
ASI CERTIFICATION
PERFORMANCE
STANDARD



PRESENTED TO

VIMETCO EXTRUSION

CERTIFICATE
NUMBER

309

ASI
STANDARD

PERFORMANCE
STANDARD
(V2 2017)

CERTIFICATION
LEVEL

FULL
CERTIFICATION

ASI ACCREDITED
AUDITOR

TÜV
RHEINLAND
CERT GMBH

DATE OF ISSUE

25 AUGUST 2023

DATE OF EXPIRY

24 AUGUST 2026

CERTIFIED SINCE

24 AUGUST 2023

AUTHORISED BY

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

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

*Validity of this Certificate is subject to continued
conformance with the applicable ASI Standard
and can be verified at
www.aluminium-stewardship.org*

CERTIFICATION SCOPE

Manufacture of extruded Aluminium profiles and
shapes located in Slatina, Romania.

SUMMARY AUDIT REPORT

PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	SC Vimetco Extrusion Srl
ENTITY NAME	Vimetco Extrusion
CERTIFICATION SCOPE	Manufacture of extruded Aluminium profiles and shapes located in Slatina, Romania.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">• Semi-Fabrication
ASI STANDARD	<ul style="list-style-type: none">• Performance Standard V2
AUDIT TYPE	<ul style="list-style-type: none">• Initial Certification Audit
AUDIT FIRM	TÜV Rheinland Cert GmbH
AUDIT DATE	<ul style="list-style-type: none">• 7 – 9 February 2023
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">• 24 July 2023
AUDIT SCOPE	<p>The audit scope includes Aluminium extrusion operations manufacturing extruded profiles and shapes in Slatina, Romania.</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none">• Semi-Fabrication <p>All applicable 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.

The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.

CERTIFICATION PERIOD 25 August 2023 – 24 August 2026

NEXT AUDIT TYPE Surveillance Audit

NEXT AUDIT DUE DATE 24 August 2024

CERTIFICATE NUMBER 309

SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	A structured system exists at the Entity to ensure compliance with applicable legislation, regulations, and other requirements. The Entity receives services from an externally contracted law office. Legal requirement registers are held under the Entity's quality documentation system. A review and evaluation process has been implemented.
1.2 Anti-Corruption	Conformance	The Entity has a structured system against Corruption established at the Group level (Alro Group) which is then implemented at the Entity level (Vimetco Extrusion SRL) including ethics, Extortion, Bribery and conflict of interest, consistent with local legislation. An updated Group Policy specific to the Entity defines conflict of interest, communication methods, and control mechanisms as well as corporate duties. It also includes primary and secondary corporate activities, financial investments, political and networking groups, donations, sponsorships, and a personal (employee-based) framework.
1.3 Code of Conduct	Conformance	The Entity has implemented a Code of Conduct that prescribes commitments to environmental, social and governance compliance and performance. Staff and employees are made aware of the Code through internal training and meetings. The Code is available to external Stakeholders and other related parties at: https://www.vimetcoextrusion.com/images/pdf/Co_d_de_conduita.pdf
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	The Entity has established a stand-alone Corporate Policy, in line with environmental, social, and governance practices. The implementation of the processes is in place with in-house training, communications, and other required procedural revisions.
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	The Entity has implemented regular review processes defined in the procedures for the stand-alone Corporate Policy. Senior management's endorsement is at both the Entity (Vimetco Extrusion SRL) and Group level (Alro Group). Through budget allocations, the Entity has demonstrated that these policies are supported with appropriate resources.

CRITERION	RATING	COMMENT
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	The Entity has established a stand-alone Corporate Policy, in line with the environmental, social, and governance practices, which is both internally and publicly available and accessible via its corporate website. The Policy has been communicated internally along with in-house training for all employees. External communication with suppliers and other Stakeholders has also commenced and awareness raising is ongoing.
2.2 Leadership	Conformance	The Entity has nominated two competent Management Representatives, both with required training and qualifications who have overall responsibility and authority for the implementation and development of the ASI Performance Standard. ASI capacity building activities include a gap analysis and training provided by external service providers.
2.3a Environmental and Social Management Systems (environmental)	Minor Non-Conformance	The Entity has established and implemented a quality management system that includes environmental procedures and practices and is consistent with legal requirements and ASI requirements. The system covers the entire site and all activities of the Entity. However, it was identified the system is incomplete with some elements requiring further development. Additionally, a more detailed senior management review is required to adequately evaluate environmental aspects.
2.3b Environmental and Social Management Systems (social)	Minor Non-Conformance	The Entity has established and implemented a quality management system that includes social and Occupational Health and Safety (OH&S) procedures and practices and is consistent with legal requirements and ASI requirements. The system covers the whole site and all activities of the Entity. However, it was identified the system currently requires additional evaluation of social and health & safety risks and impacts.
2.4 Responsible Sourcing	Minor Non-Conformance	The Entity has implemented a Supplier Code of Conduct, which is available at: https://www.vimetcoextrusion.com/images/pdf/SupplierCodeofConduct.pdf The Code addresses relevant environmental, social and governance issues. These methods and criteria are part of the existing supplier evaluation system of the Entity. However, it was identified the Code has not been fully implemented and further effort is needed for development such as regular monitoring and record keeping.

CRITERION	RATING	COMMENT
2.5 Impact Assessments	Conformance	The Entity has implemented a process to conduct risk/Impact Assessments for several environmental, social, and OH&S topics. At the time of the audit, no New Projects or Major Changes were planned for the Facility. In case of any significant future changes, detailed environmental, social, cultural, and Human Rights Impact Assessments will be undertaken.
2.6 Emergency Response Plan	Conformance	The Entity's emergency response activities are managed under the internal Emergency preparedness and responsiveness procedure. The emergency plans including all activities within the Entity's entire area are developed accordingly with the participation of both internal and external parties such as shareholders located in Slatina. Emergency drills are planned and conducted every quarter.
2.7 Mergers and Acquisitions	Conformance	Although no Mergers and Acquisition (M&A) activity has yet occurred, nor is there any planned future activity, detailed project planning models are used for investments with different aspects (including Environmental, social and governance topics), deadlines, budgets, organisation, and communication plans. Any potential M&A activity is managed by the Entity's ASI-certified parent company Alro Group: https://www.alro.ro/en/about/alro/structure
2.8 Closure, Decommissioning and Divestment	Conformance	The Entity has not undertaken any closure, decommissioning or divestment activity. In case of any relevant action, environmental, social and governance review processes can be incorporated into existing risk and opportunities review documentation infrastructure. These decisions and actions will also be guided and managed together with the Entity's ASI Certified parent company Alro Group: https://www.alro.ro/en/about/alro/structure
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	The Entity, under its parent company Alro Group together with other subsidiaries, has prepared a Sustainability Report 2021 according to the GRI Guidelines. This report has been disclosed and communicated through the Group website at: https://www.alro.ro/sites/default/files/alro/2022/0220630_alro_group_sustainable_value_report_2021.pdf) and the Entity website at: https://www.vimetcoextrusion.com/en/downloads At the time of the audit, the updated Sustainability Report for 2022 was in the preparation phase and

CRITERION	RATING	COMMENT
		<p>was issued on 30 June 2023:</p> <p>https://www.alro.ro/sites/default/files/alro/2023/ALRO%20Group%20Annual%20Sustainability%20Report%202022.pdf</p>
3.2 Non-compliance and liabilities	Conformance	<p>According to audit interviews and feedback and evidence, there have been no significant fines, judgments, penalties, or non-monetary sanctions against the Entity for failure to comply with Applicable Law. However, a typographical error was noted in the Sustainability report on page 233, which shows incorrectly the Entity had incidents of non-compliance resulting in a fine or penalty for the year 2021:</p> <p>https://www.alro.ro/sites/default/files/alro/2022/2022_0630_alro_group_sustainable_value_report_2021.pdf</p> <p>The Entity is operating under an open stock exchange company (ALRO S.A., Alro Group) in Romania and is audited regularly by independent financial third-party companies. Findings are double-checked by the Entity's finance department. The Sustainability Report will be corrected retrospectively in the next Sustainability Report (2022).</p>
3.3a Payments to governments (legal and contractual)	Conformance	<p>The Entity has established a Code of Conduct coherent with Applicable Laws, pages 6-9:</p> <p>https://www.vimetcoextrusion.com/en/downloads</p> <p>Policies and procedures relating to payments, donations, Corruption and Bribery issues, gifts, third party involvements and others were defined in internal documents. The Entity is operating under an open stock exchange company (ALRO S.A., Alro Group) in Romania and is audited regularly by independent financial third-party companies.</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	Minor Non-Conformance	<p>The complaint/feedback management procedure was defined and implemented under the Quality Management System. Both internal and external requests and complaints are recorded and followed by the quality department and legal department, if needed. There are publicly accessible contact options (that are reachable from the corporate website). However, a more transparent and understandable Resolution Mechanism ensuring confidentiality and response times; addressing</p>

CRITERION	RATING	COMMENT
		complaints, grievances and information requests should be established.
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	The main process line for the Entity is extrusion and the main outputs are extruded products, known as Aluminium extrusion profiles. The life cycle impacts of the product group are evaluated for all Aluminium alloys and the Life Cycle Assessment (LCA) report was completed in 2022 according to ISO 14040 and ISO 14044 standards.
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	The LCA report for the products of the Entity (Aluminium extrusion profiles) was developed using a 'cradle-to-gate' methodology for all Aluminium alloys. The report is available and disclosed on the Entity website at: https://www.vimetcoextrusion.com/images/pdf/LCA_Vimetco_Publication_2022_PPP.pdf
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	Public access is available for the LCA report and its external validation document, available at: https://www.vimetcoextrusion.com/en/downloads Assumptions such as system boundaries have been defined in the LCA report.
4.2 Product design	Conformance	While all products are manufactured upon Client specific design requirements from alloy type and material content to the product shape, the Entity considers sustainability concerns including evaluating the environmental life cycle impacts of the end products.
4.3a Aluminium Process Scrap (targets)	Conformance	The Entity is working to minimise the generation of Aluminium Process Scrap within its operations via its internal scrap management/waste prevention system. There are designated targets (100%) for process scrap handling, including collection and recycling to prevent any Aluminium material from becoming waste.
4.3b Aluminium Process Scrap (alloy separation)	Conformance	The Entity is focusing on separating alloys and grades for recycling during its processes. From the planning/purchasing step until scrap management, the Entity follows a strict material scrap waste management system for all kinds of Aluminium types.
4.4a Collection and recycling of products at end-of-life (strategy)	Conformance	The Entity has internally implemented a scrap/product handling and recycling management system with targets within its operations. The nearby

CRITERION	RATING	COMMENT
		parent company, Alro SA is used for Vimetco Extrusion's scrap processing/recycling activities as a recycling facility (https://www.alro.ro/en/recycling) in a 100% closed loop situation.
4.4b Collection and recycling of products at end-of-life (engagement)	Conformance	The Entity has implemented an internal scrap and product handling and recycling management system with targets within operations. Neighbour Parent company, Alro SA is used for the Entity's scrap processing and recycling activities as a recycling Facility in a 100% Closed-Loop situation. The recycling facility which belongs to Vimetco Group, can operate across a large range of technical specifications and volumes and is open for use by local recycling companies, initiatives, and all interested institutions to support and collaborate on a Circular Economy project. More information is available at: https://www.alro.ro/en/recycling
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		
5.1 Disclosure of GHG emissions and energy use	Minor Non-Conformance	The Entity monitors its energy consumption continuously and calculates Greenhouse gas (GHG) emissions periodically by source. The Entity, under its parent company Alro Group together with other subsidiaries, had prepared a Sustainability Report according to the GRI scheme including GHG emissions and energy. This Report was publicly disclosed through the Group website, pages 138-157 and 197: https://www.alro.ro/sites/default/files/alro/2022/2022_0630_alro_group_sustainable_value_report_2021.pdf And available at: https://www.vimetcoextrusion.com/en/downloads However, it was identified that the Entity's GHG information is only partly located in the report, and there are missing GHG scope details on pages 199-200.
5.2 GHG emissions reductions	Conformance	The Entity has an energy consumption of over 1,000 tonnes of oil equivalent and therefore under local law, they are required to report to the local authorities both their energy consumption tracking and reporting and emission reduction targets and plan submissions. These are available at: https://www.vimetcoextrusion.com/en/downloads The Entity also employs a full-time dedicated energy manager who works together with production and maintenance teams to manage

CRITERION	RATING	COMMENT
		energy efficiency, consumption minimisation and GHG emissions reduction activities. More detailed information is also shared via the Group's Sustainability Report, pages 138-157: https://www.alro.ro/sites/default/files/alro/2022/2022_0630_alro_group_sustainable_value_report_2021.pdf
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	Minor Non-Conformance	As required under local law, the Entity monitors and reports air emissions periodically. The Entity has held an environmental permit since 2011 from the local Environmental Protection Agency under the Ministry of Environment and Forests. According to this permit, the Entity (with relevant minimisation actions) measures air emissions monthly through authorised independent environmental laboratories and reports it to the Ministry via a local environment agency each year. The Entity under its parent company Alro Group together with other subsidiaries, had prepared a Sustainability Report according to the GRI Guidelines and includes the Group's air emissions, pages 138-154 and 201. https://www.alro.ro/sites/default/files/alro/2022/2022_0630_alro_group_sustainable_value_report_2021.pdf However, it was identified the Entity's public disclosure of air emissions' is currently absent.
6.2 Discharges to Water	Conformance	Water discharges are controlled under the regulatory environmental permit of the Entity since 2011. Although the Entity does not have any significant industrial water consumption and discharge, all water data are reported regularly. The Entity's water discharges are published in the Group's Sustainability Report, pages 180-188 and 206-207: https://www.alro.ro/sites/default/files/alro/2022/2022_0630_alro_group_sustainable_value_report_2021.pdf

CRITERION	RATING	COMMENT
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	The nature of the Entity's production processes means there is no significant risk of Spills and Leakages. However, any possible Spill and Leakage risks are defined under the Emergency Response procedures and plans as 'accidental pollution of environmental factors' and managed according to protection measures defined in the Entity's Environmental Permit.
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	Regular control and monitoring are undertaken daily by production personnel and weekly, and monthly by maintenance personnel. According to the Entity records and interviews with site personnel, no similar incidents have occurred within the Entity.
6.4a Reporting of Spills (immediate disclosure)	Conformance	Because of the Entity's production processes, there is no significant risk of Spills and Leakages. On the other hand, any possible Spill and Leakage risks even if it is minor, are defined under the Emergency Response procedures and plans as "accidental pollution of environmental factors" and handled according to protection measures defined in the Entity's Environmental Permit (no.10198, dated 28/11/2022).
6.4b Reporting of Spills (regular reporting)	Conformance	The nature of the Entity's production processes means there is no significant risk of Spills and Leakages. Any possible spill and leakage are defined under the Emergency Response procedures and plans as 'accidental pollution of environmental factors' and managed according to protection measures defined in the Entity's Environmental Permit. Any possible incident is disclosed publicly via the annual Sustainability Report.
6.5a Waste management and reporting (strategy)	Conformance	The Entity has implemented a waste management strategy addressing all waste generated under its operations consistent with legal requirements. Waste management practices address all waste generated within the relevant scope of operations. Waste characterisation and the mitigation hierarchy are followed and almost all operational wastes are being diverted from disposal to recycling and recovery.
6.5b Waste management and reporting (disclosure)	Conformance	Disclosure on waste management addressed all waste (Hazardous and Non-Hazardous) generated within the relevant scope of the Entity's operations. Waste reports are characterised according to

CRITERION	RATING	COMMENT
		composition and treatment method. The Waste Mitigation Hierarchy was considered including diverted wastes from disposal. All data are reported as legally mandated to public authorities like the Environment Protection Agency (ANPM). Waste data for 2021 are disclosed within the Group's Sustainability Report, pages 202-205: https://www.alro.ro/sites/default/files/alro/2022/2022_0630_alro_group_sustainable_value_report_2021.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 (start of the art technologies)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6f Bauxite Residue (remediation)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7a Spent Pot Lining (SPL) (storage and management)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7b Spent Pot Lining (SPL) (recovery and recycling)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7c Spent Pot Lining (SPL) (Untreated SPL)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7d Spent Pot Lining (SPL) (review of alternatives)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7e Spent Pot Lining (SPL) (marine and aquatic environments)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8a Dross (recovery)	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.

CRITERION	RATING	COMMENT
PRINCIPLE 7 WATER STEWARDSHIP		
7.1a Water assessment (mapping)	Conformance	The Entity has developed a register and map (inventory) of its water sources and types. The name and location of water sources, water quantities and source of the water are known. The Entity draws water from one main pipeline and is then distributed into eight different lines/counters inside the Entity. Water discharge points, location, and quantity, including the destination or ultimate receiving water body, are known. Therefore, the water balance can be monitored via the flow of water in and out during the operations.
7.1b Water assessment (risk assessment)	Conformance	The Entity has assessed water-related risks which are evaluated using two different methods - a regulatory Environmental Impact Assessment (EIA) report, and the Alro Group's internal environmental risk assessment process. According to the World Resources Institute (WRI) Aqueduct tool, the Olt Valley in Romania has a medium to high water stress level, riverine flood risk and drought risk. The Group defines the Entity as the low-risk group because their water dependency is less significant as consumption of water is low.
7.2a Water management (management plans)	Not Applicable	This Criterion is not applicable, based on the evaluation of Alro Group companies, the Entity has a lower level of water dependency and consumption. As a result, there is no current need for a comprehensive water management plan. In 2021, the annual water withdrawal was around 10 ML, and in 2022, it was 8.55 ML. Most of this water (about 80%) is used for employee consumption, while the remainder is used for closed-loop cooling water. However, any changes in water sources or consumption levels in the future may prompt a re-evaluation of the Entity's water situation.
7.2b Water management (monitoring)	Not Applicable	This Criterion is not applicable, based on the evaluation of Alro Group companies, the Entity has a lower level of water dependency and consumption. As a result, there is no need for a comprehensive water management plan.
7.3 Disclosure of water usage and risks	Conformance	The Entity's disclosures on water usage and potential risks are included in the annual Sustainability Reports. Water withdrawal by source, water discharge by destination and total water consumption amounts for the Entity for 2021 are disclosed in the Group's Sustainability Report,

CRITERION	RATING	COMMENT
		pages 206-207: https://www.alro.ro/sites/default/files/alro/2022/2022_0630_alro_group_sustainable_value_report_2021.pdf
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	The Entity is located in an official industrial zone designed by the government; therefore, biodiversity risks are accepted as minimal. Additionally, the Entity assessed the risk and Materiality of the impacts on biodiversity from the land use and activities within the Entity's Area of Influence using two different methods - the Natura 2000 report by the national environment authority ANPM (Agentia Nationala pentru Protectia Mediului) dated 2017, which is coherent with local environmental legislation, and an internal assessment is conducted by the Entity's environmental department on the protection and restoration of biodiversity and ecosystems according to EU legislation and local law. Both results confirm an insignificant impact on biodiversity.
8.2a Biodiversity management (biodiversity action plans)	Not Applicable	The Criterion is not applicable, as the Entity biodiversity assessments concluded there is not any significant biodiversity impact in the Entity's Area of Influence.
8.2b Biodiversity management (consultation and mitigation hierarchy)	Not Applicable	The Criterion is not applicable, as the Entity biodiversity assessments concluded there is not any significant biodiversity impact in the Entity's Area of Influence.
8.2c Biodiversity management (reporting)	Not Applicable	The Criterion is not applicable, as the Entity biodiversity assessments concluded there is not any significant biodiversity impact in the Entity's Area of Influence.
8.3 Alien Species	Conformance	The Entity has identified risks relating to Alien Species as minimal. The Entity adheres to its parent company Alien Species processes under the Alro Group's environmental management system framework which complies with the International Standards for Phytosanitary Measures No. 15 (ISPM 15) to prevent accidental or deliberate introduction of Alien Species.
8.4a Commitment to "No Go" in World Heritage properties (exploration and new mines)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
8.4b Commitment to “No Go” in World Heritage properties (existing operations)	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 has established and implemented integrated policies and procedures for different aspects like quality, environment, OH&S and governance. A Policy commitment to Human Rights is included in the Group’s Sustainability Strategy Policy 2021-2025, the Entity’s Code of Conduct and Human Rights procedures. Also, a stand-alone Human Rights Policy and Due Diligence process is established at the Group level under the parent company (Alro S.A.). More information is available in the Alro Group Sustainability Strategy 2021-2025, page 88:</p> <p>https://www.alro.ro/sites/default/files/alro/2023/ALRO%20Sustainability%20Strategy%20ENG.pdf https://www.alro.ro/sites/default/files/alro/2022/2022_0630_alro_group_sustainable_value_report_2021.pdf</p>
9.1b Human Rights Due Diligence (process)	Conformance	<p>The Entity has an established Due Diligence process at the Group level under parent company Alro S.A.’s ASI Certification and is implemented by the Entity. It covers Human Rights topics, from Forced Labour, Human Trafficking, Discrimination, association, and Collective Bargaining, working conditions and Remuneration to environmental Human Rights. More information is available at:</p> <p>Alro Group Sustainability Strategy 2021-2025: https://www.alro.ro/sites/default/files/alro/2023/ALRO%20Sustainability%20Strategy%20ENG.pdf Alro Group Sustainability Report 2021, page 88: https://www.alro.ro/sites/default/files/alro/2022/2022_0630_alro_group_sustainable_value_report_2021.pdf</p>
9.1c Human Rights Due Diligence (remediation)	Conformance	<p>The Group level, led by parent company Alro S.A., has established a Human Rights Policy which includes remediation processes for any potential negative impact.</p> <p>More information is available at:</p>

CRITERION	RATING	COMMENT
		<p>Alro Group Sustainability Strategy 2021-2025: https://www.alro.ro/sites/default/files/alro/2023/ALRO%20Sustainability%20Strategy%20ENG.pdf</p> <p>Alro Group Sustainability Report 2021, page 88: https://www.alro.ro/sites/default/files/alro/2022/2022_0630_alro_group_sustainable_value_report_2021.pdf</p>
9.2 Women's Rights	Conformance	Both local laws and the Entity's on-site practices demonstrate a firm commitment to Women's Rights. The Alro Group has publicly announced targets to implement further processes for its subsidiaries, including the Entity, to ensure respect for Women's Rights and interests, consistent with international standards including the UN Convention on the Elimination of All Forms of Discrimination against Women (CEDAW).
9.3 Indigenous Peoples	Not Applicable	This Criterion does not apply to the Entity as there are no Indigenous Peoples identified within the Entity's Area of Influence.
9.4 Free, Prior, and Informed Consent (FPIC)	Not Applicable	This Criterion is not applicable to the Entity as there are no Indigenous Peoples identified within the Entity's Area of Influence.
9.5 Cultural and sacred heritage	Not Applicable	This Criterion is not applicable to the Entity, as the Entity is located in an industrial area in a city where significant industrial activity exists, and as such no cultural and/or sacred heritage features are present.
9.6a Resettlements (avoid or minimise)	Not Applicable	This Criterion is not applicable to the Entity, as the Entity is located within an industrial area in a city where significant industrial activity exists, and no resettlement activity has occurred.
9.6b Resettlements (where unavoidable)	Not Applicable	This Criterion is not applicable to the Entity, as the Entity is located within an industrial area in a city where significant industrial activity exists, and no resettlement activity has occurred.
9.7a Local Communities (rights and interests)	Conformance	The Entity respects the legal and customary rights, interests, and feedback of Local Communities in their lands and livelihoods. With the main aim of strengthening the relationships with surrounding communities, targets to improve contributions and benefits to Local Communities are included in the Sustainability Strategy 2021-2025, pages 24-25: https://www.alro.ro/sites/default/files/alro/2021/2021

CRITERION	RATING	COMMENT
		0630_alro_group_sustainability_strategy_2021_2025.pdf
9.7b Local Communities (impacts)	Conformance	<p>Employee interviews and media news searches confirmed that there are no significant issues or problems affecting Local Communities. This is consistent with assessments and consultations conducted at a Group level. At the Group level, targets to improve contributions and benefits to Local Communities are included in the Sustainability Strategy 2021-2025, pages 24-25: https://www.alro.ro/sites/default/files/alro/2021/2021_0630_alro_group_sustainability_strategy_2021_2025.pdf</p>
9.7c Local Communities (livelihoods)	Conformance	<p>The Entity has established efforts to support the community including local projects, equipment support for hospitals' heliports and emergency operations, COVID-19 funds, and donations to UNICEF. The Sustainability Strategy 2021-2025 document includes different perspectives and targets to improve the contribution and benefit of Local Communities, pages 24-25: https://www.alro.ro/sites/default/files/alro/2021/2021_0630_alro_group_sustainability_strategy_2021_2025.pdf</p>
9.8 Conflict-Affected and High-Risk Areas	Conformance	<p>The Entity requires all suppliers to acknowledge and accept the Supplier Code of Conduct. Aluminium suppliers must complete questionnaires and evaluations. It has been identified that the Entity does not source from Conflict-Affected and High-Risk Areas.</p>
9.9 Security practice	Conformance	<p>The working conditions for security services are defined by the country and local law and are under the control and approval of the local police authority. Any externally contracted security personnel are held to the same standards as internal staff, including training and disciplinary procedures. The Entity also ensures that all security providers adhere to Human Rights laws and recognised standards. Although there are no strict security measures such as body searches, the main purpose of security practices is to ensure the safety of the Facility against potential external threats.</p>

CRITERION	RATING	COMMENT
PRINCIPLE 10 LABOUR RIGHTS		
10.1a Freedom of Association and Right to Collective Bargaining (freedom of association)	Conformance	Employees at the Entity are entitled to Freedom of Association as defined in the Universal Declaration of Human Rights and according to local country regulation 62/2011. An active Labour Union is representing Workers at the Facility. All Workers have the same unlimited right to participate in or be a member of any union, as well as being freely elected as representatives at worker's councils and committees.
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Conformance	Collective Bargaining is an open and free process at the Entity, and a valid collective work agreement is already in place. No restrictions on Collective Bargaining were observed at the Entity.
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Not Applicable	This Criterion is not applicable, as Romania does not restrict the right to Freedom of Association and Collective Bargaining. Therefore, no alternative means of association Collective Bargaining is required.
10.2a Child Labour (minimum age)	Conformance	<p>The Entity does not involve, or support Child Labour as defined in local country laws, EU legislations and ILO Conventions C138 and C182. All employees in the Facility are over 18 years of age. All suppliers must accept and sign a Supplier Code of Conduct which prohibits any kind of Child Labour.</p> <p>The Entity has established a procedure for verifying the ages of workers against the country's minimum age of working at the application stage, and this includes checking identification.</p> <p>Also at the Group level, policies, strategies, and declarations are defined against Child Labour. For more information, see Group's Sustainability Report, page 91: https://www.alro.ro/sites/default/files/alro/2022/2022_0630_alro_group_sustainable_value_report_2021.pdf</p>
10.2b Child Labour (hazardous)	Conformance	The Entity does not involve, or support Child Labour as defined in local country laws, EU legislations and ILO Conventions C138 and C182. Employees in the Facility are over 18 years of age. All suppliers must accept and sign a Supplier Code of Conduct against any kind of Child Labour. Also at the Group level, policies, strategies, and declarations are defined against Child Labour. For more information, see Group's Sustainability

CRITERION	RATING	COMMENT
		<p>Report, page 91: https://www.alro.ro/sites/default/files/alro/2022/2022_0630_alro_group_sustainable_value_report_2021.pdf</p>
10.2c Child Labour (worst forms)	Conformance	<p>The Entity does not involve, or support Child Labour as defined in local country laws, EU legislations and ILO Conventions C138 and C182. Employees in the Facility are over 18 years of age. All suppliers must accept and sign a Supplier Code of Conduct against any kind of Child Labour. Also at the Group level, policies, strategies, and declarations are defined against Child Labour. For more information, see Group's Sustainability Report, page 91: https://www.alro.ro/sites/default/files/alro/2022/2022_0630_alro_group_sustainable_value_report_2021.pdf</p>
10.3a Forced Labour (human trafficking)	Conformance	<p>The Entity neither engages in nor supports the use of Forced Labour in any kind or form according to local country laws, EU legislations and related ILO Conventions. And has implemented policies and procedures such as the Code of Conduct and Suppliers' Code of Conduct. At the Group level, policies, strategies, and clear declarations are defined against Forced Labour. For more information, see Group's Sustainability Report, page 91: https://www.alro.ro/sites/default/files/alro/2022/2022_0630_alro_group_sustainable_value_report_2021.pdf</p>
10.3b Forced Labour (deposits, fees, advances)	Conformance	<p>The Entity has implemented policies and procedures such as the Code of Conduct and Suppliers' Code of Conduct. The Entity does not require Workers to pay deposits or lodge identification papers upon commencing employment. The Entity does not withhold salaries, benefits, property, or documents to force Workers to continue working.</p>
10.3c Forced Labour (migrant workers)	Conformance	<p>The Entity has implemented policies and procedures such as the Code of Conduct and Suppliers' Code of Conduct. The Entity does not require Workers to pay deposits or lodge identification papers upon commencing employment. The Entity does not withhold salaries, benefits, property, or documents to force Workers to continue working.</p>

CRITERION	RATING	COMMENT
10.3d Forced Labour (debt bondage)	Conformance	The Entity has implemented policies and procedures such as the Code of Conduct and Suppliers' Code of Conduct. The Entity does not require Workers to pay deposits or lodge identification papers upon commencing employment. The Entity does not withhold salaries, benefits, property, or documents to force Workers to continue working.
10.3e Forced Labour (freedom of movement)	Conformance	The Entity has implemented policies and procedures such as the Code of Conduct and Suppliers' Code of Conduct. Workers have the right to leave the workplace premises after completing the standard workday.
10.3f Forced Labour (retention of identity papers, permits, certificates)	Conformance	The Entity has implemented policies and procedures such as the Code of Conduct and Suppliers' Code of Conduct. The Entity does not require Workers to pay deposits or lodge identification papers upon commencing employment. The Entity does not withhold salaries, benefits, property, or documents to force Workers to continue working.
10.3g Forced Labour (freedom to terminate employment)	Conformance	The Entity has implemented policies and procedures such as the Code of Conduct and Suppliers' Code of Conduct. Workers have the right to terminate their work relationship with the Entity, on their initiative, provided they provide reasonable notice to their employer.
10.4 Non-Discrimination	Conformance	The Entity has implemented a corporate Policy against any kind of Discrimination. This Policy is reiterated in the corporate 2021-2025 strategy, internal Human Resources procedures and on-site practices. According to interviews and observations, it was demonstrated that employees have equal opportunities and do not engage in any kind of Discrimination in hiring, salary, promotion, or termination of any job contract based on gender, race, national or social origin, religion, disability, political affiliation, sexual orientation, marital status, or age etc.
10.5 Communication and engagement	Conformance	Communication channels are open with all employees and their representatives (freely elected unions, delegates etc.) at the Entity. There are defined communication and grievance/complaint solution procedures and practical mechanisms for any feedback including working conditions,

CRITERION	RATING	COMMENT
		workplace, and compensation issues. Employees can also provide feedback anonymously.
10.6 Disciplinary practices	Conformance	The Entity has implemented internal disciplinary procedures in accordance with the Labour Code (Law no 53/2003) which is harmonised under EU regulations. There is no evidence of any kind of disciplinary practice abuses in the Entity, corporal punishments, mental or physical coercion and verbal abuse are forbidden.
10.7a Remuneration (living wage)	Conformance	The Entity offers the legal minimum wage only at the entry-level and for non-qualified employees. This is a small number versus the total number of employees at the Entity. The standard Remuneration at the Entity is higher than the regional minimum. There is a Labour Union Collective Bargaining Agreement. Additionally, some discretionary income, other benefits and bonuses are in place for all employees.
10.7b Remuneration (method of payment)	Conformance	Salaries are paid on time and documented through bank transactions in accordance with local regulations.
10.8 Working Time	Conformance	The Entity complies with the local law (Labour Code no. 53/2003) and industry standards on Working Time including Overtime work. The work rules and collective labour agreement outlines that Overtime work is voluntary and will be paid at a premium rate. Two days off are granted to employees after every five consecutive days of work and this requirement is consistent with local legislation.
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	The Entity has established and implemented integrated policies and procedures for different aspects including quality, environment, Occupational Health and Safety (OH&S) and governance. OH&S requirements are included in the Policy as well as in other corporate declarations including the Sustainability Strategy 2021-2025 and the Code of Conduct. The Entity communicates and regularly updates these declarations, which are endorsed and supported by senior management, and confirmed through the adequate provision of human and financial resources.
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	The Entity's corporate Policy which includes OH&S is communicated via the website, internal web portals, posters, and announcement tables both for

CRITERION	RATING	COMMENT
		Workers and Visitors. From production lines to corridors, the Policy can be viewed and accessed in all areas under the Entity's control. All corporate declarations such as strategies and policies are reviewed and updated regularly.
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Conformance	The corporate Policy which includes OH&S but also other senior management declarations such as the Sustainability Strategy Policy and corporate public reports such as the Sustainability Report include wide-reaching commitments about Applicable Laws and regulations.
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Minor Non-Conformance	The Entity has included OH&S in detailed and integrated policies, and senior management declarations such as strategy papers and corporate reports. However, it was identified that the policies and/or corporate endorsements, do not have a specific declaration relating to the Workers' right to understand the hazards and safe practices for their work and the authority to refuse or stop unsafe work.
11.2 OH&S Management System	Conformance	The Entity has established and implemented a quality management system including OH&S procedures and practices (e.g., risk and Impact Assessments, continuous improvement and corrective actions planning, monitoring and reporting). The system addresses the entire site and all activities of the Entity.
11.3 Employee engagement on health and safety	Conformance	The Entity has established a health and safety committee, with the participation of employees, Labour Union representatives, production workers, administrative staff and medical personnel. The committee meets periodically to discuss and decide on Health, Safety and Environment actions and elevating these to senior management.
11.4 OH&S performance	Conformance	The Entity records, reports and evaluates its OH&S performance periodically via several indicators to meet best practices and to continuously improve. Performance against these indicators confirms a significant decrease in accidents with injuries and lost time.

Document Control and Version History

Revision	Date	Notes
0	25 August 2023	Initial Certification Audit – Full Certification