

# ASI CERTIFICATION CHAIN OF CUSTODY STANDARD



PRESENTED TO

# Metlen Energy & Metals S.A

CERTIFICATE NUMBER

229

ASI STANDARD

CHAIN OF CUSTODY  
(V2 2022)

CERTIFICATION LEVEL

FULL  
CERTIFICATION

ASI ACCREDITED  
AUDITING FIRM

EUROCERT S.A.

DATE OF ISSUE

2 AUGUST 2024

DATE OF EXPIRY

1 AUGUST 2027

CERTIFIED SINCE

17 OCTOBER 2022

## AUTHORISED BY

A handwritten signature in black ink, appearing to be 'J. Hall', 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](http://www.aluminium-stewardship.org)

## CERTIFICATION SCOPE

Metlen Energy and Metals - Metallurgy Sector (Greece), including:

- Bauxite mining activities of Delphi Distomon site;
- Refining, smelting and casthouse activities at the Aluminium of Greece Plant;
- Port Facilities at the Aluminium of Greece Plant;
- Metlen Energy and Metals corporate headquarters in Athens.

# AUDIT REPORT

## CHAIN OF CUSTODY

## STANDARD

### OVERVIEW

MEMBER NAME	Metlen Energy & Metals S.A.
ENTITY NAME	Metlen Energy & Metals S.A.
CERTIFICATION SCOPE	Metlen Energy and Metals - Metallurgy Sector (Greece), including: <ul style="list-style-type: none"><li>- Bauxite mining activities of Delphi Distomon site;</li><li>- Refining, smelting and casthouse activities at the Aluminium of Greece Plant;</li><li>- Port Facilities at the Aluminium of Greece Plant;</li><li>- Metlen Energy and Metals corporate headquarters in Athens.</li></ul>
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none"><li>• Bauxite Mining</li><li>• Alumina Refining</li><li>• Aluminium Smelting</li><li>• Aluminium Re-melting/Refining</li><li>• Casthouses</li></ul>
ASI STANDARD	<ul style="list-style-type: none"><li>• Chain of Custody Standard V2</li></ul>
AUDIT TYPE	<ul style="list-style-type: none"><li>• Initial Certification Audit (25 – 27 July 2022)</li><li>• Re-Certification Audit and Scope Change (17 – 18 June 2024)</li></ul>
AUDIT FIRM	EUROCERT S.A.
AUDIT DATE	<ul style="list-style-type: none"><li>• 25 – 27 July 2022 (Initial Certification Audit)</li><li>• 17 – 18 June 2024 (Re-Certification Audit and Scope Change)</li></ul>
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none"><li>• 15 September 2022 (Initial Certification Audit)</li><li>• 23 July 2024 (Re-Certification Audit and Scope Change)</li></ul>
AUDIT SCOPE	<p><u>Initial Certification Audit (25 – 27 July 2022)</u></p> <p>The Audit Scope includes all activities at the Delphi Distomon site (Greece) and the Aluminium of Greece Plant and headquarters in Athens (Greece).</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none"><li>• Bauxite Mining</li><li>• Alumina Refining</li><li>• Aluminium Smelting</li><li>• Aluminium Re-melting/Refining</li><li>• Casthouses</li></ul> <p>All applicable criteria in the ASI Chain of Custody Standard were included in the Audit Scope.</p> <p><u>Re-Certification Audit and Scope Change (17 – 18 June 2024)</u></p> <p>The Audit Scope includes all activities at the Delphi Distomon site (Greece) and the Aluminium of Greece Plant and headquarters in Athens (Greece).</p>

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Supply chain activities included in the Audit Scope:

- Bauxite Mining
- Alumina Refining
- Aluminium Smelting
- Aluminium Re-melting/Refining
- Casthouses

All applicable criteria in the ASI Chain of Custody 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 2 August 2024 – 1 August 2027

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NEXT AUDIT TYPE Surveillance Audit

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NEXT AUDIT DUE DATE 1 February 2026

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CERTIFICATE NUMBER 144

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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.

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## ENTITY OVERVIEW

The Metlen Energy and Metals – Metallurgy Sector in Greece, includes bauxite mining activities at the Delphi Distomon site, refining, smelting and casthouse activities at the Aluminium of Greece Plant, port facilities at the Aluminium of Greece Plant and, Metlen Energy and Metals corporate headquarters in Athens.

The Aluminium of Greece plant has been in operation for 60 years and has invested over €600 million in the technological upgrade of its facilities and the improvement of productivity and output. Due to the Aluminium of Greece plant, Metlen Energy and Metals is the largest vertical producer of Aluminium and Alumina in Europe. It has an annual production capacity of 860,000 tons of alumina and 190,000 tonnes of primary Aluminium. Aluminium of Greece produces primary Aluminium products (billets and slabs) by applying the Hall–Héroult process. For Aluminium production, the Aluminium of Greece industrial complex is comprised of:

- An Aluminium smelter with annual production of liquid aluminium exceeding 190,000 tonnes/year
- An anodes production unit with annual production exceeding 94,000 tonnes of baked anodes
- A casthouse with annual production of more than 120,000 tonnes in aluminium billets and 70,000 tonnes in slabs.

The Aluminium of Greece plant is located 160km from Athens and 30 kilometres from Levadia in the Corinth Gulf in Viotia. The plant operates a private port for importing raw materials and exporting end products. The plant has approximately 1,100 employees on site with a further 560 contractors engaged on a full-time basis. The Entity is committed to an Environmental Management System (ISO 14001:2015) alongside a Health and Safety Management System (ISO 45001:2018) and a Quality Management System (ISO 9001:2015).

In 1963, the installation of the industrial plant of 'Aluminium of Greece S.A.' away from the populated areas of the Prefecture of Viotia led to the need for the company to create a model working-class community to accommodate the families of its employees. Thus, the 'Aspra Spitia' (literally, 'White Houses') settlement was created at Antikyra Cove, built to the European standards of that era and provided an uncommon level of quality of life for inhabitants. Today 'Aspra Spitia' is a large modern village with a population of around 3,000 people.

Delfi-Distomon, a subsidiary company of Metlen Energy & Metals S.A., is the second largest bauxite producer in Greece and in Europe, with an annual production of 543,000 tonnes (in 2022), originating from six underground mines. The whole production is sold at AoG (Aluminium of Greece). The company has a history that started early 1970s, created from a merger of companies Delfi Bauxites and Distomon Greek Bauxites. It is based in Athens, while the Technical Management overlooking the production and research activities has its base at Ano Kounouklia (Eleonas, Fokida District). The facility includes administrative offices, a heavy and mobile equipment maintenance area, a medical clinic, rehabilitation and topography offices, equipment, and supply and fuel storage. The Technical Management integrates Health, Safety, Environment and Certifications services, alongside the rehabilitation of mining affected areas. The rehabilitation plan was voluntarily started in 1972 and in 1998 the first fully rehabilitated and self-maintained areas (26 hectares) were returned to the Forest Agency. To date (end 2022) an area of 156 hectares has been rehabilitated.

The human resources capital includes approximately 80 employees and 139 contractors. The company is committed to an Environmental Management System (ISO 14001:2015) alongside a Health and Safety Management System (ISO 45001:2018). The nearest township is Amfissa, seven kilometres away. The nearby sensitive receptors include the Parnassus Classified Forest (24 kilometres east) and Gkiona Forest (35 kilometres west). Key external stakeholders include the Government of Greece, the local town of Amfissa and the local villages of Elaionas, Viniani, and Variani (Delphi Prefecture). All underground mines are mostly in development and mine-out face. Future planning aims at keeping the volume of production at current levels.

## 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.

	OVERALL
<b>SYSTEMS</b>	Medium
<b>RISKS</b>	Medium
<b>PERFORMANCE</b>	Medium
<b>OVERALL</b>	<b>MEDIUM</b>

## FINDINGS

CRITERION	RATING	COMMENT
<b>1. MANAGEMENT SYSTEM AND RESPONSIBILITIES</b>		
1.1 ASI Membership	Conformance	In June 2024, the Entity changed its name from Mytilineos S.A. to Metlen Energy & Metals S.A. Metlen has been an ASI member in the Production and Transformation class since 2019. The Entity is committed to complying with the requirements of ASI. Further information is available at: <a href="https://aluminium-stewardship.org/about-asi/members/Metlen-Energy---Metals-S-A-">https://aluminium-stewardship.org/about-asi/members/Metlen-Energy---Metals-S-A-</a>
1.2 CoC Management System	Conformance	The Entity has established a Management System that addresses all applicable requirements of the ASI Chain of Custody (CoC) Standard. The Entity's Management System for ASI CoC Certification is linked to the existing Quality Management System. It is based on existing procedures that have been reviewed and new procedures have been developed for the implementation of the ASI CoC Standard. The procedure describes the objectives, governance model, scope, responsibilities, and handling of ASI CoC Materials and Non-CoC Materials, including calculation methods for the Material Accounting System. The Entity has an integrated supply chain and has direct control of Facilities from Bauxite Mine, Alumina production to Casting.
1.3 CoC Management System Monitoring	Conformance	The Entity has established a Management System and implemented a CoC Manual. The CoC Manual describes in detail the Material Accounting System and its use. The Aluminium of Greece Plant has a System to account for the quantity of Bauxite from the Delfoi Distomo mine, as Aluminium of Greece Plant is its sole client
1.4 Management Representative	Conformance	The Entity has nominated a senior Management Representative with the overall responsibility for the ASI CoC Standard. The Entity has also identified a cross-functional operational team responsible for the operational implementation of the ASI CoC Standard.
1.5 Communications and Training	Conformance	The Entity has developed and implemented communication and training measures to ensure relevant personnel are aware of and competent in their responsibilities under the ASI CoC Standard. Adequate training was provided to the CoC operational team.
1.6 Records Management	Conformance	The Entity maintains up-to-date records according to its procedures for document and records management and the ASI CoC Manual. This procedure and the CoC Manual describe the Material Accounting System (software/tools used) and its relevant records filing system.
1.7a Reporting to ASI (Inputs and Outputs of CoC Material)	Conformance	The Entity most recently sent information to the ASI Secretariat in June 2024 related to the Input and Output Quantities of CoC Material/s over the calendar year 2023.
1.7b Reporting to ASI (Inputs and Outputs of Eligible Scrap)	Conformance	The Entity most recently sent information to the ASI Secretariat in June 2024 related to the Input and Output Quantities of Eligible Scrap over the calendar year 2023.

CRITERION	RATING	COMMENT
1.7c Reporting to ASI (Inflows and Outflows of Non-CoC Material)	Conformance	The Entity most recently sent information to the ASI Secretariat in June 2024 on the Input and Output Quantities of Non-CoC Material/s over the calendar year 2023.
1.7d Reporting to ASI (Positive Balance carried over)	Conformance	The Entity most recently sent information to the ASI Secretariat in June 2024 on the Positive Balance carried over to the subsequent Material Accounting Period of the calendar year 2023.
1.7e Reporting to ASI (Positive Balance used)	Conformance	The Entity most recently sent information to the ASI Secretariat in June 2024 related to the Positive Balance used over the calendar year 2023.
1.7f Reporting to ASI (Internal Overdraw drawn down)	Conformance	The Entity has reported information on Internal Overdraw to the ASI Secretariat according to the ASI schedule.
1.7g Reporting to ASI (Intra-Entity Flows)	Conformance	The Entity most recently sent information to the ASI Secretariat in June 2024 related to the Quantities of CoC Material/s transferred between supply chain activities within the CoC Certified Entity (Intra-Entity Flows) over the calendar year 2023.

## 2. OUTSOURCING CONTRACTORS

2.1 Certification Scope	Not Applicable	This Criterion is not applicable to the Entity, as it does not use Outsourcing Contractors for further processing, treatment or manufacturing.
2.2a Control of CoC Material (Legal ownership or control)	Not Applicable	This Criterion is not applicable to the Entity, as it does not use Outsourcing Contractors for further processing, treatment or manufacturing.
2.2b Control of CoC Material (No further outsourcing)	Not Applicable	This Criterion is not applicable to the Entity, as it does not use Outsourcing Contractors for further processing, treatment or manufacturing.
2.2c Control of CoC Material (Risk assessment)	Not Applicable	This Criterion is not applicable to the Entity, as it does not use Outsourcing Contractors for further processing, treatment or manufacturing.
2.3 Information on Quantity of CoC Material Output and Returned	Not Applicable	This Criterion is not applicable to the Entity, as it does not use Outsourcing Contractors for further processing, treatment or manufacturing.
2.4 Consistency in Inflow and Outflow Quantity of CoC Material to/from Outsourcing Contractor	Not Applicable	This Criterion is not applicable to the Entity, as it does not use Outsourcing Contractors for further processing, treatment or manufacturing.
2.5 Error (Outsourcing Contractor)	Not Applicable	This Criterion is not applicable to the Entity, as it does not use Outsourcing Contractors for further processing, treatment or manufacturing.

## 3. PRIMARY ALUMINIUM: CRITERIA FOR ASI BAUXITE, ASI ALUMINA AND ASI ALUMINIUM

CRITERION	RATING	COMMENT
3.1a ASI Bauxite (CoC Certification Scope)	Conformance	The Entity's Bauxite Mining units (Delfi Distomon) are ASI Performance Standard Certified and within the Entity's CoC Certification Scope. Delfi Distomon transfers all its production to the Aluminium of Greece Plant without mixing it with Non-CoC Material. Therefore, the entire Bauxite quantities produced by the Entity's mining units are ASI Bauxite.
3.1b ASI Bauxite (Performance Standard)	Conformance	The Entity's Bauxite Mining units (Delfi Distomon) are ASI Performance Standard Certified and within the Entity's CoC Certification Scope. Delfi Distomon transfers all its production to the Aluminium of Greece Plant, without mixing it with Non-CoC Material. Therefore, the entire Bauxite quantities produced by the Entity's mining units are ASI Bauxite.
3.1c ASI Bauxite (Bauxite sourcing)	Conformance	The Bauxite quantities from the Entity's Delfi Distomon mines are ASI Certified Bauxite. However, in this case, no CoC Documents are issued, as it is considered an internal sale of Bauxite. The relevant quantities are attributed within the Entity's Material Accounting System.
3.2a ASI Alumina (CoC Certification Scope)	Conformance	The Entity's Alumina Refining occurs at the Aluminium of Greece plant, which is included in the Entity's CoC Certification Scope.
3.2b ASI Alumina (Performance Standard)	Conformance	The Entity's Alumina is produced at the Aluminium of Greece plant, which is included in its ASI Performance Standard Certification Scope. Further information is available at: <a href="https://aluminium-stewardship.org/about-asi/members/Metlen-Energy---Metals-S-A-">https://aluminium-stewardship.org/about-asi/members/Metlen-Energy---Metals-S-A-</a>
3.2c ASI Alumina (Bauxite sourcing)	Conformance	The Bauxite quantities from the Entity's Delfi Distomon mines are ASI Certified Bauxite. However, in this case, no CoC Documents are issued, as it is considered an internal sale of bauxite. The relevant quantities are attributed within the entity's material accounting system.
3.3a ASI Aluminium (CoC Certification Scope)	Conformance	The Entity's Aluminium is produced at its electrolysis facilities at the Aluminium of Greece Plant, which is included in the Entity's ASI CoC Certification Scope.
3.3b ASI Aluminium (Performance Standard)	Conformance	The Entity's electrolysis facilities are located within the Aluminium of Greece Plant, which is ASI Performance Standard Certified. Further information is available at: <a href="https://aluminium-stewardship.org/about-asi/members/Metlen-Energy---Metals-S-A-">https://aluminium-stewardship.org/about-asi/members/Metlen-Energy---Metals-S-A-</a>
3.3c ASI Aluminium (Alumina sourcing)	Conformance	All of the Entity's ASI Alumina is produced at the Entity's Aluminium of Greece Plant, which is included in the Entity's ASI Performance Standard Certification Scope and CoC Certification Scope: <a href="https://aluminium-stewardship.org/about-asi/members/Metlen-Energy---Metals-S-A-">https://aluminium-stewardship.org/about-asi/members/Metlen-Energy---Metals-S-A-</a>
<b>4. RECYCLED ALUMINIUM: CRITERIA FOR ELIGIBLE SCRAP</b>		
4.1a Recycled Aluminium (CoC Certification Scope)	Conformance	Pre-Consumer and Post-Consumer Scrap inputs are designated as ASI Eligible Input in the Entity's Aluminium of Greece Plant, which is included in the Entity's CoC Certification Scope. The Entity has robust processes in place to monitor the quantities of Recycled Aluminium and designated Eligible Inputs and Non-CoC Materials in the Material Accounting System.

CRITERION	RATING	COMMENT
4.1b Recycled Aluminium (Performance Standard)	Conformance	Pre-Consumer, Post-Consumer and internal Scrap are used by the Entity as input to the Aluminium production process, which is ASI Performance Standard Certified: <a href="https://aluminium-stewardship.org/about-asi/members/Metlen-Energy---Metals-S-A">https://aluminium-stewardship.org/about-asi/members/Metlen-Energy---Metals-S-A</a> However, the Entity is not engaged in Aluminium Re-melting/Refining activities to produce Recycled Aluminium at the Aluminium of Greece Plant, as the Scrap is directly mixed with Primary Aluminium into the furnace.
4.2a Eligible Scrap (Pre-Consumer)	Conformance	The Entity has implemented a procedure that describes the categories of Scrap and its classification. The Entity uses a mix of Pre-Consumer Scrap, Post-Consumer Scrap and RSIs (Recycled Scrap) made from treated Dross and Post-Consumer Scrap. After this classification, the Scrap is checked for eligibility. The incoming material is accounted for in the Material Accounting System.
4.2b Eligible Scrap (Post-Consumer)	Conformance	The Entity uses a mix of Pre-Consumer Scrap, Post-Consumer Scrap and RSIs (Recycled Scrap) made from treated Dross and Post-Consumer Scrap. The Entity has implemented Due Diligence and risk evaluation procedures to screen its critical suppliers and to conduct risk assessments according to specific criteria. The Entity has recently assessed all its Scrap suppliers and documented these results.
4.2c Eligible Scrap (Dross)	Conformance	The Entity has implemented a procedure that describes the categories of Scrap and its classification. The Entity uses a mix of Pre-Consumer and Post-Consumer Scrap that contains Dross and treated Dross as Input. After this classification, the Certification Status of Materials is checked for eligibility. The incoming material is accounted for in the Material Accounting System.
4.3a Records Management for Direct Suppliers of Recyclable Scrap Material (Suppliers)	Conformance	The Entity has established procedures to record the identity, place of operation, and principles of all direct suppliers of Recyclable Scrap Material. The Entity screens, monitors, and periodically evaluates all direct suppliers of Recyclable Scrap Material. There are detailed records for every supplier of Recyclable Scrap Material.
4.3b Records Management for Direct Suppliers of Recyclable Scrap Material (Financial transactions)	Conformance	The Entity does not conduct cash transactions with its suppliers. In any case, all transactions (including cash) are attributed within the Entity's Material Accounting System.
<b>5. CASTHOUSES: CRITERIA FOR ASI ALUMINIUM</b>		
5.1a ASI Aluminium (CoC Certification Scope)	Conformance	The Entity produces Casthouse Products from Primary Aluminium and Scrap at its Casthouse in the Aluminium of Greece Plant, which is included in the Entity's CoC Certification Scope. Further information is available at: <a href="https://www.metlengroup.com/what-we-do/metallurgy-sector/aluminium-of-greece/our-facilities/aluminium/">https://www.metlengroup.com/what-we-do/metallurgy-sector/aluminium-of-greece/our-facilities/aluminium/</a>
5.1b ASI Aluminium (Performance Standard)	Conformance	The Entity's Casthouse Products are produced at its Casthouse in the Aluminium of Greece Plant, which is included in the Entity's ASI Performance Standard Certification Scope. <a href="https://aluminium-stewardship.org/about-asi/members/Metlen-Energy---Metals-S-A">https://aluminium-stewardship.org/about-asi/members/Metlen-Energy---Metals-S-A</a>



CRITERION	RATING	COMMENT
5.1c ASI Aluminium (Aluminium sourcing)	Conformance	The Entity has systems in place to ensure that ASI Aluminium is produced only from the Entity's Casthouse or another ASI CoC Certified Entity.
5.2 Unique Identification	Conformance	The Entity's Casthouse has implemented a 'hard-marking' system to ensure that unique identification numbers appear on Products (e.g., slabs and columns). This information is linked to the Material Accounting System. A printed tag is included with each package and the information on the tag is described in the related Casthouses procedures.

## 6. POST-CASTHOUSE: CRITERIA FOR ASI ALUMINIUM

6.1a Post-Casthouse ASI Aluminium (CoC Certification Scope)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.1b Post-Casthouse ASI Aluminium (Performance Standard)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.1c Post-Casthouse ASI Aluminium (Aluminium sourcing)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

## 7. DUE DILIGENCE FOR NON-COC MATERIAL, COC MATERIAL ACQUIRED THROUGH A TRADER AND RECYCLABLE SCRAP MATERIAL

7.1a Responsible Sourcing Policy (Anti-corruption)	Conformance	<p>The Entity has established a Suppliers/Business Partners Code of Conduct and a Responsible Supply Chain Policy (both documents issued in 2023), which address environmental, social and governance issues. These documents are available at: <a href="https://www.metlengroup.com/sustainability/our-main-policies/">https://www.metlengroup.com/sustainability/our-main-policies/</a></p> <p>The Entity has established a Code of Business Conduct, which includes the relevant anti-Corruption activities and obligations of the employees, and a Suppliers/Business Partners Code of Conduct, which includes anti-Corruption and anti-Bribery requirements for suppliers and contractors. The risk assessment on ethics is dynamically updated according to the information received by established ethics reporting channels and other communication tools. The Entity has provided training to employees on business ethics and anti-Corruption. An external Chartered Accountant periodically audits the financial system.</p>
7.1b Responsible Sourcing Policy (Responsible sourcing)	Conformance	<p>The Entity has established a Suppliers/Business Partners Code of Conduct and a Responsible Supply Chain Policy, which address environmental, social and governance issues. These documents are available at: <a href="https://www.mytilneos.com/sustainability/our-main-policies/">https://www.mytilneos.com/sustainability/our-main-policies/</a></p> <p>The communication with and evaluation of new and existing suppliers according to the Entity's Policies takes place under specific procedures.</p>

CRITERION	RATING	COMMENT
7.1c Responsible Sourcing Policy (Human rights due diligence)	Conformance	<p>The Entity has established a Responsible Sourcing Policy which is documented in the Suppliers/Business Partners Code of Conduct, which addresses Human Rights:  <a href="https://www.metlengroup.com/media/vj0j4005/mytilineos_suppliers_code_of_conduct_2023_en.pdf">https://www.metlengroup.com/media/vj0j4005/mytilineos_suppliers_code_of_conduct_2023_en.pdf</a></p> <p>The Entity's Code of Business Conduct (2019) includes a clause that addresses 'Respect for Human Rights':  <a href="https://www.metlengroup.com/media/obajpknz/mytilineos_kodikas_deontologias_2019_web_en_23_01.pdf">https://www.metlengroup.com/media/obajpknz/mytilineos_kodikas_deontologias_2019_web_en_23_01.pdf</a></p> <p>The Entity has established a Human Rights Policy, available at:  <a href="https://www.metlengroup.com/media/rp3edd3u/politiki_anthrwpinwn_dikaiwmatwn_en.pdf">https://www.metlengroup.com/media/rp3edd3u/politiki_anthrwpinwn_dikaiwmatwn_en.pdf</a></p>
7.1d Responsible Sourcing Policy (Conflict-affected and high-risk areas)	Conformance	<p>The Entity has implemented a Suppliers' Code of Conduct which includes commitments to avoid direct or indirect involvement in armed conflicts according to the OECD Guidance. The Suppliers' Code of Conduct is available at:  <a href="https://www.metlengroup.com/media/vj0j4005/mytilineos_suppliers_code_of_conduct_2023_en.pdf">https://www.metlengroup.com/media/vj0j4005/mytilineos_suppliers_code_of_conduct_2023_en.pdf</a></p> <p>The Entity's Code of Business Conduct (2019) includes a clause that addresses 'Relations with the supply chain':  <a href="https://www.metlengroup.com/media/obajpknz/mytilineos_kodikas_deontologias_2019_web_en_23_01.pdf">https://www.metlengroup.com/media/obajpknz/mytilineos_kodikas_deontologias_2019_web_en_23_01.pdf</a></p> <p>The Entity has implemented a process to ensure that the main raw materials (Bauxite and Aluminium Scrap) do not originate from Conflict-Affected and High-Risk Areas (CAHRAs). All current or potential suppliers are systematically screened by the Entity's Due Diligence system in accordance with the OECD Due Diligence Guidance. The Entity's assessment did not identify any significant actual or potential risks and none of the critical suppliers provide Bauxite or other critical raw materials sourced from CAHRAs.</p>
7.2 Risk Assessment and Mitigation	Conformance	<p>The Entity has demonstrated it periodically evaluates its suppliers by using appropriate online tools, which allows new business partners (customers/suppliers) to be audited. The latest risk assessments of Bauxite and Scrap suppliers are documented in appropriate records according to established procedures. These risk assessments have not identified any adverse impacts that require measurable risk mitigation.</p>
7.3 Complaints Resolution Mechanism	Conformance	<p>The Entity has established a Complaints Mechanism and internal compliance processes, interested parties can communicate with METLEN at: <a href="https://www.metlengroup.com/contact-us/">https://www.metlengroup.com/contact-us/</a>  Requests &amp; Complaints Form at:  <a href="https://www.metlengroup.com/what-we-do/metallurgy-sector/aluminium-of-greece/requests-complaints-form/">https://www.metlengroup.com/what-we-do/metallurgy-sector/aluminium-of-greece/requests-complaints-form/</a>  email: <a href="mailto:compliance@metlengroup.com">compliance@metlengroup.com</a></p> <p>A Complaints Platform is available at:  <a href="https://mytilineos.ethics.help/web/en">https://mytilineos.ethics.help/web/en</a></p> <p>More information is available at:  <a href="https://www.metlengroup.com/who-we-are/governance/compliance/#section10%20">https://www.metlengroup.com/who-we-are/governance/compliance/#section10%20</a></p>

CRITERION	RATING	COMMENT
8.1 Material Accounting System	Conformance	The Entity has a Material Accounting System based on Oracle Applications that are used during the production process. A CoC Manual fully describes the use of the System. The Entity's CoC internal control system described the material flow, from the Bauxite mines to the Casthouses, via the Refinery and Smelter. The full functionality of the Material Accounting System was confirmed and the quantities agreed with the report submitted to the ASI Secretariat.
8.2 Material Accounting Period	Conformance	The Entity has defined its Material Accounting Period as 1 January to 31 December, a 12 month calendar year.
8.3 Input and Inflow Quantities	Conformance	The Entity has established a Material Accounting System based on Oracle Applications for the production process and has implemented a CoC Manual that describes the use of the System. The CoC internal control system describes the material flow, from the Bauxite Mines to the Casthouses, via the Refinery and Smelter. The full functionality of the Material Accounting System was confirmed and the quantities agreed with the report submitted to the ASI Secretariat..
8.4 Output Quantities of CoC Material	Conformance	The Entity has established a Material Accounting System based on Oracle Applications for the production process and has implemented a manual that describes the use of the System. The CoC internal control system describes the material flow, from the Bauxite Mines to the Casthouses, via the Refinery and Smelter. The full functionality of the Material Accounting System was confirmed and the quantities agreed with the report submitted to the ASI Secretariat..
8.5 Indivisibility of CoC Material	Conformance	The Entity has designated its Output Quantity of CoC Material as 100%. The Material Accounting System is designed to automatically calculate the Output percentage. This Output percentage is compared with the Input Percentage to ensure that it does not exceed this value.
8.6 Output Quantity of Eligible Scrap	Not Applicable	This Criterion is not applicable as the Entity recycles its internal Scrap back into the system.
8.7 Consistency Between Input Percentage and Total Output	Conformance	The Entity has established a Material Accounting System and internal control mechanisms to ensure that Outputs do not exceed Inputs, which is reviewed monthly. The Entity determines the total Output of CoC Material, based on CoC Material Inputs, conversion factors, and Eligible Scrap.
8.8a Internal Overdraw (Not exceed 20%)	Not Applicable	This Criterion is not applicable as the Entity does not intend to carry over an Internal Overdraw to the subsequent Material Accounting Period.
8.8b Internal Overdraw (Not exceed force majeure situation)	Not Applicable	This Criterion is not applicable as the Entity does not intend to carry over an Internal Overdraw to the subsequent Material Accounting Period.
8.8c Internal Overdraw (Made up within subsequent Material Accounting Period)	Not Applicable	This Criterion is not applicable as the Entity does not intend to carry over an Internal Overdraw to the subsequent Material Accounting Period.

CRITERION	RATING	COMMENT
8.9a Positive Balance (Carry over)	Conformance	The Entity has established a Material Accounting System and internal control mechanisms to ensure that a Positive Balance is carried over to the subsequent Material Accounting Period.
8.9b Positive Balance (Expiry)	Conformance	The Entity has established a Material Accounting System and internal control mechanisms to ensure that a Positive Balance carried over to the subsequent Material Accounting Period will expire at the end of that period if not drawn down.

## 9. ISSUING COC DOCUMENTS

9.1 CoC Document	Conformance	The Entity has implemented a procedure to ensure that a CoC Document accompanies each shipment or transfer of CoC Material dispatched to other CoC Certified Entities. The Entity ensures that CoC information is included in the invoice accompanying each shipment or transfer of CoC Material dispatched to other CoC Certified Entities or Traders.
9.2a CoC Document Content (Date of issue)	Conformance	The Entity's CoC Document template includes the date of issue which is the same as the shipping documentation.
9.2b CoC Document Content (Reference number)	Conformance	The Entity's CoC Document template includes the reference number, which is the same as the shipping documentation number.
9.2c CoC Document Content (Issuing Entity)	Conformance	The Entity's CoC Document template includes, by default, the Entity's identity, address, and CoC Certification number.
9.2d CoC Document Content (Receiving customer)	Conformance	The Entity's CoC Document template includes, by default, the identity and address of the customer receiving the CoC Material, and if it is another CoC Certified Entity, their CoC Certification number is included in the CoC Document.
9.2e CoC Document Content (Responsible employee)	Conformance	The Entity's CoC Document template includes, by default, the responsible employee who can verify information in the CoC Document.
9.2f CoC Document Content (Conformance statement)	Conformance	The Entity's CoC Document template includes, by default, the required statement confirming that "The information provided in the CoC Document is in Conformance with the ASI CoC Standard."
9.2g CoC Document Content (Type of CoC Material)	Conformance	The Entity's CoC Document template includes, by default, the type of CoC Material in the shipment.
9.2h CoC Document Content (Mass of CoC Material)	Conformance	The Entity's CoC Document template includes, by default, the mass of CoC Material of the shipment.
9.2i CoC Document Content (Mass of total material)	Conformance	The Entity's CoC Document template includes, by default, the Mass of total Material of the shipment.

CRITERION	RATING	COMMENT
9.3a Sustainability Data (optional) - Carbon footprint	Not Applicable	This Criterion is not applicable as Entity does not intend to report data on the average carbon footprint of the CoC Material and accounting method applied.
9.3b Sustainability Data (optional) - Origin information	Not Applicable	This Criterion is not applicable as Entity does not intend to report information to support the origin of Aluminium.
9.3c Sustainability Data (optional) - Recycled content	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9.3d Sustainability Data (optional) - Post-Casthouse ASI Certification status	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9.4 Supplementary Information (optional) - Objective evidence	Not Applicable	This Criterion is not applicable as the Entity does not intend to include Supplementary Information in CoC Documents.
9.5 Verification of Information	Conformance	The Entity has designated the Sales department personnel responsible for the management of CoC requests from customers aligned to the Entity's Quality Management System. In any case of CoC-related issues, the ASI CoC Representative is informed and takes appropriate decisions for Corrective Actions if needed. The relevant personnel were trained on their duties under the ASI CoC Standard. The system is robust to document errors, Corrective Actions, and any potential preventive measures according to the existing procedures.
9.6 Error (Shipping)	Conformance	The Entity has implemented an error management process as part of its Quality Management System. The Entity's ASI team identifies non-conformities, and regularly monitors root causes and Corrective Actions.
<b>10. RECEIVING COC DOCUMENTS</b>		
10.1 Verification of CoC Documents	Conformance	The Entity has established a Management System procedure and actions to regularly check and verify CoC Documents received from other Certified Entities.
10.2 Verification of Consistency Between CoC Documents and CoC Material	Conformance	The Entity has established procedures and controls to regularly check the consistency of the CoC Documents before recording information in the Oracle-based Material Accounting System.
10.3 Verification of Supplier's ASI CoC Certification	Conformance	The Entity has established a Management System procedure to regularly check the ASI website to verify the validity and scope of its suppliers' ASI Certification.
10.4 Error (Reception)	Conformance	The Entity has established an error management process as part of its Quality Management System. Identified non-conformities, root causes, and Corrective Actions are monitored regularly by the Entity's ASI team.

CRITERION	RATING	COMMENT
<b>11 CLAIMS AND COMMUNICATIONS</b>		
11.1a Claims and Communications (ASI Claims Guide)	Conformance	The Entity has integrated the ASI Claims Guide requirements into its internal procedures and communication mechanisms. No claims have taken place to date relating to CoC Material.
11.1b Claims and Communications (Verifiable evidence)	Conformance	The Entity has integrated the ASI Claims Guide requirements into its internal procedures and communication mechanisms. No claims have taken place to date relating to CoC Material.
11.1c Claims and Communications (Employee training)	Conformance	The Entity has trained relevant personnel on their duties regarding ASI claims and representation.

#### ASI LIMITATION OF LIABILITY DISCLAIMER

Organisations that make ASI-related claims are each responsible for their own compliance with Applicable Law, including laws and regulations related to labelling, advertisement, and consumer protection, and competition or antitrust laws, at all times. ASI does not accept liability for any violations of Applicable Law or any infringement of third-party rights (each a Breach) by other organisations, even where such Breach arises in relation to, or in reliance upon, any ASI Standard, document or other material, recommendation or directive issued by or on behalf of ASI. ASI gives no undertaking, representation or warranty that compliance with an ASI Standard, document or other material, recommendation or directive issued by or on behalf of ASI will result in compliance with any Applicable law, or will avoid any Breach from occurring.

#### DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	17 October 2022	Initial Certification Audit – Full Certification
1	2 August 2024	Re-Certification Audit and Scope Change – Full Certification Scope Change to apply ASI CoC V2. Updated to reflect change of Member and Entity Name – from Mytilineos S.A. Metallurgy Business Unit to Metlen Energy & Metals S.A.