

ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

Befesa Aluminio, S.L.U.

CERTIFICATE NUMBER
313

ASI STANDARD
**PERFORMANCE
STANDARD
(V3 2022)**

CERTIFICATION
LEVEL
**FULL
CERTIFICATION**

ASI ACCREDITED
AUDITING FIRM
**DNV BUSINESS
ASSURANCE
SERVICES UK LTD.**

DATE OF ISSUE
17 AUGUST 2023

DATE OF EXPIRY
16 AUGUST 2026

CERTIFIED SINCE
17 AUGUST 2023

AUTHORISED BY

A handwritten signature in black ink, appearing to be 'J. H.', 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

Production of Solid and Liquid
Aluminium Alloys and aluminium
waste treatments at Erandio Plant,
Spain.

AUDIT REPORT PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Befesa Aluminio, S.L.U.
ENTITY NAME	Befesa Aluminio, S.L.U.
CERTIFICATION SCOPE	Production of Solid and Liquid Aluminium Alloys and aluminium waste treatments at Erandio Plant, Spain.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthouses
ASI STANDARD	<ul style="list-style-type: none">Performance Standard V3
AUDIT TYPE	<ul style="list-style-type: none">Initial Certification Audit
AUDIT FIRM	DNV Business Assurance Services UK Ltd.
AUDIT DATE	<ul style="list-style-type: none">26 – 29 June 2023
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">21 July 2023
AUDIT SCOPE	<p>The audit scope covers the activities for the production of Solid and Liquid Aluminium Alloys and aluminium waste treatments at Erandio Plant, Spain.</p> <p>Supply Chain Activities included in the audit scope:</p> <ul style="list-style-type: none">Aluminium Re-melting/Refining <p>All relevant criteria in the ASI Performance Standard were included in the audit scope.</p>
AUDIT OUTCOME	<ul style="list-style-type: none">Certification
AUDIT METHODOLOGY DECLARATION	<p>The Auditors confirm that:</p> <ul style="list-style-type: none"><input checked="" type="checkbox"/> The information provided by the Entity is true and accurate to the best knowledge of the Auditor(s) preparing this report.<input checked="" type="checkbox"/> The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous.<input checked="" type="checkbox"/> The Audit Scope and audit methodology are sufficient to establish confidence that the findings are indicative of the performance of the Entity's defined Certification Scope.<input checked="" type="checkbox"/> The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.
CERTIFICATION PERIOD	17 August 2023 – 16 August 2026
NEXT AUDIT TYPE	Re-Certification Audit

NEXT AUDIT DATE 16 August 2026

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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

Befesa Aluminio, S.L. operates one facility in Erandio (Bizkaia, Spain), which is an aluminium refinery involved in the eco-industry sector. The company recycles, recovers, and values all types of waste from the aluminium industry.

Since its inception, Befesa Aluminio, S.L. has focused on producing aluminium alloys that meet various specifications for the automotive, domestic appliance, and construction sectors. The Erandio plant produces final products in three forms: aluminium ingots and their alloys for moulding, 1,000 kg ingots for remelting, and liquid aluminium. The company produces approximately 75,000 tonnes of aluminium alloys annually.

The facility occupies approximately 33,000 m² of land, with over 12,500 m² occupied with built facilities. There are no sensitive receptors in the area, with the closest being the Urdaibai reserve, located 40 kilometres away.

Befesa Aluminio, S.L. has been in operation since 1956 and currently employs 106 individuals. The company's facilities include two rotary furnaces, four holding furnaces, two liquid aluminium installations, two casting lines, one salt slag cooling system, two gas filter systems, two warehouses, and two outdoor car parks.

Main Stakeholders include the residents of Erandio, collaborating companies, local authorities, and educational and social organisations in the surrounding area.

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	High	High
RISKS	High	High	High	High
PERFORMANCE	High	High	High	High
OVERALL		HIGH		

FINDINGS

CRITERION	RATING	COMMENT
1. BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	<p>The Entity has implemented a system to ensure legal compliance across all functions of the Entity with a competent legal team. The Entity has defined Policies and processes to ensure risk identification and Compliance with applicable legislation that allows communication to all persons within the Entity. This process is led by the Chief Executive Officer and is continuously reviewed by external consultants and audited on an annual basis. Legal compliance commitments are documented and communicated internally and externally in the Code of Conduct and Integrated Policy.</p> <p>The Code of Conduct is available at: https://images.befesa.com/media/2022/03/Codigo-de-Conducta-Apendice-penal-ES.pdf</p> <p>The Integrated Policy is available at: https://www.befesa.com/es/sustainability/reports-policies-certifications/#1635072559856-6a3a2270-05f5</p>
1.2 Anti-Corruption	Conformance	<p>The Entity has defined a Code of Conduct and an Anti-Corruption Policy which is supported by organisational measures such as the compliance process to identify and manage risks against Corruption in all its forms, including Bribery, in accordance with applicable legislation and international standards. The defined processes affect all persons within the Entity and subcontractors. Compliance is promoted through training and communication with all employees and internal audits. The Entity has implemented a whistleblowing process to handle complaints from Stakeholders, including those suspected of Corruption.</p> <p>The whistleblowing process and channel are available at: https://www.bkms-system.net/bkwebanon/report/clientInfo?cin=2befesa1&c=-1&language=eng</p> <p>The Entity has not received any notifications or sanctions related to breaches of legislation in the last five years, including those specifically related to Bribery, Corruption, or anti-competitive behaviour. There is no record of the Entity having had their business licence permanently or suspended for Corruption or anti-competitive behaviour.</p>
1.3a-e Code of Conduct	Conformance	<p>The Entity has defined and implemented a Code of Conduct that sets out the commitments and principles relating to environmental, social and governance performance. The Code of Conduct is reviewed regularly. The Code of Conduct is available at: https://www.befesa.com/es/sustainability/reports-policies-certifications/#1635072559856-6a3a2270-05f5</p> <p>The Entity has defined processes to communicate and apply the Code of Conduct to all employees and subcontractors.</p>
2. POLICY AND MANAGEMENT		
2.1a-f Environmental, Social, and Governance Policy	Conformance	<p>The Entity has established Policies consistent with the environmental, social and governance practices included in the ASI standard. The Entity's General Management has approved and supported the</p>

CRITERION	RATING	COMMENT
		<p>deployment of the Policies by providing resources. The Entity has demonstrated that the Policies are periodically reviewed as part of the Management Review Process of the Management System. The Entity communicates their Policies internally through brochures, via training, on the intranet and externally via the website.</p> <p>https://www.befesa.com/es/sustainability/reports-policies-certifications/#1635072559856-6a3a2270-05f5</p>
2.2a-c Leadership	Conformance	The Entity has designated responsibilities to the General Manager and his management team for the implementation and communication of Policies and the provision of resources to implement, maintain and improve the Management System, which is aligned with the ASI Performance Standard.
2.3a Environmental and Social Management Systems - Environmental	Conformance	The Entity has implemented Environmental Management Systems in accordance with and certified to ISO 14001, Eco-Management and Audit Scheme (EMAS), ISO 50001 and ISO 14064. These systems are audited by an independent entity on an annual basis.
2.3b Environmental and Social Management Systems - Social	Conformance	The Entity has implemented an ISO 45001 certified Management System. This system is audited by an independent entity on an annual basis.
2.4a-e Responsible Sourcing	Minor Non-Conformance	<p>The Entity has defined a Code of Conduct for suppliers, which is disseminated internally and externally within the supply chain. The Entity has defined objectives regarding the communication of the Code of Conduct to suppliers. These objectives are included in the Sustainability Report available at:</p> <p>https://www.befesa.com/es/sustainability/reports-policies-certifications/#1635072559830-14cb20bb-8331</p> <p>However, it was identified the Entity does not have a risk analysis for compliance with the supplier Code of Conduct by supply chains.</p>
2.5a-g Environmental and Social Impact Assessments	Conformance	<p>The Entity has implemented an internal procedure and conducts Environmental and Social Impact Assessments for New Projects or major modifications to existing Facilities. Risk assessments and actions derived from the management plan are conducted annually.</p> <p>The Entity has demonstrated that it has not made any changes to their Facilities that would have negative environmental or social impacts, but rather, investments to improve operations and eliminate or reduce risks. The Entity has a process to determine an environmental and social impact management plan to prevent, mitigate and, if necessary, remediate any identified Material impacts, although it is evident that its use has not been necessary in recent years. The Entity discloses in the EMAS Statement the Environmental and Social Impact Assessments and the latest active version of the environmental and social impact management plan, available at:</p> <p>https://www.befesa.com/es/sustainability/reports-policies-certifications/#1635072559881-be9221c7-5550</p>
2.6a-h Human Rights Impact Assessment	Conformance	The Entity has conducted a Human Rights Impact Assessment (HRIA), including gender analysis, for New Projects or Major Changes to existing Facilities. They have procedures in place to manage New Projects, which assess the impact on human rights. In addition, the Entity has established a preventive control process to ensure that human rights are not violated (due diligence), assesses the risks and

CRITERION	RATING	COMMENT
		<p>defines an annual action plan for all processes and Facilities to control these risks. The Entity has demonstrated that they do not generate impacts on Human Rights in the projects undertaken, or in current operations and Facilities, so it has not been necessary to remedy any Material impacts.</p> <p>The HRIA and the latest version of the human rights impact management plan are included in the annual Sustainability Report, section 4.5: https://images.befesa.com/media/2023/06/Befesa_ESG_Progress_Report_2022-.pdf</p>
2.7a-f Emergency Response Plan	Conformance	<p>The Entity has an ISO 14001 and ISO 45001 certified Management System with internal procedures and an Emergency Response Plan called the Self-Protection Plan, which sets out the methodologies to be followed in case of possible emergencies that may arise because of several activities. The Entity has notified the local authority of the Self-Protection Plan. The Entity has demonstrated training and informed employees on the guidelines for action in the event of emergencies and carried out drills to test the effectiveness of the Self-Protection Plan. The Entity reports annually any environmental incidents in the EMAS Statement, there have been none in recent years: https://www.befesa.com/es/sustainability/reports-policies-certifications/#1635072559881-be9221c7-5550</p> <p>The Entity has communicated the Emergency Response Plan to the authorities and is available to Stakeholders upon request.</p>
2.8a-d Suspended Operations	Conformance	<p>The Entity has implemented an internal procedure that forms part of the Management System, which includes the methodology for identifying and assessing business continuity risk levels. The Entity has developed a contingency plan for risk situations that defines the action to be taken in the event of a disaster, including actions to be undertaken, those responsible, estimated times and return to normality. The identification and assessment of business continuity risk situations are reviewed annually and recorded in the Annual Management Report.</p>
2.9a-b Mergers and Acquisitions	Conformance	<p>The Entity has implemented a procedure that includes the protocol for action in the event of mergers and/or acquisitions, which defines the different phases and responsibilities. The Entity has demonstrated there have been no mergers and/or acquisitions in recent years therefore has not needed to initiate the process.</p>
2.10a-b Closure, Decommissioning and Divestment	Conformance	<p>The Entity has implemented a procedure that includes the protocol for action in the event of divestments, closures or closures, which defines the different phases and responsibilities. The Entity has demonstrated there have been no divestments, or closures in recent years, and therefore has not needed to initiate the process.</p>
3. TRANSPARENCY		
3.1a-b Sustainability Reporting	Conformance	<p>The Entity publicly discloses their governance approach and environmental, social and economic impacts on an annual basis in the Sustainability Report: https://www.befesa.com/es/sustainability/reports-policies-certifications/#1635072559830-14cb20bb-8331</p>

CRITERION	RATING	COMMENT
		<p>This report follows the guidelines of the Global Reporting Initiative (GRI) and includes information on the company's performance with respect to environmental, social and governance issues, demonstrating their alignment with the ASI standard.</p> <p>In addition, the Entity publishes annually their approach to governance and environmental impacts in the EMAS Statement: https://www.befesa.com/es/sustainability/reports-policies-certifications/#1635072559881-be9221c7-5550</p>
3.2 Non-compliance and Liabilities	Conformance	<p>The Entity discloses publicly and annually in the Sustainability Report the results of compliance with all applicable legal requirements and the sanctioning processes or sanctions received: https://images.befesa.com/media/2023/06/Befesa_ESG_Progress_Report_2022-.pdf</p> <p>The Entity publicly discloses their compliance results in the Annual Report available at: https://images.befesa.com/media/2023/03/Befesa_-_Annual_Report_2022-.pdf</p> <p>The Entity communicates its environmental legal compliance in the annual EMAS statement: https://www.befesa.com/es/sustainability/reports-policies-certifications/#1635072559881-be9221c7-5550</p> <p>The Entity has not received any type of fine or sanction from the administration in recent years for non-compliance.</p>
3.3a-c Payments to Governments	Conformance	<p>The Entity has implemented an Anti-Corruption and Bribery Policy which includes a commitment to only make payments to governments or public institutions on legal and/or contractual bases and principles. Any other payments to public institutions are strictly prohibited. The Entity has implemented annual external and internal audit processes, in compliance with tax legislation, which verify the consolidated annual accounts and the statutory annual accounts. These audits are performed by an external audit firm and an independent internal audit team. At the corporate level, the results of the audits and legal compliance are included in the Annual Report: https://images.befesa.com/media/2023/03/Befesa_-_Annual_Report_2022-.pdf</p> <p>The Entity has not made contributions to political parties, authorities, or governments, and therefore it is not necessary to disclose this aspect in the reports.</p>
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	<p>The Entity has implemented a complaints resolution process, available at: https://www.befesa.com/es/sustainability/governance/#compliance It is accessible to all interested parties and informs and trains employees in the complaints resolution process to ensure awareness. The Entity has a Compliance Committee and a Compliance system to deal with complaints received. The system and resources are adequate to deal with complaints, claims and requests for information about their operations. The Entity's compliance system is reviewed annually through internal audits and includes a risk analysis to identify control gaps.</p>

4. MATERIAL STEWARDSHIP

CRITERION	RATING	COMMENT
4.1a Environmental Life Cycle Assessment	Conformance	The Entity has two cradle-to-gate environmental Life Cycle Assessments (LCA) developed by an independent external consultant, based on the internationally recognised standards ISO 14040:2006 and ISO 14044:2006. Both assessments are developed for the manufacture of all solid and liquid alloys produced. These assessments include the environmental impacts corresponding to the stages of raw material supply, transport of raw materials to the plant and production processes carried out within the plant, without taking into account the use and End of Life stages, since when an alloy is manufactured, its final intended application (automotive, household appliances and/or construction) is not exactly known.
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	<p>The Entity has established an internal procedure to make LCAs available to customers upon request. The Entity has demonstrated that up to the time of the audit, no customer or public institution has requested such life cycle environmental analyses or any related information. The Entity has provided through ISO 14064 certification, information to customers on the carbon footprint of the production of manufactured Aluminium alloys. The Entity publishes their annual carbon footprint through the EMAS Statement, which includes a specific section on direct and indirect emissions: https://www.befesa.com/es/sustainability/reports-policies-certifications/#1635072559881-be9221c7-5550</p> <p>The Entity is a member of the EAA (European Aluminium Association) and therefore participates in making the complete Aluminium life cycle data available. The 2018 Life Cycle Inventory (LCI) report for the European Aluminium industry is available at: https://www.european-aluminium.eu/resource-hub/environmental-profile-report-2018</p> <p>The European refining sector for 2021 is available at: https://www.european-aluminium.eu/policy-areas/environment</p> <p>Carbon footprint information is available at: https://www.european-aluminium.eu/data/environmental-data</p>
4.2 Product Design	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.3a-b Aluminium Process Scrap	Conformance	The Entity's production process involves the generation of scrap waste. The Entity is a secondary Aluminium smelter, and all raw materials are considered Aluminium waste. All Aluminium entering the Entity's Facilities is consumed at the Entity's Facilities, focusing on 100% recycling of the raw materials received. The Entity has implemented procedures as part of their ISO 9001 and ISO 14001 Management Systems for the treatment, characterisation, and storage of the different types of materials that may be received as raw materials. The Entity has defined a scrap recycling target of 100% and monitors compliance using indicators that are reviewed regularly.
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.

CRITERION	RATING	COMMENT
4.4d Collection and Recycling of Products at End of Life	Conformance	<p>The Entity has implemented a material recycling strategy, increasing their management, and recycling capacity through multiple substantial changes to their Facilities and a series of investments. The Entity is a member of several associations at the state level (Aseral, http://www.aseral.es, Confemetal, https://confemetal.es) and the European level (European Aluminium Association, https://www.european-aluminium.eu).</p> <p>The Entity actively participates in the sustainability committees of these entities with a focus on improving the collection and recycling of products at the end of their useful life, establishing clear recycling plans, deadlines and strategies.</p>

5. GREENHOUSE GAS EMISSIONS

5.1a-b Disclosure of GHG Emissions and Energy Use	Conformance	<p>The Entity has implemented an Environmental Management System that includes procedures for the calculation of Greenhouse Gases (GHG) inventory and energy use. The Entity calculates and publishes GHG performance data and energy uses by energy source in the EMAS Statement, sustainability, and progress reports. The Entity verifies energy consumption and emissions data on an annual basis through external audits undertaken by independent entities based on ISO 14064-1, ISO 14001, EMAS and ISO 50001 standards. The EMAS Statement is published on the website: https://www.befesa.com/es/sustainability/reports-policies-certifications/#1635072559881-be9221c7-5550</p> <p>The Sustainability Report is available at: https://images.befesa.com/media/2023/06/Befesa_ESG_Progress_Report_2022-.pdf</p>
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	Conformance	<p>The Entity has implemented a Management System certified according to ISO 14064-1, ISO 14001, EMAS, and ISO 50001 standards. This system promotes continuous improvement, including a GHG Emissions Reduction Plan and a specific plan to reduce energy consumption. The Entity develops annual energy action plans to reduce the consumption of natural gas, electricity, and diesel. These energy action plans form the basis of the GHG Emissions Reduction Plan. The GHG reduction plan includes quantified reduction targets for each of the emissions (direct and indirect). The Entity publishes an annual EMAS Statement that includes data on GHG emissions as well as the reduction plan with the progress achieved: https://www.befesa.com/es/sustainability/reports-policies-certifications/#1635072559881-be9221c7-5550</p> <p>The Entity publishes its performance with respect to GHG emissions (section 3.4) and energy uses (section 3.3) in the annual Sustainability Report as well as the emissions reduction strategy and the progress achieved. The Sustainability Report is available at:</p>

CRITERION	RATING	COMMENT
		<p>https://images.befesa.com/media/2023/06/Befesa_ESG_Progress_Report_2022-.pdf</p> <p>The Entity has reduced GHG emissions in recent years through investment projects incorporated in plans to reduce emissions and energy consumption.</p>
5.4 GHG Emissions Management	Conformance	<p>The Entity has implemented a Management System certified according to ISO 14064-1, ISO 14001, EMAS, and ISO 50001. This system has operational controls to deploy and monitor the GHG Emissions Reduction Plan and the energy consumption reduction plan. The Entity develops annual energy action plans with assigned responsibilities, means and deadlines for implementation that include specific actions aimed at reducing their energy consumption. The Entity monitors the degree of progress of the actions of the energy reduction plan through a committee. These energy action plans are the basis for the GHG Emissions Reduction Plan.</p> <p>The Entity develops a GHG reduction plan annually which include quantified and specific reduction targets for emissions (direct and indirect). The percentage of actual reduction achieved is monitored periodically. The Entity also determines environmental indicators associated with energy consumption and GHG emissions. These indicators form a component of the scorecard used in the management committees.</p>
6. EMISSIONS, EFFLUENTS AND WASTE		
6.1a-f Emissions to Air	Conformance	<p>The Entity has implemented a certified Environmental Management System based on ISO 14001-EMAS standards. This system includes procedures for the control of atmospheric emissions, including compliance with legislation. The Entity has an Integrated Environmental Authorisation (AAI) (AAI is the environmental licence granted by the environmental authority) which includes the maximum limits allowed for atmospheric emissions, as well as the frequency with which the parameters must be measured for each source of emissions. The Entity has demonstrated compliance with the established frequency of controls and no parameter has ever been exceeded in the measurements taken.</p> <p>The Entity has defined a plan to reduce atmospheric emissions, taking as a reference the emission values achieved in each year of activity, setting target values for reduction to be achieved in the new year. The results of atmospheric emissions are monitored monthly, The Entity, considers Best Available Technology (BAT) and has made investments over recent years that have contributed to the reduction of atmospheric emissions. The Entity publishes annually in the EMAS Statement the results of their atmospheric emissions and reduction plans: https://www.befesa.com/es/sustainability/reports-policies-certifications/#1635072559881-be9221c7-5550</p>
6.2a-g Discharges to Water	Minor Non-Conformance	<p>The Entity has implemented a certified Environmental Management System based on ISO 14001-EMAS standards. This system includes procedures for the control of discharges into water, including compliance with legislation. The Entity annually assesses the environmental impact associated with discharges into water. The Entity conducts controls of water discharges based on analyses. The periodicity of the characterisations, as well as the parameters and limits to be controlled, are set out in their Integrated Environmental</p>

CRITERION	RATING	COMMENT
		<p>Authorisation (environmental licence). The Entity has defined a plan for the reduction of discharges to water, taking as a reference the discharge quality values and the pollutant load achieved in each year of activity, setting target values for reduction to be achieved in the new year.</p> <p>At the corporate level, the Entity publishes the results of water consumption and discharges and the reduction plan in the Sustainability Report, section 3.5: https://images.befesa.com/media/2023/06/Befesa_ESG_Progress_Report_2022-.pdf</p> <p>The Entity publishes the results of Discharges to Water annually in the EMAS Statement: https://www.befesa.com/es/sustainability/reports-policies-certifications/#1635072559881-be9221c7-5550</p> <p>This statement includes the details of the reduction and control plan. However, it was identified discharge for 2021 and 2022 have not been included.</p>
6.3a-g Assessment and Management of Spills and Leakages	Conformance	<p>The Entity has implemented a certified Management System based on the ISO 14001-EMAS-ISO 45001 standards. This system includes procedures for the evaluation of impacts related to potential leaks, Spills and spillages generated in emergency situations. The Entity has implemented a Self-Protection Plan where they have evaluated potential emergency situations, determining the probable causes or origins, consequences, risk estimation and preventive and/or corrective measures. The Entity has demonstrated that the Self-Protection Plan is reviewed at least every five years and is communicated to the authorities and agents related to the emergency and civil protection network.</p> <p>The Entity have notified the Environmental Risk Analysis Authority (ARMA) and discloses the emergency plan to act before Spills and Leakages as well as its effectiveness in the annual EMAS Statement: https://www.befesa.com/es/sustainability/reports-policies-certifications/#1635072559881-be9221c7-5550</p> <p>The Entity has demonstrated they undertake annual drills to determine the level of implementation of the Self-Protection Plan. The Entity monitors incidents of leaks, Spills, and spillages, which has demonstrated that no incidents have been generated that require the Self-Protection Plan to be revised.</p>
6.4a-b Public Disclosure of Spills and Leakages	Conformance	<p>The Entity has implemented a Self-Protection Plan in accordance with their Management System based on ISO 14001 and ISO 45001 standards. The Self-Protection Plan defines the protocols for notification and communication of potential emergency situations that may arise because of the plant's activity, which also indicates which institutions should be notified of emergency situations including neighbours, members of the Community and other Stakeholders.</p> <p>The Entity publishes annually in the EMAS Statement the environmental incidents that may have been generated as a result of Spills, leaks and/or discharges: https://www.befesa.com/es/sustainability/reports-policies-certifications/#1635072559881-be9221c7-5550</p>
6.5a-c Waste Management and Reporting	Conformance	<p>The Entity publishes an annual EMAS Statement which includes a specific section on waste generation, reporting the results of the main Hazardous and Non-Hazardous Waste generated:</p>

CRITERION	RATING	COMMENT
		<p>https://www.befesa.com/es/sustainability/reports-policies-certifications/#1635072559881-be9221c7-5550</p> <p>For compliance with legislation, the Entity reports annually to the local public administration (Basque Government) the Environmental Monitoring Programme, which includes a specific section with the quantities and types of the different Hazardous and Non-Hazardous Waste managed and generated. The Entity publishes in the Sustainability Report the amount of waste treated, with an annual comparison, section 3.2:</p> <p>https://images.befesa.com/media/2023/06/Befesa_ESG_Progress_Report_2022-.pdf</p> <p>The Entity has implemented procedures for the annual quantification and evaluation of environmental impacts, including those related to waste. The Entity has a strategy for the management of Hazardous Waste, defining specific annual improvement targets and through the Hazardous Waste minimisation plan that is submitted to the local public administration every four years. The Entity has made investments over the last few years to achieve the annual improvement targets and objectives in the minimisation plan. These investments have been based on the BATs of the Non-Ferrous Metallurgy BREF. The Entity has implemented internal waste management procedures. These procedures define how to respond to the requirements stipulated by legislation on waste management regarding storage, labelling, transport and management through authorised transporters and managers. The Entity applies a waste management strategy designed in accordance with the Waste Mitigation Hierarchy. This is evidenced by the prevention of waste generation, the reuse of waste generated in processes, the recycling of waste as raw materials for processes and the recycling of waste by sending it to other plants for reprocessing.</p>
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	The Entity is a secondary Aluminium smelter, their core business consists precisely in recycling all types of Aluminium waste, including Aluminium slag. This system includes procedures for slag management. The Entity has Facilities considered BAT for the management and recovery of Aluminium slag (rotary kilns and tilting reverberatory furnaces). Their strategy is to achieve the highest degree of recovery of raw materials. The Entity demonstrates that no aluminium slag or Salt Slag is sent to landfill. The Entity demonstrates that they achieve 100% recycling of Aluminium Slag and Salt Slag.
7. WATER STEWARDSHIP		
7.1a-b Water Assessment and Disclosure	Conformance	<p>The Entity annually identifies and documents water use by source and maps water type. The Entity publishes an annual EMAS Statement that includes a specific section on water consumption and water discharge: https://www.befesa.com/es/sustainability/reports-policies-certifications/#1635072559881-be9221c7-5550</p> <p>The Entity annually publishes the results of water consumption, discharges and reduction plan in the Sustainability Report, section 3.5:</p>

CRITERION	RATING	COMMENT
		<p>https://images.befesa.com/media/2023/06/Befesa_ESG_Progress_Report_2022-.pdf</p> <p>Annually, the Entity assesses the impact associated with water consumption and discharges, concluding the environmental impact is not significant. As this is a low risk, the risks are not reported, only the assessment results and targets for water consumption and water discharge are reported. The Entity has demonstrated good water consumption performance, reducing consumption by 43% within two years.</p>
7.2a-e Water Management	Not Applicable	This Criterion is not applicable, as the Entity classifies water consumption and water discharge as low risk. As such. It has not developed water management plans in conjunction with the Affected Populations and Organisations.
8. BIODIVERSITY AND ECOSYSTEM SERVICES		
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	<p>The Entity has conducted a study on the overall impact on operational activities could have on the environment, surroundings, Biodiversity, and ecosystems. The study confirms a rating of low for risks and identified possible impacts. In the annual EMAS Statement, the Entity assesses their impact on Biodiversity with respect to the total occupancy of the Facilities and land use:</p> <p>https://www.befesa.com/es/sustainability/reports-policies-certifications/#1635072559881-be9221c7-5550</p> <p>The Entity has demonstrated that changes to the Facilities resulting from investments include an assessment on the impact on Biodiversity, concluding that there has been no increase in risk.</p>
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Not Applicable	This Criterion is not applicable, as the Entity study on the overall impact on operational activities that could have on the environment, surrounding areas, Biodiversity, and Ecosystem Services. The study confirms a rating of low for risks and identified possible impacts.
8.2a-g Biodiversity Management	Not Applicable	This Criterion is not applicable, as the Entity study on the overall impact of operational activities that could have on the environment, surrounding areas, Biodiversity, and Ecosystem Services. The study confirms a rating of low for risks and identified possible impacts and is reviewed at least every five years.
8.3a-c Management of Priority Ecosystem Services	Not Applicable	This Criterion is not applicable, as the Entity study on the overall impact of operational activities that could have on the environment, surrounding areas, Biodiversity, and Ecosystem Services. The study concludes that there are no priority areas or Ecosystem Services within the Entity's Area of Influence of the Entity, the closest being the Urdaibai wetland (Biosphere Reserve), some 40 kilometres away. This is confirmed via the following sources for priority areas such as the International Union for Conservation of Nature (IUCN), Red Natura and, Ramsar.
8.4 Alien Species	Conformance	The Entity does not generate potential situations that could lead to the accidental introduction of new exotic species that could affect the environment, the surroundings, Biodiversity, or the ecosystems in which they carry out their functions. The risk of raw materials being received containing any exotic species is low, a thermal fusion

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		process is performed for all raw materials received and eliminating any potential exotic species that may accompany them.
8.5a-b Commitment to "No Go" in World Heritage Properties	Conformance	The Entity does not undertake activities, nor do they occupy spaces or areas considered World Heritage sites. The Entity demonstrated that the changes to Facilities derived from investments have been developed within the current site and do not exceed the limits of the plant.
8.6a-d Protected Areas	Conformance	The Entity has conducted a study on the overall impact that the development activity could have on the environment, surrounding areas, Biodiversity, and Ecosystem Services. The study confirmed that there are no protected areas within the Entity's Area of Influence. The Entity has demonstrated that the changes in the installations derived from investments on the current site do not exceed the limits of the plant. The Entity demonstrates that they do not undertake activities nor occupy spaces or areas considered as Protected Areas.
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	<p>The Entity has defined a Human Rights Policy and a Diversity, Equality, and Inclusion Policy. The Entity has defined a Code of Conduct to respect and support the protection of internationally proclaimed Human Rights in line with the United Nations Universal Declaration of Human Rights. The Policies and Code are reviewed every five years or whenever relevant changes occur.</p> <p>The Policies and the Code of Conduct are available internally via intranet and externally at: https://www.befesa.com/es/sustainability/reports-policies-certifications/#1635072559856-6a3a2270-05f5</p> <p>The Entity has implemented two systems to control the non-violation of Human Rights. One is of a preventive nature (Due Diligence) and the other is for monitoring and compliance. The Due Diligence process analyses all the risks that the Entity may face, including those related to Human Rights. This analysis assesses the level of risk with the Affected Populations and organisations and determines the control systems to prevent, mitigate and account for how they address the actual and potential impacts on Human Rights. The Entity assesses each Human Rights Charter Right, including gender issues, concluding that there are no high rated risks.</p> <p>The Entity conducts a review of the Due Diligence process, Human Resources Policy, Diversity, Equality and Inclusion Policy and the Code of Conduct within a maximum period of five years or when relevant changes occur.</p> <p>The Entity has demonstrated that they have not generated negative effects on the Human Rights on Workers, external Workers or other Stakeholders and therefore no remediation actions are currently required.</p>

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9.2a-e Gender Equity and Women's Empowerment	Conformance	<p>The Entity has implemented a programme that promotes gender equality and women's empowerment through an equality plan. The Equality Plan is agreed with the legal representatives of the employees and includes an analysis of gender-related topics such as the selection and recruitment process, professional classification, training, professional promotion, working conditions including a salary audit between women and men etc.</p> <p>The Equality Plan, valid for four years, defines a series of actionable measures with dates for their implementation and meetings to enable the monitoring committee to guarantee compliance with the agreed measures and to review and assess the agreed measures and/or propose new ones.</p> <p>As part of the Due Diligence process, the Entity analyses all Human Rights, including those related to women's rights. It is concluded that there are no high risks.</p> <p>At the corporate level, the Entity publishes the effectiveness of the measures of the equality plan within the Sustainability Report, section 4.4: https://www.befesa.com/es/sustainability/reports-policies-certifications/#1635072559830-14cb20bb-8331</p> <p>And through communication and registration of the equality plan with the Basque Government's Department of Labour and Employment.</p>
9.3a-i Indigenous Peoples	Not Applicable	This Criterion is not applicable as there are no Indigenous Peoples within 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 as there are no Indigenous Peoples within 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 as there are no Indigenous Peoples within the Entity's Area of Influence.
9.5a Cultural and Sacred Heritage - Identification	Conformance	The Entity has demonstrated they have cooperated with Affected Populations and Organisations to identify sacred cultural sites and determined that there are no sacred cultural sites within the Entity's Area of Influence.
9.5b Cultural and Sacred Heritage - Impacts	Not Applicable	This Criterion is not applicable as there are no Indigenous Peoples within the Entity's Area of Influence.
9.6a-i Displacement	Not Applicable	This Criterion is not applicable, as the Entity has been located in the same location since 1956. The Entity has demonstrated changes to Facilities, which have been undertaken in the same location and have not resulted in any physical or economic displacements.

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9.7a-h Affected Populations and Organisations	Conformance	<p>As part of their Due Diligence process, the Entity annually analyses the legal or customary rights and interests of the Affected Populations and Organisations on their lands, means of subsistence and use of natural resources. This process is carried out in collaboration with the Local Communities and a plan is developed to avoid and minimise significant impacts on them and allocate resources for their development, reviewing their efficiency annually. The Due Diligence process concluded that the risks are low for Local Communities in terms of the environment, health and safety and social and cultural Human Rights.</p> <p>The Entity promotes actions for the benefit of society and Affected Populations and Organisations, these actions focus on creating employment opportunities, corporate collaborations, social sponsorship, and charitable donations.</p> <p>The Entity annually publishes their community support actions and their results in the Sustainability Report, section 4.11: https://www.befesa.com/es/sustainability/reports-policies-certifications/#1635072559830-14cb20bb-8331</p> <p>Stakeholders interviewed during the audit stated that they value the Entity as a positive influence in the Community, valuing performance in sustainability, recycling, and the promotion of actions to favour society, including actions to support social and sports entities.</p>
9.8a Conflict-Affected and High-Risk Areas - Strong Management Systems	Not Applicable	<p>This Criterion is not applicable, as the Entity does not directly or indirectly source Bauxite, Alumina, or Primary Aluminium as a secondary Aluminium smelter, where all raw materials are considered Aluminium waste.</p> <p>The Entity's activities do not involve the use of minerals considered to be conflict minerals due to their direct extraction in countries and areas of risk. The Entity does not import or use such minerals and therefore does not contribute to armed conflicts or Human Rights violations.</p>
9.8b Conflict-Affected and High-Risk Areas - Identify and assess risks	Not Applicable	<p>This Criterion is not applicable, as the Entity does not directly or indirectly source Bauxite, Alumina, or Primary Aluminium as a secondary Aluminium smelter, where all raw materials are considered Aluminium waste.</p>
9.8c Conflict-Affected and High-Risk Areas - Strategy to respond to risks	Not Applicable	<p>This Criterion is not applicable, as the Entity does not directly or indirectly source Bauxite, Alumina, or Primary Aluminium as a secondary Aluminium smelter, where all raw materials are considered Aluminium waste.</p>
9.8d Conflict-Affected and High-Risk Areas - Audit of due diligence	Not Applicable	<p>This Criterion is not applicable, as the Entity does not directly or indirectly source Bauxite, Alumina, or Primary Aluminium as a secondary Aluminium smelter, where all raw materials are considered Aluminium waste.</p>
9.8e Conflict-Affected and High-Risk Areas - Report annually	Not Applicable	<p>This Criterion is not applicable, as the Entity does not directly or indirectly source Bauxite, Alumina, or Primary Aluminium as a secondary Aluminium smelter, where all raw materials are considered Aluminium waste.</p>

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9.9 Security practice	Conformance	The Entity has a contracted security guard company that has a continuous presence at the gatehouse and entrance to the plant to ensure access control and the protection of people, property, and assets. The security guards do not carry weapons. The security company is authorised by the Police authority. The Entity has demonstrated security personnel have good practices and respect for the Code of Conduct and Human Rights.
10. LABOUR RIGHTS		
10.1a-c Freedom of Association and Right to Collective Bargaining	Conformance	<p>The Entity recognises and encourages Freedom of Association and the right of Workers to bargain collectively within the framework of Applicable Laws and regulations and their Code of Conduct. The Entity has a Works Council representing all employees. The representatives that make up the Works Council are union members and delegates who are freely elected through periodic elections in accordance with legislation. All Workers can and have the right to appear freely on union lists and have the right to vote freely.</p> <p>The committee discusses and negotiates relevant issues of direct concern to Workers they represent, including collective bargaining. Agreements reached between management and works council members are documented in minutes and records, which are published on information boards. The Entity adheres to and complies with the agreements of the Bizkaia Steel and Metallurgy Industry Collective Bargaining Agreement. The Entity has demonstrated that they respect the right of Trade Unions, providing them with resources and spaces to undertake their activities and inform Workers.</p>
10.1d Freedom of Association and Right to Collective Bargaining - Alternative means in context of Applicable Law	Not Applicable	This Criterion is not applicable as there are no restrictions on the right to Freedom of Association and Collective Bargaining in Applicable law in Spain.
10.2a Child Labour	Conformance	The Entity has implemented a Code of Conduct, with a commitment to the elimination of exploitative Child Labour. They employ only Workers over 15 years of age. The Entity verifies the age of employees and subcontractors by checking the employee's documents when hiring them. The Entity has demonstrated that they do not engage in child or youth employment.
10.3a-c Forced Labour	Minor Non-Conformance	<p>The Entity has defined a Code of Conduct with a commitment to Human Rights in accordance with the United Nations Universal Declaration of Human Rights and not to tolerate any form of forced or compulsory labour. The Entity extends this commitment to suppliers by sending the Code of Conduct for Suppliers. The Entity adheres to and complies with the Sectoral Collective Bargaining Agreement of Industria Siderometalurgica de Bizkaia: https://www.convenioscolectivos.net/industria-siderometalurgica-de-bizkaia</p> <p>The Entity has implemented and demonstrated compliance via the Human Resources Procedure process that details recruitment procedures in accordance with regulatory standards and does not allow any form of deposit, recruitment fee or advance payment of Workers, either directly or indirectly through recruitment agencies. These recruitment procedures do not allow and require Migrant</p>

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		<p>Workers to submit deposits or security payments at any time, hold Workers in Debt Bondage or force them to work to pay off a previously acquired debt.</p> <p>The Entity also does not restrict Workers' freedom of movement in the workplace, keeping original copies of Workers' identity documents, work permits, general travel documents or personal training certificates or deny Workers the freedom to terminate, upon reasonable notice, their employment at any time without penalty.</p> <p>It was identified the Entity does not have a separate Modern Slavery Statement detailing the assessed risks, as well as actions for their mitigation in the short and medium term while assessing the effectiveness of the actions taken.</p>
10.4a-c Non-Discrimination	Conformance	<p>The Entity has implemented a Code of Conduct with a commitment to Human Rights, employment and safety at work which includes observing all equal employment opportunity legislation in the relevant countries and does not tolerate any unlawful discriminatory treatment of Employees unless national legislation expressly provides for selection according to specific criteria. It recruits, remunerates, and promotes Employees based on their qualifications and performance. For Remuneration, the Entity respects the principle of equal pay for work of equal value. The Entity is committed, within the scope of the legislation in force, to oppose any form of Discrimination. Therefore, no employee may discriminate against another employee.</p> <p>The Code of Conduct also includes a reference to the whistle-blowing channel that all employees have at their disposal to be used in the event of a possible discriminatory case.</p> <p>The Entity has implemented a Human Resources Policy that includes a commitment to Non-Discrimination. The Entity's Works Committee representing all employees discusses and negotiates relevant aspects directly affecting Workers, including reviewing information on any possible Discrimination and also as a place to report any situation that contravenes the Code of Conduct and Collective Bargaining agreement.</p>
10.5 Communication and engagement	Conformance	<p>The Entity has established various means to ensure communication and handling of labour-related issues, as well as to ensure direct engagement with all employees. These means include both individualised formats at the employee level and collective formats through their representatives. The Entity has demonstrated they promote open communication with Workers and their representatives without threat of retaliation, intimidation, violence or harassment.</p>
10.6a-g Violence and Harassment	Conformance	<p>The Entity has implemented an action protocol for the prevention of sexual and gender-based harassment. This protocol determines that employees and their representatives are consulted and participate in the management of aspects related to Violence and Harassment through a Works Committee.</p> <p>The Entity has implemented a Code of Conduct incorporating Human Rights, employment, and safety at work. The Code of Conduct sets out the applicable disciplinary regime.</p> <p>https://www.befesa.com/es/sustainability/governance/#compliance</p> <p>At the corporate level, the Entity annually publishes their commitments to Human Rights, including those related to Violence and Harassment in the workplace in a Sustainability Report, section 4.5:</p>

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		<p>https://www.befesa.com/es/sustainability/reports-policies-certifications/#1635072559830-14cb20bb-8331</p> <p>The Entity's ISO 45001 certified Management System includes procedures for undertaking a health and safety risk assessment of the workplace. This assessment includes the risks of harassment and concluded that there are no high risks.</p>
10.7a-c Remuneration	Conformance	<p>The Entity adheres to and complies with the agreements of the sectoral Collective Bargaining Agreement for the Bizkaia Iron and Steel Industry and improves on the conditions through an additional agreement. The Entity has demonstrated it remunerates Workers above the legally required minimum wage. The Entity has implemented a payment process that ensures monthly salaries are paid on time and in accordance with the established law, including detailed information on all items paid and payments in legal tender. This process includes the payment of Overtime when required. The Entity has implemented a Human Resources Policy, which covers compensation, and defines that all employees receive equal Remuneration for the performance of work of equal value.</p>
10.8a-c Working Time	Conformance	<p>The Entity has implemented a Human Resources Policy that includes a commitment to recognise the right to rest and leisure of Workers, in accordance with local laws, regulations and/or customs. The Collective Bargaining Agreement covers the number of annual working hours and holidays. It also includes compensation in case of termination due to temporary incapacity or occupational accident, taking into consideration legislation and improving the conditions established by law. All agreements are recorded in a Collective Bargaining Agreement. The Entity has a process in place to monitor compliance with the number of hours worked by each employee. The average working day of employees does not exceed eight hours on average over six months and on average, employees have at least one day off per seven-day period. When the Entity requires Workers to undertake Overtime, this is not compulsory and is always voluntary. Payment for public holidays and holidays is in accordance with local law, negotiating and agreeing on the conditions with the Works Committee.</p>
10.9a-b Informing Workers of Rights	Conformance	<p>The Entity informs employees of their rights through the Code of Conduct and through established communication channels, including the Works Council and the trade unions, which all employees are free to join. The Entity ensures that all employees are aware of their rights through the Welcome Manual, which is provided to all employees upon joining the Entity and is posted on the intranet.</p>
11. OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Management System	Minor Non-Conformance	<p>The Entity has implemented a Health and Safety Management System in accordance with ISO 45001. This system is audited by an independent entity on an annual basis. Based on the ISO 45001 Management System, the Entity has implemented assigned responsibilities and functions for the organisational context. Provided provision of support resources for the maintenance and improvement of Health and Safety and defined operational procedures and instructions to carry out operations in a safe manner. The Entity has</p>

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		<p>established indicators for monitoring the effectiveness of health and safety based on a monitoring and measurement procedure.</p> <p>A participation and consultation procedure has been implemented to ensure the participation of Workers through Prevention Delegates and the establishment of a Health and Safety Committee to monitor the effectiveness of the Management System. Planning of the preventive activity that makes it possible to plan and follow up on the actions to be taken in Health and Safety.</p> <p>The Entity has implemented a Business Activity Coordination System to promote and ensure the control of Health and Safety risks for subcontractors. However, it was identified that one of the subcontractors was selected for a job/task that did not align with their actual abilities.</p>
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Minor Non-Conformance	<p>The Entity monitors their Health and Safety Management System on an annual basis in a management review process. The Health and Safety Committee, reviews the most relevant aspects of Health and Safety every quarter. The Entity's Health and Safety Management System is audited annually by an independent entity. It also conducts internal audits on an annual basis. The Entity assesses health and safety risks and updates them whenever there are changes in the Facilities or working conditions. Psychosocial risk assessment and hygiene measurements are included. At the corporate level, the Entity publicly discloses the effectiveness of the OSH Management System annually in the Sustainability Report annually, including lagging indicators, section 4.3: https://www.befesa.com/es/sustainability/reports-policies-certifications/#1635072559830-14cb20bb-8331</p> <p>However, it was identified the Sustainability Report does not include leading indicators or a comparative analysis of performance with peer companies and best practices.</p>
11.2 Employee engagement on Health and Safety	Conformance	<p>The Entity has implemented an ISO 45001 Health and Safety Management System that includes mechanisms to discuss OH&S issues with Workers and their representatives. The mechanisms are quarterly safety committees with the presence of prevention delegates, monthly prevention committees and prevention sub-committees, Internal meetings during work shifts and safety dialogues.</p> <p>The Entity has implemented a participation and consultation procedure to ensure the participation of Workers through the appointment of Prevention Delegates and the establishment of a Health and Safety Committee to monitor the effectiveness of the Management System and discuss OH&S issues with Workers and their representatives.</p>

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DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	17 August 2023	Initial Certification Audit – Full Certification
