

ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

ALUMAN S.A.

CERTIFICATE NUMBER
303

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

DATE OF ISSUE
18 JULY 2023

CERTIFICATION
LEVEL
**FULL
CERTIFICATION**

DATE OF EXPIRY
17 JULY 2026

ASI ACCREDITED
AUDITING FIRM
EUROCERT S.A.

CERTIFIED SINCE
18 JULY 2023

AUTHORISED BY

A handwritten signature in black ink, appearing to be 'J. H.', followed by a long horizontal line.

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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 ALUMAN S.A. facility in Oinofyta, Greece, including its Casthouse, Hot Rolling, Cold Rolling, Blanking, Annealing, Surface treatment and Packaging activities, and the corporate headquarters in Athens, Greece.

AUDIT REPORT

PERFORMANCE

STANDARD

OVERVIEW

MEMBER NAME	ALUMAN S.A.
ENTITY NAME	ALUMAN S.A.
CERTIFICATION SCOPE	The ALUMAN S.A. facility in Oinofyta, Greece, including its Casthouse, Hot Rolling, Cold Rolling, Blanking, Annealing, Surface treatment and Packaging activities, and the corporate headquarters in Athens, Greece.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthousesSemi-Fabrication
ASI STANDARD	Performance Standard V3
AUDIT TYPE	<ul style="list-style-type: none">Initial Certification Audit (24 – 27 April 2023)Surveillance Audit (4 – 5 December 2024)
AUDIT FIRM	EUROCERT S.A.
AUDIT DATE	<ul style="list-style-type: none">24 – 27 April 2023 (Initial Certification Audit)4 – 5 December 2024 (Surveillance Audit)
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">22 June 2023 (Initial Certification Audit)28 January 2025 (Surveillance Audit)
AUDIT SCOPE	<p><u>Initial Certification Audit (24 – 27 April 2023)</u></p> <p>The Audit Scope covers ALUMAN's Oinofyta Aluminium Slugs and Discs Plant (Greece).</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthousesSemi-Fabrication <p>All applicable criteria in the ASI Performance Standard were included in the Audit Scope.</p> <p><u>Surveillance Audit (4 – 5 December 2024)</u></p> <p>The Audit Scope covers ALUMAN's Oinofyta Aluminium Slugs and Discs Plant and Headquarters located in Athens.</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthousesSemi-Fabrication <p>All applicable criteria in the ASI Performance Standard were included in the Audit Scope.</p>

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

18 July 2023 – 17 July 2026

NEXT AUDIT TYPE

Re-Certification Audit

NEXT AUDIT DATE

17 July 2026

CERTIFICATE NUMBER

303



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

ALUMAN S.A. (the ‘Entity’) is situated in the industrial area of Oinofyta, 50 kilometres north of Athens (Greece) where the manufacturing facility satisfies European and international standards. The Entity has been certified against various ISO standards including ISO 9001, ISO 14001, ISO 45001 and ISO 50001.

Activities at the Oinofyta facility include casthouse, hot rolling, cold rolling, blanking, annealing, surface treatment and packaging activities. The corporate headquarters is located in Athens. The Entity is a family-owned business producing Aluminium slugs and discs and has been in the Aluminium transformation business since 1965, with an annual production capacity of 35,000 tonnes. The Entity exports 100% of its production.

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	Medium	High	Medium	MEDIUM
RISKS	Medium	Medium	Medium	MEDIUM
PERFORMANCE	Medium	High	Medium	MEDIUM
OVERALL	MEDIUM			

FINDINGS

CRITERION	RATING	COMMENT
1. BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity has implemented processes to monitor and ensure Compliance with all Applicable Law and legal requirements. A registry of Compliance obligations per topic has been established and is maintained, while periodic evaluations of Compliance are conducted.
1.2 Anti-Corruption	Conformance	<p>The Entity has implemented a system to work against Corruption in all its forms that is adequate for its size and nature and consistent with the relevant Applicable Law. The Entity has implemented a Code of Conduct that addresses business ethics and anti-Corruption Policies, which has been communicated internally and externally: https://www.aluman.gr/sustainability/our-sustainable-commitment-ethics-and-sustainability</p> <p>The Entity has provided training to employees on business ethics and anti-Corruption.</p>
1.3a-e Code of Conduct	Conformance	<p>The Entity has implemented a Code of Conduct and a Supplier Code of Conduct which include principles relevant to environmental, social and governance performance, available at: https://www.aluman.gr/sustainability/our-sustainable-commitment-ethics-and-sustainability</p> <p>The Entity's Policies are reviewed annually through the management review. There is a commitment for both Codes to be reviewed and updated every five years (maximum) and in any case of changes, new risks, or gaps that affect them.</p>
2. POLICY AND MANAGEMENT		
2.1a-f Environmental, Social, and Governance Policy	Conformance	<p>The Entity has implemented its Environment, Health and Safety Policy. Social and governance practices and Policies are addressed in the Entity's Code of Conduct. These documents have been adequately communicated internally and externally via the Entity's website: https://www.aluman.gr/sustainability/our-sustainable-commitment-ethics-and-sustainability</p> <p>In accordance with the Entity's Procedures, the Codes of Conduct and Policies are subject to review annually and updated at least every five years and in any case of significant changes, new risks or gaps in environmental, social and governance management. The Entity's Policies are reviewed annually through the management review.</p>
2.2a-c Leadership	Conformance	The Entity has nominated the Chief Executive Office (CEO) as the senior Management Representative to lead the implementation and communication of the environmental, social and governance Policies. Furthermore, it has appointed the Plant Manager as the senior Management Representative for the application of the ASI Performance Standard at the operational level. Resources (including training) are budgeted and allocated for on an annual basis.
2.3a Environmental and Social Management Systems – Environmental	Conformance	The Entity has implemented and certified an Integrated Management System that addresses the ASI Standards, quality, environmental, energy and occupational health and safety requirements. Certificates for ISO 9001, ISO 14001, ISO 45001 and ISO 50001 are publicly available:

CRITERION	RATING	COMMENT
		https://www.aluman.gr/about-us/certifications
2.3b Environmental and Social Management Systems – Social	Conformance	The Entity has established a Social Management System that addresses the requirements of the ASI Performance Standard, which is adequate for the size and nature of its activities. The documented Social Management System includes social Policies, Procedures, and records.
2.4a-e Responsible Sourcing	Conformance	<p>The Entity has implemented a Supplier Code of Conduct, which includes Policies for responsible sourcing and addresses environmental, social and governance issues. The Supplier Code of Conduct is publicly available at:</p> <p>https://www.aluman.gr/sustainability/our-sustainable-commitment-ethics-and-sustainability</p> <p>The Entity has provided every current supplier with the Supplier Code of Conduct and requires the completion of an evaluation questionnaire. Information collected is screened and further action is undertaken as necessary.</p>
2.5a-g Environmental and Social Impact Assessments	Not Applicable	This Criterion is not applicable as no new Projects or Major Changes to existing Facilities have occurred since joining ASI.
2.6a-h Human Rights Impact Assessment	Not Applicable	This Criterion is not applicable as no new Projects or Major Changes to existing Facilities have occurred since joining ASI.
2.7a-f Emergency Response Plan	Conformance	<p>The Entity has implemented an Emergency Response Plan with the involvement of the employees, neighbouring factories and according to the requirements of local authorities. The effectiveness of the Emergency Response Plan is tested regularly. The Entity has publicly disclosed the latest version of its Emergency Response Plans:</p> <p>https://www.aluman.gr/emergency-response-plan</p>
2.8a-d Suspended Operations	Conformance	The Entity has developed a formal internal process for reviewing environmental, social and governance issues in the planning process for suspended operations.
2.9a-b Mergers and Acquisitions	Conformance	The Entity has developed a formal internal process for reviewing environmental, social and governance issues in the planning process for mergers and acquisitions. There have not been any mergers or acquisitions in the past or are likely in the foreseeable future.
2.10a-b Closure, Decommissioning and Divestment	Conformance	The Entity has developed a formal internal process for reviewing environmental, social and governance issues in the planning process for closure, decommissioning and divestment. There have not been any cases of closure, decommissioning or divestment in the past or are likely in the foreseeable future.
3. TRANSPARENCY		
3.1a-b Sustainability Reporting	Conformance	The Entity has publicly disclosed its Sustainability Report 2023, which includes its governance approach to environmental, social and economic impacts and its Material environmental, social and economic impacts:

CRITERION	RATING	COMMENT
		https://www.aluman.gr/wp-content/uploads/2025/01/ALUMAN-SA-SUSTANABILITY-REPORT-2023-v1-10.01.2025.pdf
3.2 Non-compliance and Liabilities	Conformance	<p>The Entity has publicly disclosed information on Material fines, judgments, penalties and non-monetary sanctions for failure to comply with Applicable Law in its Sustainability Report. There are no such cases as referred to in the Sustainability Report 2023, refer to GRI 205-3, 206-1, 307-1, and 419-1:</p> <p>https://www.aluman.gr/wp-content/uploads/2025/01/ALUMAN-SA-SUSTANABILITY-REPORT-2023-v1-10.01.2025.pdf</p>
3.3a-c Payments to Governments	Conformance	<p>The Entity has declared in the Sustainability Report 2023 that it makes payments to Government on a legal basis only. No financial and in-kind political contributions, whether made directly or through an intermediary, have been made. The Entity also declares that no payments have been made to political parties or any other type of payments on a contractual basis. The total amount of payments to the government is declared in its Sustainability Report 2023, refer to GRI 415-1 on page 93:</p> <p>https://www.aluman.gr/wp-content/uploads/2025/01/ALUMAN-SA-SUSTANABILITY-REPORT-2023-v1-10.01.2025.pdf</p>
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	<p>The Entity has developed and implemented Policies and documented processes that are appropriate to complaints, grievances, and Stakeholder requests for information. Complaints, grievances, and Stakeholder requests and concerns may be reported in writing (anonymously or by name) via the Entity's details outlined on the website, via a dedicated form, verbally directly to the Human Resources (HR) Manager or via the 'black box' at the Entity's premises. An investigation committee, consisting of the HR Manager, Plant Manager and the relevant Head of Department, conducts the investigation. Further information is available at:</p> <p>https://www.aluman.gr/our-commitment-to-transparency-and-accountability</p>
4. MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment	Conformance	The Entity has conducted a Life Cycle Assessment (LCA) of Aluminium slugs and discs, which is aligned with ISO 14040:2006 and ISO 14044:2006 standards.
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	<p>The Entity has conducted an LCA for its Aluminium Products, which is aligned with ISO 14040:2006 and ISO 14044:2006 standards. A detailed version of the LCA is available to customers upon request, as described in a relevant procedure, and a summary of the LCA is publicly available on the website:</p> <p>https://www.aluman.gr/life-cycle-assessment</p>
4.2 Product Design	Not Applicable	This Criterion is not applicable, as the Entity is not involved in the design and development process of Products or components of the end Product. Aluminium slugs and discs are formulated in size and shape as per customer request without a design and development process.
4.3a-b Aluminium Process Scrap	Conformance	The Entity is committed to minimising the generation of Aluminium Process Scrap within its own operations and where generated, targets

CRITERION	RATING	COMMENT
		100% of internal Scrap for collection and recycling. The collection of Aluminium Scrap is segregated by alloy and grade. The target of 100% of internal Scrap for recycling has been achieved for the years 2021, 2022 and 2023.
4.4a-c Collection and Recycling of Products at End of Life – Material Conversion and other Manufacturing	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.4d Collection and Recycling of Products at End of Life	Conformance	<p>The Entity purchases standard quality recycled Scrap (Post-Consumer printing press sheets and wire scrap and Pre-Consumer customer scrap), which are used in the production process. Internal Aluminium Scrap is 100% recycled.</p> <p>The Entity has initiated efforts with parties related to local, regional/national collection and recycling systems to support efforts to increase recycling rates in their respective markets for its Products (slugs and discs).</p>
5. GREENHOUSE GAS EMISSIONS		
5.1a-b Disclosure of GHG Emissions and Energy Use	Conformance	<p>The Entity has accounted for its Greenhouse Gas (GHG) emissions and prepares annual GHG emissions reporting according to ISO 14064-1: 2019 and the Greenhouse Gas Protocol. The Entity's GHG emissions are verified by an accredited verification body. GHG emissions data, including Scopes 1, 2 and 3 are publicly disclosed in the Entity's Sustainability Report 2023, pages 59 to 62: https://www.aluman.gr/wp-content/uploads/2025/01/ALUMAN-SA-SUSTANABILITY-REPORT-2023-v1-10.01.2025.pdf</p> <p>The Entity's energy use data are publicly disclosed in the Sustainability Report 2023, pages 49-51.</p>
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	Minor Non-Conformance	<p>The Entity has established a GHG Emissions Reduction Plan to reduce GHG emissions addressing both Direct and Indirect GHG emissions sources to achieve its targets. The GHG Emissions Reduction Pathway is consistent with a 1.5°C warming scenario and reduction targets are established and based on a 2019 base year. The Entity has publicly disclosed its latest planned targets and actions in the Sustainability Report 2023, refer to GRI 305-5 on pages 64-68: https://www.aluman.gr/wp-content/uploads/2025/01/ALUMAN-SA-SUSTANABILITY-REPORT-2023-v1-10.01.2025.pdf</p> <p>However, at the time of the Audit, the Entity's GHG Emissions Reduction Pathway was not fully aligned with the ASI endorsed methodology.</p>

CRITERION	RATING	COMMENT
5.4 GHG Emissions Management	Conformance	The Entity monitors and quantifies its GHG emissions annually, according to ISO 14064-1: 2018 and the Greenhouse Gas Protocol requirements. The Entity also has a certified Energy Management System, according to ISO 50001:2018. The Entity's Energy and GHG Emissions Management System addresses appropriate operational controls necessary to implement its GHG Emissions Reduction Plan and the established targets.
6. EMISSIONS, EFFLUENTS AND WASTE		
6.1a-f Emissions to Air	Conformance	<p>The Entity's Emissions to Air are regulated according to the Entity's legal permit. An Emission Reduction Plan is incorporated as part of the environmental program.</p> <p>The Entity has publicly disclosed its material Emissions to Air and the plans to minimise the exposure and the impacts of these emission, Emissions to Air from its activities in its Sustainability Report 2023, pages 68-69:</p> <p>https://www.aluman.gr/wp-content/uploads/2025/01/ALUMAN-SA-SUSTANABILITY-REPORT-2023-v1-10.01.2025.pdf</p>
6.2a-g Discharges to Water	Conformance	<p>The Entity does not discharge into any body of water. All liquid waste (sewage, brine from water softeners, bleed-off from cooling towers, and rainfall) is collected and transferred to a licensed facility for treatment. The Entity discloses that it does no discharge in its Sustainability Report, refer to GRI 303-4 on page 56:</p> <p>https://www.aluman.gr/wp-content/uploads/2025/01/ALUMAN-SA-SUSTANABILITY-REPORT-2023-v1-10.01.2025.pdf</p>
6.3a-g Assessment and Management of Spills and Leakages	Conformance	<p>The Entity has assessed the risks associated with Spills and Leakages and has taken measures to prevent such incidents. No actual Spill or Leakage events have occurred at the Entity during the last year. The Entity has publicly disclosed the latest version of its Emergency Response Plans (including Spills and Leakages) on its website:</p> <p>https://www.aluman.gr/emergency-response-plan</p>
6.4a-b Public Disclosure of Spills and Leakages	Conformance	<p>The Entity has established procedures to communicate to affected parties the volume, type, and potential impact of significant Spills immediately after an incident. No Spill incidents occurred during the reporting period. The Entity discloses any significant Spills in its annual Sustainability Report, refer to GRI 306-3 on page 73:</p> <p>https://www.aluman.gr/wp-content/uploads/2025/01/ALUMAN-SA-SUSTANABILITY-REPORT-2023-v1-10.01.2025.pdf</p>
6.5a-c Waste Management and Reporting	Conformance	<p>The Entity has a Waste management procedure, under its ISO 14001 certified Management System, that defines the process for collecting and disposing of Waste. All Hazardous Waste is transferred to qualified and licensed third parties according to legal requirements.</p> <p>The Entity has publicly disclosed on an annual basis, the quantity of Hazardous and Non-Hazardous Waste generated and the associated disposal methods in the Sustainability Report 2023, refer to GRI 306-2 on pages 72-73:</p> <p>https://www.aluman.gr/wp-content/uploads/2025/01/ALUMAN-SA-SUSTANABILITY-REPORT-2023-v1-10.01.2025.pdf</p>
6.6a-g Bauxite Residue	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
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	Aluminium Dross generated by the Entity's manufacturing process is stored in an appropriate location before being sent to a licensed partner for recovery. 100% of the Dross is collected and sent to licensed recycling companies, in accordance with the Entity's environmental permit. Relevant personnel are trained in the handling of Dross according to specified guidelines.
7. WATER STEWARDSHIP		
7.1a-b Water Assessment and Disclosure	Conformance	The Entity has conducted a risk assessment which determined that the water-related risks are low. The Entity is located within a low-water risk area. Although the Entity has no Material water-related risks, it has disclosed its water usage and risks in the Sustainability Report 2023, refer to GRI 303-1, 303-2, 303-3 on pages 55-56: https://www.aluman.gr/wp-content/uploads/2025/01/ALUMAN-SA-SUSTANABILITY-REPORT-2023-v1-10.01.2025.pdf
7.2a-e Water Management	Not Applicable	This Criterion is not applicable to the Entity, as the environmental risk analysis undertaken determined that there are no Material water-related risks, with only a small amount of water used by the production plant. However, the Entity monitors the quantities of consumed water, in accordance with ISO 14001 requirements.
8. BIODIVERSITY AND ECOSYSTEM SERVICES		
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	The Entity has assessed the risk and potential impacts on Biodiversity and Ecosystem Services from land use and activities within its Area of Influence. The risks 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, as the Entity has identified Biodiversity and Ecosystem Services risks and impact from its activities as low.
8.2a-g Biodiversity Management	Not Applicable	This Criterion is not applicable, as the Entity has identified Biodiversity and Ecosystem Services risks and impact from its activities as low. However, the Entity monitors Biodiversity parameters annually and reports to the relevant authorities in accordance with its environmental permits, published on the Ministry of Environment and Energy's website: https://diavgeia.gov.gr/decision/view/45740-%CE%95%CE%A5%CE%96 https://diavgeia.gov.gr/decision/view/7%CE%9D9%CE%99465%CE%A6%CE%98%CE%97-%CE%94%CE%A5
8.3a-c Management of Priority Ecosystem Services	Not Applicable	This Criterion is not applicable, as the Entity does not depend on Priority Ecosystem Services and it is not required to implement measures that increase the resource efficiency of operations. No Affected Populations and Organisations were identified in the Biodiversity assessment.
8.4 Alien Species	Conformance	The Entity has assessed the Alien Species and no high risk has been identified. Pallets from other countries delivered to Greece are marked

CRITERION	RATING	COMMENT
		according to International Standard ISPM 15 (International Standard for Phytosanitary ISPM No.15).
8.5a-b Commitment to “No Go” in World Heritage Properties	Conformance	<p>The Environmental Assessment Study determined that there are no areas of historical, archaeological or cultural interest near the Entity. No World Heritage Properties or cultural and sacred heritage sites are affected by the Entity.</p> <p>The Entity’s Code of Conduct commits the Entity to not interfering with World Heritage Sites and Protected Areas. However, before any new activity is initiated, an environmental permit is issued that addresses any archaeological/cultural/sacred heritage sites.</p>
8.6a-d Protected Areas	Conformance	<p>The Entity does not operate in or near a Protected Area. For further information, refer to the Sustainability Report 2023, GRI 304-1, page 57: https://www.aluman.gr/wp-content/uploads/2025/01/ALUMAN-SA-SUSTANABILITY-REPORT-2023-v1-10.01.2025.pdf</p>
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	<p>The Entity has conducted a Human Rights impact assessment based on the Universal Declaration of Human Rights. Furthermore, it has established a Code of Conduct, based on the UN Guiding Principles on Business and Human Rights, which includes a commitment to respect Human Rights, Workers’ rights, and the avoidance of any form of Discrimination: https://www.aluman.gr/wp-content/uploads/2023/05/Code-of-conduct-engl-v2-20.04.2023-fin.pdf</p> <p>Additionally, the Entity has established an Equality and anti-Violence, Harassment and Discrimination Policy: https://www.aluman.gr/wp-content/uploads/2023/05/POLICY-FOR-FIGHTING-VIOLENCE-HARASSMENT-v1-engl.pdf</p>
9.2a-e Gender Equity and Women’s Empowerment	Conformance	<p>The Entity has developed and implemented Policies, processes and a program to promote gender equity and women’s empowerment in employment practices, training opportunities, awarding of contracts, processes of engagement, and management activities to address barriers to professional development, Discrimination, Violence and Harassment. During the onsite Audit, there were no complaints from female Workers, and no indication of Discrimination against women was observed.</p> <p>The Entity publicly reports on gender diversity indicators, such as the female/male Workers ratio in the Sustainability Report 2023, refer to GRI 401-1, 401-2, 401-3 on pages 79-81: https://www.aluman.gr/wp-content/uploads/2025/01/ALUMAN-SA-SUSTANABILITY-REPORT-2023-v1-10.01.2025.pdf</p>
9.3a-i Indigenous Peoples	Not Applicable	This Criterion is not applicable, as there are no Indigenous Peoples in the Entity areas of influence.

CRITERION	RATING	COMMENT
9.4a Free, Prior, and Informed Consent (FPIC) – New Projects or Major Changes	Not Applicable	This Criterion is not applicable, as there are no Indigenous Peoples in the Entity areas 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 in the Entity areas of influence.
9.5a Cultural and Sacred Heritage – Identification	Conformance	<p>There are no cultural or sacred heritage sites affected by the Entity. Furthermore, there are no Indigenous Peoples situated within the Entity's Area of Influence.</p> <p>The Entity's Code of Conduct commits the Entity to not interfering with World Heritage Sites and Protected Areas. However, before any new activity is initiated, an environmental permit is issued that addresses any archaeological/cultural/sacred heritage sites. This commitment is also examined by the Archaeological Service in order to issue the Environmental Permit.</p>
9.5b Cultural and Sacred Heritage – Impacts	Not Applicable	This Criterion is not applicable, as there are no cultural or sacred heritage sites affected by the Entity. Furthermore, there are no Indigenous Peoples situated in the Entity's Area of Influence.
9.6a-i Displacement	Not Applicable	This Criterion is not applicable, as there have been no New Projects and Major Changes initiated since the Entity joined ASI and there is no history of physical displacement.
9.7a-h Affected Populations and Organisations	Conformance	<p>The Entity has demonstrated there are no issues with Local Communities and therefore no need for any action. The Entity regularly contacts the local authorities and the Local Community. The interest and impacts of potentially affected groups have been mapped and described in the Sustainability Report 2023, refer to GRI 2-29 and GRI 3-1 on pages 30-32:</p> <p>https://www.aluman.gr/wp-content/uploads/2025/01/ALUMAN-SA-SUSTANABILITY-REPORT-2023-v1-10.01.2025.pdf</p>
9.8a Conflict-Affected and High-Risk Areas – Strong Management Systems	Conformance	<p>The Entity has implemented its Supplier Code of Conduct, which includes a commitment to avoid direct or indirect involvement in armed conflicts according to OECD Guidance, available at: https://www.aluman.gr/wp-content/uploads/2023/05/SUPPLIER-CODE-OF-CONTACT-ENG-v3-20.4.2023-1.pdf</p> <p>The Entity has issued evaluation questionnaires to all suppliers related to Aluminium trading and production requesting information on environmental, social and governance (ESG) issues and encouraging them to implement ESG Management Systems. None of the raw materials used by the Entity in its production are obtained through Conflict-Affected and High-Risk Areas (CAHRAs).</p>

CRITERION	RATING	COMMENT
9.8b Conflict-Affected and High-Risk Areas - Identify and assess risks	Conformance	The Entity has implemented a process to ensure that the main raw materials do not originate from areas of armed conflict or Human Rights abuses. All current or potential suppliers are systematically screened by the Entity's procurement system in accordance with the OECD Due Diligence Guidance. The Entity's assessment did not identify any actual or potential risks.
9.8c Conflict-Affected and High-Risk Areas - Strategy to respond to risks	Not Applicable	This Criterion is not applicable, as the Entity's assessment has not identified any actual or potential risks.
9.8d Conflict-Affected and High-Risk Areas - Audit of due diligence	Conformance	<p>A risk-based Due Diligence process over the Entity's Aluminium supply chain is applied by the Entity on an annual basis, in accordance with the OECD Due Diligence Guidance. The Entity's assessment did not identify any actual or potential risks.</p> <p>The Entity's Due Diligence practices were audited as part of this Audit as a requirement for an independent third-party audit.</p>
9.8e Conflict-Affected and High-Risk Areas - Report annually	Conformance	<p>The Entity annually reports its supply chain risks, practices and incidents via its Sustainability Report 2023, refer to GRI 301-2 on page 47:</p> <p>https://www.aluman.gr/wp-content/uploads/2025/01/ALUMAN-SA-SUSTANABILITY-REPORT-2023-v1-10.01.2025.pdf</p> <p>The Entity's assessment did not identify any actual or potential risks.</p>
9.9 Security practice	Conformance	The Entity has conducted a Human Rights risk assessment of the existing security practices. The contract with the security provider that guards the Entity's premises is in accordance with local laws and records on training and certification of the security personnel are maintained.
10. LABOUR RIGHTS		
10.1a-c Freedom of Association and Right to Collective Bargaining	Conformance	The Entity respects the rights of Workers to form or join Labour Unions or other Associations to Collective Bargain within the bounds of Applicable Law, as mentioned in the Entity's Code of Conduct. A Workers' Committee consisting of three members was freely elected by the Workers, however, it focuses on Occupational Health and Safety issues. According to the representatives of this Committee, the employees do not wish to establish a Union or a Collective Bargaining Agreement.
10.1d Freedom of Association and Right to Collective Bargaining - Alternative means in context of Applicable Law	Not Applicable	This Criterion is not applicable, as the Entity operates in Greece where Applicable Law permits the right to Freedom of Association and Collective Bargaining.
10.2a Child Labour	Conformance	The Entity has implemented practices in order to ensure that all employees are at least 18 years old. The youngest employee is just over 18 years old.
10.3a-c Forced Labour	Conformance	The Entity's Code of Conduct prohibits the use of compulsory or Forced Labour. It also explicitly prohibits the involvement or support of

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		<p>any act of Human Trafficking, fully complying with laws against Human Trafficking and modern slavery, and does not work with companies that support these practices. The Code of Conduct is publicly available at: https://www.aluman.gr/sustainability/our-sustainable-commitment-ethics-and-sustainability</p> <p>The Entity has publicly disclosed a dedicated Modern Slavery Statement, available at: https://www.aluman.gr/wp-content/uploads/2025/03/Modern-Slavery-Statement.pdf</p>
10.4a-c Non-Discrimination	Conformance	<p>The Entity promotes a culture of non-Discrimination in the hiring, salary, promotion and training process, which is expressed via its Code of Conduct, the Internal Labour Regulation and the applied procedures. All these documents ensure equal opportunities without Discrimination. There were no incidents of Discrimination during 2023. Further information is available on the Sustainability Report 2023, refer to GRI 406-1 on page 91: https://www.aluman.gr/wp-content/uploads/2025/01/ALUMAN-SA-SUSTANABILITY-REPORT-2023-v1-10.01.2025.pdf</p>
10.5 Communication and engagement	Conformance	<p>The Entity has established processes of open communication and direct engagement with Workers and their representatives regarding working conditions and the resolution of workplace and compensation issues, without the threat of reprisal, intimidation, or violence and harassment. The Entity engages with the employees and their representatives via monthly meetings, or in any case of emerged issues. Records relating to communication and engagement are maintained.</p>
10.6a-g Violence and Harassment	Conformance	<p>The Entity, in consultation with the Workers and their representatives, has established a Policy against Violence and Harassment, as part of its Occupational Health and Safety Management System: https://www.aluman.gr/wp-content/uploads/2023/05/POLICY-FOR-FIGHTING-VIOLENCE-HARASSMENT-v1-engl.pdf</p> <p>The Entity has established appropriate channels of communication for employees to declare any incidents of Violence and Harassment. No incidents have been reported to date. Training of employees is undertaken and training records are maintained.</p> <p>The Entity's Code of Conduct and Policies are reviewed annually and updated at least every five years.</p>
10.7a-c Remuneration	Conformance	<p>The Entity respects the rights of Workers to a living wage and remuneration is addressed in compliance with the relevant Applicable Law. Wage payments are made by the Entity to employees' nominated bank account. Interviewed Workers confirmed that payments are on time, in full and that they understand the details stated on their payslips.</p> <p>The Entity pays a premium equivalent of 20% for work that exceeds 40 hours per week, as defined by local legislation.</p>
10.8a-c Working Time	Conformance	<p>Working Time is recorded electronically by the Entity, and working hours comply with local laws. Shift Workers have at a minimum, an average of one day off per seven-day period and it is ensured the</p>

CRITERION	RATING	COMMENT
		workday is 8 hours on average over a six-month period. Records relating to Working Time are maintained and up to date.
10.9a-b Informing Workers of Rights	Conformance	The Entity informs employees of their rights in a number of ways, including the Internal Labour Regulation, announcements on notice boards, training, and through the Employees' Committee and its meetings.
11. OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Management System	Conformance	The Entity has implemented and certified an Occupational Health and Safety (OH&S) Management System applicable to all Workers and Visitors. The Entity holds a valid ISO 45001:2018 certification: https://www.aluman.gr/about-us/certifications
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Conformance	<p>The Entity's OH&S Management System is certified by an accredited certification body. Additionally, the Entity annually performs internal audits and a management review that addresses all risks and control gaps. Further information on OH&S performance is available in the Sustainability Report 2023, pages 84-87: https://www.aluman.gr/wp-content/uploads/2025/01/ALUMAN-SA-SUSTANABILITY-REPORT-2023-v1-10.01.2025.pdf</p> <p>However, comparative analyses of performance with peer Businesses and leading practices are limited as there are no publicly available OH&S statistical data for similar local plants.</p>
11.2 Employee engagement on Health and Safety	Conformance	The Employees' OH&S Committee meetings are held at least four times per year. In accordance with relevant legislation and the requirements of its certified ISO 45001:2018 Management System, the Entity's management works with the Employees' OH&S Committee where employees can raise, discuss, and participate in solving OH&S issues.

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DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	18 July 2023	Initial Certification Audit – Full Certification
1	2 May 2025	Surveillance Audit