

ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

ALRO SA

CERTIFICATE NUMBER
237

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

CERTIFICATION
LEVEL
**FULL
CERTIFICATION**

ASI ACCREDITED
AUDITING FIRM
DQS CFS

DATE OF ISSUE
13 JANUARY 2023

DATE OF EXPIRY
12 JANUARY 2026

CERTIFIED SINCE
13 JANUARY 2023

AUTHORISED BY

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

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

CERTIFICATION SCOPE

The manufacture and sale of aluminium alloy slabs, billets, wire rod, plates and sheets obtained by casting, hot rolling, homogenization, heat treatment, mechanical processing, finishing, and testing for industrial applications, aerospace, automotive and defense industry in location ALRO SA, Str. Pitesti, No. 116, 230048 Slatina, Olt County and ALRO SA, str. Milcov No. 1, 230077 Slatina, Olt County, Romania.

AUDIT REPORT PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	ALRO
ENTITY NAME	ALRO SA
CERTIFICATION SCOPE	The manufacture and sale of aluminium alloy slabs, billets, wire rod, plates and sheets obtained by smelting, casting, hot rolling, homogenization, heat treatment, mechanical processing, finishing, and testing for industrial applications, aerospace, automotive and defense industry in two sites located in Slatina, Olt County, Romania.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Aluminium SmeltingAluminium Re-melting/RefiningCasthousesSemi-Fabrication
ASI STANDARD	<ul style="list-style-type: none">Performance Standard V3
AUDIT TYPE	<ul style="list-style-type: none">Initial Certification Audit (10 – 18 October 2022)Surveillance Audit (22 – 25 April 2024)
AUDIT FIRM	DQS CFS
AUDIT DATE	<ul style="list-style-type: none">10 – 18 October 2022 (Initial Certification Audit)22 – 25 April 2024 (Surveillance Audit)
AUDIT SCOPE	<p><u>Initial Certification Audit (10 – 18 October 2022)</u></p> <p>The audit scope covers the manufacture and sale of aluminium alloy slabs, billets, wire rod, plates and sheets obtained by casting, hot rolling, homogenization, heat treatment, mechanical processing, finishing, and testing for industrial applications, aerospace, automotive and defense industry in locations ALRO SA, Str. Pitesti, No. 116, 230048 Slatina, Olt County and ALRO SA, str. Milcov No. 1, 230077 Slatina, Olt County, Romania.</p> <p>Supply chain activities included in the audit scope:</p> <ul style="list-style-type: none">Aluminium SmeltingAluminium Re-melting/RefiningCasthousesMaterial Conversion <p>All applicable criteria in the ASI Performance Standard were included in the audit scope.</p> <p><u>Surveillance Audit (22 – 25 April 2024)</u></p> <p>The audit scope covers the manufacture and sale of aluminium alloy slabs, billets, wire rod, plates and sheets at the ALRO SA 1 facility (Str. Pitesti, Slatina, Romania) and ALRO SA 2 (str. MilcovSlatina, Romania).</p>

Supply chain activities included in the audit scope:

- Aluminium Smelting
- Aluminium Re-melting/Refining
- Casthouses
- Semi-Fabrication

All applicable criteria in the ASI Performance Standard were included in the audit scope.

AUDIT OUTCOME

- 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.
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CERTIFICATION PERIOD

13 January 2023 - 12 January 2026

NEXT AUDIT TYPE

Re-Certification Audit

NEXT AUDIT DATE

12 January 2026

CERTIFICATE NUMBER

237



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

ALRO S.A. ("the Entity") manufactures and sells Aluminium alloy slabs, billets, wire rods, plates and sheets obtained by Casting, hot rolling, homogenisation, heat treatment, mechanical processing, finishing, and testing for industrial applications, aerospace, automotive and defence industry across its two Facilities in Romania. ALRO SA 1, located at Str. Pitesti, No. 116, 230048 Slatina, Olt County and ALRO SA 2, str. Milcov No. 1, 230077 Slatina, Olt County. Production at the ALRO SA 1 site, which includes the Smelter with four potlines and Casthouse, commenced in 1965 and is Romania's sole Primary Aluminium smelter. Production at ALRO SA 2 commenced in 1974.

The Entity employs approximately 2,700 personnel and has a production capacity of approximately 265,000 tonnes of Primary Aluminium and 340,000 tonnes of cast Aluminium. Anodes required for the electrolysis of Alumina are internally produced on site. Processed Aluminium of approximately 90,000 tonnes is produced annually and a current expansion programme is likely to see this capacity increase to 120,000 tonnes per annum.

As well as smelting Facilities, the Entity includes an anode plant, a Casting house, an Aluminium scrap re-melting facility (the "Eco Recycling Facility"), hot and cold rolling mills and an extrusion shop.

MATURITY RATINGS

A rating of maturity (low, medium or high) determined by the Auditor that provides a general assessment in terms of systems, Residual Risk and performance assigned to a Sustainability Component.

Maturity ratings are not a direct assessment of conformance to the Standard.

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

FINDINGS

CRITERION	RATING	COMMENT
1. BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity is committed to complying with all relevant laws and regulations, and has implemented rigorous legal compliance practices and procedures to ensure integrity and ethics in its operations. The Entity undertakes periodic audits to determine their Compliance with Applicable Law using specialised software.
1.2 Anti-Corruption	Conformance	The Entity has implemented an Anti-Bribery and Anti-Corruption Policy. It has also implemented strict measures to prevent and combat any form of Corruption,
1.3a-e Code of Conduct	Conformance	The Entity has implemented a Code of Conduct that includes principles relevant to environmental, social and governance performance and is reviewed annually. The Code of Conduct is communicated to interested parties and is available at https://www.alro.ro/sites/default/files/alro/2022/Code%20of%20ethics%20and%20conduct%20.pdf
2. POLICY AND MANAGEMENT		
2.1a-f Environmental, Social, and Governance Policy	Conformance	The Entity has implemented various environmental, social and governance Policies and communicates the Policies internally and externally. The Policies are available at: https://www.alro.ro/en/responsible-business-policies-0 The Entity has established a procedure for regular management reviews of the Policies.
2.2a-c Leadership	Conformance	The Entity has appointed a senior Management Representative to lead the implementation of the Policy (Quality Manager), and the Human Resources Manager is responsible for communicating the Policy and criteria. The Entity has established a manual that outlines how the Policy is communicated. The Policy is part of the initial training (when hiring new operators) and periodic training (once a month). Resources are budgeted and allocated in the annual training program.
2.3a Environmental and Social Management Systems - Environmental	Conformance	The Entity has implemented Environmental and Social Management Systems that are integrated into all aspects of activities. The Entity's Integrated Management System is ISO 14001:2015 certified.
2.3b Environmental and Social Management Systems - Social	Conformance	The Entity has implemented social responsibility as part of the management process, including a Corporate Social Responsibility Policy (CSR) Policy and Human Rights Policy, available at: https://www.alro.ro/en/responsible-business-policies-0 The Entity has implemented a Management System that is ISO 45001:2018. (Occupational Health and Safety) certified.
2.4a-e Responsible Sourcing	Conformance	The Entity continuously assesses and monitors its supply chains to ensure compliance with social and environmental standards. The Entity has implemented documents and practices covering responsible sourcing which addresses environmental, social and governance issues.

CRITERION	RATING	COMMENT
		<p>Responsible sourcing related documents are available at: https://www.alro.ro/sites/default/files/alro/2022/Code%20of%20ethics%20and%20conduct%20.pdf</p> <p>Policy regarding Corporate Social Responsibility: https://www.alro.ro/sites/default/files/alro/2023/Policy%20regarding%20Corporate%20Social%20Responsability.pdf</p> <p>Suppliers are monitored according to the procedure 'Evaluation and monitoring of suppliers Code'.</p> <p>In accordance with the ASI standard, ALRO leaders are firmly committed to responsible sourcing, seeking to identify and promote sustainable and ethical sources of raw materials. ALRO continuously assesses and monitors our supply chains to ensure compliance with high social and environmental standards. Through responsible sourcing practices, ALRO aims to reduce the negative impact on communities and the environment and help promote sustainable practices throughout the industry."</p> <p>ALRO has implemented a Responsible Sourcing Policy which addresses environmental, social and governance issues based on its Supplier Code of Conduct. The Responsible Sourcing Policy is available at: https://www.alro.ro/sites/default/files/alro/2022/Code%20of%20ethics%20and%20conduct%20.pdf https://www.alro.ro/sites/default/files/alro/2023/Policy%20regarding%20Corporate%20Social%20Responsability.pdf</p> <p>Suppliers are monitored according to the procedure 'Evaluation and monitoring of suppliers Code'.</p>
2.5a-g Environmental and Social Impact Assessments	Not Applicable	This Criterion is not applicable to the Entity, as there are no New Projects or Major Changes to Facilities.
2.6a-h Human Rights Impact Assessment	Not Applicable	This Criterion is not applicable to the Entity, as there are no New Projects or Major Changes to Facilities.
2.7a-f Emergency Response Plan	Conformance	The Entity has well-defined Emergency Response Plans (ERPs), which address various emergency scenarios. The implemented site-specific ERPs are developed in collaboration with Workers, neighbours, and relevant agencies (e.g., the National Environmental Guard, and the Slatina Emergency Department). The plans are periodically tested in accordance with the 'Prevention and Protection Plan' and 'Preparation for Emergency Situation and Response Capacity Code' and regularly reviewed to reflect best practices and lessons learned. The ERPs are available at: http://www.isuolt.ro/wp-content/uploads/2020/04/Informatii-PUE-ALRO.pdf (Romanian)
2.8a-d Suspended Operations	Conformance	The Entity has developed a business resilience plan to address situations where it may have to suspend or significantly alter operations due to factors beyond its control, which considers significant negative environmental, social and governance impacts. The Entity reviews the business resilience plan annually.
2.9a-b Mergers and Acquisitions	Conformance	The Entity has reviewed its environmental, social and governance practices, including those associated with Historic Aluminium Operations according to its 'Management System Manual Code'.

CRITERION	RATING	COMMENT
		Should a merger or acquisition occur, the Entity has established processes to disclose information.
2.10a-b Closure, Decommissioning and Divestment	Conformance	The Entity has demonstrated it has environmental, social and governance practices in the planning process for closure, decommissioning and disposal. Whilst the Entity has not carried out closure or decommissioning works in recent years, it has established the ALRO Risk Register and a documented procedure, 'Transfer and preservation of fixed assets Code', which outlines the steps necessary in the event of closure, decommissioning or divestment (e.g., consultation with the interested parties, monitoring plan for the material environmental, social and governance).
3. TRANSPARENCY		
3.1a-b Sustainability Reporting	Conformance	The Entity has disclosed its Sustainability Report, which has been prepared in accordance with internationally recognised reporting standards and addresses its governance of environmental, social, and economic impacts and its sustainability performance: https://www.alro.ro/en/sustainability-reports
3.2 Non-compliance and Liabilities	Conformance	The Entity has publicly disclosed information regarding fines, court rulings, sanctions, and significant non-monetary sanctions for non-compliance with legislation, including that applicable to the Bucharest Stock Exchange, in its Sustainability Report. https://www.alro.ro/en/sustainability-reports
3.3a-c Payments to Governments	Conformance	The Entity has reported on payments made to national and local governments in the countries in which it operates. The Entity has established a procedure 'Code of Anti-Corruption and Anti-Corruption Actions' covering how it makes, or has payments made on its behalf, only on a legal and/or contractual basis in accordance with the procedure. Further information on the value and beneficiaries of financial and in-kind political contributions are available in the Code of Ethics and Conduct, pages 4-7: https://www.alro.ro/sites/default/files/alro/2022/Code%20of%20ethics%20and%20conduct%20.pdf Annual Financial information is available at: https://bvb.ro/FinancialInstruments/Details/FinancialInstrumentsDetails.aspx?s=ALR
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	The Entity has implemented a Complaints Resolution Mechanism and established a procedure for the resolution of notification requests and management of complaints. The Entity has designated a person responsible for resolving complaints at the senior management level who records and analyses all complaints. For interested parties (other than employees), an email address is available that can be accessed both anonymously and personally on the website. Refer to: https://www.alro.ro/en/contact The latest version of the Complaints Mechanism is available at: https://www.alro.ro/en/informare-petitii

CRITERION	RATING	COMMENT
4. MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment	Conformance	<p>The Life Cycle Assessment was carried out according to ISO 14040:2006 and ISO 14044: 2006. All activities and main product groups (slabs, billets, wire rods, plates, sheets) are covered. The analysis is undertaken at the activity level for all the main activity processes: smelting, casting, refining, hot rolling, homogenisation, heat treatment, mechanical processing, and finishing.</p> <p>The LCA is updated annually for both existing processes and for products in series production. The assessment is carried out annually by the multidisciplinary team, with the most recent update (assessment) conducted in November 2023. When new products are manufactured, the LCA is evaluated both before and after the start of manufacturing</p>
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	<p>The Entity has established a Procedure to manage requests from customers for information on its cradle-to-gate LCA on its Aluminium Products. Further information is available in the ALRO Sustainability Report: https://www.alro.ro/en/sustainability-reports</p>
4.2 Product Design	Conformance	<p>The Entity has established and introduced recyclability requirements in its Product design process from the beginning of the project, as defined by an internal 'Advanced product quality planning' Procedure. As part of sustainability planning, the requirements of the 'Control of production and service provision' Procedure are also analysed. The trends and dynamics of the results are analysed during annual management reviews, and if corrective actions or adjustments of targets are necessary, they are allocated and budgeted.</p>
4.3a-b Aluminium Process Scrap	Conformance	<p>The Entity has implemented a Waste Management System and established an Aluminium recovery Procedure and a Scrap collection Procedure. The Entity minimises the generation of Aluminium Process Scrap within its operations and, where generated, targets 100% of waste for collection, recycling and/or reuse. The Entity separates Aluminium alloys and grades for recycling.</p>
4.4a-c Collection and Recycling of Products at End of Life - Material Conversion and other Manufacturing	Conformance	<p>The Entity has implemented a recycling strategy that includes a waste Management System and established an Aluminium recovery Procedure with specific calendars, activities, and objectives. The recycling strategy is reviewed annually, and is available at: https://www.alro.ro/en/recycling</p>
4.4d Collection and Recycling of Products at End of Life	Conformance	<p>In 2019, the Entity established a new Casting facility for Aluminium recovered from the market, known as the ECO-Recycling Facility. The Entity has Scrap purchasing contracts both within local and foreign markets. Further Information is available at: https://www.alro.ro/en/recycling</p>
5. GREENHOUSE GAS EMISSIONS		
5.1a-b Disclosure of GHG Emissions and Energy Use	Conformance	<p>The Entity has established a Procedure for the reporting of Greenhouse Gases (GHG) Emissions and publicly discloses this information annually including energy use and GHG Emissions by source. The publicly disclosed energy and GHG Emissions data are independently verified prior to publication. Scope 1, 2 and 3 GHG</p>

CRITERION	RATING	COMMENT
		Emissions are available in the 2023 Sustainability Report, pages 190 - 197: https://www.alro.ro/sites/default/files/alro/2024/2023%20Sustainability%20Report%20ALRO%20Group.pdf
5.2a Aluminium Smelter GHG Emissions Intensity - Started production after 2020	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope, as the Entity started production in 1965.
5.2b Aluminium Smelter GHG Emissions Intensity - In production up to and including 2020	Conformance	The Entity has been active since 1965. In recent years, the Entity has implemented joint actions to reduce GHG emissions. The Entity has demonstrated that the intensity of emissions from Mine to Metal is below 11.0 t CO ₂ e/t Al. Further information is available in the ALRO Group Sustainability Strategy 2021-2025: https://www.alro.ro/sites/default/files/alro/2021/20210630_alro_group_sustainability_strategy_2021_2025.pdf And the Sustainability Report 2023: https://www.alro.ro/sites/default/files/alro/2024/2023%20Sustainability%20Report%20ALRO%20Group.pdf
5.3a-e GHG Emissions Reduction Plans	Minor Non-Conformance	The Entity has established a plan to reduce GHG Emissions as part of its Sustainability Strategy, using a methodology aligned with the Emissions Reduction Plan and compliance with Best Available Techniques (BAT) requirements (EU Directive 2016/1032). The strategy covers all Direct and Indirect GHG Emissions, and targets are monitored annually in accordance with the Monitoring and Reporting of Greenhouse Gas Emissions Code. The 2021-2025 Sustainability Strategy is available at: https://www.alro.ro/sites/default/files/alro/2021/20210630_alro_group_sustainability_strategy_2021_2025.pdf Progress results are continuously monitored and reported annually. For any deviation from the target, an action plan including responsible persons, and a timeframe is implemented. The Sustainability Report 2023 is available at: https://www.alro.ro/sites/default/files/alro/2024/2023%20Sustainability%20Report%20ALRO%20Group.pdf The Entity has presented their detailed GHG Emissions Reduction Plan and has used the recognised ASI GHG Emissions Calculation Tool for the GHG Emissions Reduction Pathway with a 2020 baseline year, however these are not publicly disclosed.
5.4 GHG Emissions Management	Conformance	The Entity is implementing innovative technologies and practices to minimise GHG emissions in all operations. The Entity has implemented a GHG Emissions Management System, evaluation procedures and the operational controls necessary to achieve the performance aligned with its GHG Emissions Reduction Plan and targets.
6. EMISSIONS, EFFLUENTS AND WASTE		
6.1a-f Emissions to Air	Conformance	The Entity has quantified and publicly disclosed annual Material Emissions to Air from its activities and those within its Area of Influence in the Sustainability Report 2023:

CRITERION	RATING	COMMENT
		<p>https://www.alro.ro/sites/default/files/alro/2024/2023%20Sustainability%20Report%20ALRO%20Group.pdf</p> <p>The Entity has implemented plans and a procedure to minimise exposure to air emissions and their impacts. These plans are reviewed annually or after any emissions event that exceeds internally or externally imposed limits. The Entity reviews the plan for any changes to the business that alter the Material risks from air emissions.</p> <p>The plans are available in the ALRO Group Sustainability Strategy 2021-2025: https://www.alro.ro/sites/default/files/alro/2021/20210630_alro_group_sustainability_strategy_2021_2025.pdf</p>
6.2a-g Discharges to Water	Conformance	<p>The Entity has quantified and publicly discloses annual Material Discharges to Water from its activities and, where possible, from those within its Area of Influence in the Sustainability Report 2023: https://www.alro.ro/sites/default/files/alro/2024/2023%20Sustainability%20Report%20ALRO%20Group.pdf</p> <p>The Entity has implemented plans and established procedures to minimise exposure to, and impacts from discharges into the water. The Plans are reviewed annually and after any discharge event that exceeds internally or externally imposed limits. The plans are available in the ALRO Group Sustainability Strategy 2021-2025: https://www.alro.ro/sites/default/files/alro/2021/20210630_alro_group_sustainability_strategy_2021_2025.pdf</p>
6.3a-g Assessment and Management of Spills and Leakages	Conformance	<p>The Entity has assessed major risk areas of its operations where Spills and Leakages could contaminate the air, water, and/or soil. The Entity has implemented management plans including the 'Natural disaster prevention and combat plan', an internal emergency plan and a procedure for the prevention of accidental Spills to monitor, prevent, detect, and remediate Spills and Leakages. The plans are reviewed annually and after any Leakage event or any changes to the business that change the Leakage risk(s).</p> <p>The management plans are publicly available at: https://www.alro.ro/en/production/alro/environmentalprotection</p> <p>The plan for emergencies produced together with local officials is available at: https://www.alro.ro/sites/default/files/alro/2022/Informare%20publica%20ALRO_14_09_2022.pdf (Romanian) https://www.alro.ro/en/stakeholder-questionnaire-2023</p>
6.4a-b Public Disclosure of Spills and Leakages	Conformance	<p>The Entity has established plans for emergencies and response capacity is developed both internally and together with the local authorities regarding Information to be made available to the public in the event of an accident. The actions and methods of interventions are available in the Entity's Corporate Social Responsibility (CSR) Activity Report, page 5: https://www.alro.ro/politici-model-de-afacere-responsabil</p>
6.5a-c Waste Management and Reporting	Conformance	<p>The Entity has implemented practices to minimise the generation of Waste and promote the recycling and reuse of materials.</p> <p>The Entity collects, sorts, and disposes of Waste in accordance with an internal procedure 'Collection, sorting, disposal and storage of waste'. Together with the local authorities, they developed a plan to prevent</p>

CRITERION	RATING	COMMENT
		and combat accidental pollution. The results are monitored and are publicly available in the Sustainability Report 2023: https://www.airo.ro/sites/default/files/airo/2024/2023%20Sustainability%20Report%20ALRO%20Group.pdf The Entity periodically reports to the Environmental Authority according to legal and regulatory requirements through the 'Declaration of obligations towards the environmental fund 2023'.
6.6a-g Bauxite Residue	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7a-f Spent Pot Lining (SPL)	Conformance	The Entity has developed a plan and procedure to store and manage Spent Pot Lining (SPL) in order to prevent SPL from being released or leached into the environment. The Entity optimises the recovery and recycling processes of carbon and refractory materials from SPL and does not store untreated SPL waste where there is potential for negative environmental effects. The Entity annually examines alternative options for the storage of treated SPL. It does not discharge SPL into freshwater or marine environments.
6.8a-d Dross	Conformance	The Entity has implemented a procedure for processing the Aluminium Dross resulting from the Aluminium alloy fabrication. The Entity stores and manages Slag to prevent the release of Dross and leachate into the environment. The Entity maximises Aluminium recovery by treating treated and untreated Slag residues. The Entity annually reviews alternative options for the disposal of Slag residues.
7. WATER STEWARDSHIP		
7.1a-b Water Assessment and Disclosure	Conformance	The Entity operates on-site water treatment stations and has implemented a procedure to monitor the water quality. The Entity has established a plan to prevent and mitigate the effects of accidental pollution and to analyse monthly water consumption annually. The activities are declared and legally validated by the authorities. The Entity has assessed its water-related risks, which are identified as low. Further information on the Entity's water withdrawal and use by source and type is available in the Sustainability Report 2023: https://www.airo.ro/sites/default/files/airo/2024/2023%20Sustainability%20Report%20ALRO%20Group.pdf
7.2a-e Water Management	Not Applicable	This Criterion is not applicable, as the Entity has identified water-related risks as low.
8. BIODIVERSITY AND ECOSYSTEM SERVICES		
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	The Entity has assessed the risk and potential impact on Biodiversity and Ecosystem Services from land use and activities within its Area of Influence with the Agency for Environmental Protection, Natura 2000. The risk and potential impacts have been identified as low.
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Not Applicable	This Criterion is not applicable to the Entity, as it has determined that the risk to and impacts on Biodiversity and Ecosystem Services are low.

CRITERION	RATING	COMMENT
8.2a-g Biodiversity Management	Not Applicable	This Criterion is not applicable to the Entity, as it has determined that the risk to and impacts on Biodiversity and Ecosystem Services are low.
8.3a-c Management of Priority Ecosystem Services	Not Applicable	This Criterion is not applicable to the Entity, as no Priority Ecosystem Services have been identified in its Area of Influence.
8.4 Alien Species	Conformance	The Entity has implemented processes, including those in accordance with the International Standards for Phytosanitary Measures No. 15 (ISPM 15), to prevent the accidental or deliberate introduction of Alien Species, which could have Material negative impacts on Biodiversity and Ecosystem Services.
8.5a-b Commitment to “No Go” in World Heritage Properties	Conformance	The Entity does not explore or develop New Projects or make Major Changes to World Heritage Properties, and it adheres to the declaration of Natura 2000 sites.
8.6a-d Protected Areas	Conformance	The Entity has conducted a risk analysis of Protected Areas within its Area of Influence for the protection and restoration of Biodiversity and ecosystems according to legal requirements. The management plans are available at: https://www.alro.ro/sites/default/files/alro/2022/Biodiversity_ASI.pdf (English) https://www.alro.ro/sites/default/files/alro/2022/Biodiversitate_ASI_0.pdf (Romanian)
8.6e Protected Areas - Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.7a-i Mine Rehabilitation	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9. HUMAN RIGHTS		
9.1a-d Human Rights Due Diligence	Conformance	The Entity has implemented a Code of Conduct and a Human Rights Policy with a commitment to respect Human Rights and the United Nations (UN) Guiding Principles on Business and Human Rights. Any alleged violation of Human Rights is documented and dealt with in accordance with internal procedures. Further information is available at: Human Rights Policy: https://www.alro.ro/en/responsible-business-policies-0 Policy Regarding Corporate Social Responsibility: https://www.alro.ro/sites/default/files/alro/2023/Policy%20regarding%20Corporate%20Social%20Responsability.pdf Code of Ethics and Conduct: https://www.alro.ro/sites/default/files/alro/2022/Code%20of%20ethics%20and%20conduct%20.pdf
9.2a-e Gender Equity and Women's Empowerment	Conformance	The Entity has implemented a Human Rights Policy, which removes barriers to professional development, and addresses Discrimination, Violence, and Harassment. The Entity has established a program that promotes gender equity and women's empowerment. The program is reviewed annually, and the effectiveness of the measures taken to promote gender equality are publicly disclosed annually in the

CRITERION	RATING	COMMENT
		<p>Sustainability Report and Corporate Social Responsibility Activity Report:</p> <p>https://www.alro.ro/sites/default/files/alro/2023/ALRO%20Group%20Annual%20Sustainability%20Report%202022.pdf</p> <p>https://www.alro.ro/sites/default/files/alro/2021/20210630_alro_group_sustainability_strategy_2021_2025.pdf</p> <p>All documents are publicly available at:</p> <p>Code of Ethics And Conduct of Alro Employees: https://www.alro.ro/sites/default/files/alro/2022/Code%20of%20ethics%20and%20conduct%20.pdf</p> <p>Anti-Bribery And Anti-Corruption Policy: https://www.alro.ro/sites/default/files/alro/2022/Anti-bribery%20and%20anti-%20corruption%20%20Policy.pdf</p> <p>Human Rights Policy: https://www.alro.ro/sites/default/files/alro/2022/ALRO%20Human%20Rights%20Policy.pdf (English) https://www.alro.ro/sites/default/files/alro/2022/Politica%20privind%20drepturile%20omului.pdf (Romanian)</p>
9.3a-i Indigenous Peoples	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples within the Entity's Area of Influence. However, the Entity has established processes to identify minorities based on linguistics, and social characteristics and conduct public consultations on the impact of every new development or investment. The related Policies and processes are reviewed annually.
9.4a Free, Prior, and Informed Consent (FPIC) - New Projects or Major Changes	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples within the Entity's Area of Influence.
9.4b Free, Prior, and Informed Consent (FPIC) - Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9.4c Free, Prior, and Informed Consent (FPIC) - Demonstrate support	Not Applicable	This Criterion is not applicable, as there are no Indigenous Peoples within the Entity's Area of Influence.
9.5a Cultural and Sacred Heritage - Identification	Conformance	The Entity takes appropriate measures to avoid or remedy the impacts, as well as to ensure continued access rights to cultural and sacred heritage sites or their values. For projects that can have a significant impact on the cultural, historical, or spiritual heritage, (i.e., essential for the identity of the neighbours) priority will be given to avoiding such impacts, as defined in the Entity's Sustainability Manual.
9.5b Cultural and Sacred Heritage - Impacts	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples within the Entity's Area of Influence.
9.6a-i Displacement	Not Applicable	This Criterion is not applicable to the Entity, as no New Projects or Major Changes have occurred since joining ASI and it has undertaken its activities in accordance with its construction permit.

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9.7a-h Affected Populations and Organisations	Conformance	<p>The Entity operates in Slatina, Romania. The Entity has undertaken consultations with neighbours for the development of its Facilities. The evaluation of requirements and the expectations of the neighbours are periodically evaluated. There is annual feedback received from relevant Stakeholders.</p> <p>Further information is available in the Sustainability Strategy 2021-2025, page 25: https://www.alro.ro/sites/default/files/alro/2021/20210630_alro_group_sustainability_strategy_2021_2025.pdf</p>
9.8a Conflict-Affected and High-Risk Areas - Strong management systems	Conformance	<p>The Entity has implemented responsible sourcing related documents to avoid direct or indirect involvement in armed conflicts such as the Conflict Mineral Reporting Template (CMRT), the London Metal Exchange (LME) Red Flag assessment and a Self-Assessment Questionnaire for suppliers.</p> <p>The Code of Ethics and Conduct and Policy regarding Corporate Social Responsibility require employees to consider environmental, social, and governance risks. Suppliers are regularly monitored through questionnaires and audits, and the risk approach is reported periodically to top management.</p> <p>The documents covering responsible sourcing practices are available at: https://www.alro.ro/sites/default/files/alro/2022/Code%20of%20ethics%20and%20conduct%20.pdf https://www.alro.ro/sites/default/files/alro/2023/Policy%20regarding%20Corporate%20Social%20Responsibility.pdf</p>
9.8b Conflict-Affected and High-Risk Areas - Identify and assess risks	Conformance	<p>The Entity undertakes its manufacturing activities only in Romania. For materials and raw materials purchased from outside the country, there is a system of self-evaluation of suppliers in the Self-Assessment Questionnaire for suppliers. The Entity conducts the evaluation of suppliers guided by its internal rules and in accordance with the CMRT Form - Conflict Minerals Reporting Table, ALRO statute on the LME Red Flag assessment.</p>
9.8c Conflict-Affected and High-Risk Areas - Strategy to respond to risks	Conformance	<p>If the Entity receives a report of a violation of the agreements, an action plan is implemented. If the issue is not resolved, it will be escalated to the level of removal from the approved supplier list and blocked from making purchases. Supply from alternative suppliers is evaluated annually, and the list of suppliers is structured on three levels. The Entity has a backup plan implemented for each supplier. The risk is analysed at least annually through the Risk Register.</p>
9.8d Conflict-Affected and High-Risk Areas - Audit of due diligence	Conformance	<p>The Entity's Due Diligence practices audited during this ASI Audit meet the requirement for this Criterion.</p>
9.8e Conflict-Affected and High-Risk Areas - Report annually	Conformance	<p>The Entity reports annually on supply chain Due Diligence practices. Refer to the Sustainability Report 2023, pages 111 - 113: https://www.alro.ro/sites/default/files/alro/2024/2023%20Sustainability%20Report%20ALRO%20Group.pdf</p> <p>In addition, any negative evaluation of suppliers will be blocked for purchases and with an improvement plan, corrections, or corrective</p>

CRITERION	RATING	COMMENT
		action. Any incidents are made public at: https://www.alro.ro/en/about/alro/socialresponsibility
9.9 Security practice	Conformance	The Entity does not use private security contractors, the guards and security company are part of the ALRO SA Group. All the Entity's regulations apply to security personnel, this includes the Human Rights Policy, Code of Ethics and Conduct of ALRO employees and Policies regarding corporate social responsibility.
10. LABOUR RIGHTS		
10.1a-c Freedom of Association and Right to Collective Bargaining	Conformance	The Entity operates in Romania only (an EU member country) with fundamental rights, including the right to form Trade Unions, guaranteed by the applicable legislation. Employees are represented by six distinct Unions and the collective labour contract is negotiated by the management and the 'Joint Commission'. The Joint Commission includes all leaders from the Trade Unions.
10.1d Freedom of Association and Right to Collective Bargaining - Alternative means in context of Applicable Law	Not Applicable	This Criterion is not applicable to the Entity, as it operates in Romania only (an EU member country). Fundamental rights (including the right to form Trade Unions) are guaranteed by the applicable legislation.
10.2a Child Labour	Conformance	The Entity complies with the laws applicable in Romania that prohibit Child Labour (under 16 years old). Workers under 18 years are protected from danger and/or exposure to dangerous areas. The Entity reports on Child Labour in accordance with GRI standards. Further information is available in the Sustainability Report 2023: https://www.alro.ro/sites/default/files/alro/2024/2023%20Sustainability%20Report%20ALRO%20Group.pdf
10.3a-c Forced Labour	Minor Non-Conformance	<p>The Audit confirmed that the Entity does not use any form of compulsory or Forced Labour in their operations and supply chain. They do not use local or migrant labour placement agencies. Employment is voluntary, and the Entity has strong Policies and mechanisms in place to prevent and detect any form of coercion on Workers, such as withholding personal documents or imposing undue debt. These activities are documented in agreement with the employees' representatives in the collective labour contract.</p> <p>Periodic checks and internal audits confirm compliance with international and national Human Rights legislation. The reports throughout the year are consolidated in the 2023 Management Review. Measures include regular training of employees and managers on the topic of Forced Labour, and the implementation of safe and confidential channels for reporting violations.</p> <p>The Entity has internal documents for the prohibition of Forced Labour.</p> <p>Sustainability Report 2022, page 96: https://www.alro.ro/sites/default/files/alro/2023/ALRO%20Group%20Annual%20Sustainability%20Report%202022.pdf</p> <p>Human Rights Policy, page2: https://www.alro.ro/sites/default/files/alro/2022/Politica%20privind%20drepturile%20omului.pdf</p>

CRITERION	RATING	COMMENT
		<p>Corporate Social Responsibility Policy (CSR) page 3: https://www.alro.ro/sites/default/files/alro/2022/Politica%20CSR%20.pdf</p> <p>Code Of Ethics And Conduct, page 3: https://www.alro.ro/sites/default/files/alro/2022/Cod%20Etica%20si%20Conducta%20_0.pdf</p> <p>However, even though the Entity has elements of a Modern Slavery Statement across several documents it is only partially effective. The Entity has not disclosed a standalone Modern Slavery Statement.</p>
10.4a-c Non-Discrimination	Conformance	<p>The Entity promotes a culture of non-Discrimination in the recruitment, salary, and promotion process based on its Human Rights Policy, Code of Ethics and Conduct, and Policy regarding Corporate Social Responsibility (CSR). All these documents ensure equal opportunities without Discrimination. Further information is available in the Sustainability Report 2022, page 100: https://www.alro.ro/sites/default/files/alro/2023/ALRO%20Group%20Annual%20Sustainability%20Report%202022.pdf</p>
10.5 Communication and engagement	Conformance	<p>The Entity communicates openly with Workers and their representatives (union leaders). The frequency of formal communications is monthly and whenever requested by employers or unions. A Collective Labour Agreement has been negotiated annually.</p>
10.6a-g Violence and Harassment	Conformance	<p>The Entity (in consultation with the Workers and their representatives) has drawn up a Policy against Violence and Harassment in the workplace. A communication channel involving senior management is in place to address any issues that may arise. These issues are resolved according to the resolution of notification requests and complaint codes. The Human Rights Policy is available at: https://www.alro.ro/en/responsible-business-policies-0</p>
10.7a-c Remuneration	Conformance	<p>The Entity has implemented a Salary Policy which is regulated and mandatory according to legislation. The Salary Policy is defined in the Remuneration of Employees Code, in accordance with the legislation in force and the Entity's Human Rights Policy and Policy regarding Corporate Social Responsibility (CSR). The salary scale is negotiated together with the Unions and documented in the Collective Labour Agreement.</p>
10.8a-c Working Time	Conformance	<p>The Entity has established a procedure that defines the Working Time in accordance with relevant legislation. The payment of Overtime is negotiated together with the Unions and documented in the Collective Labour Agreement. Monitoring of Working Time is undertaken via SAL software (monitoring time).</p>
10.9a-b Informing Workers of Rights	Conformance	<p>The Entity's employees are informed of their rights through the Collective Labour Agreement and individual labour contract.</p>
11. OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Management System	Conformance	<p>The Entity has implemented and certified an Occupational Health and Safety (OH&S) Management System applicable to all Workers and Visitors. The Entity holds a valid ISO 45001:2018 certification. https://www.alro.ro/en/production/alro/quality</p>

CRITERION	RATING	COMMENT
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Conformance	<p>The Entity's implemented OH&S Management System is certified by an accredited third-party. In addition to third-party audits, the Entity annually performs internal audits that address all company processes and activities.</p> <p>The Entity discloses OH&S data in the Sustainability Report 2023, pages 240 - 254: https://www.alro.ro/sites/default/files/alro/2024/2023%20Sustainability%20Report%20ALRO%20Group.pdf</p>
11.2 Employee engagement on Health and Safety	Conformance	<p>In accordance with relevant legislation, the Entity's management works with the joint Health and Safety Committee (from all levels) where employees can raise, discuss, and participate in solving OH&S issues. Issues raised are addressed immediately and action plans are monitored by the management and the joint Committee until each action is effectively closed.</p>

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DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	13 January 2022	Initial Certification Audit – Full Certification
1	12 August 2024	Surveillance Audit