

# ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

# ASAŞ ALÜMİNYUM

CERTIFICATE  
NUMBER

238

ASI  
STANDARD

PERFORMANCE  
STANDARD  
(V2 2017)

CERTIFICATION  
LEVEL

FULL  
CERTIFICATION

ASI  
ACCREDITED  
AUDITOR

CETIZION  
VERIFICA

DATE OF ISSUE

9 DECEMBER 2022

DATE OF EXPIRY

8 DECEMBER 2025

CERTIFIED SINCE

9 DECEMBER 2022

AUTHORISED BY

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

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ACN 606 661 125, Australia  
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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](http://www.aluminium-stewardship.org)*

CERTIFICATION SCOPE

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

# SUMMARY AUDIT REPORT

## PERFORMANCE STANDARD

### OVERVIEW

MEMBER NAME	ASAŞ Alüminyum San. Ve Tic. A.Ş.
ENTITY NAME	ASAŞ Alüminyum
CERTIFICATION SCOPE	Manufacture of Aluminium Flat Products, Aluminium Profile & Composite Panels and PVC Profile & Shutter Products at the Akyazi and Karapürçek facilities, Turkey.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none"><li>Aluminium Re-melting/Refining</li><li>Casthouses</li><li>Material Conversion (Production and Transformation)</li></ul>
ASI STANDARD	<ul style="list-style-type: none"><li>Performance Standard V2</li></ul>
AUDIT TYPE	<ul style="list-style-type: none"><li>Initial Certification Audit (22 – 29 August 2022)</li><li>Surveillance Audit (27 – 30 November 2023)</li></ul>
AUDIT FIRM	CETIZION Verifica
AUDIT DATE	<ul style="list-style-type: none"><li>22 – 29 August 2022 (Initial Certification Audit)</li><li>27 – 30 November 2023 (Surveillance Audit)</li></ul>
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none"><li>7 November 2022 (Initial Certification Audit)</li><li>29 January 2023 (Surveillance Audit)</li></ul>
AUDIT SCOPE	<p><u>Initial Certification Audit (22 – 29 August 2022)</u></p> <p>The audit scope covers the Akyazi and Karapürçek facilities, Turkey which manufacture Aluminium Flat Products, Aluminium Profile &amp; Composite Panels and PVC Profile &amp; Shutter Products, as well as ASAŞ Alüminyum Headquarters located at Akyazı/Sakarya, Turkey.</p> <p>The supply chain activities included in the audit scope:</p> <ul style="list-style-type: none"><li>Aluminium Re-melting/Refining</li><li>Casthouses</li><li>Material Conversion (Production and Transformation)</li></ul> <p>All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.</p>

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Surveillance Audit (27 – 30 November 2023)

The audit scope covers the Akyazi and Karapürçek facilities, Turkey which manufacture Aluminium Flat Products, Aluminium Profile & Composite Panels and PVC Profile & Shutter Products, as well as ASAŞ Alüminyum Headquarters located at Akyazi/Sakarya, Turkey.

The supply chain activities included in the audit scope:

- Aluminium Re-melting/Refining
- Casthouses
- Material Conversion (Production and Transformation)

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

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AUDIT  
OUTCOME

Certification

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AUDIT  
METHODOLOGY  
DECLARATION

The Auditors confirm that:

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

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CERTIFICATION  
PERIOD

9 December 2022 – 8 December 2025

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NEXT AUDIT  
TYPE

Re-Certification Audit

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NEXT AUDIT  
DUE DATE

8 December 2025

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CERTIFICATE  
NUMBER

238

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## SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	<p>The Internal Audit and Compliance Director, who reports to both the Board and Chairman, has overall responsibility for legal compliance. There is formal management commitment towards various legal obligations. A monitoring matrix includes the identification of Applicable Laws and their monthly status. Independent evaluation of legal compliance is undertaken externally.</p> <p>For 2023, no non-compliances were found on the periodic random audits conducted by government authorities for social, labour and environmental requirements.</p>
1.2 Anti-Corruption	Conformance	<p>The Entity has a formal management commitment that addresses Anti-Corruption, which is in accordance with Turkish Law. The Code of Conduct is publicly available at:  <a href="https://www.asastr.com/corporate-/codes-of-conduct">https://www.asastr.com/corporate-/codes-of-conduct</a></p> <p>An internal ethics committee is responsible for overall ethical practices, including the establishment of a hotline, which is directly accessed by ethics committee members. There is a system to track the number of reported cases. There have been no complaints raised regarding Corruption.</p>
1.3 Code of Conduct	Conformance	<p>The Entity has developed a Code of Conduct, in multiple languages, and it is available at:  <a href="https://www.asastr.com/corporate-/codes-of-conduct">https://www.asastr.com/corporate-/codes-of-conduct</a></p> <p>The Code of Conduct is part of the induction program for new employees as well as part of regular training.</p>
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	<p>The Entity has established a Health, Safety and Environmental Policy:  <a href="https://www.asastr.com/corporate-/sustainability">https://www.asastr.com/corporate-/sustainability</a></p>
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	<p>The Entity's senior management has designated a member of the senior management team to develop, establish and effectively maintain ASI Performance Standard requirements.</p>
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	<p>The Entity's management has internally and publicly communicated its Health, Safety and Environmental</p>

CRITERION	RATING	COMMENT
		<p>Policy: <a href="https://www.asastr.com/corporate-/sustainability">https://www.asastr.com/corporate-/sustainability</a></p> <p>Governance Policies are addressed in the Code of Conduct: <a href="https://www.asastr.com/corporate-/codes-of-conduct">https://www.asastr.com/corporate-/codes-of-conduct</a></p>
2.2 Leadership	Conformance	The Entity has designated a member of senior management with the overall responsibility for the implementation of the ASI Performance Standard requirements.
2.3a Environmental and Social Management Systems (environmental)	Conformance	The Entity holds a valid Environmental Management System as per ISO 14001:2015, which has been independently verified.
2.3b Environmental and Social Management Systems (social)	Conformance	The Entity has established a Social Management System through the development of various human resources, employee safety Policies, procedures, training records and risk assessment processes in accordance with Turkish Labour Laws.
2.4 Responsible Sourcing	Conformance	<p>The Entity has implemented a company-wide commitment to responsible sourcing through the Supply Chain Policy: <a href="https://www.asastr.com/corporate-/policies/sustainable-supply-chain-policy/">https://www.asastr.com/corporate-/policies/sustainable-supply-chain-policy/</a></p> <p>The Entity has demonstrated the implementation of the Policy and has provided resources with a clear understanding of responsible sourcing. The Supply Chain Policy commitment has been incorporated into all the purchasing contracts. Supplier-specific risk assessment has been carried out in a QDMS, a quality management software.</p> <p>The ESG monitoring of critical suppliers has started both online and on-site, and the audit checklist was developed to cover quality, customer, environment, and social topics.</p>
2.5 Impact Assessments	Conformance	The Entity has established an overarching risk management process that consists of related risks, opportunities, and impacts when there is a change in activities and/or expansion. Some of the large expansion projects required a formal Environment Impact Assessment (EIA) and approval by the Turkish authorities. A social engagement plan is in place following national and international standards. These assessments are conducted with an external agency and identify, engage and develop action plans to mitigate and optimise the social impacts of new/expansion activities.

CRITERION	RATING	COMMENT
2.6 Emergency Response Plan	Conformance	The Entity has documented emergency situation instructions (Acil Durum Plan Talimati) including potential emergency scenarios such as chemical spillage, earthquake and fire. The response action plan for each type of emergency has been detailed, and the team has been trained on the Emergency Response Plan. The annual planning for drill events is maintained. During the plant visit, it was verified that previous audit non-conformities have been effectively closed (e.g. windsocks are provided and considered during gas leakage emergency scenarios).
2.7 Mergers and Acquisitions	Conformance	The Entity has established a Due Diligence process that addresses environmental, social and governance issues in addition to financial and technical topics. There have been no mergers and acquisitions activities since becoming an ASI Member.
2.8 Closure, Decommissioning and Divestment	Conformance	The Entity has established a Due Diligence process that addresses environmental, social and governance issues in the planning process for closure, decommissioning, and divestment. No closure, decommissioning and/or shutdown has taken place since becoming an ASI Member.
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	The Entity has published its 2022 Sustainability Report, which has been developed in accordance with GRI standards: <a href="https://www.asastr.com/sites/1/upload/files/ASAS_Surdurulebilirlik_Raporu_2022_EN-2289.pdf">https://www.asastr.com/sites/1/upload/files/ASAS_Surdurulebilirlik_Raporu_2022_EN-2289.pdf</a>
3.2 Non-compliance and liabilities	Conformance	There are no significant monetary fines or penalties, as evidenced by various spot checks by Government authorities. However, two fines for traffic violations of company transport vehicles amounting to TRY2200 during the year 2022. The Entity's commitment to its responsibilities towards compliances and liabilities is highlighted in the Sustainability Report, page 41: <a href="https://www.asastr.com/sites/1/upload/files/ASAS_Surdurulebilirlik_Raporu_2022_EN-2289.pdf">https://www.asastr.com/sites/1/upload/files/ASAS_Surdurulebilirlik_Raporu_2022_EN-2289.pdf</a>
3.3a Payments to governments (legal and contractual)	Conformance	The Entity has made payments to governments towards statutory taxes, value added tax and social security payments on a legal and/or contractual basis.

CRITERION	RATING	COMMENT
3.3b Payments to governments (disclosure - bauxite mining)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
3.4 Stakeholder complaints, grievances and requests for information	Conformance	<p>The Entity has established a Stakeholder engagement plan with an external agency which is publicly available at: <a href="https://www.asastr.com/corporate-/sustainability/stakeholder-engagement-plan">https://www.asastr.com/corporate-/sustainability/stakeholder-engagement-plan</a></p> <p>An internal system was implemented to collect and analyse the internal grievances received. The plan is to increase awareness about the grievances system through training and making it more user friendly.</p> <p>For external Stakeholders, a Customer Relationship Management (CRM) system was implemented to facilitate Stakeholders raising grievances as well as contacting the Facility: <a href="https://www.asastr.com/contact">https://www.asastr.com/contact</a></p> <p>A dedicated email is available to report breaches of the Code of Conduct: <a href="mailto:etik@asastr.com">etik@asastr.com</a> and <a href="mailto:ethics@asastr.com">ethics@asastr.com</a></p> <p>A concept of an Ethics committee, defined in the Code of Conduct is assigned at each Facility level: <a href="https://www.asastr.com/corporate-/codes-of-conduct/">https://www.asastr.com/corporate-/codes-of-conduct/</a> Items 5.1 and 5.2</p>
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	The Entity has conducted a Life Cycle Assessment (LCA) and obtained an Environmental Product Declaration (EPD) for all major product categories including flat rolled Aluminium and composite panels etc. The assessment follows a cradle-to-gate approach.
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	The Entity has conducted an LCA and obtained an EPD for all major product categories including flat rolled Aluminium and composite panels etc. The assessment follows a cradle-to-gate approach.
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	The Entity has publicly disclosed its LCA) and EPD via the Sustainability Report, page 57: <a href="https://www.asastr.com/corporate-/sustainability/corporate-sustainability-reports">https://www.asastr.com/corporate-/sustainability/corporate-sustainability-reports</a>
4.2 Product design	Conformance	The Entity is the first licensed Research and Development (R&D) centre in the Turkish Aluminium sector. It is subject to periodic review by government authorities and is equipped with leading practice processes and is operated by qualified research and development (R&D) personnel. Product design focus areas include new material

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		compositions, weight reduction and functionality improvements. The Entity also works closely with national and global research centres.
4.3a Aluminium Process Scrap (targets)	Conformance	The Entity has developed a Scrap Policy which is publicly available: <a href="https://www.asastr.com/corporate-/policies/scrap-policy">https://www.asastr.com/corporate-/policies/scrap-policy</a> Indicators have been established for scrap for relevant functions and are tracked for actual performance through internal systems. All process scrap generated is segregated and re-used in Casthouses (extrusion and flat rolled products). Aluminium Scrap is segregated according to alloys and then fed back into the Casthouse accordingly.
4.3b Aluminium Process Scrap (alloy separation)	Conformance	All process scrap generated is segregated and re-used in Casthouses (Extrusion and Flat Product). Aluminium scrap is segregated as per alloys and then fed to the Casthouse accordingly.
4.4a Collection and recycling of products at end-of-life (strategy)	Conformance	Collection and recycling are defined in the Entity's Scrap Policy. The Entity is engaged in ensuring both consumer and customer awareness is increased and practices relating to the collection and recycling of products at End of Life.
4.4b Collection and recycling of products at end-of-life (engagement)	Conformance	Collection and recycling are defined in the Entity's Scrap Policy. The Entity is engaged in ensuring both consumer and customer awareness is increased and practices relating to the collection and recycling of products at the End of Life.
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		
5.1 Disclosure of GHG emissions and energy use	Conformance	The Entity has calculated Greenhouse Gases (GHG) for Scopes 1 and 2 Emissions covering all manufacturing locations, excluding the head office located in Istanbul. The base year is January-December 2020. See the Sustainability Report, page 89: <a href="https://www.asastr.com/sites/1/upload/files/ASAS_S_urdurulebilirlik_Raporu_2022_EN-2289.pdf">https://www.asastr.com/sites/1/upload/files/ASAS_S_urdurulebilirlik_Raporu_2022_EN-2289.pdf</a> The ISO 14064-1 standard was used as the basis for the calculation.
5.2 GHG emissions reductions	Conformance	The Entity has developed a sustainability strategy and decarbonisation roadmap, identified potential GHG reduction projects and an implementation plan. The Entity has made a commitment to related initiatives and endorsements such as the Science



CRITERION	RATING	COMMENT
		Based Targets initiative (SBTi) and CDP in coming years. The related GHG reduction or Decarbonization targets are disclosed on pages 28 & 29 of the Sustainability report. <a href="https://www.asastr.com/sites/1/upload/files/ASAS_Surdurulebilirlik_Raporu_2022_EN-2289.pdf">https://www.asastr.com/sites/1/upload/files/ASAS_Surdurulebilirlik_Raporu_2022_EN-2289.pdf</a>
5.3a Aluminium Smelting (management system)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.3b Aluminium Smelting (up to and including 2020)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.3c Aluminium Smelting (after 2020)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
PRINCIPLE 6 EMISSIONS, EFFLUENTS AND WASTE		
6.1 Emissions to Air	Conformance	The Entity undertakes daily, weekly and monthly checks of the combustion system for maintenance purposes and air emission status. There are also external agency testing reports prepared for air emissions. Stacks are numbered and mapped for applicable emission parameters. There are also regular government audits of these results to assess the implementation of environmental conditions in accordance with environmental permits.
6.2 Discharges to Water	Conformance	Treated water is discharged in municipal systems and is sample tested by local authorities monthly, the parameters tested include chemical oxygen demand (COD) and biological oxygen demand (BOD). These have all been assessed as within permissible limits.
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	An environmental risk assessment and evaluation has been completed with an evaluation of Spills and Leakages.
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	The management practices are checked through monthly Health, Safety and Environment (HSE) audits. Spillage and Leakage-related training is provided to the employees. During the plant visit, there were no Leakage or Spillages identified. Spillage kits are provided, periodically checked and maintained.
6.4a Reporting of Spills (immediate disclosure)	Conformance	No significant Spills and Leakage were reported during the past three years. It was noted that a secondary containment area is provided for chemicals and includes chemical spillage kits. Spill information is included in the Sustainability Report,

CRITERION	RATING	COMMENT
		page 73: <a href="https://www.asastr.com/sites/1/upload/files/ASAS_Surdurulebilirlik_Raporu_2022_EN-2289.pdf">https://www.asastr.com/sites/1/upload/files/ASAS_Surdurulebilirlik_Raporu_2022_EN-2289.pdf</a>
6.4b Reporting of Spills (regular reporting)	Conformance	Regular spillage and Leakage reports are available in the Sustainability Report, page 73: <a href="https://www.asastr.com/sites/1/upload/files/ASAS_Surdurulebilirlik_Raporu_2022_EN-2289.pdf">https://www.asastr.com/sites/1/upload/files/ASAS_Surdurulebilirlik_Raporu_2022_EN-2289.pdf</a>
6.5a Waste management and reporting (strategy)	Conformance	The Entity's waste management practices are documented in line with national norms. Training modules on waste management are available and records are maintained. The different types of waste are segregated and disposed of according to government requirements, related disclosures are made in the Sustainability Report: <a href="https://www.asastr.com/sites/1/upload/files/ASAS_Surdurulebilirlik_Raporu_2022_EN-2289.pdf">https://www.asastr.com/sites/1/upload/files/ASAS_Surdurulebilirlik_Raporu_2022_EN-2289.pdf</a>
6.5b Waste management and reporting (disclosure)	Conformance	Waste management related disclosures are included in the Sustainability Report, page 89: <a href="https://www.asastr.com/sites/1/upload/files/ASAS_Surdurulebilirlik_Raporu_2022_EN-2289.pdf">https://www.asastr.com/sites/1/upload/files/ASAS_Surdurulebilirlik_Raporu_2022_EN-2289.pdf</a>
6.6a Bauxite Residue (storage construction)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6b Bauxite Residue (integrity checks and controls)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6c Bauxite Residue (water discharge)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6d Bauxite Residue (marine and aquatic environments)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6e Bauxite Residue (state of the art technologies)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6f Bauxite Residue (remediation)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
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.

CRITERION	RATING	COMMENT
6.7d Spent Pot Lining (SPL) (review of alternatives)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7e Spent Pot Lining (SPL) (marine and aquatic environments)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8a Dross (recovery)	Conformance	The Dross from the melting furnace is collected and stored in a designated area and is sent to an external agency for further treatment/recovery. There is national level database to track Dross movement and its treatment by the authorised processor.
6.8b Dross (recycling)	Conformance	The Dross from the melting furnace is collected, stored in a designated/restricted area, checked during the plant visit, and sent to an external agency for further treatment and Aluminium recovery. There is a national level database maintained by the Ministry of Environment, Urbanisation and Climate Change (Türkiye Cumhuriyeti Çevre, Şehircilik ve İklim Değişikliği Bakanlığı) to track the Dross movement and its treatment by an authorised processor. Each Dross shipment/disposal is recorded/entered in a database.
6.8c Dross (review of alternatives)	Conformance	The Entity regularly reviews alternative options to the landfilling of Dross residues and maximises the Aluminium recovery in consultation with authorised Dross processor(s).
PRINCIPLE 7 WATER STEWARDSHIP		
7.1a Water assessment (mapping)	Conformance	Groundwater is extracted to fulfil the Entity's water supply requirements and a water map has been developed. There are water meters installed to measure the amount of water use and use is recorded in a database.
7.1b Water assessment (risk assessment)	Conformance	The water-related risks have been assessed via the environmental risk assessment as per ISO 14001 requirements and relevant mitigation measures have been identified and implemented. These include water consumption being further divided into gardening irrigation, domestic and process water.
7.2a Water management (management plans)	Conformance	The Entity has developed an operating procedure for overall water management addressing water risk, implementation guidelines and the monitoring of water consumption and performance.

CRITERION	RATING	COMMENT
7.2b Water management (monitoring)	Conformance	The Entity has developed an operating procedure and Capital Expenditure (CapEx) project for overall water management addressing water risk, implementation guidelines and the monitoring of water consumption and performance.
7.3 Disclosure of water usage and risks	Conformance	The Entity has disclosed their water performance which shows improvements in water performance in water intensity and consumption. See the Sustainability Report, page 89: <a href="https://www.asastr.com/sites/1/upload/files/ASAS_Surdurulebilirlik_Raporu_2022_EN-2289.pdf">https://www.asastr.com/sites/1/upload/files/ASAS_Surdurulebilirlik_Raporu_2022_EN-2289.pdf</a>
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	The Entity has conducted a Biodiversity assessment in accordance with ASI requirements and International Finance Corporation (IFC) requirements, with the assistance of an external agency and university. The assessment has identified two main Biodiversity sensitive areas, Sapanca Lake (west side) and a protected mountain area (east side) located approximately twenty kilometres from the Entity. A periodic observation visit was conducted by an external agency in 2023 as an effort to continue the monitoring of Biodiversity risks, no new Biodiversity risks have been identified.
8.2a Biodiversity management (biodiversity action plans)	Conformance	The Entity has developed and incorporated Biodiversity Action Plans into the Biodiversity Report. Progress on the Biodiversity management plan has been demonstrated with the development of an annual activity plan for the removal of Alien Species. The related information is disclosed in the Sustainability report, page 77: <a href="https://www.asastr.com/sites/1/upload/files/ASAS_Surdurulebilirlik_Raporu_2022_EN-2289.pdf">https://www.asastr.com/sites/1/upload/files/ASAS_Surdurulebilirlik_Raporu_2022_EN-2289.pdf</a>
8.2b Biodiversity management (consultation and mitigation hierarchy)	Conformance	The Biodiversity Action Plan has been developed in consultation with relevant Stakeholders and in accordance with the Biodiversity Mitigation Hierarchy.
8.2c Biodiversity management (reporting)	Conformance	Biodiversity-related disclosures are made to Government authorities and are included in the Sustainability Report, page 77: <a href="https://www.asastr.com/sites/1/upload/files/ASAS_Surdurulebilirlik_Raporu_2022_EN-2289.pdf">https://www.asastr.com/sites/1/upload/files/ASAS_Surdurulebilirlik_Raporu_2022_EN-2289.pdf</a>

CRITERION	RATING	COMMENT
8.3 Alien Species	Conformance	The Entity has identified Alien species as part of the Biodiversity risk assessment and implemented necessary mitigation/removal plans.
8.4a Commitment to “No Go” in World Heritage properties (exploration and new mines)	Not Applicable	This Criterion is not applicable to the Entity’s Certification Scope.
8.4b Commitment to “No Go” in World Heritage properties (existing mines)	Not Applicable	This Criterion is not applicable to the Entity’s Certification Scope.
8.5a Mine rehabilitation (best available techniques)	Not Applicable	This Criterion is not applicable to the Entity’s Certification Scope.
8.5b Mine rehabilitation (financial provisions)	Not Applicable	This Criterion is not applicable to the Entity’s Certification Scope.
PRINCIPLE 9 HUMAN RIGHTS		
9.1a Human Rights Due Diligence (policy)	Conformance	The Entity has developed various human resources Policies with a commitment to respect Human Rights. These Policies have been communicated to employees and other Stakeholders.
9.1b Human Rights Due Diligence (process)	Conformance	The Human Rights risk assessment has been undertaken considering both internal and external impacts and aspects. The ranking of these has been completed and appropriate mitigation measures have been implemented.
9.1c Human Rights Due Diligence (remediation)	Conformance	The Entity has conducted risk assessment at the enterprise level and defined mitigation plans for major functions. These are checked periodically, and status reports are submitted to the executive level.
9.2 Women’s Rights	Conformance	The Entity has conducted a gender analysis as part of the Worker’s engagement survey with individual parameters, like social infrastructure. There are women Workers at both, the head office and plant locations.
9.3 Indigenous Peoples	Not Applicable	This Criterion is not applicable as there are no Indigenous Peoples within the Entity’s Area of Influence.
9.4 Free, Prior, and Informed Consent (FPIC)	Not Applicable	This Criterion is not applicable as there are no Indigenous Peoples within the Entity’s Area of Influence.

CRITERION	RATING	COMMENT
9.5 Cultural and sacred heritage	Not Applicable	This Criterion is not applicable as there are no Indigenous Peoples within the Entity's Area of Influence.
9.6a Resettlements (avoid or minimise)	Not Applicable	This Criterion is not applicable as there have been no projects that require resettlements in the history of the Entity.
9.6b Resettlements (where unavoidable)	Not Applicable	This Criterion is not applicable as there have been no projects that require resettlements in the history of the Entity.
9.7a Local Communities (rights and interests)	Conformance	The Entity has engaged with the Local Community in the Akyazi area by supporting the basketball club, donating saplings through the TEMA Foundation, and raising environmental awareness was funded by the Entity. Local Community and Corporate social responsibility (CSR) project areas such as sports facilities and dog shelters were visited at Audit. More information is disclosed in the Sustainability Report, pages 51-52: <a href="https://www.asastr.com/sites/1/upload/files/ASAS_Surdurulebilirlik_Raporu_2022_EN-2289.pdf">https://www.asastr.com/sites/1/upload/files/ASAS_Surdurulebilirlik_Raporu_2022_EN-2289.pdf</a>
9.7b Local Communities (impacts)	Conformance	The company has identified the actual and potential impact of its business activities on the local community. The corporate social responsibility activities undertaken during the year 2022 representing the Entity's positive impact in the local community are disclosed on pages 50-51 of the Sustainability report: <a href="https://www.asastr.com/sites/1/upload/files/ASAS_Surdurulebilirlik_Raporu_2022_EN-2289.pdf">https://www.asastr.com/sites/1/upload/files/ASAS_Surdurulebilirlik_Raporu_2022_EN-2289.pdf</a>
9.7c Local Communities (livelihoods)	Conformance	The Entity has positively impacted the livelihood of Local Communities through local employment and ongoing contribution to the local economy.
9.8 Conflict-Affected and High-Risk Areas	Conformance	The Entity's business activities do not contribute to armed conflict or Human Rights abuses in Conflict-Affected and High-Risk Areas (CAHRAs) according to responsible sourcing practices and operational practices. There are no CAHRAs near the Entity's operations or its sourcing companies. The Entity has undertaken Stakeholder engagement and addressed Human Rights aspects besides other Stakeholder expectations. The Human Rights approach is defined in the Sustainability Report, page 60: <a href="https://www.asastr.com/sites/1/upload/files/ASAS_Surdurulebilirlik_Raporu_2022_EN-2289.pdf">https://www.asastr.com/sites/1/upload/files/ASAS_Surdurulebilirlik_Raporu_2022_EN-2289.pdf</a>

CRITERION	RATING	COMMENT
9.9 Security practice	Conformance	The Entity has employed full-time security guards who are treated like any other full-time employee regarding to hiring, on-boarding, training, promotion, benefits, social security, Human Rights training and Code of Conduct obligations. The plant is manned with security guards at all times at entry-exit points, perimeter boundary and fencing and CCTV monitoring.
PRINCIPLE 10 LABOUR RIGHTS		
10.1a Freedom of Association and Right to Collective Bargaining (freedom of association)	Conformance	The Entity respects the rights of Workers to associate freely in Labour Unions, seek representation and join Workers' councils without interference to the extent possible under Applicable Law, and this is reflected in its Human Resources Policies. Worker's representatives were elected by Workers, and the last election occurred in 2023. The Worker's Council is comprised of Worker's representatives and management meets periodically.
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Conformance	The Entity respects the rights of Workers to Collective Bargaining and to participate in any Collective Bargaining process in good faith to the extent possible under Applicable Law. It is reflected in its Human Resources Policies and the employee Code of Conduct: <a href="https://www.asastr.com/corporate-/policies/human-resources-policy">https://www.asastr.com/corporate-/policies/human-resources-policy</a> <a href="https://www.asastr.com/corporate-/codes-of-conduct">https://www.asastr.com/corporate-/codes-of-conduct</a>
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Not Applicable	This Criterion is not applicable, as Turkish Law does not restrict the right to Freedom of Association and Collective Bargaining.
10.2a Child Labour (minimum age)	Conformance	The minimum age of hiring at the Entity is 18 years which is verified via proof of age as well as the applicants' education certificate and national identification. The Entity's Human Resources Policy is available at: <a href="https://www.asastr.com/corporate-/policies/human-resources-policy">https://www.asastr.com/corporate-/policies/human-resources-policy</a>
10.2b Child Labour (hazardous)	Conformance	The Entity does not engage in, nor support Hazardous Child Labour.
10.2c Child Labour (worst forms)	Conformance	The Entity does not engage in, nor support the Worst Forms of Child Labour.

CRITERION	RATING	COMMENT
10.3a Forced Labour (human trafficking)	Conformance	The Entity does not engage in, nor supports Human Trafficking either directly or through any employment or recruitment agencies.
10.3b Forced Labour (deposits, fees, advances)	Conformance	The Entity does not require any form of deposit, recruitment fee or equipment advance from Workers, either directly or through employment or recruitment agencies.
10.3c Forced Labour (migrant workers)	Conformance	The Entity does not require Migrant Workers to lodge deposits or security payments at any time during the employment period.
10.3d Forced Labour (debt bondage)	Conformance	The Entity does not hold Workers in Debt Bondage or force them to work to pay off debt.
10.3e Forced Labour (freedom of movement)	Conformance	The Entity does not restrict the freedom of movement of Workers to, from and within the workplace.
10.3f Forced Labour (retention of identity papers, permits, certificates)	Conformance	The Entity does not retain original copies of Workers' identity papers, work permits, travel documents or training certificates.
10.3g Forced Labour (freedom to terminate employment)	Conformance	The Entity does not deny Workers the freedom to terminate their employment at any time without penalty, provided given notice is given per mutually agreed contract conditions.
10.4 Non-Discrimination	Conformance	The Entity ensures that all employees are informed about their rights and the Policy of Non-Discrimination through training. The Human Resources Policy states that no Discrimination is allowed. If Workers feel they are discriminated, raise the issue with the Entity's Ethics Committee.
10.5 Communication and engagement	Conformance	The Entity has implemented various channels of communication and engagement with employees through training and performance evaluations. The Entity has developed a stakeholder engagement plan which explain how the Entity communicates with stakeholders and grievance mechanisms. <a href="https://www.asastr.com/sites/1/upload/files/SEP_2022_Rev01-2263.pdf">https://www.asastr.com/sites/1/upload/files/SEP_2022_Rev01-2263.pdf</a>
10.6 Disciplinary practices	Conformance	The disciplinary procedures are addressed in the employee Code of Conduct and the related Human Resources Policy. There is no wage deduction for any disciplinary reasons, which was confirmed via document review and Worker interviews.



CRITERION	RATING	COMMENT
10.7a Remuneration (living wage)	Conformance	The Entity pays wages for a normal working week according to legal or industry minimum standards in to meet the basic needs of Workers. The Entity has conducted a wage survey to estimate living wages.
10.7b Remuneration (method of payment)	Conformance	The Entity pays wages for a normal working week according to legal or industry minimum standards to meet the basic needs of Workers. The salary is paid monthly through bank transfer.
10.8 Working Time	Conformance	The working hours are recorded through a system called 'Biometric'. Overtime is not regularly undertaken by Workers, however, when undertaken, Overtime is paid at a premium rate as according to Applicable Law.
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	The Entity's Safety Policy has been established and implemented: <a href="https://www.asastr.com/corporate-policies/health-safety-and-environmental-policy/">https://www.asastr.com/corporate-policies/health-safety-and-environmental-policy/</a>
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	The Entity's Safety Policy has been established and implemented and includes employees and Visitors: <a href="https://www.asastr.com/kurumsal/surdurulebilirlik/">https://www.asastr.com/kurumsal/surdurulebilirlik/</a>
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Conformance	The Entity's Safety Policy has been established and implemented and includes a commitment to comply with Applicable Law on Workers' health and safety, international standards, and ILO Conventions on Occupational Health and Safety (OH&S): <a href="https://www.asastr.com/kurumsal/surdurulebilirlik/">https://www.asastr.com/kurumsal/surdurulebilirlik/</a>
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	The Entity's Safety Policy has been established and implemented which includes the provision that Workers have the right to understand the hazards and safe practices for their work, and the authority to refuse or stop unsafe work: <a href="https://www.asastr.com/kurumsal/surdurulebilirlik/">https://www.asastr.com/kurumsal/surdurulebilirlik/</a>
11.2 OH&S Management System	Conformance	The Entity has developed and implemented an OH&S Management System in accordance with ISO 45001. During the plant visit and document reviews, it was confirmed that the non-conformances raised in the last audit are now closed.
11.3 Employee engagement on health and safety	Conformance	There is periodic health and safety training provided to employees. The theme for 2022 is 'Hand Safety'. This is evident through displays and employee commitment seen during the Audit. There are periodic employee communications and

CRITERION	RATING	COMMENT
		engagement activities related to Health and Safety Committee meetings. This committee has representation from both management and employees to review the health and safety topics, status quo, challenges, improvements needed, etc.
11.4 OH&S performance	Conformance	The Entity has established and monitors OH&S performance indicators, which include lost time injury frequency rate (LTIFR). A monthly trend analysis has been completed.

**Document Control and Version History**

Revision	Date	Notes
0	9 December 2022	Initial Certification Audit - Full Certification
1	29 February 2024	Surveillance Audit; Updated Audit Firm from LiberoAssurance to CETIZION Verifica