

# ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

# Arslan Alüminyum A.Ş.

CERTIFICATE NUMBER  
429

ASI STANDARD  
PERFORMANCE  
STANDARD  
(V3 2022)

CERTIFICATION LEVEL  
FULL  
CERTIFICATION

ASI ACCREDITED  
AUDITING FIRM  
CETIZION VERIFICA

DATE OF ISSUE  
10 FEBRUARY 2025

DATE OF EXPIRY  
9 FEBRUARY 2028

CERTIFIED SINCE  
10 FEBRUARY 2025

## AUTHORISED BY

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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](http://www.aluminium-stewardship.org)*

## CERTIFICATION SCOPE

Manufacture and production of  
Aluminium extrusion profiles,  
anodising, other associated  
activities and recycling facility and  
foundries at Arslan Alüminyum  
Factory 1, Factory 2 and Factory 3  
located in Bilecik, Türkiye.

# AUDIT REPORT PERFORMANCE STANDARD

## OVERVIEW

MEMBER NAME	Arslan Alüminyum A.Ş.
ENTITY NAME	Arslan Alüminyum A.Ş.
CERTIFICATION SCOPE	Manufacture and production of Aluminium extrusion profiles, anodising, other associated activities and recycling facility and foundries at Arslan Alüminyum Factory 1, Factory 2 and Factory 3 located in Bilecik, Türkiye.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none"><li>Aluminium Re-melting/Refining</li><li>Casthouses</li><li>Semi-Fabrication</li><li>Material Conversion</li></ul>
ASI STANDARD	<ul style="list-style-type: none"><li>Performance Standard V3</li></ul>
AUDIT TYPE	<ul style="list-style-type: none"><li>Initial Certification Audit</li></ul>
AUDIT FIRM	CETIZION Verifica
AUDIT DATE	<ul style="list-style-type: none"><li>12 – 16 August 2024</li></ul>
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none"><li>9 December 2025</li></ul>
AUDIT SCOPE	<p>The Audit Scope included the manufacture and production of Aluminium extrusion profiles, anodising, other associated activities and recycling facility and foundries at Arslan Alüminyum Factory 1, Factory 2 and Factory 3.</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none"><li>Aluminium Re-melting/Refining</li><li>Casthouses</li><li>Semi-Fabrication</li><li>Material Conversion</li></ul> <p>All applicable criteria in the ASI Performance Standard were included in the Audit Scope.</p>
AUDIT OUTCOME	<ul style="list-style-type: none"><li>Certification</li></ul>
AUDIT METHODOLOGY DECLARATION	<p>The Auditors confirm that:</p> <ul style="list-style-type: none"><li><input checked="" type="checkbox"/> The information provided by the Entity is true and accurate to the best knowledge of the Auditor(s) preparing this report.</li><li><input checked="" type="checkbox"/> The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous.</li></ul>

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- ☑ 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 10 February 2025 - 9 February 2028

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NEXT AUDIT TYPE Surveillance Audit

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NEXT AUDIT DATE 10 February 2026

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CERTIFICATE NUMBER 429

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

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

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

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## ENTITY OVERVIEW

Arslan Alüminyum A.Ş (the 'Entity'), established in 1970, is one of the oldest Aluminium companies in Türkiye and currently has 624 employees. It operates four factories located in the 1<sup>st</sup> and 2<sup>nd</sup> Organised Industrial Zones in the Bilecik province. Each factory focuses on different production activities:

- Factory 1: Extrusion profile production and anodising facility.
- Factory 2: Extrusion profile production, painting lines, wood coating unit, mould shop, and mechanical processing sections.
- Factory 3: Recycling facility and foundries.
- Factory 4: A recent addition focused on extrusion profile production, which is not included in the ASI Performance Standard V3 Certification Scope.

The Entity's products primarily serve the building and construction sector, and include Aluminium systems such as windows, doors, facades and curtain walls. It has an overall production capacity of 240,000 tonnes per year, of which 90,000 tonnes are extrusion profiles, with an annual production of saleable profiles at 22,368 tonnes. It is well-equipped with advanced machinery, including a 45 MN extrusion press and two fully automatic solar frame profile processing lines, which have a daily capacity of 7,000 sets.

Bilecik is strategically located between the major cities of Istanbul and Ankara, making the Entity well-connected by road and rail. The nearest airports are in Istanbul and Ankara.

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

## FINDINGS

CRITERION	RATING	COMMENT
<b>1. BUSINESS INTEGRITY</b>		
1.1 Legal Compliance	Conformance	<p>The Entity has delegated the legal compliance responsibility to the Assistant General Manager, which is outlined in the Entity's organisational chart. The Entity has identified applicable legal requirements (e.g. regulations to disclose GHG emissions due to stationary combustion, Turkish regulations).</p> <p>The Entity has submitted its verified annual report for 2023 to the Ministry of Environment, Urbanization and Climate Change through an online portal. It also fulfils its obligations under Turkish laws and to registered institutions, organisations, and industry chambers.</p> <p>The Entity has the required valid legal permits to operate a recycling facility (Factory 3), issued by the Ministry of Environment, Urbanization and Climate Change, and periodic capacity reports are submitted.</p>
1.2 Anti-Corruption	Conformance	<p>The Entity has established rules and procedures related to anti-Corruption in its business procedures and work plans, available at: <a href="https://www.arslanaluminyum.com/documents/surdurulebilirlik/en/anti-bribery-and-corruption-policy.pdf">https://www.arslanaluminyum.com/documents/surdurulebilirlik/en/anti-bribery-and-corruption-policy.pdf</a></p> <p>Stakeholders can raise any grievances related to anti-Bribery via the Ethics Line (+90 228 216 0221 (368)). The functioning of the telephone number was checked on-site and was found to be working satisfactorily. Additionally, the Entity has formed an Ethics Committee with the participation of the senior management team and is working on principles, monitoring mechanisms, and awareness. The latest Ethics Committee meeting was held in July 2024. The risk assessment covering anti-Bribery has been conducted as part of the Human Rights risk assessment, and there are no reported incidents of Bribery.</p>
1.3a-e Code of Conduct	Conformance	<p>The Entity has established an employee Code of Conduct in Turkish and English, publicly available at: <a href="https://www.arslanaluminyum.com/documents/surdurulebilirlik/en/business-ethics-and-code-of-conduct-procedure.pdf">https://www.arslanaluminyum.com/documents/surdurulebilirlik/en/business-ethics-and-code-of-conduct-procedure.pdf</a></p> <p>The employees are trained on the Code of Conduct and training records are maintained.</p>
<b>2. POLICY AND MANAGEMENT</b>		
2.1a-f Environmental, Social, and Governance Policy	Conformance	<p>The Entity has established and implemented various Environmental, Social, and Governance (ESG) Policies, such as Sustainability, Environmental, OH&amp;S, and Human Rights Policies, available at: <a href="https://www.arslanaluminyum.com/?lang=en">https://www.arslanaluminyum.com/?lang=en</a></p>
2.2a-c Leadership	Conformance	<p>The General Manager has designated the Assistant General Manager with the overall responsibility to effectively implement the ASI requirements. The related Policies are approved, and necessary resources are provided. At the leadership meeting, videos were available to raise awareness about the ASI Performance Standard requirements.</p>

CRITERION	RATING	COMMENT
2.3a Environmental and Social Management Systems – Environmental	Conformance	The Entity has implemented an ISO 14001:2015 certified Environment Management System covering all three manufacturing locations, including the head office.
2.3b Environmental and Social Management Systems – Social	Conformance	The Entity has developed its Social Management System generally in line with national and international standards: <a href="https://www.arslanaluminyum.com/documents/surdurulebilirlik/en/human-rights-policy.pdf">https://www.arslanaluminyum.com/documents/surdurulebilirlik/en/human-rights-policy.pdf</a>
2.4a-e Responsible Sourcing	Conformance	The Entity has established a Sustainable Supply Chain Policy, available at: <a href="https://www.arslanaluminyum.com/documents/surdurulebilirlik/en/sustainable-supply-chain-policy.pdf">https://www.arslanaluminyum.com/documents/surdurulebilirlik/en/sustainable-supply-chain-policy.pdf</a>  There is a detailed supplier handling procedure covering suppliers of Primary Aluminium, scrap material and alloying elements. The supplier of Pre-Consumer Scrap was assessed covering ESG criteria. The Sustainable Supply Chain Policy adequately addresses ASI-related requirements of Conflict-Affected and High-Risk Areas (CAHRAs) and modern slavery.
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 and is therefore not required to conduct Environmental and Social Impact Assessments.
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 and is therefore not required to conduct a Human Rights Impact Assessment.
2.7a-f Emergency Response Plan	Conformance	The Entity has developed a specific emergency response plan, which addresses the emergency response team structure, emergency scenarios and annual drills to review emergency readiness. The drill records containing photos and employees' signatures are maintained.  The emergency response team members are trained by an external competent person issued by the Ministry of Labour and Social Security. The full version of the emergency plan is available to Stakeholders upon request, as per the management statement.  Further information on emergency planning is in the Sustainability Report 2023, pages 32 and 69: <a href="https://www.arslanaluminyum.com/documents/surdurulebilirlik/en/Arslan_Enx_Sustainability_Report.pdf">https://www.arslanaluminyum.com/documents/surdurulebilirlik/en/Arslan_Enx_Sustainability_Report.pdf</a>
2.8a-d Suspended Operations	Conformance	The Entity has developed a business continuity or resilience plan including an emergency response plan for suspended operations. Also, the Entity has committed to address ESG criteria in case of suspended operations via the Sustainability Policy: <a href="https://www.arslanaluminyum.com/documents/surdurulebilirlik/en/sustainability-policy.pdf">https://www.arslanaluminyum.com/documents/surdurulebilirlik/en/sustainability-policy.pdf</a>
2.9a-b Mergers and Acquisitions	Conformance	The Entity has made provisions to undertake ESG Due Diligence in for mergers or acquisitions to avoid or reduce the negative effect of ESG aspects. Also, the Entity has committed to address ESG criteria in case of mergers and acquisitions via the Sustainability Policy: <a href="https://www.arslanaluminyum.com/documents/surdurulebilirlik/en/sustainability-policy.pdf">https://www.arslanaluminyum.com/documents/surdurulebilirlik/en/sustainability-policy.pdf</a>

CRITERION	RATING	COMMENT
2.10a-b Closure, Decommissioning and Divestment	Conformance	The Entity has committed to address ESG criteria in case of closure, decommissioning and divestment via the Sustainability Policy: <a href="https://www.arslanaluminyum.com/documents/surdurulebilirlik/en/sustainability-policy.pdf">https://www.arslanaluminyum.com/documents/surdurulebilirlik/en/sustainability-policy.pdf</a>
<b>3. TRANSPARENCY</b>		
3.1a-b Sustainability Reporting	Conformance	The Entity has developed and disclosed its 2023 Sustainability Report, which utilises the Global Reporting Initiative (GRI) reporting framework. Information on the sustainability governance structure is detailed on pages 19-22, and the Materiality assessment on pages 23-25: <a href="https://www.arslanaluminyum.com/documents/surdurulebilirlik/en/Arslan_Enx_Sustainability_Report.pdf">https://www.arslanaluminyum.com/documents/surdurulebilirlik/en/Arslan_Enx_Sustainability_Report.pdf</a>
3.2 Non-compliance and Liabilities	Conformance	The Entity has established an ethical business framework to conduct business in a compliant and ethical manner. There are no Material fines, judgments, penalties, or non-monetary sanctions for failure to comply with Applicable Law during the reporting period. The related disclosures are included the Sustainability Report 2023, page 33: <a href="https://www.arslanaluminyum.com/documents/surdurulebilirlik/en/Arslan_Enx_Sustainability_Report.pdf">https://www.arslanaluminyum.com/documents/surdurulebilirlik/en/Arslan_Enx_Sustainability_Report.pdf</a>
3.3a-c Payments to Governments	Conformance	The Entity has made payments to the government as part of its legal requirements, such as corporate tax, and value added tax (VAT), in accordance with their Business Code of Ethics, point 7: <a href="https://www.arslanaluminyum.com/documents/surdurulebilirlik/en/code-of-ethics.pdf">https://www.arslanaluminyum.com/documents/surdurulebilirlik/en/code-of-ethics.pdf</a>  There were no financial and in-kind political contributions made by the Entity during the reporting period. The related disclosure is available in the Sustainability Report 2023, page 33: <a href="https://www.arslanaluminyum.com/documents/surdurulebilirlik/en/Arslan_Enx_Sustainability_Report.pdf">https://www.arslanaluminyum.com/documents/surdurulebilirlik/en/Arslan_Enx_Sustainability_Report.pdf</a>  Due to confidentiality and the non-obligatory nature of Turkish legislation, the Entity's financial results are not publicly disclosed.
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	The Entity has established Policies and procedures for Stakeholders to raise grievances and for the review of grievances by the Ethics Committee. There have been no grievances received. Further information is available in the Stakeholder Engagement Plan: <a href="https://www.arslanaluminyum.com/documents/surdurulebilirlik/en/STAKEHOLDER-ENGAGEMENT-PLAN.pdf">https://www.arslanaluminyum.com/documents/surdurulebilirlik/en/STAKEHOLDER-ENGAGEMENT-PLAN.pdf</a>
<b>4. MATERIAL STEWARDSHIP</b>		
4.1a Environmental Life Cycle Assessment	Conformance	The Entity has completed Life Cycle Assessment (LCA) studies for four product groups, including Aluminium Billet, Aluminium Profile, Anodised Aluminium Profile, and Coated Aluminium Profile. The base year is 2022, and the functional unit is one kilogram. The approach includes cradle-to-gate with modules A1, A2, A3, A4, C and D.
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	The Entity has conducted LCA studies for four product groups, including Aluminium Billet, Aluminium Profile, Anodised Aluminium Profile, and Coated Aluminium Profile. Customers can request the LCA and Environmental Product Disclosure (EPD) reports. The related disclosures are available in the Sustainability Report 2023, page 61:

CRITERION	RATING	COMMENT
		<a href="https://www.arslanaluminyum.com/documents/surdurulebilirlik/en/Arslan_Enx_Sustainability_Report.pdf">https://www.arslanaluminyum.com/documents/surdurulebilirlik/en/Arslan_Enx_Sustainability_Report.pdf</a>
4.2 Product Design	Conformance	The Entity has implemented processes to improve product design, which addresses extrudability, recycled content, mechanical properties, productivity, and process temperature. The Entity's Research & Design department addresses environmental concerns both in terms of product recovery and product design. The department conducts its work through equipment procurement, process optimisation, product specification, design, and other related areas.
4.3a-b Aluminium Process Scrap	Conformance	The Entity collects and consumes 100% of its Aluminium Process Scrap in its Casthouse. The Entity has a process to collect, segregate and weigh the Process Scrap according to different alloy grades, which was confirmed during on-site observations. The total Process Scrap quantities are collected from different manufacturing processes. In order to melt chips from profile cutting, the Entity has a special twin chamber furnace to reduce melt loss.
4.4a-c Collection and Recycling of Products at End of Life - Material Conversion and other Manufacturing	Conformance	<p>The Entity has developed its Recycling and Scrap Policy, available at: <a href="https://www.arslanaluminyum.com/documents/surdurulebilirlik/en/recycling-and-scrap-policy.pdf">https://www.arslanaluminyum.com/documents/surdurulebilirlik/en/recycling-and-scrap-policy.pdf</a></p> <p>The Entity has developed targets and time-based management strategies for the collection, processing, and recovery of Scrap which includes Post-Consumer Scrap. These are outlined in the 'Recycling and collecting recycle product' document, which provides detailed guidelines (e.g. 10% increase in sourcing of scrap from the previous year).</p> <p>The Entity publishes its targets and practices related to Scrap management in the Sustainability Report 2023, page 27: <a href="https://www.arslanaluminyum.com/documents/surdurulebilirlik/en/Arslan_Enx_Sustainability_Report.pdf">https://www.arslanaluminyum.com/documents/surdurulebilirlik/en/Arslan_Enx_Sustainability_Report.pdf</a></p>
4.4d Collection and Recycling of Products at End of Life	Conformance	The Entity is a member of the Türkiye Alüminyum Sanayicileri Derneği (TALSAD), and a member of European Aluminium, which promote the recycling and collection of Aluminium products at End of Life. <a href="https://talsad.org.tr/en">https://talsad.org.tr/en</a>
<b>5. GREENHOUSE GAS EMISSIONS</b>		
5.1a-b Disclosure of GHG Emissions and Energy Use	Conformance	The Entity's GHG and energy consumption data for 2023 was externally verified. The GHG emissions and energy use by type and quantity are disclosed in the Sustainability Report 2023, page 81: <a href="https://www.arslanaluminyum.com/documents/surdurulebilirlik/en/Arslan_Enx_Sustainability_Report.pdf">https://www.arslanaluminyum.com/documents/surdurulebilirlik/en/Arslan_Enx_Sustainability_Report.pdf</a>
5.2a Aluminium Smelter GHG Emissions Intensity - Started production after 2020	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.2b Aluminium Smelter GHG Emissions Intensity -	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.



CRITERION	RATING	COMMENT
In production up to and including 2020		
5.3a-e GHG Emissions Reduction Plans	Minor Non-Conformance	<p>The Entity has established the GHG Emissions Reduction Pathway with Intermediate Targets using the ASI Entity GHG Pathways Method and Calculation Tool. The total carbon intensity targets (Scopes 1, 2 and 3 combined) are established according to the 1.5°C warming scenario:</p> <ul style="list-style-type: none"> <li>- 4.05 tO2e/t by year 2030</li> <li>- Net-zero emissions by 2050</li> </ul> <p>However, the GHG Emissions Reduction Pathway with the intermediate and intensity targets are not publicly disclosed.</p> <p>The Entity has established a Strategic Carbon Roadmap, which is disclosed in the Sustainability Report 2023, page 46:  <a href="https://www.arslanaluminyum.com/documents/surdurulebilirlik/en/Arslan_Enx_Sustainability_Report.pdf">https://www.arslanaluminyum.com/documents/surdurulebilirlik/en/Arslan_Enx_Sustainability_Report.pdf</a></p> <p>The Strategic Carbon Roadmap aims to reduce carbon intensity by 30% in 2030 compared to the 2021 baseline year.</p>
5.4 GHG Emissions Management	Conformance	<p>The Entity has developed and implemented an ISO 50001:2018 third-party certified Energy Management System. Further information is available in the Sustainability Report 2023, pages 41 and 42:  <a href="https://www.arslanaluminyum.com/documents/surdurulebilirlik/en/Arslan_Enx_Sustainability_Report.pdf">https://www.arslanaluminyum.com/documents/surdurulebilirlik/en/Arslan_Enx_Sustainability_Report.pdf</a></p>
<b>6. EMISSIONS, EFFLUENTS AND WASTE</b>		
6.1a-f Emissions to Air	Minor Non-Conformance	<p>The Entity has implemented a procedure for air emissions monitoring in compliance with Turkish Law. The parameters for particulate matter, TOC (total organic compounds), carbon monoxide, sulphur dioxide, and nitrogen oxides are within legally permissible limits.</p> <p>Emissions reduction initiatives are disclosed in the Sustainability Report 2023, page 47:  <a href="https://www.arslanaluminyum.com/documents/surdurulebilirlik/en/Arslan_Enx_Sustainability_Report.pdf">https://www.arslanaluminyum.com/documents/surdurulebilirlik/en/Arslan_Enx_Sustainability_Report.pdf</a></p> <p>However, the Entity has not quantified and publicly disclosed its Material Emissions to Air from its activities.</p>
6.2a-g Discharges to Waters	Conformance	<p>The Entity collects wastewater from both domestic and industrial sources, performs primary treatment to achieve discharge water quality parameters, and releases it into the industrial area drainage system. For 2023, total wastewater discharge after primary treatment to a common effluent treatment facility was 133,471 cubic meters. The related disclosures are in the Sustainability Report 2023, pages 42-45 and 82:  <a href="https://www.arslanaluminyum.com/documents/surdurulebilirlik/en/Arslan_Enx_Sustainability_Report.pdf">https://www.arslanaluminyum.com/documents/surdurulebilirlik/en/Arslan_Enx_Sustainability_Report.pdf</a></p>
6.3a-g Assessment and Management of Spills and Leakages	Conformance	<p>The Entity has conducted a risk assessment related to chemical leaks and a health and safety risk analysis through a consultative process with human resources, safety specialists, medical staff, and Worker's representatives. Control measures have been implemented and related training has been provided to staff. Interviews with Workers</p>

CRITERION	RATING	COMMENT
		<p>and on-site observations during the Audit confirmed that the control measures were implemented.</p> <p>The Entity has disclosed its emergency planning and strategies in the Sustainability Report 2023, pages 69-70:  <a href="https://www.arslanaluminyum.com/documents/surdurulebilirlik/en/Arslan_Enx_Sustainability_Report.pdf">https://www.arslanaluminyum.com/documents/surdurulebilirlik/en/Arslan_Enx_Sustainability_Report.pdf</a></p>
6.4a-b Public Disclosure of Spills and Leakages	Conformance	<p>There are no Spills or Leakages, however, the Entity has disclosed information on Spills in the Sustainability Report 2023, page 68:  <a href="https://www.arslanaluminyum.com/documents/surdurulebilirlik/en/Arslan_Enx_Sustainability_Report.pdf">https://www.arslanaluminyum.com/documents/surdurulebilirlik/en/Arslan_Enx_Sustainability_Report.pdf</a></p> <p>In addition, the Entity has engaged an approved external safety specialist to conduct a workplace safety assessment, which addressed Spills and Leakages. The report was submitted to the relevant government authority.</p>
6.5a-c Waste Management and Reporting	Conformance	<p>The Entity has developed and implemented waste management practices in accordance with legal regulations. The waste management procedure addresses various types of waste, including Dross. The waste disposal is conducted by an external, licenced agency in accordance with the waste code prescribed by the Ministry of Environment, Urbanisation, and Climate Change., and the Entity's compliance was confirmed using the secure login access. The waste-related disclosures are available in the Sustainability Report 2023, pages 48-49 and 82:  <a href="https://www.arslanaluminyum.com/documents/surdurulebilirlik/en/Arslan_Enx_Sustainability_Report.pdf">https://www.arslanaluminyum.com/documents/surdurulebilirlik/en/Arslan_Enx_Sustainability_Report.pdf</a></p>
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)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8a-d Dross	Conformance	<p>The Entity records and tracks Dross generation daily and reports monthly to the government portal (Ministry of Environment, Urbanization and Climate Change). The total Dross generated was 5,737.57 tonnes and is disposed of by an external licensed agency. The recovered Aluminium is purchased in the form of ingots. As per Turkish Law, Dross residue is used in cement co-processing and does not go to landfill</p> <p>Quantities of Dross are disclosed in the Sustainability Report 2023, page 82:  <a href="https://www.arslanaluminyum.com/documents/surdurulebilirlik/en/Arslan_Enx_Sustainability_Report.pdf">https://www.arslanaluminyum.com/documents/surdurulebilirlik/en/Arslan_Enx_Sustainability_Report.pdf</a></p>
<b>7. WATER STEWARDSHIP</b>		
7.1a-b Water Assessment and Disclosure	Conformance	<p>The Entity has conducted a water risk assessment using the WRI Aqueduct Tool, with an overall water risk of low-medium (1-2). The water stress assessment for future business scenarios has been conducted, and the outcome is low. The industrial zone authority supplies the water.</p> <p>The Entity has an ISO 14046 certification. Data on water withdrawal and consumption is disclosed in the Sustainability Report 2023, pages 27,</p>

CRITERION	RATING	COMMENT
		43-44 and 82: <a href="https://www.arslanaluminyum.com/documents/surdurulebilirlik/en/Arslan_Enx_Sustainability_Report.pdf">https://www.arslanaluminyum.com/documents/surdurulebilirlik/en/Arslan_Enx_Sustainability_Report.pdf</a>
7.2a-e Water Management	Not Applicable	This Criterion is not applicable to the Entity, as the risks related to water in the Watersheds are low.  However, the Entity has conducted a detailed water footprint study to establish a 2022 baseline year and underwent an environment audit from an external agency covering water management. Further information on their water management strategy, usage, operations, and goals is disclosed in the Sustainability Report 2023, pages 27, 43-44 and 82: <a href="https://www.arslanaluminyum.com/documents/surdurulebilirlik/en/Arslan_Enx_Sustainability_Report.pdf">https://www.arslanaluminyum.com/documents/surdurulebilirlik/en/Arslan_Enx_Sustainability_Report.pdf</a>
<b>8. BIODIVERSITY AND ECOSYSTEM SERVICES</b>		
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	The Entity conducted a detailed on-site Biodiversity assessment during 2024 using external experts and which covered both a core and buffer area using three monitoring stations. The nearest Protected Area is located 33 kilometres from the Entity. The flora and fauna assessment were conducted using IUCN, BERN, and CITES guidelines through observation and literature review. No critical or vulnerable flora species were found, however some invasive species were identified. The related disclosures in the Sustainability Report 2023, pages 26, and 50-51: <a href="https://www.arslanaluminyum.com/documents/surdurulebilirlik/en/Arslan_Enx_Sustainability_Report.pdf">https://www.arslanaluminyum.com/documents/surdurulebilirlik/en/Arslan_Enx_Sustainability_Report.pdf</a>
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Not Applicable	This Criterion is not applicable to the Entity, as there were no priority ecosystem risks or impacts identified during the Biodiversity and Ecosystem Services risk and impact assessment.
8.2a-g Biodiversity Management	Not Applicable	This Criterion is not applicable to the Entity, as the Biodiversity risks and potential impacts are assessed and documented as low.  However, The Entity has developed a Biodiversity management plan which includes a plan to reduce and/or avoid water pollution. Further information is available in the Sustainability Report 2023, pages 26 and 50-51: <a href="https://www.arslanaluminyum.com/documents/surdurulebilirlik/en/Arslan_Enx_Sustainability_Report.pdf">https://www.arslanaluminyum.com/documents/surdurulebilirlik/en/Arslan_Enx_Sustainability_Report.pdf</a>
8.3a-c Management of Priority Ecosystem Services	Not Applicable	This Criterion is not applicable to the Entity, as no Priority Ecosystem Services impacts have been identified in the Biodiversity and Ecosystem Services risk and impact assessment.
8.4 Alien Species	Conformance	As part of Biodiversity assessment, the Entity identified the presence of invasive species. Mitigation measures have been identified and implemented.
8.5a-b Commitment to "No Go" in World Heritage Properties	Conformance	The Entity has made a commitment to "No Go" in World Heritage Properties as part of future business expansion, as documented in the Sustainability Report 2023, page 51:

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		<p><a href="https://www.arslanaluminyum.com/documents/surdurulebilirlik/en/Arslan_Enx_Sustainability_Report.pdf">https://www.arslanaluminyum.com/documents/surdurulebilirlik/en/Arslan_Enx_Sustainability_Report.pdf</a></p> <p>There are no World Heritage Properties located near the sites.</p>
8.6a-d Protected Areas	Conformance	The Entity has confirmed there are no Protected Areas located near the sites.
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.
<b>9. HUMAN RIGHTS</b>		
9.1a-d Human Rights Due Diligence	Conformance	<p>The Entity has developed a Human Rights Policy confirming their respect for the UN Guiding Principles on Business and Human Rights, ILO, available at:  <a href="https://www.arslanaluminyum.com/documents/surdurulebilirlik/en/human-rights-policy.pdf">https://www.arslanaluminyum.com/documents/surdurulebilirlik/en/human-rights-policy.pdf</a></p> <p>The Entity has conducted Human Rights Due Diligence covering Human Rights topics including Child Labour, equal opportunities, freedom of speech, and employee benefits such as social services, working hours, and Remuneration. According to the actions identified, the risks and impacts are categorised as low, medium, and high. Working hours are rated high risk, and control measures are implemented.</p>
9.2a-e Gender Equity and Women's Empowerment	Conformance	<p>The current male-to-female ratio at the Entity is 75% to 25%. Whilst there are limitations to employing women in hazardous areas, such as the Castehouse, the Entity actively encourages female employment in other areas such as packaging and office positions. Female Workers are permitted to work night shifts, but their hours are limited to 7.5 hours in accordance with Turkish law.</p> <p>The explanations and regulations regarding women's rights are organised in accordance with internal Policies:  <a href="https://www.arslanaluminyum.com/documents/surdurulebilirlik/en/womens-rights-policy.pdf">https://www.arslanaluminyum.com/documents/surdurulebilirlik/en/womens-rights-policy.pdf</a></p> <p>The Entity has a target for a 15% increase in female employees from 2023 to 2025, the related disclosures are available in the Sustainability Report 2023, pages 28, 72 and 77:  <a href="https://www.arslanaluminyum.com/documents/surdurulebilirlik/en/Arslan_Enx_Sustainability_Report.pdf">https://www.arslanaluminyum.com/documents/surdurulebilirlik/en/Arslan_Enx_Sustainability_Report.pdf</a></p>
9.3a-i Indigenous Peoples	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples in the Entity's Area of Influence, as confirmed via the International Work Group for Indigenous Affairs (IWGIA) resource - <a href="https://iwgia.org/en/countries.html">https://iwgia.org/en/countries.html</a>
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 in the Entity's Area of Influence, and there are no Major Changes or project expansions. According to Turkish Law, in case of any major expansion/change, there is a requirement to conduct an

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		Environmental Impact Assessment which includes external stakeholder consultations.
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 to the Entity, as there are no Indigenous Peoples in the Entity's Area of Influence.
9.5a Cultural and Sacred Heritage - Identification	Conformance	The Entity is not located near any cultural or sacred heritage sites. The nearest cultural sites, which are designated on the UNESCO World Heritage List, are in the city of Bursa and village of Cumalikizik, located approximately 100 kilometres away. There are no negative impacts from the Entity's activities on these cultural and heritage sites.
9.5b Cultural and Sacred Heritage - Impacts	Conformance	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples in the Entity's Area of Influence.
9.6a-i Displacement	Not Applicable	This Criterion is not applicable to the Entity, as there are no New Projects or Major Changes planned, and no Business activities that have resulted in displacement or resettlement.
9.7a-h Affected Populations and Organisations	Conformance	<p>The Entity has developed a Stakeholder Engagement Plan, available at:  <a href="https://www.arslanaluminyum.com/documents/surdurulebilirlik/en/STAKEHOLDER-ENGAGEMENT-PLAN.pdf">https://www.arslanaluminyum.com/documents/surdurulebilirlik/en/STAKEHOLDER-ENGAGEMENT-PLAN.pdf</a></p> <p>The Plan details various types of affected Stakeholders, the impact and responses, corporate social responsibility activities and the Grievance Mechanism. The Entity is actively working with other neighbouring industries and trade associations to address environmental and social challenges. The Entity's Chairperson of the Board is also the President of the Bilicik 1 Industrial Organization Zone, where the Entity is located, and working on a common effluent treatment plant, developing shared daycare facilities (creche), and accessibility to water resources.</p> <p>The related disclosures are available in the Sustainability Report 2023, pages 78-79:  <a href="https://www.arslanaluminyum.com/documents/surdurulebilirlik/en/Arslan_Enx_Sustainability_Report.pdf">https://www.arslanaluminyum.com/documents/surdurulebilirlik/en/Arslan_Enx_Sustainability_Report.pdf</a></p>
9.8a Conflict-Affected and High-Risk Areas - Strong Management Systems	Conformance	<p>The Entity has developed and implemented a Sustainable Supply Chain Policy that requires suppliers to follow requirements related to Conflict-Affected and High-Risk Areas (CAHRAs):  <a href="https://www.arslanaluminyum.com/documents/surdurulebilirlik/en/sustainable-supply-chain-policy.pdf">https://www.arslanaluminyum.com/documents/surdurulebilirlik/en/sustainable-supply-chain-policy.pdf</a></p> <p>The Sustainable Supply Chain Policy has been communicated, and the Entity has developed a mechanism to monitor supplier progress on Policy requirements.</p> <p>Further information on Due Diligence is available in the Sustainability Report 2023, pages 62 -63:  <a href="https://www.arslanaluminyum.com/documents/surdurulebilirlik/en/Arslan_Enx_Sustainability_Report.pdf">https://www.arslanaluminyum.com/documents/surdurulebilirlik/en/Arslan_Enx_Sustainability_Report.pdf</a></p>

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9.8b Conflict-Affected and High-Risk Areas - Identify and assess risks	Minor Non-Conformance	<p>The Entity has assessed its tier-1 suppliers or immediate suppliers for any involvement in CAHRAs, and confirmed they are not located in CAHRAs.</p> <p>However, the Entity does not exercise risk-based Due Diligence over its upstream Aluminium supply chain in accordance with the OECD Due Diligence Guidance of Minerals from Conflict-Affected and High-Risk Areas (OECD Guidance). There is no documented evidence that the Entity has determined and/or sought information from the Smelter in its supply chain to identify and assess risk associated with Bauxite origin and countries of transit.</p>
9.8c Conflict-Affected and High-Risk Areas - Strategy to respond to risks	Minor Non-Conformance	<p>The Entity states they do not source from CAHRAs and strictly avoids financing conflict minerals. However, there is no documented strategy to respond to CAHRAs' risks when they are identified.</p>
9.8d Conflict-Affected and High-Risk Areas - Audit of due diligence	Conformance	<p>The Entity's Due Diligence processes were included in this ASI Performance Standard Certification Audit, which addresses this requirement.</p> <p>In addition, the Entity conducts supply chain Due Diligence through periodic audits of select suppliers and has a target of 80% for supplier audits regarding environmental and social impacts for 2025.</p>
9.8e Conflict-Affected and High-Risk Areas - Report annually	Minor Non-Conformance	<p>It was identified that the Entity has not disclosed the Due Diligence efforts or progress of Aluminium suppliers and associated identified risks during the reporting period.</p>
9.9 Security practice	Conformance	<p>The Entity has conducted Human Rights Due Diligence covering security services. There are both male and female security guards deployed who work in three shifts and are hired through an external agency. The security personnel have received training in Human Rights and other work-related matters such as emergency preparedness and response.</p>
<b>10. LABOUR RIGHTS</b>		
10.1a-c Freedom of Association and Right to Collective Bargaining	Conformance	<p>The Entity respects employees' right to Freedom of Association and Collective Bargaining as part of national regulations and international instruments. Each factory has elected its Workers' representative in accordance with Turkish labour regulations.</p> <p>The Entity's Human Rights Policy is disclosed at:  <a href="https://www.arslanaluminyum.com/documents/surdurulebilirlik/en/human-rights-policy.pdf">https://www.arslanaluminyum.com/documents/surdurulebilirlik/en/human-rights-policy.pdf</a></p>
10.1d Freedom of Association and Right to Collective Bargaining - Alternative means in context of Applicable Law	Not Applicable	<p>This Criterion is not applicable to the Entity, as the Turkish laws do not restrict Freedom of Association and Collective Bargaining.</p>
10.2a Child Labour	Conformance	<p>The Entity has established a Business Ethics and Code Of Conduct Procedure covering Child Labour, available at:  <a href="https://www.arslanaluminyum.com/documents/surdurulebilirlik/en/business-ethics-and-code-of-conduct-procedure.pdf">https://www.arslanaluminyum.com/documents/surdurulebilirlik/en/business-ethics-and-code-of-conduct-procedure.pdf</a></p>

CRITERION	RATING	COMMENT
		<p>The Sustainable Supply Chain Policy covers Child Labour:  <a href="https://www.arslanaluminyum.com/documents/surdurulebilirlik/en/sustainable-supply-chain-policy.pdf">https://www.arslanaluminyum.com/documents/surdurulebilirlik/en/sustainable-supply-chain-policy.pdf</a></p> <p>Anyone under the age of 15 is defined as a child. During the on-site visit as part of the Audit, there were no suspected cases of Child Labour, and the 30 employees randomly selected for interview were confirmed to be above 15 years of age. The age of employees is verified by the Entity through national identification (ID) documents, and their age is captured in the application form along with other personal details along with a declaration to use personal data in a confidential manner.</p>
10.3a-c Forced Labour	Conformance	<p>The Entity has established a Sustainable Supply Chain Policy covering internal work practices and the supply chain, which prohibits the use of Forced Labour and modern slavery:  <a href="https://www.arslanaluminyum.com/documents/surdurulebilirlik/en/sustainable-supply-chain-policy.pdf">https://www.arslanaluminyum.com/documents/surdurulebilirlik/en/sustainable-supply-chain-policy.pdf</a></p> <p>The Entity's Business Ethics and Code of Conduct Procedure covers Forced Labour:  <a href="https://www.arslanaluminyum.com/documents/surdurulebilirlik/en/business-ethics-and-code-of-conduct-procedure.pdf">https://www.arslanaluminyum.com/documents/surdurulebilirlik/en/business-ethics-and-code-of-conduct-procedure.pdf</a></p> <p>There is a list of information and documents (only copies) required from new employees e.g. national ID copy, education/diploma certificate, bank account, pre-employment medical examination records etc.</p> <p>According to Turkish regulations, employees are subject to a notice period of two or four weeks, depending on the length of their employment. There are no indicators or conditions of employment that suggest the presence of Forced Labour or modern slavery. The Modern Slavery Statement, signed by the Deputy General Manager, is available at:  <a href="https://www.arslanaluminyum.com/documents/surdurulebilirlik/en/MODERN-SLAVERY-STATEMENT.pdf">https://www.arslanaluminyum.com/documents/surdurulebilirlik/en/MODERN-SLAVERY-STATEMENT.pdf</a></p> <p>The Entity's commitments on modern slavery are included in the Sustainability Report 2023, page 72:  <a href="https://www.arslanaluminyum.com/documents/surdurulebilirlik/en/Arslan_Enx_Sustainability_Report.pdf">https://www.arslanaluminyum.com/documents/surdurulebilirlik/en/Arslan_Enx_Sustainability_Report.pdf</a></p>
10.4a-c Non-Discrimination	Conformance	<p>The Entity's commitment and practices do not discriminate based on race, gender and other attributes as outlined in the Business Ethics and Code of Conduct Procedure:  <a href="https://www.arslanaluminyum.com/documents/surdurulebilirlik/en/business-ethics-and-code-of-conduct-procedure.pdf">https://www.arslanaluminyum.com/documents/surdurulebilirlik/en/business-ethics-and-code-of-conduct-procedure.pdf</a></p> <p>A review of training, promotion and recruitment documentation confirms there are no discriminatory practices.</p>
10.5 Communication and engagement	Conformance	<p>The Entity communicates and engages employees regarding working conditions through various mechanisms such as campaigns (e.g. awards &amp; recognition), training, human resources-related Policies on the website, notice board, and videos streaming in work areas.</p> <p>The Stakeholder Engagement Plan regarding complaints is available at:  <a href="https://www.arslanaluminyum.com/documents/surdurulebilirlik/en/STAKEHOLDER-ENGAGEMENT-PLAN.pdf">https://www.arslanaluminyum.com/documents/surdurulebilirlik/en/STAKEHOLDER-ENGAGEMENT-PLAN.pdf</a></p>

CRITERION	RATING	COMMENT
10.6a-g Violence and Harassment	Conformance	<p>The Entity has addressed requirements related to Violence and Harassment through its various Policies implemented.</p> <p>Human Resources Policy:  <a href="https://www.arslanaluminyum.com/documents/surdurulebilirlik/en/human-resources-policy.pdf">https://www.arslanaluminyum.com/documents/surdurulebilirlik/en/human-resources-policy.pdf</a></p> <p>Code of Ethics:  <a href="https://www.arslanaluminyum.com/documents/surdurulebilirlik/en/code-of-ethics.pdf">https://www.arslanaluminyum.com/documents/surdurulebilirlik/en/code-of-ethics.pdf</a></p> <p>Employees are trained on the Code of Ethics and the reporting mechanism to report any incidents of Violence and Harassment.</p>
10.7a-c Remuneration	Conformance	<p>The Entity pays Remuneration above the legal minimum wage. Overtime pay is provided at a premium rate in accordance with Turkish law, which stipulates a 150% premium.</p> <p>The calculations for Remuneration were reviewed during the Audit and confirmed to be accurate. The cost of living is taken into account to determine the salary level above the legal minimum wage. Statutory deductions such as income tax and social security are considered, and salaries are paid twice a month through bank transfer (17th or 18th and 3rd or 4th of every month). The Remuneration slip is provided to all employees.</p>
10.8a-c Working Time	Minor Non-Conformance	<p>Working hours are organised into three shifts, and employees are entitled to annual leave. Working hours, including Overtime, are tracked using a card system.</p> <p>However, the Audit identified isolated cases where the weekly working hours exceeded 45 hours. The Entity is working towards analysing these additional working hours (Overtime) and approaches to reduce the need for Overtime work such as implementing an automation process, using robots for mechanical treatments and adding an additional manufacturing unit.</p>
10.9a-b Informing Workers of Rights	Conformance	<p>The Entity has informed employees of their rights through various mechanisms such as induction training, human resources-related Policies, the notice board, and videos streaming in work areas.</p>
<b>11. OCCUPATIONAL HEALTH AND SAFETY</b>		
11.1a Occupational Health and Safety (OH&S) Management System	Conformance	<p>The Entity has a valid ISO 45001:2018 certified Occupational Health and Safety (OH&amp;S) Management System. The Entity has documented OH&amp;S procedures covering various aspects of OH&amp;S (e.g. medical examinations, and workplace accidents).</p>
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Conformance	<p>The Entity reviews OH&amp;S performance data monthly for each factory. This review is conducted by a Safety Committee that consists of eight members, which includes management representatives, Worker representatives, a doctor, and a safety specialist. Employees may be included as required based on the nature of the actions, and meeting minutes are maintained.</p> <p>The 2023 Sustainability Report includes disclosures on OH&amp;S performance with leading and lagging indicators (e.g. number of work accidents, total lost days due to work accidents, the number of fatal accidents, and the accident frequency rate), pages 68-70, 87-88 and 90:</p>



CRITERION	RATING	COMMENT
		<a href="https://www.arslanaluminyum.com/documents/surdurulebilirlik/en/Arslan_Enx_Sustainability_Report.pdf">https://www.arslanaluminyum.com/documents/surdurulebilirlik/en/Arslan_Enx_Sustainability_Report.pdf</a> A comparative analysis has been conducted with peers for parameters such as accident frequency rates.
11.2 Employee engagement on Health and Safety	Conformance	The Entity has formed a Safety Committee, and employees are regularly engaged through safety training, and toolbox talks that address topics such as 'Basic Occupational Health and Safety'.

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#### DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	10 February 2025	Initial Certification Audit – Full Certification