

ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

Metlen Energy & Metals S.A

CERTIFICATE NUMBER
156

ASI STANDARD
PERFORMANCE
STANDARD
(V3 2022)

CERTIFICATION LEVEL
FULL
CERTIFICATION

ASI ACCREDITED
AUDITING FIRM
EUROCERT S.A.

DATE OF ISSUE
16 OCTOBER 2023

DATE OF EXPIRY
15 OCTOBER 2026

CERTIFIED SINCE
11 OCTOBER 2021

AUTHORISED BY

A handwritten signature in black ink, appearing to be 'J. Hall', with a long horizontal line extending to the right.

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

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 PERFORMANCE 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">- 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.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">• Bauxite Mining• Alumina Refining• Aluminium Smelting• Aluminium Re-melting/Refining• Casthouses
ASI STANDARD	<ul style="list-style-type: none">• Performance Standard V3
AUDIT TYPE	<ul style="list-style-type: none">• Initial Certification Audit (9 - 16 July 2021)• Re-Certification Audit and Scope Change (22 - 24 May 2023)
AUDIT FIRM	EUROCERT S.A.
AUDIT DATE	<ul style="list-style-type: none">• 9 - 16 July 2021 (Initial Certification Audit)• 22 - 24 May 2023 (Re-Certification Audit and Scope Change)
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">• 21 September 2021 (Initial Certification Audit)• 4 August 2023 (Re-Certification Audit and Scope Change)
AUDIT SCOPE	<p><u>Initial Certification Audit (9 - 16 July 2021)</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">• Bauxite Mining• Alumina Refining• Aluminium Smelting• Aluminium Re-melting/Refining• Casthouses <p>All applicable criteria in the ASI Performance Standard were included in the audit scope.</p> <p><u>Re-Certification Audit and Scope Change (22 - 24 May 2023)</u></p> <p>The audit scope covered the MYTILINEOS Metallurgy sector, including Bauxite Mining activities of Delphi Distomon site in Amfissa (Greece) and Alumina Refining,</p>

Aluminium Smelting, Aluminium Re-melting/Refining, Casthouses activities, Support Activities and Port Facilities at Aluminium of Greece Plant in Boeotia (Greece) and headquarters in Athens (Greece).

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 Performance Standard were included in the audit scope.

AUDIT OUTCOME

- Full Certification

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.

CERTIFICATION PERIOD

16 October 2023 – 15 October 2026

NEXT AUDIT TYPE

Surveillance Audit

NEXT AUDIT DATE

15 April 2025

CERTIFICATE NUMBER

156



If you have an inquiry or complaint about this Certification, go to the third-party EthicsPoint portal at: <https://aluminium-stewardship.ethicspoint.com/>

EthicsPoint is a comprehensive and confidential reporting tool that enables complaints to be securely raised, managed and responded to. This enables anonymity to be maintained where desired by complainants, or as relevant to whistleblowing situations.

Information is available in five languages – English, French, Chinese, German and Portuguese (Brazil). Translation services provided by EthicsPoint enable complaints and correspondence to be managed in multiple languages.

ENTITY OVERVIEW

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 tons 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 tons of baked anodes
- A casthouse with annual production of more than 120,000 tons in aluminium billets and 70,000 tons in slabs

The Aluminium of Greece plant is located 160km from Athens and 30 Km 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 company 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 542,5 Ktn (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 Kounouklias (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 156,1 ha 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, 7km away. The nearby sensitive receptors include the Parnassus Classified Forest (24 km east) and Gkiona Forest (35 km 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.

	GOVERNANCE	ENVIRONMENT	SOCIAL	COMBINED RATING
SYSTEMS	High	High	Medium	High
RISKS	High	High	Medium	High
PERFORMANCE	Medium	Medium	Medium	Medium
OVERALL	HIGH			

FINDINGS

CRITERION	RATING	COMMENT
1. BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity has implemented processes and maintains an applicable legislation registry. Well established channels of communication exist that allow adequate awareness of legal requirements and ensure compliance with Applicable Laws and regulations. An effective process for regularly evaluating compliance with Applicable Law is established.
1.2 Anti-Corruption	Conformance	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.
1.3a-e Code of Conduct	Conformance	<p>The Entity has implemented a Code of Business Conduct and a Suppliers / Business Partners Code of Conduct which includes principles relevant to environmental, social, and governance performance:</p> <p>https://www.mytilneos.com/media/doi4yvc/mytilneos_kodikas_deontologias_2019_web_en_23_01.pdf</p> <p>https://www.mytilneos.com/media/14hbtss2/mytilneos_suppliers_code_of_conduct_2022_en.pdf</p> <p>The Code of Business Conduct is applicable to all employees and the Suppliers / Business Partners Code of Conduct is applicable to all suppliers and contractors. The Entity's Policies, including both Codes of Conduct, are reviewed annually, and updated in any case of changes, new risks, or gaps that affect them.</p>
2. POLICY AND MANAGEMENT		
2.1a-f Environmental, Social, and Governance Policy	Conformance	<p>The Entity has implemented and maintains Policies regarding Occupational Health and Safety, environmental and Human Rights practices consistent with the principles included in the ASI Performance Standard. The Policies are periodically reviewed and employees are provided training as part of the ISO 14001:2015 Environmental Management System and ISO 45001 Occupational Health and Safety Management System certifications. The Policies are reviewed annually and updated in any case of changes, new risks, or gaps that affect them. The Entity's Policies are communicated via its website:</p> <p>https://www.mytilneos.gr/sustainability/our-main-policies/</p>
2.2a-c Leadership	Conformance	The Entity has nominated a senior Management Representative for the implementation of the ASI Performance Standard. Furthermore, an Environmental Social and Governance (ESG) Team has been defined for the Metallurgy Business Unit, addressing health and safety, environmental, labour, ethics, and Human Rights issues.

CRITERION	RATING	COMMENT
2.3a Environmental and Social Management Systems – Environmental	Conformance	The Entity has implemented and documented an Environmental Management System and holds valid ISO 14001:2015 certificates for all its activities within the ASI Certification Scope.
2.3b Environmental and Social Management Systems – Social	Conformance	The Entity has established a (non-certified) Social Management System with processes and systems. Furthermore, the Entity has implemented a certified Occupational Health and Safety Management System according to ISO 45001:2018.
2.4a-e Responsible Sourcing	Conformance	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: https://www.mytilineos.gr/sustainability/our-main-policies/
2.5a-g Environmental and Social Impact Assessments	Not Applicable	This Criterion is not applicable, as the Entity does not have a New Project or Major Change to existing Facilities. However, the Entity has identified, assessed, and documented impacts regarding social, cultural, environmental, and Occupational Health and Safety based on risk assessment, covering all activities in the ASI Performance Standard. A Human Rights Impact Assessment is documented via the Human Rights Self-Evaluation Tool (UN Global Compact), which also includes a gender analysis.
2.6a-h Human Rights Impact Assessment	Not Applicable	This Criterion is not applicable, as the Entity does not have a New Project or Major Change to existing Facilities. However, the Entity has identified, assessed, and documented impacts regarding social, cultural, and Occupational Health and Safety based on risk assessment, covering all activities under the ASI Performance Standard. A Human Rights Impact Assessment is documented via the Human Rights Self-Evaluation Tool (UN Global Compact), which also includes a gender analysis.
2.7a-f Emergency Response Plan	Conformance	The Entity has implemented an Emergency Response Plan with the involvement of the employees, neighbouring factories and according to the requirements of the Authorities. The effectiveness of the Emergency Response Plan is tested regularly. The Entity has publicly disclosed the latest version of its Emergency Response Plans for major accidents on the Region of Central Greece government website: https://pste.gov.gr/anakoinosi-gia-ti-apostoli-eidikou-schediou-antimetopisis-technologikon-atychimaton-megalis-ektasis-s-a-t-a-m-e-tis-egkatastasis-tis-alouminion-tis-ellados-veae-tou-omilou-mytilin/ Furthermore, the Entity has publicly disclosed a list of its emergency response plans on its website: https://www.mytilineos.com/media/tkfp5cvh/table-2a-list-of-possible-senarios-emergency-plans-aog-mytilineos.pdf https://www.mytilineos.com/media/tiuesvfj/plhmmura_entos_ergostasiou.pdf https://www.mytilineos.com/media/fv4dwfmx/deksamenes_kausimwn.pdf https://www.mytilineos.com/media/zd0pofrd/sxedio_antimetopisis_thalassias_ripansis.pdf

CRITERION	RATING	COMMENT
2.8a-d Suspended Operations	Conformance	The Entity has established a procedure for suspending or significantly altering operations due to factors outside its control. Several Business Continuity Plans have been established, dealing with predictable interruptive (probable or unlikely) incidents. However, no such case has taken place recently. All relevant procedures and plans are reviewed annually.
2.9a-b Mergers and Acquisitions	Conformance	The Entity has established a procedure for reviewing environmental, social and governance issues in the planning process for mergers and acquisitions. There have been no mergers and acquisitions in the recent past and none are planned in the near future.
2.10a-b Closure, Decommissioning and Divestment	Conformance	The Entity has established a procedure for closure, decommissioning, and divestment. No such events have occurred recently. In case of closure of mining activity, all required obligations are included in the environmental studies and permits of each specific mine.
3. TRANSPARENCY		
3.1a-b Sustainability Reporting	Conformance	The Entity has issued the Sustainable Development Report 2022, which includes its governance approach to environmental, social and economic impacts and its Material environmental, social and economic impacts. The Entity's Sustainability Report 2022 is publicly disclosed on its website: https://www.mytilineos.com/interactive-document/csr-report-2022-eng/html/index.html
3.2 Non-compliance and Liabilities	Conformance	The Entity has disclosed information on Material fines, judgments, penalties and non-monetary sanctions for failure to comply with Applicable Law in its Sustainable Development Report 2022. There are no such cases, as referred to in the report, refer pages 96 and 197: https://www.mytilineos.com/interactive-document/csr-report-2022-eng/html/index.html
3.3a-c Payments to Governments	Conformance	The Entity declares in its Sustainable Development Report 2022 that it makes payments to governments on a legal basis only and there are no financial and in-kind political contributions made directly or through an intermediary on an annual basis. The Entity also declares that no payments have been made to political parties or any other type of payments on a contractual basis. The total amount of payments to the government is declared in the Sustainable Development Report 2022, pages 196-197: https://www.mytilineos.gr/sustainability/reports/sustainable-development-reporting/ https://www.mytilineos.com/interactive-document/csr-report-2022-eng/html/index.html
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	The Entity has implemented accessible, transparent, and culturally and gender-sensitive, Complaints Resolution Mechanisms, adequate to address Stakeholder complaints, grievances, and requests for information relating to its operations. Complaints, grievances, stakeholder requests, and concerns may be reported, in writing, anonymously or by name, via the Entity's webpage: https://www.mytilineos.gr/contact-us/ or

CRITERION	RATING	COMMENT
		<p>https://mytilineos.ethics.help/web/en or via email at mytilineos@ethics.email or info@alhellas.gr</p> <p>Furthermore, the Entity has also established the web platform 'In Practice', which is appropriate for submitting social requests:</p> <p>https://www.mytilineos.com/sustainability/in-practice-submission-platform-for-social-requests/in-practice/</p> <p>Responsibility for the management of complaints rests with the Communications and Public Relations activity of the Aluminium of Greece Plant, which regularly informs the plant management and the General Division of the Metallurgy Business Unit.</p>

4. MATERIAL STEWARDSHIP

4.1a Environmental Life Cycle Assessment	Conformance	The Entity has conducted an environmental Life Cycle Assessment (LCA) of the Bauxite extraction and Primary Aluminium production. The methodologies for identifying major Product lines for which Aluminium is considered for evaluating lifecycle impacts are aligned with the ISO 14040:2006 and ISO 14044:2006 standards.
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	The Entity has completed Life Cycle Assessments (LCA) for all Products, aligned with the ISO 14040:2006 and ISO 14044:2006 standards. Information on the LCA report results and underlying assumptions and system boundaries is included in the Sustainable Development Report 2022, pages 8, 72 and 82: https://www.mytilineos.com/interactive-document/csr-report-2022-eng/html/index.html
4.2 Product Design	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.3a-b Aluminium Process Scrap	Conformance	<p>The Entity has minimised the generation of Aluminium Process Scrap within its operations and, where generated, a target near 100% is established for the collection, recycling, and/or re-use of scrap. The Entity has established targets and improvement programs to reduce scrap during production. Scrap is recycled by the internal smelter workshop. The scrap generated rate is reviewed monthly to ensure the targets are achieved.</p> <p>The Entity purchases a standard quality of recycled scrap (>98% of Aluminium) and therefore does not separate Aluminium alloys and grades for recycling.</p>
4.4a-c Collection and Recycling of Products at End of Life - Material Conversion and other Manufacturing	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.4d Collection and Recycling of Products at End of Life	Not Applicable	This Criterion is not applicable, as there is no collection and recycling of Products at End of Life and the Entity does not engage with local, regional, or national collection and recycling systems. The Entity purchases a standard quality of recycled scrap (>98% of Aluminium).

5. GREENHOUSE GAS EMISSIONS

CRITERION	RATING	COMMENT
5.1a-b Disclosure of GHG Emissions and Energy Use	Conformance	<p>The Entity accounts for and discloses its Scope 1, Scope 2, and Scope 3 GHG emissions and energy consumption by source (separately for Aluminium of Greece Plant and Delfi-Distomon) in the Sustainable Development Report 2022, page 196:</p> <p>https://www.mytilineos.com/interactive-document/csr-report-2022-eng/html/index.html</p> <p>The Entity's Scope 1 emissions are verified under the EU-ETS (Emissions Trading System) requirements. The Sustainable Development Report 2022 is independently verified by KPMG and an Independent Assurance Statement is provided on pages 168-169.</p>
5.2a Aluminium Smelter GHG Emissions Intensity - Started production after 2020	Not Applicable	This Criterion is not applicable, as the Entity is an Aluminium Smelter that started production before 2020.
5.2b Aluminium Smelter GHG Emissions Intensity - In production up to and including 2020	Conformance	As confirmed by the examination of the Entity's documentation, the GHG Emissions intensity (both Mine to liquid Metal Emissions and Mine to solid Metal Emissions) is below 11.0 t CO ₂ e/t Al.
5.3a-e GHG Emissions Reduction Plans	Conformance	<p>The Entity has publicly disclosed the latest version of the GHG Emissions Reduction Pathway (consistent with a 1.5°C warming scenario) and Action Plan in its Sustainable Development Report 2022, pages 36-37:</p> <p>https://www.mytilineos.com/interactive-document/csr-report-2022-eng/html/index.html</p> <p>Furthermore, progress against the GHG Emissions Reduction Plan is disclosed in the Sustainable Development Report on an annual basis.</p>
5.4 GHG Emissions Management	Conformance	<p>The Entity has implemented a GHG Emissions Management System and operational controls necessary to achieve the performance aligned with its GHG Emissions Reduction Plan and targets. The Entity publicly discloses the latest version of the GHG Emissions Reduction Pathway and Action Plan in its Sustainable Development Report 2022, pages 36-37:</p> <p>https://www.mytilineos.com/interactive-document/csr-report-2022-eng/html/index.html</p> <p>Furthermore, the progress against the GHG Emissions Reduction Plan is disclosed in the Sustainable Development Report on an annual basis</p>
6. EMISSIONS, EFFLUENTS AND WASTE		
6.1a-f Emissions to Air	Conformance	<p>The quantification and disclosure of Material Emissions to Air from the Entity's activities and within its Area of Influence is undertaken annually, refer to the Sustainable Development Report, page 196:</p> <p>https://www.mytilineos.com/interactive-document/csr-report-2022-eng/html/index.html</p> <p>As the Entity complies with all the air emissions limits defined in its Environmental Permits, no further action plans are required.</p>

CRITERION	RATING	COMMENT
6.2a-g Discharges to Water	Conformance	<p>The Entity has established procedures, programs and plans to minimise exposure to and impacts from Discharges to Water. The Program/Plans are reviewed at least annually under the Entity's Environmental Management System or after any discharge event that exceeds internally or externally mandated limits of the Environmental Permit, on any changes to the Business processes that alter Material risks from Discharges to Water, or on any indication of a control gap. The quantification and disclosure of Material Discharges to Water from its activities and from those within its Area of Influence is undertaken annually, refer to the Sustainable Development Report, page 196:</p> <p>https://www.mytilineos.com/interactive-document/csr-report-2022-eng/html/index.html</p>
6.3a-g Assessment and Management of Spills and Leakages	Conformance	<p>The Entity has conducted an assessment of the major risks where Spills and Leakages could contaminate air, water, and soil. It has established management and emergency plans, in cooperation with the Authorities, to prevent, detect and remediate Spills and Leakages. The Entity has publicly disclosed a list of the emergency plans and the specific emergency response plan for Spills or Leakages (e.g., leakage into the sea) on its website (in the Greek language):</p> <p>https://www.mytilineos.com/el/viosimi-anaptiksi/dimosieuseis-viwsimis/dimosieuseis-eva/</p> <p>https://www.mytilineos.com/media/zd0pofrd/sxedio_antimetopisis_thalassias_ripansis.pdf</p> <p>All plans are reviewed annually or after any Spill or Leakage event or after any changes to the Business that alter Spills and Leakages risks or on any indication of a control gap.</p>
6.4a-b Public Disclosure of Spills and Leakages	Conformance	<p>The Entity has publicly disclosed in the Sustainable Development Report the volume, type, and potential impact of Material Spills and Leakages, the root causes, and the remediation actions taken on an annual basis, which exclusively concern its mining activities. There is a relevant statement in the Sustainable Development Report 2022, refer to pages 86 and 197:</p> <p>https://www.mytilineos.com/interactive-document/csr-report-2022-eng/html/index.html</p>
6.5a-c Waste Management and Reporting	Conformance	<p>The Entity has established waste management procedures under its ISO 14001 certified Management System, which define Material impacts to human well-being and the environment, the Waste management strategy, and the process for collecting and disposing of all Wastes. All Hazardous Wastes are transferred to qualified and licensed third parties according to legal requirements. The Entity has publicly disclosed, on an annual basis, the quantity of Hazardous and Non-Hazardous Waste generated by the Entity, and associated Waste disposal methods. These waste quantities for the year 2022 are publicly disclosed in the Sustainable Development Report, page 197:</p> <p>https://www.mytilineos.com/media/404ookb1/sustainable_development_report_2022_eng.pdf</p>
6.6a-g Bauxite Residue	Conformance	<p>The Aluminium of Greece Plant passes the Bauxite Residue through a filtration compartment and the output residue is stored in a specially constructed, licensed landfill in accordance with the Environmental Permit. No Bauxite Residue lagooning has taken place since the end of</p>

CRITERION	RATING	COMMENT
		<p>2011. Regular third-party inspections are conducted at the Bauxite Residue storage site. Daily visual inspections and periodic, detailed internal audits are performed by the Environmental Department on the Aluminium of Greece Plant to ensure the integrity of the controls applied. Currently, 15% of the water filtrate is discharged into the sea and the remaining is recycled. The filtrated water, resulting after pressing, is neutralised according to the Environmental Permit requirements to minimise impacts to the environment.</p> <p>The current controls at the Aluminium of Greece Plant ensure that there is no discharge to marine and aquatic environments from the Bauxite Residue areas.</p>
6.7a-f Spent Pot Lining (SPL)	Conformance	<p>The Entity's Aluminium of Greece Plant applies procedures and processes that conform to the Spent Pot Lining (SPL) requirements. SPL are disposed of to a licensed disposal area, in accordance with the Environmental Permit. The landfill has been constructed using geomembranes to ensure water-tightness towards the Watershed, and a network to collect the wash that accumulates at the bottom before discharge to an insulated tank.</p> <p>The discharge of SPL to marine or aquatic environments is prohibited. The Entity currently participates in the European project 'SPLCycle' to optimise processes for the recovery and recycling of carbon and refractory materials. This project is funded by the European Institute of Innovation and Technology:</p> <p>https://eitrawmaterials.eu/project/spl-cycle/</p>
6.8a-d Dross	Conformance	<p>The Entity sells 100% of the recovered Dross to third parties for recycling (there is no landfilling, in accordance with the Environmental Permit), and maximises the recycling of treated Dross residues. Although the Entity's Aluminium of Greece Plant is licensed to landfill Dross, according to the Environmental Permit, the recovered Dross is recycled by contractors. Alternatives are discussed annually during the Environmental Management System management review meeting.</p>
7. WATER STEWARDSHIP		
7.1a-b Water Assessment and Disclosure	Conformance	<p>The Entity has identified, documented and publicly disclosed its water withdrawal and use by source and type and its water-related risks in Watersheds in the Area of Influence of the Aluminium of Greece Plant and the Delphi-Distomon mining activities on an annual basis in the Sustainable Development Report, pages 78-79, and 196-197:</p> <p>https://www.mytilineos.com/interactive-document/csr-report-2022-eng/html/index.html</p>
7.2a-e Water Management	Conformance	<p>The Entity updates its water management plans annually, on any changes to the Business that alter Material water-related risks, and on any indication of a control gap. The Entity publicly discloses its water management actions in the Sustainable Development Report, pages 74-79:</p> <p>https://www.mytilineos.com/media/404ookb1/sustainable_development_report_2022_eng.pdf</p>
8. BIODIVERSITY AND ECOSYSTEM SERVICES		

CRITERION	RATING	COMMENT
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	The Entity has assessed the risks and potential impacts on Biodiversity and Ecosystem Services on the land and marine environment from activities within the Entity's Area of Influence. The Entity has implemented several environmental and biodiversity impact assessments and programs that addressed Biodiversity issues and concluded that the existing measures are adequate to prevent any Material adverse impacts on Biodiversity and Ecosystem Services.
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment – Priority	Conformance	<p>The Entity has assessed the risks and potential impacts on Biodiversity and Ecosystem Services on the land and marine environment from activities within the Entity's Area of Influence. The Entity has implemented several environmental and biodiversity impact assessments and programs that addressed Biodiversity issues and concluded that the existing measures are adequate to prevent any Material adverse impacts on Biodiversity and Ecosystem Services.</p> <p>Whilst the risks and potential impacts have been assessed as low, the Entity consumes underground water and potable water as a Priority Ecosystem Service. The Entity has established a biodiversity monitoring plan for the water consumed by the Aluminium of Greece Plant.</p>
8.2a-g Biodiversity Management	Conformance	<p>The Entity has implemented several environmental and biodiversity impact assessments and programs that addressed Biodiversity issues and concluded that the existing measures are adequate to prevent any Material adverse impacts on Biodiversity and Ecosystem Services. Therefore, no further action is required.</p> <p>The existing Biodiversity Action Plan, which addresses the systematic measurement of the ecosystems, is implemented as part of the Entity's Environmental Management System. The results of these activities are presented in the Sustainable Development Report, pages 70-91:</p> <p>https://www.mytilineos.com/media/4040okb1/sustainable_development_report_2022_eng.pdf</p>
8.3a-c Management of Priority Ecosystem Services	Conformance	The Entity consumes underground water as a Priority Ecosystem Service and has established a biodiversity monitoring plan for the Aluminium of Greece Plant, which is in accordance with the Biodiversity Mitigation Hierarchy.
8.4 Alien Species	Conformance	The Entity's Policy for the protection of the environment does not permit the deliberate introduction of Alien Species that could have significant adverse impacts on Biodiversity. The Entity has assessed the risk of introduction of Alien Species and no significant risks have been identified. Actions have been implemented to prevent the accidental introduction of Alien Species via, for example, imported wooden pallets, ballast water and raw materials (including imported bauxite, bitumen, and coke).
8.5a-b Commitment to "No Go" in World Heritage Properties	Conformance	A Commitment to "No Go" in World Heritage properties is included in the Environmental Policy of Delfi-Distomo. However, there are no World Heritage Properties in the Entity's active mining areas, as documented in the Environmental Impacts Assessments and Environmental Permits.
8.6a-d Protected Areas	Conformance	The Entity has identified the Protected Areas (Natura) within its Area of Influence, conducted a risk analysis and assures its compliance with

CRITERION	RATING	COMMENT
		the relevant regulations and its Environmental Permits. All relevant obligations have been fulfilled and no further action is required.
8.6e Protected Areas – Bauxite Mining	Conformance	<p>The Entity has undertaken mining activities within Protected Areas (Natura). However, the Entity has conducted independent third-party assessments by an external Qualified Specialist for the mining activities of Delfi-Distomon situated within the Protected Areas. Specific biodiversity and ecological assessments have been conducted, according to Greek legislation. The studies concluded the risks in Protected Areas were low and no further action was proposed. The approved Environmental Permit for the Delfi-Distomon mining activities (including the Natura Area) and the relevant technical study approval are publicly disclosed on the government website of Diavgeia:</p> <p>https://diavgeia.gov.gr/decision/view/%CE%92%CE%A070-071 and https://diavgeia.gov.gr/decision/view/%CE%92%CE%9B4%CE%A90-%CE%A3%CE%92%CE%9D</p>
8.7a-i Mine Rehabilitation	Conformance	<p>The Entity has developed and implemented policies and processes that conform to the Mine Rehabilitation and closure requirements. Rehabilitated areas are monitored against completion criteria approved by the environmental authorities. Rehabilitation criteria specific to each mine site have been established as part of Environmental Permit requirements and the relevant technical study. The approval process involves consultation between the relevant Environmental Authority and the Entity. The Mine Rehabilitation and closure plans are reviewed annually under the Entity's certified Management System. As current mining activities are limited to underground sites, rehabilitation relates to the maintenance of previously rehabilitated surface mines.</p> <p>The approved Environmental Permit for the Delfi-Distomon mining activities and the relevant technical study approval are publicly disclosed on the government website of Diavgeia:</p> <p>https://diavgeia.gov.gr/decision/view/%CE%92%CE%A070-071 and https://diavgeia.gov.gr/decision/view/%CE%92%CE%9B4%CE%A90-%CE%A3%CE%92%CE%9D</p>
9. HUMAN RIGHTS		
9.1a-d Human Rights Due Diligence	Conformance	<p>The Entity has established a Human Rights Policy, which is available on the Entity's website:</p> <p>https://www.mytilineos.gr/media/rp3edd3u/politiki_anthrwpinwn_dika_iwmatwn_en.pdf</p> <p>The Entity has conducted a documented Human Rights Due Diligence assessment. It was concluded in the risk assessment and confirmed during management interviews that there were no adverse Human Rights impacts and remediation cases related to Human Rights caused or contributed to by the Entity's activities.</p>
9.2a-e Gender Equity and Women's Empowerment	Conformance	<p>The Entity has developed and implemented policies, processes and a program to promote gender equity and women's empowerment in employment practices, training opportunities, awarding of contracts, processes of engagement, and management activities, and addresses barriers to professional development, Discrimination,</p>

CRITERION	RATING	COMMENT
		<p>Violence and Harassment. The Entity's Human Rights Policy contains a commitment to the application of the UN Convention on the Elimination of all Forms of Discrimination Against Women (CEDAW):</p> <p>https://www.mytilneos.gr/media/rp3edd3u/politiki_anthrwpinwn_dika_iwmatwn_en.pdf</p> <p>During the onsite Audit, there were no complaints from female Workers, and no indication of Discrimination against women was observed. The risks and actions of the Entity related to women's rights are included in the Sustainable Development Report 2022, page 118:</p> <p>https://www.mytilneos.com/interactive-document/csr-report-2022-eng/html/index.html</p>
9.3a-i Indigenous Peoples	Not Applicable	This Criterion is not applicable as there are no Indigenous Peoples in the Entity's Area of Influence.
9.4a Free, Prior, and Informed Consent (FPIC) - New Projects or Major Changes	Not Applicable	This Criterion is not applicable as there are no Indigenous Peoples in the Entity's Area of Influence.
9.4b Free, Prior, and Informed Consent (FPIC) - Bauxite Mining	Not Applicable	This Criterion is not applicable as there are no Indigenous Peoples in the Entity's Area of Influence.
9.4c Free, Prior, and Informed Consent (FPIC) - Demonstrate support	Not Applicable	This Criterion is not applicable as there are no Indigenous Peoples in the Entity's Area of Influence.
9.5a Cultural and Sacred Heritage - Identification	Conformance	<p>Prior to new mining activities and the licensing process, archaeological, cultural and sacred heritage sites are evaluated. The archaeological areas are designated in the relevant Environmental Impacts Studies, which are submitted to the relevant authorities to issue the Environmental Permits. There are no special terms defined in the Environmental Permits for the mining areas of Delfi-Distomon. Furthermore, a Technical Report for antiquities protection was issued by the Aluminium of Greece Plant which identifies sacred or cultural heritage sites within the Entity's Area of Influence and proposes appropriate actions to improve issues of the antiquities (which are not caused by the activities of the Entity). The Entity's plant and business activities are not located in Indigenous Peoples' sacred or cultural heritage sites.</p>
9.5b Cultural and Sacred Heritage - Impacts	Not Applicable	This Criterion is not applicable, as the Entity is not located near sacred or cultural heritage sites and there are no Indigenous Peoples present in the area.
9.6a-i Displacement	Not Applicable	This Criterion is not applicable, as there are no physical displacement cases.
9.7a-h Affected Populations and Organisations	Conformance	<p>Social dialogue with the Local Community and other Stakeholders takes place on an annual basis. The Entity's Stakeholder engagement process has not identified any significant impacts, including health and safety, social and cultural Human Rights and environmental impacts resulting from its activities and therefore there is no need for</p>

CRITERION	RATING	COMMENT
		<p>action. The interest of and impacts on potentially affected groups has been mapped and described in the Sustainable Development Report, pages 40-44:</p> <p>https://www.mytilineos.com/interactive-document/csr-report-2022-eng/html/index.html</p>
9.8a Conflict-Affected and High-Risk Areas - Strong Management Systems	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 and publicly disclosed:</p> <p>https://www.mytilineos.com/media/vj0j4005/mytilineos_suppliers_code_of_conduct_2023_en.pdf</p> <p>In addition, the Entity has established an additional policy for the responsible operation of the supply chain. The Responsible Supply Chain Policy is available at:</p> <p>https://www.mytilineos.com/sustainability/our-main-policies</p> <p>Evaluation questionnaires are distributed to all critical suppliers (including Bauxite) requesting information on ESG issues. 100% of the critical suppliers have been screened. None of the critical suppliers provide Bauxite or other critical raw materials sourced from Conflict-Affected and High-Risk Areas (CAHRAs).</p>
9.8b Conflict-Affected and High-Risk Areas - Identify and assess risks	Conformance	<p>The Entity has implemented a process to ensure that the main raw materials (Bauxite and Aluminium scrap) do not originate from 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.</p>
9.8c Conflict-Affected and High-Risk Areas - Strategy to respond to risks	Not Applicable	<p>This Criterion is not applicable, as the Entity's assessment has not identified any significant actual or potential risks.</p>
9.8d Conflict-Affected and High-Risk Areas - Audit of due diligence	Conformance	<p>The Entity has established a Management System to monitor its critical suppliers. The evaluations and screening of all critical suppliers by applying Due Diligence investigations, demonstrated that no critical raw material (Bauxite, Aluminium scrap) has been sourced from CAHRAs.</p>
9.8e Conflict-Affected and High-Risk Areas - Report annually	Conformance	<p>The Entity includes the information related to its supply chain Due Diligence process and practices that apply (including raw materials from CAHRAs) in its annual Sustainable Development Report 2022, pages 130-131:</p> <p>https://www.mytilineos.com/interactive-document/csr-report-2022-eng/html/index.html</p>
9.9 Security practice	Conformance	<p>The Entity has implemented a Human Rights Policy that includes commitments to security practices. The security practices regarding Human Rights are documented in a specific procedure. The emergency risk assessment includes risks related to security practices and Human Rights. There are no armed personnel on the Entity's sites. Security management and supervisory staff are trained in the</p>

CRITERION	RATING	COMMENT
		protection of Human Rights according to the Entity's regular training program.
10. LABOUR RIGHTS		
10.1a-c Freedom of Association and Right to Collective Bargaining	Conformance	<p>The right of association of Workers is supported by the Entity's Policies and Greek legislation. The Entity applies policies that conform to the Freedom of Association and right to Collective Bargaining requirements. Workers organise meetings of their committees without interference from the Entity. Collective Bargaining Agreements are regularly updated and agreed upon with the Labour Union.</p> <p>Interviews with Union representatives confirmed that the Union and senior management have a good relationship. Collective Bargaining is a process that takes place regularly between Workers' representatives and senior management and usually focuses on negotiating terms and conditions of employment, such as wages, working hours, Overtime, working conditions, grievance procedures, and the rights and responsibilities of each party. The Entity maintains records of negotiations between the Entity and the Union or Workers' Association, including the collective agreement and compliance with national laws. During the onsite audit, the Collective Bargaining agreement and the minutes of Labour Union meetings were reviewed and interviews with Labour Union representatives were undertaken. During the interviews, the Labour Unions' representatives expressed their satisfaction with the outcome of the Collective Bargaining process and the agreement.</p>
10.1d Freedom of Association and Right to Collective Bargaining – Alternative means in context of Applicable Law	Not Applicable	This Criterion is not applicable, as the Entity operates in Greece where Applicable Law permits the right to Freedom of Association and Collective Bargaining.
10.2a-c Child Labour	Conformance	According to the Human Rights Policy, the Entity neither uses nor supports the use of Child Labour, and has defined a basic minimum working age of 18 years. The list of personnel was examined during the audit and no person under 18 years old was identified. Currently, the youngest Worker is 21 years old. No children were detected as Workers during the site visit.
10.3a-c Forced Labour	Minor Non-Conformance	<p>According to its Policies and procedures, and Greek legislation, the Entity neither engages in nor supports the use of Forced Labour. According to the Human Rights Policy and the Code of Professional Conduct, the Entity prohibits engaging in or supporting Human Trafficking and Modern Slavery either directly or indirectly. No Forced Labour was detected during the site visit. Further information is available in the Human Rights Policy, page 8:</p> <p>https://www.mytilineos.com/media/rp3edd3u/politiki_anthrwpinwn_di_kaiwmatwn_en.pdf</p> <p>The Entity is committed to taking all measures required in order to avoid incidents and any direct or indirect involvement in any form of forced or compulsory labour and human trafficking. The Entity has publicly disclosed its commitment to address Modern Slavery, however, it has not prepared and disclosed an annual Modern Slavery Statement.</p>

CRITERION	RATING	COMMENT
10.4a-c Non-Discrimination	Conformance	<p>The Entity has developed, implemented and maintained systems, Policies, and procedures related to non-Discrimination and the promotion of a culture of non-Discrimination. The Entity is committed to providing equal opportunities and not engaging in or supporting Discrimination in hiring, salary, promotion, training, advancement opportunities, or termination of any Worker based on gender, race, national or social origin, religion, disability, political affiliation, sexual orientation, marital status, family responsibilities, age, or any other condition that could give rise to Discrimination, as defined in the Code of Professional Conduct, pages 20-21:</p> <p>https://www.mytilineos.com/media/doi14yvc/mytilineos_kodikas_deontologias_2019_web_en_23_01.pdf</p> <p>The Entity has undertaken objective appraisals of jobs on the basis of the work to be performed to verify equitable rates of pay and promotes a non-discrimination culture via training.</p>
10.5 Communication and engagement	Conformance	<p>As confirmed by interviews and documentation review, the Entity ensures communication and direct engagement with Workers and their representatives regarding working conditions and the resolution of workplace and compensation issues, without the threat of reprisal, intimidation, violence or harassment.</p>
10.6a-g Violence and Harassment	Conformance	<p>The Entity, in consultation with the Workers and their representatives, has established a 'Policy against Violence and Harassment in the Workplace'. This Policy is available to the Entity's employees through the intranet and has been publicly disclosed on the website:</p> <p>https://www.mytilineos.com/sustainability/our-main-policies/</p> <p>The Entity has established appropriate channels of communication for employees to declare any Violence and Harassment incidents. No incidents have been reported to date.</p>
10.7a-c Remuneration	Conformance	<p>The Entity has established specific salary rates and working hour rates via the Collective Bargaining agreement with the employees' union. Different rates have been established for regular working hours, Overtime hours including night work, statutory holidays, and weekly rest days, and rates are more favourable to Workers than the minimum set out in national law and according to ASI requirements. The Entity provides its employees with other benefits in addition to the salary, including meal vouchers, mileage compensation (in some categories) or ensures transfer to and from work, and a residence or non-housing allowance (for those who do not receive housing). All payment transactions are conducted timely, documented, transparent and understandable.</p>
10.8a-c Working Time	Conformance	<p>The Entity's procedures ensure Workers are not forced to work beyond the hours allowed, as defined by the Applicable Law. Overtime is voluntary unless it is part of a legally recognised collective agreement. Workers are not forced to work Overtime under threat of dismissal. The Entity ensures that the amount of Overtime does not exceed 2% of normal attendance hours, and that Workers have, at a minimum, an average of one day off per seven-day period, and that the workday is eight hours on average over a six-month period. Records relating to Working Time are maintained and up to date.</p>

CRITERION	RATING	COMMENT
10.9a-b Informing Workers of Rights	Conformance	The Entity informs employees of their rights in numerous ways, such as through the Internal Labour Regulation, announcements on notice boards and the intranet, training, via the Union and frequently scheduled meetings between the management and working teams/employees.
11. OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Management System	Conformance	The Entity has implemented and certified an Occupational Health and Safety (OH&S) Management System applicable to all Workers and Visitors for both Aluminium of Greece and Delfi-Distomon sites. The Entity holds valid ISO 45001:2018 certifications, available at: https://www.mytilineos.com/media/osqfvzkn/cert_alouminion_45001_2015_2022-en.pdf https://www.mytilineos.com/media/izhjfmh4/delphes_distomon_single-member_45001_2018_en_2021.pdf
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Conformance	The Entity publicly discloses the effectiveness of the OH&S Management System annually. The Entity's OH&S performance for 2022 is available in the Sustainable Development Report 2022, pages 108-109: https://www.mytilineos.com/interactive-document/csr-report-2022-eng/html/index.html The Entity's KPIs can be compared with the accident statistics published on the IAI website: https://international-aluminium.org/statistics/workplace-accidents/
11.2 Employee engagement on Health and Safety	Conformance	The Entity has established an Occupational Health & Safety Committee which represents the employees for OH&S issues. The Committee consists of six elected representatives and conducts meetings quarterly. Quarterly meetings are also performed with the joined presence of the OH&S Committee, senior management, the Safety Coordinator, and the Occupational Doctor, in accordance with relevant legislation and the requirements of its certified ISO 45001:2018 Management System, where employees can raise, discuss, and participate in solving OH&S issues.

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	11 October 2021	Initial Certification Audit – Full Certification
1	16 October 2023	Re-Certification Audit –Full Certification Scope Change to apply PS V3.
2	30 July 2024	Updated to reflect change of Member and Entity Name – from Mytilineos S.A. Metallurgy Business Unit to Metlen Energy & Metals S.A.
