

ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

Elval Hellenic Aluminium Industry

CERTIFICATE NUMBER

82

ASI STANDARD

PERFORMANCE
STANDARD
(V3 2022)

CERTIFICATION
LEVEL

FULL
CERTIFICATION

ASI ACCREDITED
AUDITING FIRM

DNV BUSINESS
ASSURANCE SERVICES
UK LTD.

DATE OF ISSUE

21 JULY 2023

DATE OF EXPIRY

20 JULY 2026

CERTIFIED SINCE

21 JULY 2020

AUTHORISED BY

A handwritten signature in black ink, appearing to be 'J. Hal', with a long horizontal line extending to the right.

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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

Aluminium Rolling Division of
Elvalhacor S.A. for the facility in
Oinofyta, Greece, covering its Re-
Melting & Casthouse facilities,
Hot/Cold Rolling, Coil Coating and
Finishing Lines.

AUDIT REPORT PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	ELVAL Hellenic Aluminium Industry
ENTITY NAME	ELVALHALCOR S.A. - Aluminium Rolling Division
CERTIFICATION SCOPE	Aluminium Rolling Division of Elvalhacor S.A. for the facility in Oinofyta, Greece, covering its Re-Melting & Casthouse facilities, Hot/Cold Rolling, Coil Coating and Finishing Lines.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthousesSemi-Fabrication
ASI STANDARD	<ul style="list-style-type: none">Performance Standard V3
AUDIT TYPE	<ul style="list-style-type: none">Initial Certification Audit (desktop) (7 - 8 April 2020)Follow up on-site Audit (8 July 2020)Re-Certification and Scope Change Audit (17 - 21 July 2023)
AUDIT FIRM	DNV Business Assurance Services UK Ltd.
AUDIT DATE	<ul style="list-style-type: none">7 - 8 April 2020 (Initial Certification Audit (desktop))8 July 2020 (Follow up on-site Audit)17 - 21 July 2023 (Re-Certification and Scope Change Audit)
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">26 May 2020 (Initial Certification Audit (desktop))13 July 2020 (Follow up on-site Audit)26 October 2023 (Re-Certification and Scope Change Audit)
AUDIT SCOPE	<p><u>Initial Certification Audit (desktop) 7 - 8 April 2020 and 8 July 2020 (on-site)</u></p> <p>The audit scope covered: Re-melting & Casthouse (DCC + CC) operations, Hot Rolling, Cold Rolling, Coil Coating, Finishing Lines and Packaging.</p> <p>Supply chain activities included in the audit scope:</p> <ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthousesSemi-Fabrication <p>All relevant criteria in the ASI Performance Standard were included in the audit scope.</p> <p>At the commencement of the audit, access to the site was not possible, due to COVID-19 related travel restrictions. The audit was initially undertaken as a 'desktop' exercise in April 2020, in accordance with the ASI Interim Policy regarding Audits, Audit-Related Travel and Coronavirus (v4), and included a remote review of relevant documentation. The audit was later completed on-site on 8 July 2020.</p>

Re-Certification and Scope Change Audit (17 – 21 July 2023)

The Audit Scope covered re-melting & Casthouse (DCC + CC) operations, hot rolling, cold rolling, coil coating, finishing lines and packaging.

Supply chain activities included in the audit scope:

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

All relevant supply chain activities, and Criteria in the Performance Standard were included in the Audit Scope.

AUDIT OUTCOME

- Certification

AUDIT METHODOLOGY
DECLARATION

The Auditors confirm that:

- The information provided by the Entity is true and accurate to the best knowledge of the Auditor(s) preparing this report.
- The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous.
- The Audit Scope and audit methodology are sufficient to establish confidence that the findings are indicative of the performance of the Entity's defined Certification Scope.
- The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.

CERTIFICATION PERIOD

21 July 2023 – 20 July 2026

NEXT AUDIT TYPE

Surveillance Audit

NEXT AUDIT DATE

21 January 2025

CERTIFICATE NUMBER

82



If you have an inquiry or complaint about this Certification, go to the third-party EthicsPoint portal at: <https://aluminium-stewardship.ethicspoint.com/>

EthicsPoint is a comprehensive and confidential reporting tool that enables complaints to be securely raised, managed and responded to. This enables anonymity to be maintained where desired by complainants, or as relevant to whistleblowing situations.

Information is available in five languages – English, French, Chinese, German and Portuguese (Brazil). Translation services provided by EthicsPoint enable complaints and correspondence to be managed in multiple languages.

ENTITY OVERVIEW

Elval is the aluminium rolling division of ElvalHalcor S.A., one of the leading flat rolled aluminium manufacturers worldwide. For more than 40 years, Elval has been recognised as a significant producer with a broad portfolio of quality products for the packaging, construction, shipbuilding, automotive, energy, industrial and HVAC and refrigeration markets. Through an established global commercial network across 18 countries, Elval exports approximately 80% of its production to more than 60 countries. For more information, please see: <https://www.elval.com/en/about-elval#about-elval-at-a-glance>

ElvalHalcor S.A. operates in the aluminium and copper segments through its aluminium rolling division (Elval) and copper and alloy extrusion division (Halcor) businesses (Halcor is outside of the Certification Scope), as well as its subsidiaries, working with over 1,800 employees and a wider contractor network. The aluminium rolling mill division has the capacity to produce 450,000 tonnes of aluminium per year and operates a Casthouse, aluminium hot and cold-rolling divisions and downstream processing for different markets. In 2021, Elval completed the installation of a four-stand tandem aluminium hot rolling finishing mill, followed by a six high aluminium cold rolling mill and a new lacquering line. The Entity is situated in an industrial area in Oinofyta Viotias (61 km from Athen's centre).

MATURITY RATINGS

A rating of maturity (low, medium or high) determined by the Auditor that provides a general assessment in terms of systems, Residual Risk and performance assigned to a Sustainability Component.

Maturity ratings are not a direct assessment of conformance to the Standard.

	GOVERNANCE	ENVIRONMENT	SOCIAL	COMBINED RATING
SYSTEMS	High	High	Medium	High
RISKS	High	Medium	Medium	Medium
PERFORMANCE	High	Medium	High	High
OVERALL		HIGH		

FINDINGS

CRITERION	RATING	COMMENT
1. BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity's commitment to legal Compliance is incorporated into its corporate principles as outlined in the Code of Conduct and Business Ethics. This commitment extends to environmental and health & safety through the integration of robust Policies and Management Systems aligned with ISO 14001 and ISO 45001 standards.
1.2 Anti-Corruption	Conformance	The Entity operates under a written Code of Conduct and Business Ethics Policy and has implemented a Transparency Policy against Corruption and Bribery. The Entity is implementing an Anti-Corruption Risk Assessment and is subject to internal audits, (undertaken by Group auditors), and external financial audits to assess Corruption risk and Compliance with anti-Corruption legislation.
1.3a-e Code of Conduct	Conformance	The Entity has established a Code of Conduct and Business Ethics, which is fully communicated to all employees and contractors, available at: https://www.elval.com/en/sustainability-our-people
2. POLICY AND MANAGEMENT		
2.1a-f Environmental, Social, and Governance Policy	Conformance	The Entity has implemented a Sustainability, Health and Safety Policy, an Environment and Energy Policy, a Code of Conduct and Business Ethics and an Integrity and Transparency Policy. The Environmental, Social and Governance Policies are available at: https://www.elval.com/en/sustainability
2.2a-c Leadership	Conformance	The Entity has appointed its Environmental Compliance Manager and Sustainability Senior Manager as the persons with overall responsibility for conformance with the ASI Performance Standard.
2.3a Environmental and Social Management Systems - Environmental	Conformance	The Entity has implemented an Environmental Management System that has achieved certification in accordance with the ISO 14001:2015 Standard.
2.3b Environmental and Social Management Systems - Social	Conformance	The Entity has implemented an integrated Management System and is certified against ISO 14001, ISO 50001, ISO 9001, and ISO 45001. Social elements are managed across many tasks of these Management Systems. Additionally, a Code of Conduct and Business Ethics is in place, as well as an Anti-Corruption Policy and a Policy regarding Violence and Harassment at Working Places. A Supplier's Code of Conduct is in place, and the procurement team manage the social aspects of sourcing. Environmental, Social, and corporate Governance (ESG) risks and performance are reviewed periodically.
2.4a-e Responsible Sourcing	Conformance	The Entity has implemented a Responsible Sourcing Policy that is integrated into both the Sustainability Policy and the Supplier's Code of Conduct, available at: https://www.elval.com/en/sustainability-supply-chain-responsibility The fundamental principles and values included in the Supplier's Code of Conduct extend to all suppliers, encompassing those involved in the supply of raw or secondary materials, as well as metals or scrap.

CRITERION	RATING	COMMENT
2.5a-g Environmental and Social Impact Assessments	Conformance	<p>The Entity has conducted an Environmental Impact, Biodiversity and Human Rights Impact Assessment which was approved by the competent authorities. This assessment is integral to the plant's environmental permit and is a binding document for the plant and its operations.</p> <p>The Entity has disclosed its major investments, and New Projects in the 2022 Sustainability Report, pages 48-49: https://www.elvalhacor.com/sustainability/reporting</p> <p>The latest Human Rights Due Diligence and social footprint assessment (conducted by third-party consultancy, IOBE) are disclosed in the 2022 Sustainability Report, pages 14-15, and the Human Rights Section, pages 50-51: https://www.elvalhacor.com/sustainability/reporting</p> <p>The environmental permit conditions have been updated with the environmental impact assessment outcomes on new installations, available on the public ministry webpage (https://aepo.ypeka.gr/untitled_6940) and in the governmental agency domain (https://diavgeia.gov.gr/doc/%CE%A8%CE%9D9%CE%954653%CE%A08-6%CE%A1%CE%9E?inline=true)</p> <p>The Entity has not identified any potential adverse impact on humans or the environment resulting from these changes. These changes take place within the operational boundary of the site and contribute to the scaling of operational capacity.</p>
2.6a-h Human Rights Impact Assessment	Conformance	<p>The Entity has developed a Human Rights Impact Assessment as part of the Human Rights Due Diligence process. This assessment follows the UN Protect, Respect and Remedy framework from the United Nations and uses the 'Guide to Human Rights Impact Assessment and Management (HRIAM)' co-issued by the International Business Leaders Forum (IBLF), the International Finance Corporation (IFC), and UN Global Compact. It addresses all relevant matters under the influence of the Entity.</p>
2.7a-f Emergency Response Plan	Conformance	<p>The Entity has established Emergency Response Plans that are developed according to ISO 14001 and ISO 45001. European and national legislation requirements regarding risk assessment, preparedness and awareness against major accidents (environmental, health and safety) are fulfilled. Procedures are tested through drills and adequate equipment and auxiliaries are in place. The Emergency Response Plans are available to Stakeholders upon request.</p>
2.8a-d Suspended Operations	Conformance	<p>The Entity has established an Environmental Management procedure that prescribes the process to be followed upon the suspension of operations of any kind in an existing Facility. Operational Impact Assessments and contingency plans are in place for energy and extreme weather risks that might lead to disruption of operation. No suspension of operations has taken place since they joined ASI as a Member and Initial Certification.</p>
2.9a-b Mergers and Acquisitions	Conformance	<p>The Entity follows an established standardised procedure that outlines how to assess environmental, social, and governance risks associated with Mergers and Acquisitions.</p>

CRITERION	RATING	COMMENT
2.10a-b Closure, Decommissioning and Divestment	Conformance	The Entity has established an Environmental Management procedure which prescribes the process to be followed upon the closure, decommissioning and de-investment of an existing Facility.
3. TRANSPARENCY		
3.1a-b Sustainability Reporting	Conformance	<p>The Entity issues an annual Sustainability Report, which is publicly available and is developed according to the Global Reporting Initiative (GRI) Standards and verified against the AA1000 standard by a third party auditor (TUV Austria Hellas). It includes information on its governance approach and a Materiality analysis, identifying its Material ESG issues. The Entity publishes the Sustainability Report end of June every year both in Greek and English. The English version of the report is available: https://www.elval.com/en/sustainability-csr-reports</p> <p>All Material ESG impacts are included in the Sustainability Report, including non-compliances and liabilities, Greenhouse Gases (GHG) emissions intensity, Discharges to Water, reporting of Spills (whenever they exist), waste management (including quantities and disposal and treatment methods), biodiversity management and human rights. Also, the report includes external studies for social impact, double Materiality analysis, and commitments regarding all Material issues.</p>
3.2 Non-compliance and Liabilities	Conformance	The Entity publishes information on significant fines, judgments, penalties, and non-monetary sanctions for failure to comply with Applicable Law in its annual Sustainability Report, the most recent version is available at: https://www.elval.com/en/sustainability
3.3a-c Payments to Governments	Conformance	<p>The Entity discloses payments to governments (taxes, social securities) in ElvalHalcor's Sustainability Reports in the Generated Economic Value section, page 13: https://www.elval.com/en/sustainability-csr-reports</p> <p>The Entity is listed on the Athens stock exchange and, as a result, is subject to financial regulations of the stock market. The Entity publishes their financial statements every quarter, and an accounting firm audits the Entity's half-year and full-year financial statements, as well as the Entity's accounting system. Each quarter, the Board of Directors approves the disclosures. No contribution to political parties has been paid.</p>
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	The Entity has developed a strategy to address Stakeholder complaints, grievances, and information requests. Their approach ensures an inclusive and efficient means of addressing stakeholder inputs. Employees have multiple methods to raise a grievance, which includes a grievance box and hotline. For further information on the Complaints Resolution Mechanism, refer to the Entity's EthicsPoint website: https://www.elval.com/en/integrityhotline
4. MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment	Conformance	The Entity has produced Cradle to Gate Life Cycle Assessments (LCA) according to ISO 14040/44 for can stock and foil stock product lines.

CRITERION	RATING	COMMENT
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	The Entity has devised a comprehensive LCA model encompassing the entire plant, using a cradle-to-gate approach. The ISO 14040/44 standards are integrated into the LCA framework and the results of the LCA are provided to the customers upon request. The communication sent to one of their customers was verified during the audit.
4.2 Product Design	Conformance	The Entity produces standardised items that serve as inputs for specialised manufacturing (like beverage cans or foil). The design process is structured, and considerations for recyclability, reuse, dismantling, and disassembly come into play further down the Aluminium value chain. The Entity provides customers with cradle-to-gate information to aid them in aligning with the focus with the product design requirement of the ASI Performance Standard.
4.3a-b Aluminium Process Scrap	Conformance	The Entity monitors all process scrap produced on-site and segregates it for re-melting. Excess scrap that cannot be re-melted in the Facility are sent for external reprocessing, and recycling and sent back to the site for use. The monitoring takes place under multiple perspectives, aiming to ensure efficient involvement both by management and personnel. They have devised and employed various initiatives in the plant and have promoted the Aluminium recycling culture.
4.4a-c Collection and Recycling of Products at End of Life - Material Conversion and other Manufacturing	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.4d Collection and Recycling of Products at End of Life	Conformance	The Entity has developed a recycling strategy for 2019-2026 that includes targets, timeframes and supporting activities. Most initiatives and actions regarding awareness and engagement in End of Life recycling at the local and national level are described in the annual Sustainability Report. https://www.elval.com/en/sustainability-csr-reports

5. GREENHOUSE GAS EMISSIONS

5.1a-b Disclosure of GHG Emissions and Energy Use	Minor Non-Conformance	<p>The Entity participates in the EU Emission Trading System (EU ETS), which tracks greenhouse gas (GHG) emissions, and the Entity's Scope 1 emissions are verified through the EU ETS assurance process. The Entity creates an annual report detailing emissions from different sources, this report is checked by an independent certified auditor before being sent to authorities. The external assurance statement is published in the Elval Sustainability Report 2022, Our Way Forward, pages 115-116 and the Climate change KPI disclosure, page 40: https://www.elval.com/en/sustainability-csr-reports</p> <p>The methodology for assessing emissions is explained in the GHG Monitoring Plan, which competent authorities have approved.</p> <p>However, it was identified the Entity has not reported the most Material indirect Scope 3 emissions. Whilst they have been measuring its Scope 3 emissions, these emissions have not yet been publicly disclosed (Categories 1, 2 and 4) and should be subject to independent assurance.</p>
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CRITERION	RATING	COMMENT
5.2a Aluminium Smelter GHG Emissions Intensity - Started production after 2020	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.2b Aluminium Smelter GHG Emissions Intensity - In production up to and including 2020	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.3a-e GHG Emissions Reduction Plans	Minor Non-Conformance	<p>The Entity has defined a Climate Transition plan (not yet published at the time of the audit) and considered forecasted production growth, best available technologies, and regulatory/technological context. As there is currently a lack of an industry-aligned specific emissions reduction pathway methodology, they are currently engaging with ASI Members and European Aluminium Association discussions and workshops to contribute to a pathway for Aluminium semi-fabricators. It is noted that the Entity is planning to publish its Task Force on Climate-Related Financial Disclosures (TCFD) which are currently under Board of Directors approval at the time of the audit.</p> <p>The Entity has defined a Climate Transition plan internally however, it was identified the GHG Emissions Reduction Pathway and GHG Emissions Reductions Plans were not yet disclosed at the time of the Audit.</p>
5.4 GHG Emissions Management	Conformance	The Entity has established an integrated Management System that includes key ISO standards, such as 14001 and 50001 involving dedicated departments covering all aspects of GHG emissions, which include Energy, Sustainability, Environment, and Technology. The reduction strategy, direction and approach are disclosed in the annual Sustainability Report.
6. EMISSIONS, EFFLUENTS AND WASTE		
6.1a-f Emissions to Air	Conformance	<p>The Entity has established and implemented an ISO 14001:2015 certified Environmental Management System, developed an inventory of emission sources and monitored all emission types. The Entity monitors and reports these as required under its Environmental Permit Conditions. The Entity also evaluates how these emissions potentially affect the environment in an Environmental Impact Assessment. No adverse effects on humans are expected from the plant's activities.</p> <p>The Entity annually submits data on Air Emissions to the Ministry of Environment, available on the ministry's website: http://www.ypeka.gr/LinkClick.aspx?fileticket=OZlrgCnYsO8%3D&tabid=965&language=el-GR</p>
6.2a-g Discharges to Water	Conformance	The Entity operates a wastewater treatment plant with two advanced lines for different types of wastewater. The treated wastewater is combined as a single discharge and released into a tank and then into the nearby River. All regulatory requirements are currently fully achieved. A Water Risk Assessment has been conducted, which includes the quality of wastewater discharged to a water receiving body. No Material risks were identified, and no adverse effects have arisen from this process as the quality of the wastewater is well below established thresholds.

CRITERION	RATING	COMMENT
		The Entity annually submits data on Wastewater Disposal to the Ministry of Environment, available on the ministry's website: http://www.ypeka.gr/LinkClick.aspx?fileticket=eskjWvz%2FU5U%3D&tabid=965&language=el-GR
6.3a-g Assessment and Management of Spills and Leakages	Conformance	The Entity has conducted a risk assessment, identified risks, and implemented plans and procedures for incident management and reporting. It has ISO 14001 certification which also addresses Spills and Leakage management.
6.4a-b Public Disclosure of Spills and Leakages	Conformance	The Entity has implemented a procedure to report Spills. As part of its annual reporting obligations, any Spills or Leakages are reported if they occur during the reporting year.
6.5a-c Waste Management and Reporting	Conformance	The Entity has documented a Waste Management Strategy, which is included in the Standard Operating Procedure for Environmental Management. The Entity monitors waste generation by department and by process. When an environmental concern is identified as significant, based on specific criteria and a scoring system, they create and put in place environmental programs. Waste is transported off-site following local legislative requirements (including the use of approved contractors, specialised vehicles, and licensed drivers for Hazardous Waste, proper packaging and labelling, and prescribed methods). The Entity has evaluated environmental and social impacts through their Hazardous and Non-Hazardous Waste management processes, and no residual risks that could result in adverse impacts on humans or the environment were identified. The key performance indicators related to waste management are in the 2022 Sustainability Report, Our Way Forward, pages 34-35: https://www.elval.com/en/sustainability-csr-reports
6.6a-g Bauxite Residue	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7a-f Spent Pot Lining (SPL)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8a-d Dross	Conformance	Dross is produced in the form of Aluminium skimming from melting ovens. All Dross is collected, cooled, and then packaged and shipped off-site for the recovery of its Aluminium content. The processing Facilities are located outside of Greece and Annex VII according to the Waste Shipment Regulation (1013/2006/EC) is issued for every shipment. No Dross is sent to landfill. The recovered material from Dross processing sent off-site is shipped back in the form of Aluminium ingots which in turn is re-melted for use in production.
7. WATER STEWARDSHIP		
7.1a-b Water Assessment and Disclosure	Conformance	The Entity through ElvalHalcor publicly discloses its water management approach, and water withdrawal by source in the 2022 Sustainability Report, pages 38-41: https://www.elvalhalcor.com/sustainability/reporting A Water Mass Balance is updated monthly and maps the flow of water from the input to the outputs of the plant. ElvalHalcor operates a 'The Zero Liquid Discharge (ZLD)' state-of-the-art Facility in the Aluminium Business segment designed to treat the entire effluent output which

CRITERION	RATING	COMMENT
		<p>was noted as industry best practice. A comprehensive Water Risk Assessment has been conducted (including an assessment of the water catchment area and the Entity Area of Influence, water balance and inventory, and the assessment of inherent and residual risks) and regularly updated. This is undertaken in accordance with the WWF Filter and the Alliance for Water Stewardship Standard v.2.0. The Entity has concluded that there are no Material residual risks regarding water stress and water scarcity.</p> <p>The Entity annually submits data on Water Use to the Ministry of Environment, available on the ministry's website: http://www.ypeka.gr/LinkClick.aspx?fileticket=7VMqe658hZQ%3D&tabid=965&language=el-GR</p>
7.2a-e Water Management	Not Applicable	The Criterion is not applicable, as the Entity's water Risk Assessment did not identify any Material residual risks on the water catchment area or their Area of Influence.
8. BIODIVERSITY AND ECOSYSTEM SERVICES		
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	The Entity has conducted a Biodiversity and Alien Species Impact Assessment covering the operations of the plant as well as the impacts associated with the discharge point of the Entity's treated water disposal. The impacts considered in the assessment were determined from a combination of bibliographical research and on-site observations conducted by experts specifically engaged by the Entity for this purpose. No Material risk to biodiversity was identified from this process.
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Not Applicable	This Criterion is not applicable to the Entity as the Biodiversity Impact Assessment which was conducted in 2019 identified no Material risks to biodiversity.
8.2a-g Biodiversity Management	Not Applicable	This Criterion is not applicable to the Entity, as the Biodiversity Risk Assessment conducted by specialised experts identified no Material risks.
8.3a-c Management of Priority Ecosystem Services	Conformance	An evaluation of Ecosystem Services impacts was also conducted as part of the Biodiversity Impact Assessment. The findings indicate that their operations do not present significant risks to the Area of Influence or the associated Ecosystem Services.
8.4 Alien Species	Conformance	The Entity conducted an Alien Species Impact Assessment as part of the Biodiversity and Alien Species Impact Assessment. This assessment considered all activities and assessed species on site. They compared these against the Global Invasive Species Database and the List of Invasive Alien Species of Union Concern, which are included in European regulations (2016/1141/EU, 2017/1263/EU, 2019/1262/EU).
8.5a-b Commitment to "No Go" in World Heritage Properties	Conformance	The Entity is located in an Industrial Park and does not have any World Heritage Properties in its proximity. The Entity has also used the World Heritage Site Global Map to assess the proximity to World Heritage Sites. https://whc.unesco.org/en/interactive-

CRITERION	RATING	COMMENT
		map/?search=Oinofyta%2C+Greece&id_states=gr&id_search_region=1
8.6a-d Protected Areas	Conformance	The Entity has identified that it is not in proximity to Protected Areas, according to national law and with reference to UNEP-WCMC, IUCN (2019) and the World Database on Protected Areas (WDPA).
8.6e Protected Areas - Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.7a-i Mine Rehabilitation	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9. HUMAN RIGHTS		
9.1a-d Human Rights Due Diligence	Conformance	The Entity's commitment to Human Rights is reflected in the Labour and Human Rights Policy, Code of Conduct and Business Ethics and Suppliers Code of Conduct. The Entity has conducted a Human Rights assessment to understand potential impacts and has established a hotline where anyone can report if they see any human rights violations. The hotline is available to both internal and external Stakeholders.
9.2a-e Gender Equity and Women's Empowerment	Conformance	The Entity's Labour and Human Rights Policy, and Code of Conduct and Business Ethics prohibit against gender-based Discrimination (. The Human Rights Due Diligence process has addressed gender and Women's Rights risk factors in the assessment of Human Rights risks and impacts. Twenty-one per cent of ElvalHalcor's Board members are women, 10.7% of the total workforce are women, and 10.1% of managerial positions are held by women. For more information refer to the Sustainability Report 2022, page 51: https://www.elval.com/en/sustainability-csr-reports
9.3a-i Indigenous Peoples	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples in the Entity's Area of Influence.
9.4a Free, Prior, and Informed Consent (FPIC) - New Projects or Major Changes	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples in the Entity's Area of Influence.
9.4b Free, Prior, and Informed Consent (FPIC) - Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9.4c Free, Prior, and Informed Consent (FPIC) - Demonstrate support	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples in the Entity's Area of Influence.
9.5a Cultural and Sacred Heritage - Identification	Not Applicable	This Criterion is not applicable to the Entity, as there are no cultural and/or heritage sites in the Entity's Area of Influence.
9.5b Cultural and Sacred Heritage - Impacts	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples in the Entity's Area of Influence.

CRITERION	RATING	COMMENT
9.6a-i Displacement	Not Applicable	This Criterion is not applicable to the Entity, as the Entity is located and operates within an Industrial Area. As a result, there are no issues arising with respect to any displacement or resettlement.
9.7a-h Affected Populations and Organisations	Conformance	The Entity has conducted a Human Rights Impact Assessment for their operations and no Material risks were identified relating to Local Communities or Organisations.
9.8a Conflict-Affected and High-Risk Areas - Strong Management Systems	Conformance	The Entity has established a procedure for responsible sourcing based on OECD Due Diligence of Minerals and has implemented a Management System based on ISO, IATF and AS standards.
9.8b Conflict-Affected and High-Risk Areas - Identify and assess risks	Conformance	The Entity has conducted a comprehensive metal supplier risk assessment engaging experts in accordance with the OECD Due Diligence Guidance of Minerals from Conflict-Affected and High-Risk Areas according to the OECD Guidance.
9.8c Conflict-Affected and High-Risk Areas - Strategy to respond to risks	Conformance	The Entity's risk mitigation actions are described in relevant internal procedures in the Integrated Management System. They evaluate the country of origin of scrap and Primary Aluminium supplies and assign inherent country risk ratings. The Due Diligence steps can take different forms, such as the communication and signing of the Supplier Code of Conduct, EcoVadis assessments, supplier self-assessment and evaluation, and on-site audits.
9.8d Conflict-Affected and High-Risk Areas - Audit of due diligence	Conformance	The Entity performs audits with a dedicated questionnaire for Human Rights and overall ESG criteria. EcoVadis assessments also provide a risk mitigation measure, whilst ASI Performance Standard Certification is monitored throughout the supply chain.
9.8e Conflict-Affected and High-Risk Areas - Report annually	Conformance	The Entity's Responsible Sourcing Strategy and Performance is published in the annual Sustainability Report 2022, Our Way Ahead pages 62-63, available at: https://www.elval.com/en/sustainability-csr-reports
9.9 Security practice	Conformance	The Entity does not engage private security providers but employs gatehouse personnel and night guards who operate monitoring systems along the perimeter of the plant, and work under specific rules and with certain authorities on incident management. These activities comply with the scope of the Entity's Code of Conduct and Business Ethics and Human Rights Policy.
10. LABOUR RIGHTS		
10.1a-c Freedom of Association and Right to Collective Bargaining	Conformance	The Entity respects the Right of Freedom of Association and the Right to Collective Bargaining. A statement is included in the Code of Conduct and Business Ethics, whilst full support for the UN Global Compact has been formally declared by the Entity in its Annual Sustainability Report 2022.
10.1d Freedom of Association and Right to Collective Bargaining - Alternative means in context of Applicable Law	Not Applicable	This Criterion is not applicable to the Entity as it is located in a country where the Right to Freedom of Association and Collective Bargaining is not restricted.

CRITERION	RATING	COMMENT
10.2a Child Labour	Conformance	Child Labour is prohibited by Greek and European law. The Entity fulfils its legal conditions and has developed a Policy against Child Labour included in the Code of Conduct and Business Ethics. All Workers are aged eighteen or more which was consistent with records and observations during the site visit audit and employee interviews.
10.3a-c Forced Labour	Minor Non-Conformance	<p>The Entity fulfils its legal requirements in accordance with Greek and European Union law, Forced Labour is prohibited. They have conducted a Human Rights Due Diligence that includes an evaluation of Forced Labour risks. They do not engage in Forced Labour either directly or indirectly, nor does it tolerate Forced Labour in its supply chain. A Policy against Forced Labour is included in the Code of Conduct and Business Ethics, in the Sustainability Report (support of the UN Global Compact,) and the Suppliers Code of Conduct. All contractors are inspected monthly against their legal obligations towards their employees (i.e., prompt payments, insurance, etc.) by submitting the appropriate evidence to the Entity.</p> <p>However, it was identified the Entity has not yet developed and published a Modern Slavery Statement.</p>
10.4a-c Non-Discrimination	Conformance	The Entity's Code of Conduct and Business Ethics, as well as the Supplier's Code of Conduct address non-Discrimination. Its Human Rights Due Diligence exercise did not highlight any Material unmanaged risks concerning Discrimination.
10.5 Communication and engagement	Conformance	Communication and direct engagement of Workers are assured via monthly Health & Safety Council meetings, departmental meetings, and on-the-job seminars. Several means of communication are used such as intranet, handbooks, leaflets, and screens on-site. A dedicated procedure is in place to submit improvement proposals. Complaints can be raised via a dedicated procedure, without any threat of reprisal intimidation or Harassment, whereas a suggestion box, operated solely by the Human Resources Manager, is used for the submission of anonymous complaints.
10.6a-g Violence and Harassment	Conformance	The Entity's opposition to any form of Violence and Harassment is reflected in the Business Code of Conduct and Labour and Human Rights Policy. They have established channels and methods for all Stakeholders to report any case of Violence and Harassment without fear of retaliation.
10.7a-c Remuneration	Conformance	The Entity's minimum wages are set according to the National Collective Agreement, and they fulfil the legal requirements agreed by all social Stakeholders. Furthermore, the Entity provides all its employees additional benefits that improve their living standards, such as private health insurance, food vouchers, bonuses, and family support packages. Interviews with employees confirmed that all are comfortable with their payments, fair wages, and the Entity's payroll process.
10.8a-c Working Time	Conformance	The Entity complies with Applicable Law on Working Time (including Overtime), public holidays and paid annual leave. Overtime is voluntary and is reimbursed according to national legislation requirements. The number of hours worked by each worker is automatically recorded upon the entrance and exit of employees and tracking Overtime and any other data on Working Time is feasible.

CRITERION	RATING	COMMENT
10.9a-b Informing Workers of Rights	Conformance	The Entity's Code of Conduct and Business Ethics is included in the induction process for new employees. Any updates in all relevant Policies and Codes of Conduct are communicated through announcements. Training and information are supported by a variety of mechanisms (e.g., intranet, leaflets, handbooks, screens on-site and meetings).
11. OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Management System	Conformance	The Entity has implemented an Occupational Health and Safety (OH&S) Management System certified against ISO 45001:2018. The certification is valid expires on 26 June 2026.
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Minor Non-Conformance	<p>The Entity has implemented an OH&S Management System that is certified against the ISO 45001:2018 and discloses leading and lagging indicators of OH&S Performance on an annual basis, please refer to the 2022 Sustainability Report and GRI disclosures, pages 52-54: https://www.elvalhacor.com/sustainability/reporting</p> <p>However, it was identified a comparative analysis of performance with peer Businesses and leading practices was not disclosed in the 2022 Sustainability Report (Occupational Health and Safety, pages 52-54).</p>
11.2 Employee engagement on Health and Safety	Conformance	The Entity has established a Safety Committee that holds regular meetings. A Health Safety Environment Council has also been established which holds bi-weekly meetings, including all morning shifts and daily pre-work Health and Safety tool-box meetings. Operation of the OH&S Management System certified against ISO 45001:2018 ensures the implementation of procedures aiming to confirm employees' awareness, participation, and training. This was confirmed through employee interviews and during the site audit.

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DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	21 July 2020	Initial Certification Audit – Full Certification
1	13 November 2023	Re-Certification and Scope Change Audit; Previous Audit Firm was 'DNV GL' and now changed to 'DNV Business Assurance Services UK Ltd.'