## ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

# TALUM d.d. Kidričevo

#### CERTIFICATE NUMBER

335

#### ASI STANDARD

PERFORMANCE STANDARD (V3 2022)

DATE OF ISSUE

**18 DECEMBER 2024** 

**CERTIFICATION SCOPE** 

tilt casted, machined and

Design and production of extrusion billets, slugs and discs, die casted,

assembled parts and heat transfer

CERTIFICATION LEVEL

PROVISIONAL CERTIFICATION\*

DATE OF EXPIRY

**17 DECEMBER 2025** 

ASI ACCREDITED AUDITING FIRM

### BUREAU VERITAS CERTIFICATION

**CERTIFIED SINCE** 

**18 DECEMBER 2023** 

AUTHORISED BY



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

plates of Aluminium and Aluminium alloys (Slovenia).

> \* Provisional Certification is valid for the period of one year, during which the company can address the non-conformances assessed and subsequently seek full certification.

# AUDIT REPORT PERFORMANCE STANDARD

## **OVERVIEW**

MEMBER NAME	TALUM d.d. Kidricevo			
ENTITY NAME	TALUM d.d. Kidričevo			
CERTIFICATION SCOPE	Design and production of extrusion billets, slugs and discs, die casted, tilt casted, machined and assembled parts and heat transfer plates of Aluminium and Aluminium alloys (Slovenia).			
SUPPLY CHAIN ACTIVITIES	<ul> <li>Aluminium Re-melting/Refining</li> <li>Casthouses</li> <li>Semi-Fabrication</li> <li>Material Conversion</li> </ul>			
ASI STANDARD	Performance Standard V3			
AUDIT TYPE	<ul> <li>Initial Certification Audit (21 – 23 February 2023)</li> <li>Surveillance Audit and Scope Change (12 – 13 August 2024)</li> </ul>			
AUDIT FIRM	Bureau Veritas Certification			
AUDIT DATE	<ul> <li>21 - 23 February 2023 (Initial Certification Audit)</li> <li>12 - 13 August 2024 (Surveillance Audit and Scope Change)</li> </ul>			
AUDIT REPORT SUBMISSION	<ul> <li>19 September 2023 (Initial Certification Audit)</li> <li>18 December 2024 (Surveillance Audit and Scope Change)</li> </ul>			
AUDIT SCOPE	Initial Certification Audit (21 – 23 February 2023) The Audit Scope includes the design and production of extrusion billets, slugs and discs, die casted, tilt casted, machined and assembled parts and heat transfer plates of Aluminium and Aluminium alloys.			
	<ul> <li>Supply chain activities included in the Audit Scope:</li> <li>Aluminium Smelting</li> <li>Aluminium Re-melting/Refining</li> <li>Casthouses</li> <li>Semi-Fabrication</li> <li>Material Conversion</li> </ul>			
	All applicable criteria in the ASI Performance Standard were included in the Audit Scope. Whilst the Entity's Aluminium Smelting activities are no longer operating, this supply chain activity has been included in the scope to ensure associated Greenhouse Gas emissions and Waste management information, relevant to the period the Entity's smelting activities were operational, is captured.			
	<u>Surveillance Audit and Scope Change (12 – 13 August 2024)</u>			

	The Audit Scope includes the design and production of extrusion billets, slugs and discs, die casted, tilt casted, machined and assembled parts and heat transfer plates of Aluminium and Aluminium alloys.				
	Supply chain activities included in the Audit Scope:				
	Aluminium Re-melting/Refining				
	Casthouses				
	Semi-Fabrication				
	Material Conversion				
	All applicable Criteria in the ASI Performance Standard were included in the Audit Scope.				
AUDIT OUTCOME	Provisional Certification				
AUDIT METHODOLOGY DECLARATION	The Auditors confirm that:				
	The information provided by the Entity is true and accurate to the best knowledge of the Auditor(s) preparing this report.				
	The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous.				
	The Audit Scope and audit methodology are sufficient to establish confidence that the findings are indicative of the performance of the Entity's defined Certification Scope.				
	The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.				
CERTIFICATION PERIOD	18 December 2024 – 17 December 2025				
NEXT AUDIT TYPE	Surveillance Audit				
NEXT AUDIT DATE	17 June 2025				
CERTIFICATE NUMBER	335				
	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**

TALUM d.d. Kidricevo (the 'Entity') was established in 1947 in Kidričevo, Slovenia and commenced production in 1954. The Entity is an important member of the Slovenian metals industry, with respect to its importance in the export of products, number of employees and net sales revenue, and has a workforce of approximately 1,300 employees.

Originally a Primary Aluminium producer, the Entity's Aluminium Smelting activities are currently not in operation. In recent years, the Entity has specialised in the recycling of scrap Aluminium and remelting, providing material for additional process steps, slugs and discs for the production of aerosol cans, (in particular products for the pharmacy and food industry); production of evaporators and heat exchangers, and castings for technical products. The Entity's current annual production of Aluminium products is approximately 100,000 tonnes, predominately exported across Europe.

The Entity has several Management System certifications, including quality, environment, energy, health and safety, and information security.

## 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.

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

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

## FINDINGS

CRITERION	RATING	COMMENT
1. BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity has implemented a legal compliance system to ensure Compliance with Applicable Law.
1.2 Anti-Corruption	Conformance	The Entity works against Corruption in all its forms, including Extortion and Bribery, consistent with Applicable Law and prevailing international Standards. The Entity has implemented the Talum Group Ethical Code and the Code of Rules on Corporate Integrity, available at: https://www.talum.si/en/integriteta.html
1.3a-e Code of Conduct	Conformance	The Entity has publicity disclosed the Talum Group Policy, which addresses the principles relevant to environmental, social and governance performance, available at: https://www.talum.si/en/strategija.html#politika The Code of Conduct is embedded within the Group Policy. The Code of Conduct is reviewed upon changes to Applicable Law and at least every five years.
2. POLICY AND MANAGEMEN	т	
2.1a-f Environmental, Social, and Governance Policy	Conformance	The Entity has implemented the Talum Group Policy, which addresses the principles relevant to environmental, social and governance performance, available at: https://www.talum.si/pdf/politika/POLITIKA%20ST%202023_ANG%20A4_ FIN%204.7.2023.pdf
2.2a-c Leadership	Conformance	A Talum Group Board Member is responsible for both the Environment, Health and Safety (EHS) and Energy Committee and the Sustainability Committee, and ASI is included in this responsibility.
2.3a Environmental and Social Management Systems – Environmental	Conformance	The Entity has implemented an Environmental Management System certified to ISO 14001:2015, and valid until 19 September 2025.
2.3b Environmental and Social Management Systems – Social	Conformance	The Entity has implemented an Environmental and Occupational Health and Safety Management System according to ISO 14001:2015 and ISO 45001:2018. The Management System is certified against both these Standards, which also addresses social aspects as identified in the legal compliance requirements and the Entity's risk assessment.
2.4a-e Responsible Sourcing	Conformance	The Entity has implemented a Responsible Sourcing Policy, Code of Conduct for Business Partners of the Talum Group, available at: https://www.talum.si/en/integriteta.html
2.5a-g Environmental and Social Impact Assessments	Conformance	The Entity has implemented procedures that specifies an environmental Impact Assessment is to be conducted for any Major Changes as per the EMS procedures and in accordance with legal requirements (legal permit). The social risk assessment is defined on a corporate level and the need for assessment in case of Major Change is defined in the company collective agreement. The Impact Assessment and Workers plan are undertaken by the Entity's Human

CRITERION	RATING	COMMENT
		Resources (HR) Department. The social risk assessment is a part of a periodic Risk Committee which was used during the closure of Primary Aluminium production at the Entity.
2.6a-h Human Rights Impact Assessment	Conformance	A Human Rights Impact Assessment is incorporated as an aspect of the Entity's risk assessment procedure. A risk assessment identification and review process is undertaken every second year or whenever Major Changes occur.
2.7a-f Emergency Response Plan	Conformance	The Entity has implemented an Emergency Response Plan and has engaged the Community as part of its development. The effectiveness of the Emergency Response Plan is assessed regularly, and training is also provided on a regular basis. The Emergency Response Plan is publicly disclosed at the entrance of the Entity.
2.8a-d Suspended Operations	Conformance	The Entity has implemented a process in case of closure and suspended operations which is also defined by legislation and is included in its Management Manual.
2.9a-b Mergers and Acquisitions	Conformance	The Entity has implemented a Due Diligence procedure for mergers and acquisitions in its management Procedures.
2.10a-b Closure, Decommissioning and Divestment	Conformance	For planning closures, decommissioning and disposal, the Entity has implemented a Due Diligence process.
3. TRANSPARENCY		
3.1a-b Sustainability Reporting	Conformance	The Entity has disclosed its Sustainability Report, which includes its sustainability approach and relevant sustainability data. The Sustainability Report is publicity disclosed at: https://www.talum.si/en/trajnost.html
3.2 Non-compliance and Liabilities	Conformance	The Entity has disclosed a Compliance Statement (chapter 1.17) and a Statement of Business Compliance (chapter 1.6.4) in its Annual Report 2023 with a Statement that no non-compliance and liabilities were received by the Entity: https://talum.si/img/projects/porocila/PDF/ANNUAL%20REPORT%20TALU M%20GROUP%202023.pdf
3.3a-c Payments to Governments	Conformance	The Entity has disclosed its payments to governments in its Annual Report (English version). Annual Reports are available at: https://www.talum.si/en/porocila.html
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	The Entity has established a Stakeholder management process that is described within the Entity's internal rules and regulations and communicated via the Code of Corporate Integrity. Complaints and requests for information can be made via the Entity's website at: https://talum.si/en/kontakt_trajnost.html
4. MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment	Conformance	The Entity has completed Life Cycle Assessments (LCA) for all its main Products or group of Products. The LCAs are aligned with ISO 14040:2006 and ISO14044:2006.

CRITERION	RATING	COMMENT
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	The Entity has completed Life Cycle Assessments (LCA) for all its main Products. The summary of results is made available in the Talum Group Sustainability Report 2023, Chapter 3.6.3 Product life cycle assessment, available at: <u>https://www.talum.si/en/trajnost.html</u>
4.2 Product Design	Conformance	The Entity has established a procedure that defines sustainability objectives for Product design and process design.
4.3a-b Aluminium Process Scrap	Conformance	The Entity has implemented a procedure that defines the identification, collection and separation of Aluminium and Aluminium Scrap. The Entity's goals for process scrap align with the Talum Group policy for the minimisation of Aluminium Process Scrap. The Entity's Quality Committee maintain the records associated with the monitoring of process Scrap.
4.4a-c Collection and Recycling of Products at End of Life - Material Conversion and other Manufacturing	Conformance	The Entity's Environmental program includes targets to reduce recycling Scrap. The Entity's recycling strategy and increasing the content of Post-Consumer Scrap is a part of the Talum Corporate Strategy for 2024 to 2027, which is publicly disclosed in the Sustainability Report, Chapter 3.6 Resource Use and Circular Economy, available at: <u>https://www.talum.si/en/trajnost.html</u>
4.4d Collection and Recycling of Products at End of Life	Conformance	The Entity cooperates with other businesses to receive material for re- melting. The collection and recycling of Aluminium scrap is addressed in the environmental permit for the Casthouse.
5. GREENHOUSE GAS EMISSIO	SNC	
5.1a-b Disclosure of GHG Emissions and Energy Use	Conformance	The Entity communicates its energy use and Greenhouse Gas (GHG) emissions in its Annual Report, section Environmental Management, available at: <u>https://www.talum.si/en/porocila.html</u>
		The Entity's reporting on GHG emissions to disclose Scope 1 and 2 emissions plus Material Scope 3 emissions is verified externally by the Slovenian Institute of Quality and Metrology (SIQ).
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 - In production up to and including 2020	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.3a-e GHG Emissions Reduction Plans	Major Non- Conformance	The Entity has established numerous initiatives to reduce GHG emissions and had met its EU 2030 'Fit for 55' goal by 2020. The Entity reduced its total carbon footprint from Direct GHG emissions by 79% (based on the reference year 1995, which is in accordance with the 'Fit for 55' baseline). The Entity has disclosed its GHG emissions reduction achievements in the Annual Report, page 13, graph 1: https://talum.si/pdf/trajnost/POROČIL0%200%20TRAJNOSTNEM%20RAZ VOJU%202023%20ang%20z%20linki_WEB.pdf

CRITERION	RATING	COMMENT
		Whilst the Entity has publicly stated its long-term targets such as carbon neutrality by 2030 for Scope 1 and 2, and by 2050 for Scope 3, there are no intermediate goals currently defined, and these are not publicly disclosed. Additionally, no GHG Emissions Reduction Pathways have not be developed nor disclosed, and the ASI GHG Pathways Method and Calculation Tool has not been used by the Entity.
5.4 GHG Emissions Management	Conformance	The Entity has implemented a Management System to achieve GHG emissions reductions according to the defined targets. The Entity has established numerous initiatives that has enabled it to meet its EU 2030 'Fit by 55' goal in 2020.
6. EMISSIONS, EFFLUENTS AN	D WASTE	
6.1a-f Emissions to Air	Conformance	The Entity reports its Material Emissions to Air annually to the relevant local authorities. It also communicates the annual quantity of gaseous emissions, total dust (particulate) and CO <sub>2</sub> e emissions in its Annual Report. The Entity complies with the set goals and permissible values as defined in the environmental permit. The Entity details the control measures implemented and planned to minimize air emissions in the Annual Report 2023, page 63: <u>https://www.talum.si/en/porocila.html</u>
6.2a-g Discharges to Water	Conformance	The Entity has disclosed its Discharges to Water and measures implemented and plans to minimise Discharges to Water in the Annual Report 2023, page 65: <u>https://www.talum.si/en/porocila.html</u>
6.3a-g Assessment and Management of Spills and Leakages	Conformance	The Entity has established Emergency Response Plans based on detailed risk assessments. Risks associated with Spills and Leakages are assessed and preventive actions are incorporated into the Entity's Environmental Program. This was also confirmed by interviews, site observations and document review. No Spill or Leakages were recorded over the last three years.
6.4a-b Public Disclosure of Spills and Leakages	Conformance	The method of communication regarding major incidents is defined in the Entity's Safety Report. No environmental accidents, significant leaks or other similar incidents occurred in 2021, 2022 and 2023. A Statement on Spills and leakages can be found in the Sustainability Report 2023, Section 3.5.1.1 Pollution: <u>https://www.talum.si/en/trajnost.html</u>
6.5a-c Waste Management and Reporting	Conformance	The Entity communicates its approach and activities regarding Waste, which is consistent with the Waste Management Hierarchy, in its Annual Report. The Entity reports the overall amount of Waste, mixed municipal waste and Hazardous Waste. Aluminium scrap is processed pursuant to the environmental permit, implementing the principles of Circular E\economy. The reduction of Hazardous Waste is one of the main goals in the Entity's Environmental Program. Further information is available in the Annual Report 2023, page 65: https://www.talum.si/en/porocila.html
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.

CRITERION	RATING	COMMENT
6.8a-d Dross	Conformance	The Entity's Dross is stored on site in accordance with the legal and permitting requirements. The Entity maintains Scrap statistics which are documented in the annual waste report. Dross is sent for external recycling by an external service provider. No Dross is sent to landfill.
7. WATER STEWARDSHIP		
7.1a-b Water Assessment and Disclosure	Conformance	The Entity has mapped its water withdrawal by source and has disclosed its water data in the Annual Report, page 64: <u>https://www.talum.si/en/porocila.html</u> The Entity undertakes monthly evaluations of the water withdrawal and maintains water statistics. The monitoring of water-related parameters is in accordance with the environmental permit. Based on Best Available Technologies (BAT) the consumption of process water is considered low.
7.2a-e Water Management	Conformance	Based on Best Available Techniques (BAT), the Entity's consumption of process water is considered low. The Entity has communicated its water consumption and reduction data in the Annual Report page 64: https://www.talum.si/en/porocila.html
8. BIODIVERSITY AND ECOSY	STEM SERVICES	
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	The risk to Biodiversity is addressed in the Entity's risk assessment. A Biodiversity Impact Assessment has been completed in cooperation with the Faculty of Natural Sciences and Mathematics at the Institute of Biology Maribor.
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Conformance	The risk to Biodiversity is addressed in the Entity's risk assessment. A Biodiversity Impact Assessment has been completion in cooperation with the Faculty of Natural Sciences and Mathematics at the Institute of Biology Maribor.
8.2a-g Biodiversity Management	Not Applicable	This Criterion is not applicable to the Entity, as no significant Biodiversity features were identified in the Biodiversity risk assessment.
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.
8.4 Alien Species	Conformance	The risk to Biodiversity is addressed in the Entity's risk assessment. A Biodiversity Impact Assessment has been completed in cooperation with the Faculty of Natural Sciences and Mathematics at the Institute of Biology Maribor. The assessment of Alien Species is a component of the study. The risk of accidental or deliberate introduction of non- native species has been classified as low.
8.5a-b Commitment to "No Go" in World Heritage Properties	Conformance	The Entity is not located within areas of high natural value such as Natura 2000 or World Heritage Properties: https://gis.arso.gov.si/atlasokolja/profile.aspx?id=Atlas_Okolja_AXL@Ar so&culture=en-US The Entity has developed a public commitment to "No Go" in World Heritage Properties: https://www.talum.si/pdf/politika/POLITIKA%20ST%202023_ANG%20A4_ FIN%204.7.2023.pdf

CRITERION	RATING	COMMENT
8.6a-d Protected Areas	Conformance	The Entity is located approximately four kilometres from an area of high natural value (Natura 2000) and six kilometres from a National Park. The impact on natural resources is monitored internally and externally at defined intervals and reported. Biodiversity is included in the EHS report as a basis for the sustainability reporting.
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 the Talum Group Policy, which includes the commitment to comply with Applicable Law and respect Human Rights. The Entity's business partners are expected to share this commitment. The Policy is available at: https://www.talum.si/pdf/politika/POLITIKA%20ST%202023_ANG%20A4_ FIN%204.7.2023.pdf
		The Entity has also conducted Human Rights Due Diligence Assessments.
9.2a-e Gender Equity and Women's Empowerment	Conformance	The Entity has introduced the Talum Group's Sustainability Policy and a Diversity Policy that addresses the fair treatment of employees, strives for an inclusive workplace culture and does not tolerate any form of Discrimination, including on the basis of gender: https://www.talum.si/pdf/politika/POLITIKA%20ST%202023_ANG%20A4_ FIN%204.7.2023.pdf https://talum.si/en/infromacije_za_delnicarje.html
		The Entity's business partners are expected to also establish an inclusive workplace culture and not condone any form of Discrimination in the binding Code of Ethics for Business Partners.
		Wages are paid according to qualification and not on gender. The percentage of women employees is measured and communicated internally, and activities to promote women's empowerment are established annually to coincide with International Women's Day. Data on the number and percentage of women employees over the period 2019-2023, are displayed in the Sustainability Report 2023, page 69 at: https://talum.si/en/trajnost.html#
9.3a-i Indigenous Peoples	Not Applicable	This Criterion is not applicable to the Entity, as the site is located in central Europe and Indigenous Peoples or their lands, territories and resources are not directly affected by the Entity's operations.
9.4a Free, Prior, and Informed Consent (FPIC) - New Projects or Major Changes	Not Applicable	This Criterion is not applicable to the Entity, as the site is located in central Europe and Indigenous Peoples or their lands, territories and resources are not directly affected by the Entity's operations.
9.4b Free, Prior, and Informed Consent (FPIC) - Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
9.4c Free, Prior, and Informed Consent (FPIC) - Demonstrate support	Not Applicable	This Criterion is not applicable to the Entity, as the site is located in central Europe and Indigenous Peoples or their lands, territories and resources are not directly affected by the Entity's operations.
9.5a Cultural and Sacred Heritage – Identification	Not Applicable	This Criterion is not applicable to the Entity, as the Entity's Due Diligence process did not identify any sacred or cultural heritage sites and values within its Area of Influence. Indigenous Peoples or their lands, territories and resources are not directly affected by the Entity's operations.
9.5b Cultural and Sacred Heritage – Impacts	Not Applicable	This Criterion is not applicable to the Entity, as no sacred or cultural heritage sites and values within the Entity's Area of Influence are present. Indigenous peoples or their lands, territories and resources are not directly affected by the Entity's operations.
9.6a-i Displacement	Not Applicable	This Criterion is not applicable to the Entity, as confirmed by interviews, the Entity did not require the resettlement or cause the displacement. The Entity's senior management confirmed that this is also not planned for New Projects or Major Changes.
9.7a-h Affected Populations and Organisations	Conformance	This Entity is located within an industrial zone that contains additional free land in case of future extension or expansion of the Entity. The site is neither located on nor near lands, territories or resources of Indigenous Peoples. Due to its size, the Entity plays an important role in the Local Community, is in contact with the Community and contributes to the Communities and its activities (e.g. support of a local orchestra, male choir, football club, and fire brigade). The focus areas of the contribution to the community are the arts and humanitarianism. The Entity also supports initiatives of the local community of Ptuj (e.g. hospital, and support for the Soroptimist Ptuj Club.)
9.8a Conflict-Affected and High-Risk Areas - Strong management systems	Not Applicable	The Criterion is not applicable as the Entity does not directly or indirectly source Bauxite, Alumina or primary Aluminium.
9.8b Conflict-Affected and High-Risk Areas - Identify and assess risks	Not Applicable	The Criterion is not applicable as the Entity does not directly or indirectly source Bauxite, Alumina or primary Aluminium.
9.8c Conflict-Affected and High-Risk Areas - Strategy to respond to risks	Not Applicable	The Criterion is not applicable as the Entity does not directly or indirectly source Bauxite, Alumina or primary Aluminium.
9.8d Conflict-Affected and High-Risk Areas - Audit of due diligence	Not Applicable	The Criterion is not applicable as the Entity does not directly or indirectly source Bauxite, Alumina or primary Aluminium.
9.8e Conflict-Affected and High-Risk Areas - Report annually	Not Applicable	The Criterion is not applicable as the Entity does not directly or indirectly source Bauxite, Alumina or primary Aluminium.
9.9 Security practice	Conformance	The Entity's security requirements are provided by an external provider (Vargas AI) which is a subsidiary of the Talum Group. The Entity's agreement with this provider outlines a clear definition of rights and

CRITERION	RATING	COMMENT
		duties of the security company. The contract is based on the Slovenian law for security companies.
10. LABOUR RIGHTS		
10.1a-c Freedom of Association and Right to Collective Bargaining	Conformance	The Entity has implemented the Talum Group Policy, which addresses the support of its employees' right of to Freedom of Association and Collective Bargaining and the regular cooperation with Union representatives, Workers' council and employees' council: https://www.talum.si/en/strategija.html#politika A Collective Bargaining Agreement between the Entity and the Trade Union of the Metal and Electrical Industry of Slovenia (SKEI) is in place and regulates the main elements of working conditions and contracts.
10.1d Freedom of Association and Right to Collective Bargaining - Alternative means in context of Applicable Law	Not Applicable	This Criterion is not applicable, as the Entity does not operate in a country that restricts the right to Freedom of Association and Collective Bargaining.
10.2a-c Child Labour	Conformance	The Entity has implemented its Code of Conduct, which addresses its zero-tolerance position on Child Labour, and requests its suppliers to also comply. The Code of Conduct is communicated on the website: https://www.talum.si/en/strategija.html#politika
10.3a-c Forced Labour	Conformance	The Entity has implemented the Talum Group Sustainability Policy, which addresses its commitment to international standards and that it does not tolerate any form of Slavery, Forced Labour or Human Trafficking: https://www.talum.si/pdf/politika/POLITIKA%20ST%202023_ANG%20A4_ FIN%204.7.2023.pdf
		The Entity requests the same from its business partners in the binding Code of Ethics for Business Partners, that they do not allow Slavery and comply with Applicable Laws and regulations regarding the prohibition of Forced Labour and Human Trafficking.
		The Entity publishes an annual Modern Slavery Statement detailing its actions to combat Modern Slavery: <u>https://talum.si/en/integriteta.html</u>
10.4a-c Non-Discrimination	Conformance	The Entity has implemented the Talum Group Policy, which addresses the provision of a fair attitude towards employees, and strives for an inclusive workplace culture and does not condone any form of Harassment or Discrimination: https://www.talum.si/en/strategija.html#politika
		The Entity requests the same from its business partners in the binding Code of Ethics for Business Partners.
10.5 Communication and engagement	Conformance	The Entity has implemented the Talum Group Policy, which addresses the support of its employees' right of to Freedom of Association and Collective Bargaining and the regular cooperation with Union representatives, Workers' council and employees' council: https://www.talum.si/en/strategija.html#politika The Entity has established direct, internal communication channels.
		The approach towards syndicates, the Workers' council and employees' council is communicated on the website:

CRITERION	RATING	COMMENT
		https://www.talum.si/en/sindikat.html
10.6a-g Violence and Harassment	Conformance	The Entity has implemented the Talum Group Policy, which addresses the fair attitude towards employees, and strives for an inclusive workplace culture and does not condone any form of Violence or Harassment: https://www.talum.si/en/strategija.html#politika All employees have the right and obligation to be fair, open and
		respectful in relation to colleagues, superiors and subordinates. The Entity requests from its business partners that they also establish an inclusive workplace culture and does not condone any form of Harassment in the binding Code of Ethics for Business Partners.
10.7a-c Remuneration	Conformance	The Entity has a Collective Bargaining Agreement with the Trade Union of the Metal and Electrical Industry of Slovenia (SKEI) that regulates the main elements of working conditions, Remuneration, individual and group performance premiums as well as premiums for Overtime, night shift, and annual leave. All Workers receive written contracts before commencing work that described the conditions of the work they perform. All wages are documented and paid directly to employees' bank account in a timely manner.
10.8a-c Working Time	Conformance	The Entity has a Collective Bargaining Agreement with the Trade Union of the Metal and Electrical Industry of Slovenia (SKEI) that regulates working conditions including the working hours, shift system, time off, work on public holidays and days off, and annual leave. Normal full- time work is 40 hours per week with two days off at the weekend.
10.9a-b Informing Workers of Rights	Conformance	The Entity has a Collective Bargaining Agreement with the Trade Union of the Metal and Electrical Industry of Slovenia (SKEI) that regulates all conditions of the work. Workers can access this information also on the Entity's intranet and have access to the Union and the Workers' council and employees' council.
11. OCCUPATIONAL HEALTH A	ND SAFETY	
11.1a Occupational Health and Safety (OH&S) Management System	Conformance	The Entity has established an Occupational Health and Safety (OH&S) Management System according to ISO 45001, which is integrated in the Entity's Management System. The Entity has implemented the Talum Group Policy, which includes the Health and Safety Policy. The Entity's Health and Safety targets are defined and reviewed in the regular Safety Committee meetings and the annual management review.
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Minor Non- Conformance	The Entity has established an OH&S Management System according to ISO 45001, which is integrated in the Entity's Management System. The Entity's OH&S Management System is reviewed at least annually during the integrated management review, or as required due to changes. In addition to Health and Safety Committee meetings, internal audit reviews are undertaken. Information of the HSE Management system is publicly disclosed in the Sustainability Report 2023, page 90 at: https://talum.si/en/trajnost.html
		Whilst information of the HSE Management system is publicly disclosed, no leading and lagging indicators and Comparative

CRITERION	RATING	COMMENT
		analyses of performance with peer Businesses and leading practice is publicly disclosed.
11.2 Employee engagement on Health and Safety	Conformance	The Entity's Health and Safety Committee meetings are held twice a year, where Workers can raise, discuss and participate in the resolution of Occupational Health and Safety issues with management. The Workers' council was elected and represents the Workers in Health and Safety issues.

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### DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	20 November 2023	Initial Certification Audit – Provisional Certification
1	24 April 2025	Surveillance Audit and Scope Change – Provisional Certification. Scope Change to remove 'Aluminium Smelting' as a Supply Chain Activity.