 2022
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">7 November 2022
AUDIT SCOPE	<p>The audit scope covers the Akyazi and Karapürçek facilities, Turkey which manufacture Aluminium Flat Products, Aluminium Profile & Composite Panels and PVC Profile & Shutter Products, as well as ASAŞ Alüminyum Headquarters located at Akyazi/Sakarya, Turkey.</p> <p>The supply chain activities included in the audit scope:</p> <ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthousesMaterial Conversion (Production and Transformation) <p>All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.</p>
AUDIT OUTCOME	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.

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- ✔ 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 9 December 2022 – 8 December 2025

NEXT AUDIT TYPE Surveillance Audit

NEXT AUDIT DUE DATE 9 December 2023

CERTIFICATE NUMBER 238

SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Internal Audit and Compliance Director, who reports to both the Board and Chairman, has overall responsibility for legal compliance. There is formal management commitment towards various legal obligations. There is a monitoring matrix including identification of Applicable Laws and their monthly status. Independent evaluation of legal compliance is undertaken externally.
1.2 Anti-Corruption	Conformance	The Entity has a formal management commitment that addresses Anti-Corruption which is in accordance with Turkish Law. The Code of Conduct is publicly available: https://www.asastr.com/corporate-/codes-of-conduct An internal ethics committee is responsible for overall ethical practices including the establishment of a hotline, which is directly accessed by ethics committee members. There is a system to track the number of reported cases. There have been no complaints raised regarding corruption.
1.3 Code of Conduct	Conformance	The Entity has developed a bilingual Code of Conduct which is publicly available: https://www.asastr.com/corporate-/codes-of-conduct/ It is also included as part of the induction program for new employees as well as in regular training.
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	The management has established a Health, Safety and Environmental Policy: https://www.asastr.com/corporate-/sustainability/
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	Senior management has designated a member of the senior management team to develop, establish and effectively maintain ASI Performance Standard requirements.
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	Management has internally and publicly communicated its Health, Safety and Environmental Policy: https://www.asastr.com/corporate-/sustainability/ Governance policies are addressed in the Code of Conduct: https://www.asastr.com/corporate-/codes-of-conduct/

CRITERION	RATING	COMMENT
2.2 Leadership	Conformance	Senior management has designated a member of senior management to the overall responsibility for ASI Performance Standard requirements.
2.3a Environmental and Social Management Systems (environmental)	Conformance	The Entity holds a valid Environmental Management System as per ISO 14001:2015, which has independently verified by Vericert.
2.3b Environmental and Social Management Systems (social)	Conformance	The Entity has developed its Social Management Systems through the development of various human resources, employees' safety policies, procedures, training records and risk assessment processes, in general accordance with Turkish Labour Laws.
2.4 Responsible Sourcing	Minor Non-Conformance	<p>A company-wide commitment has been implemented to practice responsible sourcing through the Entity's Supply Chain Policy https://www.asastr.com/kurumsal/politikalar/tedarik-zinciri-yonetimi-politikasi/</p> <p>The Entity has demonstrated a pathway forward and has provided resources with clear understanding of responsible sourcing. However, there is currently no communication and acknowledgement of the Supplier Code of Conduct by respective suppliers except available on company website. Secondly, there is no objective evidence of supplier risk assessment undertaken with mitigation measures, as per requirement of supply chain policy, and there is no objective evidence of monitoring or assessment within supply chain as per the supply chain policy.</p>
2.5 Impact Assessments	Conformance	There is an overarching risk management process which consists of related risk, opportunity and impact for a change in activities and/or expansion. Some of the large expansion projects required formal Environment Impact Assessment (EIA) and approval by the Turkish authority. There is a social engagement plan following national and international standards. These assessments are undertaken with an external agency and identifies, engages and develops action plans to mitigate and optimize the social impact of new/expansion activity.
2.6 Emergency Response Plan	Minor Non-Conformance	The Entity has documented the Emergency Situation Instruction-Acil Durum Plan Talimati. Potential emergency scenarios have been identified including chemical spillage, earthquake and fire. The response plan for each type of emergency has

CRITERION	RATING	COMMENT
		been detailed and the team has been trained on the Emergency Response Plan. The annual planning for drill events is maintained. However, there is no documented action plan to fulfil the recommendation of the Explosion Protection Study report.
2.7 Mergers and Acquisitions	Conformance	The Entity has established a process for Due Diligence that addresses environmental, social and governance issues in addition to financial and technical topics. There has been no merger and acquisition activity since becoming an ASI Member.
2.8 Closure, Decommissioning and Divestment	Conformance	The Entity has established a process for Due Diligence that addresses environmental, social and governance issues in planning process for closure, decommissioning and divestment. There has been no closure, de-commissioning and/or shutdown since becoming an ASI Member.
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	The Entity has developed and released its 2021 Sustainability Report, which has been developed in accordance with GRI standards: https://www.asastr.com/sites/1/upload/files/ASAS_Sustainability_Report_2021-2235.pdf
3.2 Non-compliance and liabilities	Conformance	There have been no significant fines, judgments, penalties and non-monetary sanctions received by the Entity for failure to comply with Applicable Law since joining ASI membership.
3.3a Payments to governments (legal and contractual)	Conformance	The Entity made payments to governments towards statutory taxes, value added tax and social security payments on a legal and/or contractual basis.
3.3b Payments to governments (disclosure - bauxite mining)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
3.4 Stakeholder complaints, grievances and requests for information	Conformance	The Entity has demonstrated a systematic development of a stakeholder engagement plan with the external agency. It is publicly available: https://www.asastr.com/corporate-sustainability/stakeholder-engagement-plan/
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	The Entity has conducted a Life Cycle Assessment (LCA) and obtained Environmental Product Declaration (EPD) for all major product categories

CRITERION	RATING	COMMENT
		including flat rolled, Aluminium composite panel etc., following the cradle to gate approach.
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	The Entity has conducted a Life Cycle Assessment (LCA) and obtained Environmental Product Declaration (EPD) for all 12 major product categories including flat rolled, Aluminium composite panel etc., following the cradle to gate approach.
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	The Entity has publicly disclosed its Life Cycle Assessment (LCA) and Environment Product Declarations (EPD) via the Sustainability Report, Page 57: https://www.asastr.com/corporate-/sustainability/corporate-sustainability-reports/
4.2 Product design	Conformance	The Entity is the first licensed Research and Development (R&D) centre in the Turkish Aluminium sector. It is subject to periodic review by Government authorities and is equipped with leading practice processes and is operated by qualified R&D personnel. Focus areas include new material compositions, weight reduction and functionality improvements. The Entity also works closely with national and global research centres.
4.3a Aluminium Process Scrap (targets)	Conformance	The Entity has developed a Scrap Policy which is publicly available: https://www.asastr.com/corporate-/policies/scrap-policy/ Indicators have been established for scrap for relevant functions and are tracked for actual performance through internal systems. All process scrap generated is segregated and re-used in casthouses (Extrusion and Flat Product). Aluminium scrap is segregated as per alloys and then fed to the casthouse accordingly.
4.3b Aluminium Process Scrap (alloy separation)	Conformance	All process scrap generated is segregated and re-used in casthouses (Extrusion and Flat Product). Aluminium scrap is segregated as per alloys and then fed to the casthouse accordingly.
4.4a Collection and recycling of products at end-of-life (strategy)	Conformance	Collection and recycling is defined in the Entity's Scrap Policy. The Entity is engaged in ensuring both consumer and customer awareness is increased and practices relating to collection and recycling of product at End of Life.

CRITERION	RATING	COMMENT
4.4b Collection and recycling of products at end-of-life (engagement)	Conformance	Collection and recycling is defined in the Entity's Scrap Policy. The Entity is engaged in ensuring both consumer and customer awareness is increased and practices relating to collection and recycling of product at End of Life.
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		
5.1 Disclosure of GHG emissions and energy use	Conformance	The Entity has calculated Greenhouse Gas (GHG) Scope 1 and Scope 2 Emissions that address all manufacturing locations excluding head office located in Istanbul. The base year is considered as January-December 2020. The ISO 14064-1 Standard was used as the basis for calculation.
5.2 GHG emissions reductions	Conformance	The Entity has developed a document 'GHG Strategies and Management' which has received senior management approval. There was a 16% reduction of emissions during 2021. For more information, refer to the Sustainability Report, page 62: https://www.asastr.com/corporate-sustainability/corporate-sustainability-reports/
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 undertakes daily, weekly and monthly checks of the combustion system for maintenance purposes and air emission status. There is also external agency testing reports prepared for air emissions. Stacks are numbered and mapped for applicable emission parameters. There is also a regular Government audit of these results to assess implementation of environmental conditions in line with environmental permits.
6.2 Discharges to Water	Conformance	Treated water is discharged in the municipal systems and is sample tested by local authorities on a monthly basis and parameters assessed include Chemical Oxygen Demand (COD) and Biological Oxygen Demand (BOD). These have all been assessed as within permissible limits.

CRITERION	RATING	COMMENT
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	An environmental risk assessment and evaluation has been completed which includes Spills and releases.
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	The management of Spills and releases was found satisfactory and in accordance with risk assessment and required mitigation measures.
6.4a Reporting of Spills (immediate disclosure)	Conformance	There have been no significant Spills and Leakage reported during the past three years. It was noted that secondary containment is provided for chemicals and includes the provision of chemical spillage kits. Spill information has been incorporated into the Sustainability Report, page 61: https://www.asastr.com/corporate-sustainability/corporate-sustainability-reports/
6.4b Reporting of Spills (regular reporting)	Conformance	There have been no significant Spills and Leakage reported during the past three years. It was noted that secondary containment is provided for chemicals and includes the provision of chemical spillage kits. Spill information has been incorporated into the Sustainability Report, page 61: https://www.asastr.com/corporate-sustainability/corporate-sustainability-reports/
6.5a Waste management and reporting (strategy)	Conformance	Different waste streams are collected on-site. The wastes are disposed as per legal provisions and recorded in respective recording tools. The waste management practices are disclosed in the Sustainability Report, page 64: https://www.asastr.com/corporate-sustainability/corporate-sustainability-reports/
6.5b Waste management and reporting (disclosure)	Conformance	Different waste streams are collected on-site. The wastes are disposed as per legal provisions and recorded in respective recording tools. The waste management practices are disclosed in the Sustainability Report, page 64: https://www.asastr.com/corporate-sustainability/corporate-sustainability-reports/
6.6a Bauxite Residue (storage construction)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6b Bauxite Residue (integrity checks and controls)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6c Bauxite Residue (water discharge)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
6.6d Bauxite Residue (marine and aquatic environments)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6e Bauxite Residue (state of the art technologies)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6f Bauxite Residue (remediation)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7a Spent Pot Lining (SPL) (storage and management)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7b Spent Pot Lining (SPL) (recovery and recycling)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7c Spent Pot Lining (SPL) (Untreated SPL)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7d Spent Pot Lining (SPL) (review of alternatives)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7e Spent Pot Lining (SPL) (marine and aquatic environments)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8a Dross (recovery)	Conformance	The Dross from the melting furnace is collected and stored in a designated area and is sent to an external agency for further treatment/recovery. There is national level database to track dross movement and its treatment by the authorized processor.
6.8b Dross (recycling)	Conformance	The Dross from the melting furnace is collected and stored in a designated area and is sent to an external agency for further treatment/recovery.
6.8c Dross (review of alternatives)	Conformance	The Entity regularly reviews alternative options to the landfilling of Dross residues and maximizes the Aluminium recovery in consultation with authorized Dross processor(s).
PRINCIPLE 7 WATER STEWARDSHIP		
7.1a Water assessment (mapping)	Conformance	Groundwater is extracted to fulfil the Entity's water supply requirements and a water map has been developed. There are water meters installed to measure the amount of water use and use is recorded in a database.
7.1b Water assessment (risk assessment)	Conformance	The water-related risks have been assessed via the environmental risk assessment as per ISO 14001 requirements and relevant mitigation measures have been identified and implemented. These

CRITERION	RATING	COMMENT
		include water consumption being further divided into gardening irrigation, domestics and process water.
7.2a Water management (management plans)	Conformance	The Entity has developed an operating procedure for overall water management addressing water risk, implementation guidelines and the monitoring of water consumption and performance.
7.2b Water management (monitoring)	Conformance	There are water meters installed at suitable locations to measure the amount of water used on site.
7.3 Disclosure of water usage and risks	Conformance	Water-related performance disclosure is provided in the Entity's Sustainability Report, page 63: https://www.asastr.com/corporate-sustainability/corporate-sustainability-reports There was a 19 percent reduction in water consumption (cubic metres per product).
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	The biodiversity assessment has been undertaken using an external agency and University as per ASI and International Finance Corporation (IFC) requirements. There are two main biodiversity sensitive areas (i.e. Sapanca lake (west side) and protected mountain area (east side)) located approximately twenty kilometres from the Entity. The Entity demonstrates a commitment towards animal welfare and provides free living shelter and nutritional food support to stray dogs.
8.2a Biodiversity management (biodiversity action plans)	Conformance	Biodiversity action plans have been developed and incorporated into the Biodiversity Report.
8.2b Biodiversity management (consultation and mitigation hierarchy)	Conformance	The Biodiversity Action Plan has been developed in consultation with relevant stakeholders and in accordance with the Biodiversity Mitigation Hierarchy.
8.2c Biodiversity management (reporting)	Conformance	Biodiversity-related disclosures are made to Government authorities as well as included in the Sustainability Report, page 57: https://www.asastr.com/corporate-sustainability/corporate-sustainability-reports/
8.3 Alien Species	Conformance	The Biodiversity Report addresses Alien Species. The wooden pallets/package are fumigated to prevent accidental or deliberate introduction of Alien Species.

CRITERION	RATING	COMMENT
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 developed various human resources policies wherein it commits to respect Human Rights. These policies have been communicated to employees and other stakeholders.
9.1b Human Rights Due Diligence (process)	Conformance	The Human Rights risk assessment has been undertaken considering both internal and external impacts and aspects. The ranking of these has been completed and appropriate mitigation measures have been implemented.
9.1c Human Rights Due Diligence (remediation)	Conformance	The Entity has identified appropriate remedial measures and controls, including a complaints handling mechanism.
9.2 Women’s Rights	Conformance	Women employees are treated as per male employees with additional rights including maternity leave, permission for child feeding and the commemoration of women’s days. Further information is available in the Sustainability Report, page 43: https://www.asastr.com/corporate-sustainability/corporate-sustainability-reports/ The management of women’s rights by the Entity has been recognized by Turkey Women Entrepreneurs Association (KAGIDER).
9.3 Indigenous Peoples	Not Applicable	This Criterion is not applicable as there are no Indigenous Peoples within the Entity’s Area of Influence.
9.4 Free, Prior, and Informed Consent (FPIC)	Not Applicable	This Criterion is not applicable as there are no Indigenous Peoples within the Entity’s Area of Influence.

CRITERION	RATING	COMMENT
9.5 Cultural and sacred heritage	Not Applicable	This Criterion is not applicable as there are no cultural and sacred heritage within the Entity's Area of Influence.
9.6a Resettlements (avoid or minimise)	Not Applicable	This Criterion is not applicable as there have been no projects that caused Resettlement in the history of the Entity.
9.6b Resettlements (where unavoidable)	Not Applicable	This Criterion is not applicable as there have been no projects that caused Resettlement in the history of the Entity.
9.7a Local Communities (rights and interests)	Conformance	The local community in Akyazi area was engaged by the Entity regarding sports facilities. The basketball club, TEMA Foundation Sapling Donation and environment awareness was funded by the Entity. For further information, refer to the Sustainability Report, page 38: https://www.asastr.com/corporate-sustainability/corporate-sustainability-reports/
9.7b Local Communities (impacts)	Conformance	The Entity has positively impacted the livelihood of Local Communities through local employment and ongoing contribution to the local economy.
9.7c Local Communities (livelihoods)	Conformance	The Entity has positively impacted the livelihood of Local Communities through local employment and ongoing contribution to the local economy.
9.8 Conflict-Affected and High-Risk Areas	Conformance	The Entity's business activities do not contribute to armed conflict or Human Rights abuses in Conflict-Affected and High-Risk Areas as per responsible sourcing practices and its operational practices. There is no Conflict-Affected and High-Risk Area (CAHRA) near the Entity's operations nor its sourcing companies. The Entity has undertaken stakeholder engagement and addressed human rights aspects besides other stakeholder expectations. The Human Rights approach is defined in the Sustainability Report, page 45: https://www.asastr.com/corporate-sustainability/corporate-sustainability-reports/
9.9 Security practice	Conformance	Security guards are full time employees (FTE) and treated as other FTE employees in terms of their hiring, on-boarding, training, promotion, benefit, social security and Code of Conduct obligations. The plant is manned with security guards at all times at entry exit points, perimeter boundary and fencing and CCTV monitoring. The Entity's Human

CRITERION	RATING	COMMENT
		Rights approach is detailed in the Sustainability Report, page 45: https://www.asastr.com/corporate-/sustainability/corporate-sustainability-reports/
PRINCIPLE 10 LABOUR RIGHTS		
10.1a Freedom of Association and Right to Collective Bargaining (freedom of association)	Conformance	The Entity respects the rights of Workers to associate freely in Labour Unions, seek representation and join Workers' councils without interference to the extent possible under Applicable Law, and this is reflected in its Human Resources Policies.
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Conformance	The Entity respects the rights of Workers to Collective Bargaining and to participate in any collective bargaining process in good faith to the extent possible under Applicable Law. It is reflected in its Human Resources Policies and the employee Code of Conduct: https://www.asastr.com/corporate-/codes-of-conduct/ https://www.asastr.com/corporate-/policies/human-resources-policy/
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. Therefore, there is no need of alternative means and hence this Criterion is not applicable.
10.2a Child Labour (minimum age)	Conformance	The minimum age of hiring at the Entity is 18 years which is verified via proof of age as well as the applicants' education certificate and national identification. The Entity's Human Resources Policy is available https://www.asastr.com/corporate-/codes-of-conduct/ https://www.asastr.com/corporate-/policies/human-resources-policy/
10.2b Child Labour (hazardous)	Conformance	The Entity does not engage in, nor support Hazardous Child Labour. https://www.asastr.com/corporate-/codes-of-conduct/ https://www.asastr.com/corporate-/policies/human-resources-policy/
10.2c Child Labour (worst forms)	Conformance	The Entity does not engage in, nor supports Worst Forms of Child Labour.
10.3a Forced Labour (human trafficking)	Conformance	The Entity does not engage in, nor supports Human Trafficking either directly or through any employment or recruitment agencies.

CRITERION	RATING	COMMENT
10.3b Forced Labour (deposits, fees, advances)	Conformance	The Entity does not require any form of deposit, recruitment fee or equipment advance from Workers, either directly or through employment or recruitment agencies.
10.3c Forced Labour (migrant workers)	Conformance	The Entity does not require Migrant Workers to lodge deposits or security payments at any time during the employment period.
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.
10.3e Forced Labour (freedom of movement)	Conformance	The Entity does not restrict the freedom of movement of Workers to, from and within the workplace.
10.3f Forced Labour (retention of identity papers, permits, certificates)	Conformance	The Entity does not retain original copies of Workers' identity papers, work permits, travel documents or training certificates.
10.3g Forced Labour (freedom to terminate employment)	Conformance	The Entity does not deny Workers the freedom to terminate their employment at any time without penalty, provided given notice is offered as per mutually agreed contract conditions.
10.4 Non-Discrimination	Conformance	Employees are informed about their rights including Non-Discrimination via training provided. A clause in the Human Resources Policy also clearly states that no discrimination is allowed. Workers can apply to the Entity's Ethics Committee, if they feel they are discriminated.
10.5 Communication and engagement	Conformance	The Entity has established various communication mechanisms and direct engagement with Workers and their representatives regarding working conditions, without threat of reprisal, intimidation or harassment. An employee engagement and satisfaction survey was conducted.
10.6 Disciplinary practices	Conformance	The disciplinary procedures are addressed in the employee Code of Conduct and the related Human Resources Policy. There is no wage deduction for any disciplinary reasons, which was confirmed via document review and worker interviews.
10.7a Remuneration (living wage)	Minor Non-Conformance	The Entity pays the wages for a normal working week as per legal or industry minimum standard in order to meet the basic needs of Workers. However, there is no estimation of living wage for 'Blue Collar' workers which constitute the majority of employees, where the salary survey only addressed 'white collar' employees.

CRITERION	RATING	COMMENT
10.7b Remuneration (method of payment)	Conformance	The Entity pays wages for a normal working week as per legal or industry minimum standard in order to meet the basic needs of Workers. The salary is paid on monthly basis through bank transfer.
10.8 Working Time	Conformance	The working hours are recorded through a system called 'Biometric'. Overtime is not regularly undertaken by Workers, however when undertaken, Overtime is paid at premium rate as per Applicable Law.
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	The Entity's Safety Policy has been established and implemented: https://www.asastr.com/kurumsal/surdurulebilirlik/
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	The Entity's Safety Policy has been established and implemented and includes employees and visitors: https://www.asastr.com/kurumsal/surdurulebilirlik/
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Conformance	The Entity's Safety Policy has been established and implemented and includes a commitment to comply with Applicable Law on Workers' health and safety, international standards, and ILO Conventions on Occupational Health and Safety: https://www.asastr.com/kurumsal/surdurulebilirlik/
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	The Entity's Safety Policy has been established and implemented which includes the provision that Workers have the right to understand the hazards and safe practices for their work, and the authority to refuse or stop unsafe work: https://www.asastr.com/kurumsal/surdurulebilirlik/
11.2 OH&S Management System	Minor Non-Conformance	The Entity has developed and implemented a Management System on Occupational Health and Safety (OH&S) in accordance with ISO 45001. The majority of the OH&S system requirements were found effectively implemented, however in some isolated cases, access to fire safety equipment was obstructed, the emergency planning for gas leakage scenario does not include wind directions, emergency drills for night shifts had not been undertaken, and there is no documented action plan to fulfil the recommendation as per the explosion protection document.
11.3 Employee engagement on health and safety	Conformance	There is periodic health and safety training provided to employees. The theme for 2022 is 'hand safety'. Evident through displays and employee commitment evident during the audit. There are

CRITERION	RATING	COMMENT
		periodic employee communications and engagement activities related to Health and Safety Committee meetings. This Committee has representation from both management and employees to review the health and safety topics, status quo, challenges, improvements needed, etc.
11.4 OH&S performance	Conformance	The Entity has established and monitors OH&S performance indicators, which include Lost Time Injury Frequency Rate (LTIFR). A monthly trend analysis has been completed.

Document Control and Version History

Revision	Date	Notes
0	9 December 2022	Initial Certification Audit - Full Certification