

# ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

# AS METAL COM SRL

CERTIFICATE NUMBER  
**368**

ASI STANDARD  
**PERFORMANCE  
STANDARD  
(V3.1 2023)**

CERTIFICATION LEVEL  
**FULL  
CERTIFICATION**

ASI ACCREDITED  
AUDITING FIRM  
**BUREAU VERITAS  
CERTIFICATION**

DATE OF ISSUE  
**10 JULY 2024**

DATE OF EXPIRY  
**9 JULY 2027**

CERTIFIED SINCE  
**10 JULY 2024**

## AUTHORISED BY

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

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*Validity of this Certificate is subject to  
continued conformance with the  
applicable ASI Standard and can be  
verified at  
[www.aluminium-stewardship.org](http://www.aluminium-stewardship.org)*

## CERTIFICATION SCOPE

Recycling of Aluminium Scrap for  
the manufacture and supply of  
secondary Aluminium alloys cast in  
ingots and hemispheres for the  
automotive, household appliance  
and steel industries in Bucharest,  
Romania.

# AUDIT REPORT PERFORMANCE STANDARD

## OVERVIEW

MEMBER NAME	AS METAL COM SRL
ENTITY NAME	AS METAL COM SRL
CERTIFICATION SCOPE	Recycling of Aluminium Scrap for the manufacture and supply of secondary Aluminium alloys cast in ingots and hemispheres for the automotive, household appliance and steel industries in Bucharest, Romania.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none"><li>Aluminium Re-melting/Refining</li><li>Casthouses</li></ul>
ASI STANDARD	<ul style="list-style-type: none"><li>Performance Standard V3.1</li></ul>
AUDIT TYPE	<ul style="list-style-type: none"><li>Initial Certification Audit (15 – 16 January 2024)</li><li>Surveillance Audit (30 June 2025)</li></ul>
AUDIT FIRM	Bureau Veritas Certification
AUDIT DATE	<ul style="list-style-type: none"><li>15 – 16 January 2024 (Initial Certification Audit)</li><li>30 June 2025 (Surveillance Audit)</li></ul>
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none"><li>7 March 2024 (Initial Certification Audit)</li><li>11 August 2025 (Surveillance Audit)</li></ul>
AUDIT SCOPE	<p><u>Initial Certification Audit (15 – 16 January 2024)</u></p> <p>The Audit Scope included the recycling of Aluminium Scrap for the manufacture and supply of secondary Aluminium alloys cast in ingots and hemispheres at the AS METAL COM SRL site in Bucharest, Romania.</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></ul> <p>All relevant criteria in the ASI Performance Standard were included in the Audit Scope.</p> <p><u>Surveillance Audit (30 June 2025)</u></p> <p>The Audit Scope included the recycling of Aluminium Scrap for the manufacture and supply of secondary Aluminium alloys cast in ingots and hemispheres at the AS METAL COM SRL site in Bucharest, Romania.</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></ul> <p>All relevant criteria in the ASI Performance Standard were included in the Audit Scope.</p>

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AUDIT OUTCOME

- Certification

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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

10 July 2024 – 9 July 2027

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NEXT AUDIT TYPE

Re-Certification Audit

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NEXT AUDIT DATE

9 July 2027

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CERTIFICATE NUMBER

368



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

AS METAL COM SRL (the 'Entity') commenced operations in 1993 in an industrial area in Bucharest, Romania. The Entity recycles Aluminium and supplies secondary raw materials for the automotive, steel, construction and consumer goods sectors. The Entity supplies national and regional markets and produces approximately 17,000 tonnes per year of secondary Aluminium alloy cast in ingots and hemispheres.

The site, which covers an area of approximately 34,000 square metres (m<sup>2</sup>), is divided into two production sections to separate the processing of Aluminium Scrap from the production of secondary products. The first production section includes operations to store, process and sort Aluminium Scrap. The second section includes a waste storage area, warehouses for finished products, spare parts and fuels/oils, maintenance workshops, laboratories and management offices.

The site is located approximately five kilometres (km) from the nearest watercourse, one km from residential areas and over 2 km from educational facilities. The Entity's key external Stakeholders include National authorities (Bucharest Environmental Protection Agency, National Environmental Protection Agency, Environmental Guard, Bucharest Territorial Labor Inspectorate, and National Tax Administration Agency), the community, shareholders, and Non-Government Organisations (NGOs). There are currently over 100 Workers, including 38 women at the Entity.

## 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>	High	High	High	HIGH
<b>RISKS</b>	High	High	High	HIGH
<b>PERFORMANCE</b>	High	High	High	HIGH
<b>OVERALL</b>	HIGH			

## FINDINGS

CRITERION	RATING	COMMENT
<b>1. BUSINESS INTEGRITY</b>		
1.1 Legal Compliance	Conformance	The Entity has implemented a Management System, based on local law which ensures Compliance with Applicable Law. The Entity has implemented a Procedure to review and update the legal requirements related to environment, health and safety, labour-related law and financial matters. Internal audits have been performed by a specialised consultant for health and safety and environmental matters. External consultants have provided updates on legal requirements.
1.2 Anti-Corruption	Conformance	<p>The Entity has implemented a Management System, based on local law which ensures Compliance with Applicable Law that includes anti-Corruption. The Entity's Code of Ethics is publicly available at: <a href="https://asmetal.ro/wp-content/uploads/2023/04/3.-Politica-anti-mita.doc.pdf">https://asmetal.ro/wp-content/uploads/2023/04/3.-Politica-anti-mita.doc.pdf</a></p> <p>There is no evidence of sanctions related to Bribery and Corruption.</p>
1.3a-e Code of Conduct	Conformance	<p>The Entity has implemented a Code of Conduct and training on the Code is delivered to all Workers. The Code is available for all interested parties at:</p> <p><a href="https://asmetal.ro/wp-content/uploads/2023/04/1.-COD-DE-CONDUITA-SI-DE-ETICA.docx.pdf">https://asmetal.ro/wp-content/uploads/2023/04/1.-COD-DE-CONDUITA-SI-DE-ETICA.docx.pdf</a></p>
<b>2. POLICY AND MANAGEMENT</b>		
2.1a-f Environmental, Social, and Governance Policy	Conformance	<p>The Entity has implemented an integrated Policy consistent with the environmental, social and governance (ESG) requirements of the ASI Performance Standard:</p> <p><a href="https://asmetal.ro/wp-content/uploads/2025/06/5.-POLITICA-INTEGRATA-CALITATE-MEDIU-SSM.pdf">https://asmetal.ro/wp-content/uploads/2025/06/5.-POLITICA-INTEGRATA-CALITATE-MEDIU-SSM.pdf</a></p>
2.2a-c Leadership	Conformance	The Entity has appointed the senior managers as Management Representatives to ensure Conformance with the ASI Performance Standard and the provision of necessary resources.
2.3a Environmental and Social Management Systems – Environmental	Conformance	<p>The Entity has implemented an ISO 14001 certified Management System. The Certificate and relevant Policies are available at:</p> <p><a href="https://asmetal.ro/sustenabilitate-2">https://asmetal.ro/sustenabilitate-2</a></p>
2.3b Environmental and Social Management Systems – Social	Conformance	<p>The Entity has implemented and documented an Occupational Health and Safety Management System, certified to ISO 45001:2018. The Certificate and relevant Policies are available at:</p> <p><a href="https://asmetal.ro/sustenabilitate-2">https://asmetal.ro/sustenabilitate-2</a></p> <p>The Entity's Social Management System addresses labour relations as regulated by local laws on the Labour Code and other specific national regulations. Employees undertake training and are provided with the Collective Labour Agreement, Internal Regulations, Individual Labour Agreement, and job descriptions.</p>
2.4a-e Responsible Sourcing	Conformance	The Entity has implemented Procedures for the qualification of suppliers under its Management Systems for ISO 9001, ISO 14001; ISO 45001 and the ASI Standards. The Entity has also undertaken a supplier

CRITERION	RATING	COMMENT
		risk assessment. Suppliers are informed of the integrated Policy and Code of Ethics and are required to complete Supplier Evaluation Forms.
2.5a-g Environmental and Social Impact Assessments	Not Applicable	This Criterion is not applicable to the Entity, as it has not implemented a New Project or Major Change that would require a related Impact Assessment. The Entity has implemented procedures that address environmental, social, cultural, gender and overall Human Rights Impact Assessments. There are no Major Changes planned for the next years.
2.6a-h Human Rights Impact Assessment	Not Applicable	This Criterion is not applicable to the Entity, as it has not implemented a New Project or Major Change that would require a related Impact Assessment.
2.7a-f Emergency Response Plan	Conformance	The Entity has developed an Emergency Response Plan in accordance with its Environmental Management System. The Emergency Response Plan is available on the Entity's website at: <a href="https://asmetal.ro/sustenabilitate-2/">https://asmetal.ro/sustenabilitate-2/</a>
2.8a-d Suspended Operations	Conformance	In the case of suspended operations due to factors beyond the Entity's control, the General Manager is responsible for convening an extraordinary review meeting under the Management Review Procedure, in which all actions are planned in order to restart operations.
2.9a-b Mergers and Acquisitions	Conformance	The Entity has a process for assessing potential risks, including ESG risks. However, no mergers or acquisitions are planned.
2.10a-b Closure, Decommissioning and Divestment	Conformance	The process for managing closure, decommissioning or divestment is set out in the Entity's Closure Plan and takes into account environmental aspects. The social aspects of such a situation will be addressed in accordance with Romanian labour legislation (Labour Code and unemployment law).
<b>3. TRANSPARENCY</b>		
3.1a-b Sustainability Reporting	Conformance	The Entity has produced a publicly available Sustainability Report and discloses its environmental, social, health and safety impacts, available at: <a href="https://asmetal.ro/sustenabilitate-2/">https://asmetal.ro/sustenabilitate-2</a>
3.2 Non-compliance and Liabilities	Conformance	The Entity has not been fined, penalised or sanctioned by any supervisory authority over the last three years, as disclosed in the Sustainability Report: <a href="https://asmetal.ro/wp-content/uploads/2025/07/RAPORT-DE-SUSTENABILITATE-20232024-FINAL-ENG.pdf">https://asmetal.ro/wp-content/uploads/2025/07/RAPORT-DE-SUSTENABILITATE-20232024-FINAL-ENG.pdf</a>
3.3a-c Payments to Governments	Not Applicable	This Criterion is not applicable to the Entity, as payments to governments do not occur. The Entity complies with Romanian tax law and European regulations and undergoes an audit according to European standards on tax reporting. Financial statements are certified and published on the website of the Ministry of Finance. The Entity does not make political donations or sponsorships.

CRITERION	RATING	COMMENT
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	The Entity has developed documentation for the protection of whistleblowers in the public interest, in accordance with Romanian legislation, which regulates the system for reporting irregularities. The Public Interest Whistleblowing Policy and associated form is available at: <a href="https://asmetal.ro">https://asmetal.ro</a>
<b>4. MATERIAL STEWARDSHIP</b>		
4.1a Environmental Life Cycle Assessment	Conformance	The Entity has assessed the life cycle impacts of its Products and prepared a Life Cycle Assessment (LCA), which is described in the Sustainability Report, available at: <a href="https://asmetal.ro/sustenabilitate-2">https://asmetal.ro/sustenabilitate-2</a>
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	The Entity has prepared LCA studies that meet the requirements of the ASI Performance Standard criteria. These are publicly available at: <a href="https://asmetal.ro">https://asmetal.ro</a>
4.2 Product Design	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.3a-b Aluminium Process Scrap	Conformance	In order to minimise the generation of Scrap from its activities, the Entity has implemented a working Scrap management procedure.  The Entity has also developed a series of technical specifications for each type of Scrap purchased, according to several standards, which also include qualitative requirements and are available to all suppliers.
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	The Entity has implemented a process for recycling Aluminium waste from local, regional and national collection centres and waste producers. The Entity is a member of several associations at the national level.  The Entity has implemented a procedure for the evaluation and selection of suppliers and maintains a list of accepted suppliers. Further information is available in the Entity's ASI Manual and Report: <a href="https://asmetal.ro/wp-content/uploads/2025/06/6.-MANUAL-SI-RAPORT-SOCIAL-SI-ETIC.pdf">https://asmetal.ro/wp-content/uploads/2025/06/6.-MANUAL-SI-RAPORT-SOCIAL-SI-ETIC.pdf</a>
<b>5. GREENHOUSE GAS EMISSIONS</b>		
5.1a-b Disclosure of GHG Emissions and Energy Use	Conformance	The Entity has monitored natural gas and electricity consumption via installed meters to ensure accurate data on the consumption in the sorting/processing plants and the foundry hall. Electricity consumption is checked by an energy audit company. Greenhouse Gas (GHG) emissions calculations, including Scope 3 GHG emissions, are verified by a Third Party accredited by the UN Framework Convention on Climate Change.  GHG data is included and disclosed in the Sustainability Report 2023 & 2024: <a href="https://asmetal.ro/sustenabilitate-2">https://asmetal.ro/sustenabilitate-2</a>

CRITERION	RATING	COMMENT
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 GHG Emissions Reduction Plans	Conformance	The Entity has established a GHG Emissions Reduction Plan which includes projects to increase energy efficiency, and to reduce Scope 1, 2 and 3 GHG emissions. The Entity's GHG Emissions Reduction Pathway is aligned with a 1.5°C warming scenario, is consistent to the ASI GHG Pathways Method and uses a 2021 baseline year.
5.3b-e GHG Emissions Reduction Plans – Targets, review and disclosure	Conformance	The Entity has established a GHG Emissions Reduction Plan which includes projects to increase energy efficiency, and to reduce Scopes 1, 2 and 3 GHG emissions. The Entity has defined annual GHG Emissions Reduction Targets to 2050. A comparison of the Entity's GHG emission reduction performance over the years 2021-2024 is included in the Sustainability Report 2023 & 2024: <a href="https://asmetal.ro/wp-content/uploads/2025/07/RAPORT-DE-SUSTENABILITATE-20232024-FINAL-ENG.pdf">https://asmetal.ro/wp-content/uploads/2025/07/RAPORT-DE-SUSTENABILITATE-20232024-FINAL-ENG.pdf</a>
5.4 GHG Emissions Management	Conformance	The Entity has implemented processes to manage GHG emissions from its activities and this will be finalised with the support of independent consultants during 2024. In the meantime, the Entity has implemented its integrated Management System, which addresses energy used and GHG emissions.  The Entity has prepared an Energy Efficiency Improvement Plan, which is submitted to the Ministry of Energy.
<b>6. EMISSIONS, EFFLUENTS AND WASTE</b>		
6.1a-f Emissions to Air	Conformance	The Entity's Emissions to Air are controlled by and comply with national regulations and operating permits. Emissions to Air are monitored every six months and micro-climate factors annually. Air emissions are reported annually to the Bucharest Environmental Protection Agency, which provides public access to the data.
6.2a-g Discharges to Water	Conformance	The Entity is certified against ISO 14001:2015 and complies with its water management permit. Wastewater does not reach the environment (soil, groundwater and rivers). Information on wastewater is publicly disclosed in the Sustainability Report 2023 & 2024: <a href="https://asmetal.ro/sustenabilitate-2">https://asmetal.ro/sustenabilitate-2</a>
6.3a-g Assessment and Management of Spills and Leakages	Conformance	The Entity maintains an ISO 14001 certified Environmental Management System that has adequate procedures to prevent and detect Spills and Leakages. An assessment of the most Significant Risk areas of operations where Spills and Leakages may contaminate air, water, and soil is performed in accordance with its risk assessment process.



CRITERION	RATING	COMMENT
6.4a-b Public Disclosure of Spills and Leakages	Conformance	<p>The Entity has established an Operational Program for Prevention and Management of Emergency Situations, with the associated activities summarised in the Sustainability Report, available at: <a href="https://asmetal.ro/sustenabilitate-2">https://asmetal.ro/sustenabilitate-2</a></p> <p>In accordance with Romanian legislation and the Environmental Integrated Authorization, the Entity is obliged to report any environmental incident(s) related to emergency situations.</p>
6.5a-c Waste Management and Reporting	Conformance	The Entity has implemented a Waste Management Procedure in accordance with its certified Environment Management System and the national legislation. The Entity maximises the recovery of Aluminium by processing Dross. The Entity has undertaken an Impact Assessment as required by its Management System.
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	The Entity maximises the recovery of Aluminium by processing Dross. The cooled Dross in the cooling plants is treated by on-site grinding to recover part of the Aluminium that is returned to the process. The Dross dust left after the Aluminium recovery is collected, dried and then delivered to industry operators.
<b>7. WATER STEWARDSHIP</b>		
7.1a-b Water Assessment and Disclosure	Conformance	The Entity monitors its water consumption monthly, which is reported to the National Administration of Romanian Waters. The assessment of the significance of the environmental impact determined that the risks of water pollution are low. There are no hydrographic basins in the Entity's Area of Influence.
7.2a-e Water Management	Not Applicable	This Criterion is not applicable to the Entity, as the impact assessment determined water-related risks as low.
<b>8. BIODIVERSITY AND ECOSYSTEM SERVICES</b>		
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	The Entity has undertaken a Biodiversity risk assessment as part of its ISO 14001 Environmental Management System. Biodiversity was included in an environmental impact study which was, in part, a basis for the Entity's environmental permit. There are no Protected Areas or nature reserves in the vicinity of the Entity.
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Not Applicable	This Criterion is not applicable to the Entity, as the Biodiversity risk assessment determined there were no Significant Risks to Biodiversity or impacts to Ecosystem Services.
8.2a-g Biodiversity Management	Not Applicable	This Criterion is not applicable to the Entity, as the Biodiversity risk assessment determined there were no Significant Risks to Biodiversity.

CRITERION	RATING	COMMENT
8.3a-c Management of Priority Ecosystem Services	Not Applicable	This Criterion is not applicable to the Entity, as the Biodiversity risk assessment determined there were no Priority Ecosystem Services.
8.4 Alien Species	Conformance	The Entity has undertaken a Biodiversity risk assessment which determined there is no risk associated with Alien Species.
8.5a-b Commitment to 'No Go' in World Heritage Properties	Conformance	The Entity has undertaken a risk assessment as part of its ISO 14001 Environmental Management System. The Entity is not situated near World Heritage Properties.
8.6a-d Protected Areas	Conformance	The Entity has undertaken a risk assessment as part of its ISO 14001 Environmental Management System. The Entity is not situated within or nearby any Protected Areas or nature reserves.
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	The Entity has implemented a Code of Conduct and a Human Rights Policy with a commitment to respect Human Rights and the UN Guiding Principles on Business and Human Rights. Any alleged violation of rights is documented and dealt with in accordance with internal procedures. The Entity has established a risk register that considers its Corporate Social Responsibility (CSR) risks.
9.2a-e Gender Equity and Women's Empowerment	Conformance	The Entity has implemented its Code of Conduct to comply with Human Rights, which is relevant to all employees. The Entity has disclosed information on its programme to promote gender equity in its Sustainability Report, Chapter 6.2 and its Manual and Social and Ethical Report, Chapter 6: <a href="https://asmetal.ro/wp-content/uploads/2025/07/RAPORT-DE-SUSTENABILITATE-20232024-FINAL-ENG.pdf">https://asmetal.ro/wp-content/uploads/2025/07/RAPORT-DE-SUSTENABILITATE-20232024-FINAL-ENG.pdf</a> and <a href="https://asmetal.ro/wp-content/uploads/2024/01/MANUAL-SI-RAPORT-SOCIAL-SI-ETIC.pdf">https://asmetal.ro/wp-content/uploads/2024/01/MANUAL-SI-RAPORT-SOCIAL-SI-ETIC.pdf</a>
9.3a-i Indigenous Peoples	Not Applicable	This Criterion is not applicable to the Entity, as there is no presence of Indigenous Peoples or their lands, territories and resources 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 there is no presence of Indigenous Peoples or their lands, territories and resources 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 there is no presence of Indigenous Peoples or their lands, territories and resources 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 there are no sacred or cultural heritage sites and values within the Entity's Area of Influence.
9.5b Cultural and Sacred Heritage – Impacts	Not Applicable	This Criterion is not applicable to the Entity, as there is no presence of Indigenous Peoples or their lands, territories and resources directly affected by the Entity's operations.
9.6a-i Displacement	Not Applicable	This Criterion is not applicable to the Entity, as no expansions or relocations are planned. Regardless, the requirements of the ASI Performance Standard are considered as part of new risk assessments.
9.7a-h Affected Populations and Organisations	Conformance	The Entity has implemented an external communication procedure which identified relevant Stakeholders, their rights and their interests and communication plans are established. The Entity is in close contact with surrounding Communities and authorities (local and national). Most of its employees are from the local area. Further information is provided in the Sustainability Report 2023 & 2024.
9.8a Conflict-Affected and High-Risk Areas – Strong Management Systems	Not Applicable	This Criterion is not applicable to the Entity, as its main activity is the recovery/recycling of Aluminium Scrap as well as the production of secondary Aluminium alloys (from pre-consumer and post-consumer waste).
9.8b Conflict-Affected and High-Risk Areas – Identify and assess risks	Not Applicable	This Criterion is not applicable to the Entity, as its main activity is the recovery/recycling of Aluminium Scrap as well as the production of secondary Aluminium alloys (from pre-consumer and post-consumer waste).
9.8c Conflict-Affected and High-Risk Areas – Strategy to respond to risks	Not Applicable	This Criterion is not applicable to the Entity, as its main activity is the recovery/recycling of Aluminium Scrap as well as the production of secondary Aluminium alloys (from pre-consumer and post-consumer waste).
9.8d Conflict-Affected and High-Risk Areas – Audit of due diligence	Not Applicable	This Criterion is not applicable to the Entity, as its main activity is the recovery/recycling of Aluminium Scrap as well as the production of secondary Aluminium alloys (from pre-consumer and post-consumer waste).
9.8e Conflict-Affected and High-Risk Areas – Report annually	Not Applicable	This Criterion is not applicable to the Entity, as its main activity is the recovery/recycling of Aluminium Scrap as well as the production of secondary Aluminium alloys (from pre-consumer and post-consumer waste).
9.9 Security practice	Conformance	The Entity has its own unarmed security service. It has a contract with an unarmed alarm service for rapid intervention.

CRITERION	RATING	COMMENT
<b>10. LABOUR RIGHTS</b>		
10.1a-c Freedom of Association and Right to Collective Bargaining	Conformance	The Entity respects the rights of Workers to unite freely, seek representation and join the works councils without interference. A Collective Labour Contract (CLC) (according to Romanian legislation) applies to all employees.
10.1d Freedom of Association and Right to Collective Bargaining - Alternative means in context of Applicable Law	Not Applicable	This Criterion is not applicable to the Entity, as there are no restrictions on the Freedom of Association and Collective Bargaining in Romania.
10.2a-c Child Labour	Conformance	The Entity does not employ Child Labour or young Workers in compliance with the national law. The minimum age of Workers is 25 years.
10.3a-c Forced Labour	Conformance	<p>The Entity does not engage in Forced Labour. The Entity has implemented its Code of Conduct and Ethics, which establishes clear standards for all employees, including their relationship with the Entity, and promotes values, norms and ethical behaviour:  <a href="https://asmetal.ro/wp-content/uploads/2023/04/1.-COD-DE-CONDUITA-SI-DE-ETICA.docx.pdf">https://asmetal.ro/wp-content/uploads/2023/04/1.-COD-DE-CONDUITA-SI-DE-ETICA.docx.pdf</a></p> <p>Workers are made aware of the issue of modern slavery via the Manual and Social and Ethical Report, which includes an explanation of the terms, rights and obligations in accordance with national law and activity-specific rules. The Entity has prepared a commitment to modern slavery in its Human Rights Policy and provided a statement on modern slavery in its Manual and Social and Ethical Report, under Point 13:  <a href="https://asmetal.ro/wp-content/uploads/2024/01/MANUAL-SI-RAPORT-SOCIAL-SI-ETIC.pdf">https://asmetal.ro/wp-content/uploads/2024/01/MANUAL-SI-RAPORT-SOCIAL-SI-ETIC.pdf</a></p> <p>The Entity's Modern Slavery and Trafficking Policy is available at:  <a href="https://asmetal.ro/wp-content/uploads/2024/05/POLITICA-PRIVIND-SCLAVIA-MODERNA.pdf">https://asmetal.ro/wp-content/uploads/2024/05/POLITICA-PRIVIND-SCLAVIA-MODERNA.pdf</a></p>
10.4a-c Non-Discrimination	Conformance	<p>The Entity guarantees equal opportunities and does not engage in nor support Discrimination in the hiring, salary, promotion, training, promotion opportunities or termination of any Employee based on gender, race, national or social origin, religion, disability, affiliation politics, sexual orientation, marital status, family responsibilities, age or any other condition that may give rise to Discrimination.</p> <p>The Entity has established Internal Regulations that address employee behaviours and the commitment to combat Discrimination is provided in the Entity's Human Rights Policy. Training on social responsibility, Discrimination, Child Labour, Forced Labour, and inclusion and diversity is provided to all employees.</p>
10.5 Communication and engagement	Conformance	The Entity has implemented a Communication Procedure in accordance with ISO 45001 which describes both external communication (authorities, customers and suppliers) and internal communication (employer, employees, and employee representatives). Internal communication takes place during various meetings between the parties. In addition, employees are consulted

CRITERION	RATING	COMMENT
		annually via a questionnaire on working conditions, stress at work, and suggestions for improvement.
10.6a-g Violence and Harassment	Conformance	<p>The Entity respects its employees and disciplinary measures are in compliance with legal requirements and require the confirmation of the Worker involved. The Entity does not engage in nor tolerate the use of corporal punishment, mental or physical coercion, Harassment, and gender-based Violence including sexual Harassment, or verbal abuse of Workers.</p> <p>The Entity has a Policy on Violence and Harassment in place and all Workers are provided training on the Policy:  <a href="https://asmetal.ro/wp-content/uploads/2024/01/Politica-Anti-Hartuire.pdf">https://asmetal.ro/wp-content/uploads/2024/01/Politica-Anti-Hartuire.pdf</a></p>
10.7a-d Remuneration	Conformance	In accordance with ISO 9001:2015, the Entity's documentation is written in Romanian and in a format that Workers understand. The minimum wage at the Entity is equal to the minimum wage prescribed in Romanian legislation. Overtime is paid in accordance with the provisions of the internal regulations which comply with the legislation in force. All payments are documented and paid to all Workers on time by bank transfer twice a month. Romanian legislation together with the Collective Labor Contract ensures that Remuneration requirements are respected.
10.8a-c Working Time	Conformance	The Entity has published an employee handbook that prescribes the working hours, Overtime, weekly time off, public holidays and annual leave. The CLC contains the Individual Employment Contract, which establishes the requirements for Workers' Working Time. The Entity is in compliance with local laws regarding Working Time, public holidays and annual leave.
10.9a-b Informing Workers of Rights	Conformance	Both the Internal Regulations and the CLC are provided for Workers, which outlines the rights of Workers. All employees sign an Individual Employment Contract, which forms the basis of the relationship between employee and employer.
<b>II. OCCUPATIONAL HEALTH AND SAFETY</b>		
11.1a Occupational Health and Safety (OH&S) Management System	Conformance	The Entity has a documented Occupational Health and Safety (OH&S) Management System. The assessment of occupational injury and illness risks is additionally a legal requirement in Romania.
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Conformance	<p>All employees are trained annually with the requirements of the Entity's OH&amp;S Management System and its Integrated Policy. The Integrated Policy is discussed annually during the management review and the Integrated Management System is reviewed as necessary (for example, with new activities or changes in activities). The Policy is available at:  <a href="http://www.asmetal.ro">www.asmetal.ro</a></p> <p>The Entity publicly discloses the effectiveness of the OH&amp;S Management System in the Sustainability Report 2023 &amp; 2024:  <a href="https://asmetal.ro/wp-content/uploads/2025/07/RAPORT-DE-SUSTENABILITATE-20232024-FINAL-ENG.pdf">https://asmetal.ro/wp-content/uploads/2025/07/RAPORT-DE-SUSTENABILITATE-20232024-FINAL-ENG.pdf</a></p>

CRITERION	RATING	COMMENT
11.2 Employee engagement on Health and Safety	Conformance	Each employee, upon hiring, is provided with a job description document that includes a chapter on the 'Duties and responsibilities in the field of Occupational Health and Safety'. The Entity has established an OH&S Committee, which meets quarterly, where employees can discuss and participate in solving OH&S issues.

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#### DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	10 July 2024	Initial Certification Audit – Full Certification
1	4 September 2025	Surveillance Audit