
ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

SYMETAL ALUMINIUM FOIL INDUSTRY SINGLE MEMBER S.A.

CERTIFICATE
NUMBER

196

ASI
STANDARD

PERFORMANCE
STANDARD
(V2 2017)

CERTIFICATION
LEVEL

FULL
CERTIFICATION

ASI ACCREDITED
AUDITOR

DNV BUSINESS
ASSURANCE
SERVICES UK
LTD.

DATE OF ISSUE

18 MARCH 2022

DATE OF EXPIRY

17 MARCH 2025

CERTIFIED SINCE

18 MARCH 2022

AUTHORISED BY

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

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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 Foil Rolling Facility (Oinofyta) and Foil
Converting Facility (Mandra) in Greece.

SUMMARY AUDIT REPORT

PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME Symetal

ENTITY NAME Symetal Aluminium Foil Industry Single Member S.A.

CERTIFICATION SCOPE Aluminium Foil Rolling Facility (Oinofyta) and Foil Converting Facility (Mandra) in Greece.

SUPPLY CHAIN ACTIVITIES

- Semi-Fabrication
- Material Conversion (Production and Transformation)

ASI STANDARD

- Performance Standard V2

AUDIT TYPE

- Initial Certification Audit

AUDIT FIRM DNV Business Assurance Services UK Ltd.

AUDIT DATE 11 – 12 January 2022 (Remote) and 19 January 2022 (On-site)

AUDIT REPORT SUBMISSION 8 March 2022

AUDIT SCOPE The audit scope includes the Aluminium Foil Rolling Facility (Oinofyta) and Foil Converting Facility (Mandra) in Greece.

The supply chain activities included in the audit scope:

- Semi-Fabrication
- Material Conversion (Production and Transformation)

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

The audit has been undertaken as a combined 'desktop' and on-site exercise, in accordance with ASI Interim Policy regarding Audits, Audit-Related Travel and Coronavirus (v4), and included a remote audit (11 – 12 January 2022) and an on-site audit (19 January 2022).

AUDIT OUTCOME Certification

AUDIT METHODOLOGY DECLARATION The Auditors confirm that:

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- 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	18 March 2022 – 17 March 2025
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NEXT AUDIT TYPE	Re-Certification Audit
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NEXT AUDIT DUE DATE	17 March 2025
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CERTIFICATE NUMBER	196
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SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	Legal compliance is included as an objective in the Code of Conduct and Business Ethics, as well as in the Environmental and Health and Safety Policies. Compliance is enforced by dedicated procedures included in the Entity's ISO 14001 and ISO 45001 Management System certifications, while appropriate implementation is ensured through the reporting hierarchy at all levels and personnel. The Entity is part of the Viohalco Group and legislative conformance is supported by the Group's Legal Department.
1.2 Anti-Corruption	Conformance	The Entity operates under a written Integrity and Transparency Policy against Corruption and Bribery: https://www.symetal.gr/arxeia/files/SYMETAL-Business-Ethics-Anti-Corruption-Policy-EN.pdf The Entity implements an Anti-Corruption Risk Assessment and is subject to internal audits by Viohalco Group auditors. Furthermore, the external financial audit assesses the corruption risk and compliance with corruption legislation.
1.3 Code of Conduct	Conformance	The Entity has implemented a Code of Conduct, which is communicated to all internal stakeholders and contractors and is available via the website: https://www.symetal.gr/arxeia/files/Symetal-Code-of-Conduct-Business-Ethics-EN-final-2017.pdf
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	The Entity has a Health and Safety Policy, Environment Policy, Energy and Climate Change Policy, Business Ethics and Anti-Corruption Policy, Labour and Human Rights Policy, Sustainability Policy, Supplier Code of Conduct and a Code of Conduct and Business Ethics. All of the Policies are available via links on the website: https://www.symetal.gr/en/sustainability
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	All Policies have been approved by Senior Management. Each Manager is responsible for the day-to-day implementation of the relevant department's objectives and for the reporting of potential gaps between their content and the actual business practices. An Environmental, Social and Governance (ESG) Risk Assessment process is established and the Entity has assessed the conformance of existing business activities with the

CRITERION	RATING	COMMENT
		relevant Policies. There were no deviations evident during the evaluation held in 2021. The ESG Risk Assessment is updated annually.
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	The Entity has a Health and Safety Policy, Environment Policy, Energy and Climate Change Policy, Business Ethics and Anti-Corruption Policy, Labour and Human Rights Policy, Sustainability Policy, Supplier Code of Conduct and a Code of Conduct and Business Ethics. All of the Policies are available via links on the website: https://www.symetal.gr/en/sustainability The Entity conducts induction trainings, regular training courses and e-learnings and communicates Policies on notice boards for employees and contractors working on site.
2.2 Leadership	Conformance	The Entity's General Manager has formally appointed the QA and Sustainability Managers at the Oinofyta and Mandra plants as the persons with overall responsibility for conformance with the ASI Performance Standard at each plant.
2.3a Environmental and Social Management Systems (environmental)	Conformance	The Entity has valid Management Systems certifications for Environment (ISO 14001) and Energy (ISO 50001). Certificates can be accessed from the standards and certifications section of the website: https://www.symetal.gr/en/how-we-do-business#certificates
2.3b Environmental and Social Management Systems (social)	Conformance	The Entity has implemented an Integrated Management System, certified to ISO 14001, ISO 50001, ISO 9001 and ISO 45001. Social elements are managed across many parts of these Management Systems. The Entity also has a Business Ethics and Anti-Corruption Policy, Labour Human Rights Policy, Sustainability Policy, Supplier Code of Conduct and Code of Conduct and Business Ethics. Based on the ESG Risk Assessment, social aspects risks and performance are reviewed periodically.
2.4 Responsible Sourcing	Conformance	The Entity has a Supplier Code of Conduct which is communicated to suppliers including through the website: https://www.symetal.gr/arxeia/files/SYMETAL-Supplier-Code-of-Conduct-EN.pdf It evaluates and prioritizes risks within its procurement categories following a dedicated procedure. All Suppliers are classified based on their

CRITERION	RATING	COMMENT
		<p>relation to the Entity. Suppliers are evaluated according to a Self-Assessment Questionnaire and are requested to sign the Supplier Code of Conduct accordingly.</p> <p>A-level suppliers will be requested to participate in the EcoVadis assessment.</p>
2.5 Impact Assessments	Conformance	<p>The Entity has conducted Environmental Impact Assessment (EIA) for both plants, as a legal requirement related to the operations permit issued by Greek State Authorities. Environmental, energy, waste management, water management, social and cultural aspects are included in the EIAs. A Biodiversity and Alien Species Impact Assessment has been conducted for both plants. The Human Rights Due Diligence includes an extended and detailed Human Rights Impact Assessment. Human Rights Impact Assessments have been drafted for all existing projects and are conducted in accordance to the 'Guide to Human Rights Impact Assessment and Management (HRIAM), UN Global Compact'. The Labour and Human Rights Policy is available at the website: https://www.symetal.gr/arxeia/files/SYMETAL-Labour-Human-Rights-Policy-EN.pdf</p>
2.6 Emergency Response Plan	Conformance	<p>The development of Emergency Response Plans (ERPs) are requirements of ISO 14001 and ISO 45001, where valid certifications are held for both plants: https://www.symetal.gr/en/how-we-do-business#certificates</p> <p>The Entity has risk assessments and Standard Operating Procedures to identify, manage and respond to emergency risks.</p>
2.7 Mergers and Acquisitions	Conformance	<p>The Entity is part of the Viohalco Group and the Group's Legal Department has a corporate Standard Operating Procedure that prescribes the process to be followed to evaluate environmental, social and governance risks relating to mergers and acquisitions. The procedure is implemented centrally by Viohalco Group Legal Department.</p>
2.8 Closure, Decommissioning and Divestment	Conformance	<p>The Entity has a Standard Operating Procedure which prescribes the process to be followed to review risks relating to environmental social and governance issues upon the closure, decommissioning and de-investment of an existing facility.</p>

CRITERION	RATING	COMMENT
3.1 Sustainability Reporting	Conformance	<p>The Entity participates in the sustainability reporting of ElvalHalcor (part of the Viohalco Group). The Sustainability Report, developed according to the Global Reporting Initiative (GRI) guidelines and third party verified against the AA1000 Assurance Standard, is available on the website, pages 70 - 77: https://www.symetal.gr/arxeia/files/Sustainability-Report-2020-EN.pdf</p> <p>The Entity prepares an annual, detailed Environmental Statement as part of its EMAS certification: https://symetal.gr/arxeia/files/Environmental-Statement-2020.pdf</p> <p>The Entity annually submits data on wastes, air emissions, waste water disposal and water use to the Ministry of Environment, which are made public.</p>
3.2 Non-compliance and liabilities	Conformance	<p>There were no incidents of non-compliance with laws and regulations in the social and economic area during 2020 - 21. Fines or judgements are detailed, where applicable, in the Entity's Annual Financial Report: https://www.symetal.gr/arxeia/files/SYMETAL-Annual-Financial-Report-2020-EN.pdf</p>
3.3a Payments to governments (legal and contractual)	Conformance	<p>The Entity issues an Annual Financial Report, which is publicly available: https://www.symetal.gr/arxeia/files/SYMETAL-Annual-Financial-Report-2020-EN.pdf</p> <p>The Entity makes no payments to government other than the legal payment of taxes.</p>
3.3b Payments to governments (disclosure - bauxite mining)	Not Applicable	<p>This Criterion is not applicable to the Entity's Certification Scope.</p>
3.4 Stakeholder complaints, grievances and requests for information	Conformance	<p>The Entity implements a system to address complaints, grievances and requests for information, which is accessible to both internal and external stakeholders. This system is defined in the Code of Conduct. There are complaint and suggestion boxes on-site for employees to submit anonymous complaints and a dedicated e-mail: opinion@symetal.vionet.gr</p> <p>All communication details and a contact form are available on the Entity's website for external complaints: https://www.symetal.gr/en/contact</p>
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	<p>The Entity has conducted Life Cycle Assessments (LCAs) according to ISO 14044 for the Laminated</p>

CRITERION	RATING	COMMENT
		Material and Lacquered Foil Aluminium products (Mandra plant) and Single Rolled and Double Rolled Aluminium products (Oinofyta plant). Both LCAs are available upon request (short versions).
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	The Entity has conducted Life Cycle Assessments (LCAs) according to ISO 14044 for the Laminated Material and Lacquered Foil Aluminium products (Mandra plant) and Single Rolled and Double Rolled Aluminium products (Oinofyta plant). Both LCAs are available upon request (short versions).
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	<p>The Entity's Life Cycle Assessments (LCAs) are available to the public on request. The LCAs include system boundaries and the Entity follows the ISO 14044 requirement for the content of any public communication of an LCA.</p> <p>The Entity, as part of the European Aluminium/ European Aluminium Foil Association, regularly takes part in sustainability surveys and annually submits data to be processed by the association for industry-level studies, which are publicly available.</p>
4.2 Product design	Conformance	The Entity's product design and development procedure includes consideration of life cycle impacts. The design and development process includes design for recyclability and re-use. Dismantling, disassembly and reuse/recycling relies on the downstream links of the aluminium value chain. The procedure applies to the Laminated Material and Lacquered Foil Aluminium products (Mandra plant).
4.3a Aluminium Process Scrap (targets)	Conformance	The Entity monitors all Process Scrap produced on site and segregates it for remelting. The monitoring takes place under multiple perspectives, aiming to ensure involvement both by Management and personnel. An aluminium recycling culture has been established at the Entity.
4.3b Aluminium Process Scrap (alloy separation)	Conformance	The Entity monitors all Process Scrap produced on site and segregates it for remelt. The monitoring takes place under multiple perspectives, aiming to ensure involvement both by Management and personnel. An aluminium recycling culture has been established at the Entity.
4.4a Collection and recycling of products at end-of-life (strategy)	Conformance	The Entity implements recycling strategy requirements of its parent company, Elval, which has a clear approach in regards of all process concerning collection and recycling of products at end-of-life.

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		<p>Elval has issued a 2020 – 2025 recycling strategy which includes targets, time frames and supporting activities. Elval's industry campaign "Every Can Counts" is fully implemented and supported by the Entity. Monitoring takes place to ensure involvement both by Management and personnel.</p>
<p>4.4b Collection and recycling of products at end-of-life (engagement)</p>	<p>Conformance</p>	<p>The Entity implements recycling strategy requirements of the mother company, Elval, which has a clear approach in regards of all process concerning collection and recycling of products at end-of-life. Elval has issued a 2020 – 2025 recycling strategy which includes targets, time frames and supporting activities. Elval's industry campaign "Every Can Counts" is fully implemented and supported by the Entity. Monitoring takes place to ensure involvement both by Management and personnel.</p>
<p>PRINCIPLE 5 GREENHOUSE GAS EMISSIONS</p>		
<p>5.1 Disclosure of GHG emissions and energy use</p>	<p>Conformance</p>	<p>The Entity participates in the ElvalHalcor Sustainability Report, which includes energy and GHG emission data, page 75: https://www.symetal.gr/arxeia/files/Sustainability-Report-2020-EN.pdf</p> <p>The Entity prepares an annual, detailed Environmental Statement as part of its EMAS certification: https://symetal.gr/arxeia/files/Environmental-Statement-2020.pdf</p> <p>The Entity reports GHG emissions to EcoVadis and the CDP and energy data to the European Aluminium/European Aluminium Foil Association. The Entity annually submits data on wastes, air emissions, waste water disposal and water use to the Ministry of Environment, which are made public.</p>
<p>5.2 GHG emissions reductions</p>	<p>Minor Non-Conformance</p>	<p>A series of energy reduction objectives and targets, which will deliver GHG emissions reductions are contained within the public Environmental Statement: https://symetal.gr/arxeia/files/Environmental-Statement-2020.pdf</p> <p>However, there are currently no time-bound GHG emissions reductions targets in place or plans to achieve Scope 2 and Scope 3 procurement based GHG emissions reductions. Viohalco Group is in the process of coordinating the consistent development of GHG emissions key performance indicators and reduction targets which will be published in due course.</p>

CRITERION	RATING	COMMENT
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 is certified under ISO 14001 Environmental Management System which is fully implemented. All Emissions to Air are monitored, analysed and reported under terms of Environmental Permit Conditions. Emissions' impact is assessed in the Environmental Impact Assessment.
6.2 Discharges to Water	Conformance	The Oinofyta plant's wastewater is treated by the parent company Elval, which is adjacent to the plant. Elval operates a Waste Water Treatment Plant that includes two modern wastewater treatment lines for different wastewater streams. The output is discharged to the Asopos River, located near the plant's boundary. All regulatory requirements are fully met. The Mandra plant has conducted a Water Risk Assessment (WRA) which included the quality of wastewater discharged. Based on the WRA results, no material risks were identified and no adverse effects arise from this process as the quality of the wastewater is well below the established threshold.
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	The Entity has conducted risk assessment and identified risks of Spills and Leakage. The Entity has plans and procedures established for incident management and reporting. The Entity's certified ISO 14001 management system covers the management of Spills and Leakage.
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	The Entity has conducted risk assessment and identified risks of Spills and Leakage. The Entity has plans and procedures established for incident management and reporting. The Entity's certified ISO 14001 management system covers the management of Spills and Leakage.
6.4a Reporting of Spills (immediate disclosure)	Conformance	In case of a Spill or leak that results in environmental pollution, the Entity has a Standard Operation Procedure which prescribes the immediate steps to be taken to address the incident, to report it and also identify the root causes in order to proceed with the

CRITERION	RATING	COMMENT
		needed corrective actions. The procedure is in accordance with the Entity's environmental permits and ISO 14001 certification.
6.4b Reporting of Spills (regular reporting)	Conformance	The Entity's environmental performance is disclosed in the Sustainability Report, pages 70 -77: https://www.symetal.gr/arxeia/files/Sustainability-Report-2020-EN.pdf pp70-77 There were no significant Spills at the Entity during 2020 (nor in 2021, of which the Sustainability Report is yet to be published).
6.5a Waste management and reporting (strategy)	Conformance	The Entity has implemented an Environmental Management System, certified to the ISO 14001 standard, which covers waste management requirements. The working instruction is designed in accordance with the Waste Management Hierarchy. The Entity maintains a documented waste management logistics digital system that is respected and implemented by all management, personnel and contractors. All relevant data are submitted to the State Authority (Ministry of Environment) annually via the Waste Management Digital Register System: https://wrm.ypeka.gr
6.5b Waste management and reporting (disclosure)	Conformance	The Entity has implemented an Environmental Management System, certified to the ISO 14001 standard. The Entity annually publishes in ElvalHalcor's Sustainability Report, the quantity of Hazardous and Non-Hazardous Waste produced, pages 70 - 77: https://www.symetal.gr/arxeia/files/Sustainability-Report-2020-EN.pdf
6.6a Bauxite Residue (storage construction)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6b Bauxite Residue (integrity checks and controls)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6c Bauxite Residue (water discharge)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6d Bauxite Residue (marine and aquatic environments)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6e Bauxite Residue (state of the art technologies)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6f Bauxite Residue (remediation)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
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)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8b Dross (recycling)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8c Dross (review of alternatives)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

PRINCIPLE 7 WATER STEWARDSHIP

7.1a Water assessment (mapping)	Conformance	The Entity has conducted Water Risk Assessments (WRA), which includes a Water Mass Balance and maps the flow of water from the input to the outputs. The Entity's operation permits include a verified Environmental Impact Assessment where Water Mass Balance has been drawn and input-output water flow mapping is included. https://www.symetal.gr/arxeia/files/Sustainability-Report-2020-EN.pdf
7.1b Water assessment (risk assessment)	Conformance	Water Risk Assessments which include the Entity's catchments have been conducted taking into consideration references from the WWF Water Risk Filter and the Alliance for Water Stewardship's International Water Stewardship Standard.
7.2a Water management (management plans)	Conformance	The Entity has implemented an Environmental Management System (EMS), certified to ISO 14001. Environmental Permits issued by the Ministry of Environment and Energy are in place, including terms and conditions relating to water management and use, monitored by the relevant competent authorities. Water-related risks are assessed as part of the EMS and no material water risks have been identified.

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7.2b Water management (monitoring)	Conformance	The Entity has implemented an Environmental Management System (EMS), certified to ISO 14001. Environmental Permits issued by the Ministry of Environment and Energy are in place, including terms and conditions relating to water management and use, monitored by the relevant competent authorities. Water-related risks are assessed as part of the EMS and no material water risks have been identified.
7.3 Disclosure of water usage and risks	Conformance	The Entity submits data on water use to the Ministry of Environment and Energy. Data relating to water use are publicly disclosed on the Ministry's website: https://ypen.gov.gr The Entity's water intensity is also disclosed in the ElvalHalcor's Sustainability Report, page 75: https://www.symetal.gr/arxeia/files/Sustainability-Report-2020-EN.pdf
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	The Entity has conducted Biodiversity and Alien Species Impact Assessments for the Oinofyta and Mandra plants. Impacts on biodiversity considered results of a bibliographical study and the field observations by third party experts.
8.2a Biodiversity management (biodiversity action plans)	Conformance	The Entity has conducted Biodiversity and Alien Species Impact Assessments for the Oinofyta and Mandra plants. Impacts on biodiversity considered the results of a bibliographical study and the field observations by external experts. An improvement plan was prepared and completed as scheduled at the Oinofyta plant. There were no material risks to biodiversity identified.
8.2b Biodiversity management (consultation and mitigation hierarchy)	Conformance	The Entity has conducted Biodiversity and Alien Species Impact Assessments for the Oinofyta and Mandra plants, undertaken by a third party. Both studies were in accordance with the Biodiversity Mitigation Hierarchy and were informed by community and expert consultation.
8.2c Biodiversity management (reporting)	Conformance	The Entity's Biodiversity and Alien Species Impact Assessments will be included in the 2021 ElvalHalcor Sustainability Report.
8.3 Alien Species	Conformance	The Entity has conducted Biodiversity and Alien Species Impact Assessments for the Oinofyta and Mandra plants. Alien Species have been planted as ornamental garden plants, none of which are considered invasive.

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	<p>The Entity’s commitment to protect Human Rights is evident in its Code of Conduct and Business Ethics: https://www.symetal.gr/arxeia/files/Symetal-Code-of-Conduct-Business-Ethics-EN-final-2017.pdf</p> <p>A clear statement of support to the United Nations Global Compact’s principles is included in the ElvalHalcor’s Sustainability Report: https://www.symetal.gr/arxeia/files/Sustainability-Report-2020-EN.pdf</p> <p>The Entity operates under the Greek legislation and European Union normative, respecting the constitutional Human Rights values.</p> <p>Further information is available in the following: https://www.symetal.gr/arxeia/files/SYMETAL-Labour-Human-Rights-Policy-EN.pdf https://www.symetal.gr/arxeia/files/SYMETAL-Business-Ethics-Anti-Corruption-Policy-EN.pdf https://www.symetal.gr/arxeia/files/SYMETAL-Supplier-Code-of-Conduct-EN.pdf</p>
9.1b Human Rights Due Diligence (process)	Conformance	<p>The Entity’s commitment to protect Human Rights is evident in its Code of Conduct and Business Ethics: https://www.symetal.gr/arxeia/files/Symetal-Code-of-Conduct-Business-Ethics-EN-final-2017.pdf</p> <p>A clear statement of support to the United Nations Global Compact’s principles is included in the ElvalHalcor’s Sustainability Report: https://www.symetal.gr/arxeia/files/Sustainability-Report-2020-EN.pdf</p> <p>The Entity operates under the Greek legislation and European Union normative, respecting the constitutional Human Rights values.</p> <p>Further information is available in the following: https://www.symetal.gr/arxeia/files/SYMETAL-Labour-Human-Rights-Policy-EN.pdf</p>

CRITERION	RATING	COMMENT
		https://www.symetal.gr/arxeia/files/SYMETAL-Business-Ethics-Anti-Corruption-Policy-EN.pdf https://www.symetal.gr/arxeia/files/SYMETAL-Supplier-Code-of-Conduct-EN.pdf
9.1c Human Rights Due Diligence (remediation)	Conformance	<p>The Entity implements a Human Rights Due Diligence process aligned to the United Nations Guiding Principles on Business and Human Rights. The Entity's commitment to protect Human Rights is evident in its Code of Conduct and Business Ethics. A clear statement of support to the United Nations Global Compact's principles is included in the ElvalHalcor's Sustainability Report: https://www.symetal.gr/arxeia/files/Sustainability-Report-2020-EN.pdf</p> <p>The Entity operates under the Greek European law, in line with its corporate values. The Human Rights Due Diligence process has identified no evidence that the Entity has caused or contributed to adverse Human Rights impacts.</p>
9.2 Women's Rights	Conformance	<p>A clear statement is included in the Entity's Code of Conduct and Business Ethics against Discrimination and on the protection of women's rights. No evidence of Discrimination, unjustifiable under-representation, unequal pay, physical or sexual abuse, lack of opportunities or any other source of indirect impact has been identified.</p>
9.3 Indigenous Peoples	Not Applicable	<p>There are no Indigenous Peoples in the Entity's Area of Influence.</p>
9.4 Free, Prior, and Informed Consent (FPIC)	Not Applicable	<p>There are no Indigenous Peoples in the Entity's Area of Influence.</p>
9.5 Cultural and sacred heritage	Not Applicable	<p>There are no Indigenous Peoples, sacred or cultural heritage sites and values within the Entity's Area of Influence.</p>
9.6a Resettlements (avoid or minimise)	Not Applicable	<p>The Entity's sites are located in industrial facilities areas. There are no Resettlement requirements.</p>
9.6b Resettlements (where unavoidable)	Not Applicable	<p>The Entity's sites are located in industrial facilities areas. There are no Resettlement requirements.</p>
9.7a Local Communities (rights and interests)	Conformance	<p>The Human Rights Due Diligence process did not identify any potential infringement of Human Rights. The Entity has ongoing constructive and positive engagement with its local Communities as evidenced by stakeholder interviews and feedback, as well as the Sustainability Report:</p>

CRITERION	RATING	COMMENT
		https://www.symetal.gr/arxeia/files/Sustainability-Report-2020-EN.pdf
9.7b Local Communities (impacts)	Conformance	The Entity has conducted Environmental Impact Assessments and evaluated the potential impacts to the surrounding Communities that stem out of its activities through various studies (e.g. Environmental Risk Assessment, Biodiversity Impact Assessment, Water Risk Assessment, Environmental Noise measurements). No adverse impacts to the Local Communities have been identified. The Entity has ongoing constructive and positive engagement with its local Communities as evidenced by stakeholder interviews and feedback, as well as the Sustainability Report: https://www.symetal.gr/arxeia/files/Sustainability-Report-2020-EN.pdf
9.7c Local Communities (livelihoods)	Conformance	The Entity has ongoing constructive and positive engagement with the local Communities as evidenced by stakeholder interviews and feedback. There is a community program to support Local Communities, with donations of equipment and in-kind support (such as supporting the local medical centre, schools, sport clubs) rather than direct financial donations: https://www.symetal.gr/en/news
9.8 Conflict-Affected and High-Risk Areas	Not Applicable	The Entity is not located in an area of conflict or high risk. Any risks are associated with the supply chain is addressed by the Code of Conduct and the supplier evaluation procedure.
9.9 Security practice	Conformance	Private security providers are not used at the Oinofyta plant. In synergy with Elval, the Entity employs gatehouse personnel and night guardians that operate monitoring systems in accordance with its Code of Conduct and Business Ethics. At the Mandra plant, a private security company has been contracted which operates under specific rules and with certain authorities on incident management, all of which fall within the scope of the Entity's Code of Conduct and Business Ethics.
PRINCIPLE 10 LABOUR RIGHTS		
10.1a Freedom of Association and Right to Collective Bargaining (freedom of association)	Conformance	The Entity fully respects the right of Freedom of Association. A clear statement is included in the Code of Conduct and Business Ethics and in the Labour and Human Rights Policy: https://www.symetal.gr/arxeia/files/Symetal-Code-of-Conduct-Business-Ethics-EN-final-2017.pdf

CRITERION	RATING	COMMENT
		<p>https://www.symetal.gr/arxeia/files/SYMETAL-Labour-Human-Rights-Policy-EN.pdf</p> <p>Support to the UN Global Compact has been formally declared in the Sustainability Report:</p> <p>https://www.symetal.gr/arxeia/files/Sustainability-Report-2020-EN.pdf</p>
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Conformance	<p>The Entity fully respects the right to Collective Bargaining. A clear statement is included in the Code of Conduct and Business Ethics and in the Labour and Human Rights Policy:</p> <p>https://www.symetal.gr/arxeia/files/Symetal-Code-of-Conduct-Business-Ethics-EN-final-2017.pdf</p> <p>https://www.symetal.gr/arxeia/files/SYMETAL-Labour-Human-Rights-Policy-EN.pdf</p> <p>Support to the UN Global Compact has been formally declared in the Sustainability Report:</p> <p>https://www.symetal.gr/arxeia/files/Sustainability-Report-2020-EN.pdf</p>
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Conformance	<p>Worker representation is assured by alternative means, including participation in Open Councils, Health and Safety Representatives Team, on-the-job awareness sessions, suggestion boxes and procedures.</p>
10.2a Child Labour (minimum age)	Conformance	<p>Child Labour is prohibited by Greek and European law. The Entity fulfils its legal conditions and has a clear policy against Child Labour included in the Code of Conduct and Business Ethics. All Workers at the Entity are aged 18 or over.</p>
10.2b Child Labour (hazardous)	Conformance	<p>Child Labour is prohibited by Greek and European law. The Entity fulfils its legal conditions and has a clear policy against Child Labour included in the Code of Conduct and Business Ethics. All Workers at the Entity are aged 18 or over.</p>
10.2c Child Labour (worst forms)	Conformance	<p>Child Labour is prohibited by Greek and European law. The Entity fulfils its legal conditions and has a clear policy against Child Labour included in the Code of Conduct and Business Ethics. All Workers at the Entity are aged 18 or over.</p>
10.3a Forced Labour (human trafficking)	Conformance	<p>In accordance with both Greek and European Union law, Forced Labour is prohibited. The Entity fulfils its legal requirements and is implementing a Human Rights Due Diligence that includes an evaluation of Forced Labour risks. The Entity does not engage in Forced Labour, directly or indirectly nor does it tolerate Forced Labour in its supply chain. A clear</p>

CRITERION	RATING	COMMENT
		policy against Forced Labour is included in the Code of Conduct and Business Ethics, Sustainability Report (support of the UN Global Compact) and Supplier Code of Conduct.
10.3b Forced Labour (deposits, fees, advances)	Conformance	The Entity does not require any form of deposit, fee or advance from Workers prior to their employment, nor does it tolerate any such actions on behalf of its supply chain. Specific and clear statements are included in the Code of Conduct and Business Ethics, Sustainability Report, Supplier Code of Conduct and Human Rights Due Diligence.
10.3c Forced Labour (migrant workers)	Conformance	The Entity does not require Migrant Workers to lodge deposits or security payments at any time. A clear policy against Forced Labour is included in the Code of Conduct and Business Ethics, Sustainability Report (support of the UN Global Compact) and Supplier Code of Conduct.
10.3d Forced Labour (debt bondage)	Conformance	The Entity's Code of Conduct and Business Ethics prohibits holding Workers in debt bondage or forcing them to pay off a loan as evidenced by its Sustainability Report, Supplier Code of Conduct and Human Rights Due Diligence, and as aligned to Greek and European Union law.
10.3e Forced Labour (freedom of movement)	Conformance	The Entity is committed to fair employment practices and does not restrict the movement of any person on site, for any reason. Clear statements are included in the Code of Conduct and Business Ethics, Sustainability Report, Supplier Code of Conduct and Human Rights Due Diligence.
10.3f Forced Labour (retention of identity papers, permits, certificates)	Conformance	The Entity retains only copies of Workers personal documents. A clear policy against Forced Labour is included in the Code of Conduct and Business Ethics, Sustainability Report (support of the UN Global Compact) and in the Supplier Code of Conduct.
10.3g Forced Labour (freedom to terminate employment)	Conformance	The local Greek legislation and the European Union normative are fully respected by the Entity. All employees are free to terminate their employment on their wish, according to applicable law.
10.4 Non-Discrimination	Conformance	The Entity's Code of Conduct and Business Ethics, and Supplier Code of Conduct cover Non-Discrimination. The Human Rights Due Diligence exercise did not highlight any material risks concerning Discrimination.

CRITERION	RATING	COMMENT
10.5 Communication and engagement	Conformance	<p>Communication and direct engagement of Workers is assured via Health and Safety Committee meetings, departmental meetings and on-the-job training seminars.</p> <p>A dedicated procedure is in place enforcing the submissions of improvement proposals.</p> <p>Complaints can be raised via a dedicated procedure, without any threat of reprisal intimidation or harassment, whereas a suggestion box, operated solely by the General Manager, is used for the submissions of anonymous complaints of any form.</p>
10.6 Disciplinary practices	Conformance	<p>The Entity's Code of Conduct and Business Ethics Policy outlines the Disciplinary procedure and practices. The Human Rights Impact Assessment, included in the Human Rights Due Diligence, has revealed no material risks in what concerns Disciplinary practices of any kind.</p>
10.7a Remuneration (living wage)	Conformance	<p>Minimum wages are set according to the National Collective Agreement and the Entity is fulfilling the legal requirements agreed by all social stakeholders.</p> <p>The Entity provides to all of employees additional benefits that improve their living standards, such as a private health insurance, food vouchers and bonuses.</p>
10.7b Remuneration (method of payment)	Conformance	<p>All payments are made centrally, in full and without delays, according to domestic legislation, after the legal deductions for taxes, health insurance and pension schemes contributions. The payments are in alignment with National Collective Agreement.</p>
10.8 Working Time	Conformance	<p>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. The Labour Inspectorate is the relevant state authority responsible to control and inspect implementation of legal requirements.</p>
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	<p>The Entity implements a certified ISO 45001 Management System at both plants.</p> <p>The Health and Safety Policy is respected and fulfilled both by Management and personnel. Greek and European Union law is followed.</p>
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	<p>The Entity implements a certified ISO 45001 Management System at both plants.</p> <p>Visitors are made aware of Health and Safety Policy and that they are obliged to comply.</p>

CRITERION	RATING	COMMENT
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Conformance	The Entity implements a certified ISO 45001 Management System at both plants. This includes requirement to comply with Greek, European Union and international law.
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	The Entity implements a certified ISO 45001 Management System at both plants. The Health and Safety Policy and the conducted training reinforces the right of Workers to stop work in hazardous or unsafe conditions.
11.2 OH&S Management System	Conformance	The Entity implements a certified ISO 45001 Management System at both plants.
11.3 Employee engagement on health and safety	Conformance	Following Greek and European Union legal requirements, employees are made aware of and informed about Occupational Health and Safety (OH&S). The Entity implements a certified ISO 45001 Management System at both plants, where specific procedures, reporting and documentation is included aiming to confirm employees' awareness and training on OH&S.
11.4 OH&S performance	Conformance	The Entity's OH&S performance is monitored, documented and reported to the Labour Inspectorate which is the relevant state authority according to the procedures, records and documents implemented by the certified ISO 45001 Management System. The Entity's OH&S performance is benchmarked through European Aluminium.

Document Control and Version History

Revision	Date	Notes
0	18 March 2022	Initial Certification Audit - Full Certification. Due to restricted access to facilities associated with COVID-19 travel restrictions a three month extension to Symetal's two year deadline for Certification to 31 January 2022 was granted.