

ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

ALRO SA

CERTIFICATE NUMBER
237

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

DATE OF ISSUE
15 DECEMBER 2025

CERTIFICATION
LEVEL
**FULL
CERTIFICATION**

DATE OF EXPIRY
14 DECEMBER 2028

ASI ACCREDITED
AUDITING FIRM
DQS CFS

CERTIFIED SINCE
13 JANUARY 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

Manufacture and sale of
Aluminium alloy slabs, billets, wire
rod, plates and sheets obtained by
smelting, casting, hot rolling,
homogenisation, heat treatment,
mechanical processing, finishing,
and testing for industrial
applications, aerospace,
automotive and defence industries
in two sites located in Slatina, Olt
County, Romania.

AUDIT REPORT PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	ALRO
ENTITY NAME	ALRO SA
CERTIFICATION SCOPE	Manufacture and sale of Aluminium alloy slabs, billets, wire rod, plates and sheets obtained by smelting, casting, hot rolling, homogenisation, heat treatment, mechanical processing, finishing, and testing for industrial applications, aerospace, automotive and defence industries in two sites located in Slatina, Olt County, Romania.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Aluminium SmeltingAluminium Re-melting/RefiningCasthousesSemi-Fabrication
ASI STANDARD	<ul style="list-style-type: none">Performance Standard V3.1
AUDIT TYPE	<ul style="list-style-type: none">Initial Certification Audit (10 – 18 October 2022)Surveillance Audit and Scope Change (22 – 25 April 2024)Re-Certification Audit (20 – 29 October 2025)
AUDIT FIRM	DQS CFS
AUDIT DATE	<ul style="list-style-type: none">10 – 18 October 2022 (Initial Certification Audit)22 – 25 April 2024 (Surveillance Audit and Scope Change)20 – 29 October 2025 (Re-Certification Audit)
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">3 November 2022 (Initial Certification Audit)15 May 2024 (Surveillance Audit and Scope Change)6 November 2025 (Re-Certification Audit)
AUDIT SCOPE	<p><u>Initial Certification Audit (10 – 18 October 2022)</u></p> <p>The Audit Scope covers the manufacture and sale of Aluminium alloy slabs, billets, wire rod, plates and sheets obtained by smelting, casting, hot rolling, homogenisation, heat treatment, mechanical processing, finishing, and testing for industrial applications, aerospace, automotive and defence industry in two sites located in Slatina, Olt County, Romania.</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none">Aluminium SmeltingAluminium Re-melting/RefiningCasthousesMaterial Conversion <p>All applicable criteria in the ASI Performance Standard were included in the Audit Scope.</p>

Surveillance Audit and Scope Change (22 – 25 April 2024)

The Audit Scope covers the manufacture and sale of Aluminium alloy slabs, billets, wire rod, plates and sheets obtained by smelting, casting, hot rolling, homogenisation, heat treatment, mechanical processing, finishing, and testing for industrial applications, aerospace, automotive and defence industry in two sites located in Slatina, Olt County, Romania.

Supply chain activities included in the Audit Scope:

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

All applicable criteria in the ASI Performance Standard were included in the Audit Scope.

Re-Certification Audit (20 – 29 October 2025)

The Audit Scope covers the manufacture and sale of Aluminium alloy slabs, billets, wire rod, plates and sheets obtained by smelting, casting, hot rolling, homogenisation, heat treatment, mechanical processing, finishing, and testing for industrial applications, aerospace, automotive and defence industries in two sites located in Slatina, Olt County, Romania.

Supply chain activities included in the Audit Scope:

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

All applicable criteria in the ASI Performance Standard were included in the Audit Scope.

AUDIT OUTCOME

- Certification

AUDIT METHODOLOGY DECLARATION

The Auditors confirm that:

- ☒ The information provided by the Entity is true and accurate to the best knowledge of the Auditor(s) preparing this report.
- ☒ The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous.
- ☒ The Audit Scope and audit methodology are sufficient to establish confidence that the findings are indicative of the performance of the Entity's defined Certification Scope.
- ☒ The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.

CERTIFICATION PERIOD

15 December 2025 – 14 December 2028

NEXT AUDIT TYPE

Surveillance Audit

NEXT AUDIT DATE

14 August 2026

CERTIFICATE NUMBER

237



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

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

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

ENTITY OVERVIEW

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

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

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

MATURITY RATINGS

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

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

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

FINDINGS

CRITERION	RATING	COMMENT
1. BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity is committed to complying with all relevant laws and regulations and has implemented rigorous legal compliance practices and procedures to ensure integrity and ethics in its operations. The Entity undertakes periodic audits to determine their Compliance with Applicable Law using specialised software.
1.2 Anti-Corruption	Conformance	The Entity enforces clear ethical and anti-Corruption Policies applicable to all employees, suppliers, and business partners. Senior management actively supports compliance with national legislation and international standards, ensuring effective mechanisms for reporting and investigating any misconduct. The Entity publicly communicates its ethics and anti-Corruption Policies, demonstrating a commitment to responsible governance and fair business practices.
1.3a-e Code of Conduct	Conformance	<p>The Entity has implemented a Code of Ethics that includes principles of responsible conduct, integrity, environmental protection, respect for Human Rights, and ethical governance. The Code has been approved by senior management and communicated to all employees, partners, and Stakeholders. It is publicly available on the Entity's website and periodically reviewed to ensure ongoing compliance with legal and international standards.</p> <p>The latest Code of Ethics and related Policies are publicly disclosed at: https://www.alro.ro/en/sustainability/policies-reports-certifications</p>
2. POLICY AND MANAGEMENT		
2.1a-f Environmental, Social, and Governance Policy	Conformance	Through its strategic framework of various Policies, the Entity promotes continuous improvement of environmental, social, and governance (ESG) performance, supporting sustainable development and the achievement of its climate neutrality goals. All current Policies are publicly available at: https://www.alro.ro/en/sustainability/policies-reports-certifications
2.2a-c Leadership	Conformance	The Entity has appointed senior Management Representatives responsible for leading the implementation and communication of environmental, social, and governance Policies, ensuring effective coordination of ESG performance across the organisation. Senior management supports these policies by providing human, technical, and financial resources necessary to maintain and continually improve management systems certified under ISO 9001, ISO 14001, ISO 45001, ISO 50001, and AS/EN 9100 standards.
2.3a Environmental and Social Management Systems – Environmental	Conformance	The Entity operates a fully integrated Environmental Management System certified to ISO 14001:2015, ensuring the identification, control, and continuous improvement of environmental performance. The Entity has implemented clear objectives on emissions reduction, energy efficiency, sustainable water and waste management, which are in alignment with its Climate Change Action Plan 2050 and the Environmental Management Program 2022–2030. Senior management provides the necessary resources and conducts periodic reviews to evaluate environmental performance. The Entity

CRITERION	RATING	COMMENT
		publicly discloses all relevant Policies, certificates, and reports at: https://www.alro.ro/en/sustainability/policies-reports-certifications
2.3b Environmental and Social Management Systems – Social	Conformance	The Entity operates an integrated Social Management System that ensures respect for Human Rights, fair labour conditions, and a safe working environment for all employees. The Entity is certified under ISO 45001:2018 and applies clear policies on social responsibility, equal treatment, and social dialogue, supported by senior management. All relevant Policies and reports are publicly available at: https://www.alro.ro/en/sustainability/policies-reports-certifications
2.4a-e Responsible Sourcing	Conformance	The Entity promotes a responsible supply chain grounded in ethics, transparency and sustainability via its Responsible Sourcing Policy and a Supplier Code of Conduct that both set clear requirements for environmental protection, Human Rights, Occupational Health and Safety, and anti-Corruption. Senior management supports these commitments through integrated evaluation, monitoring, and Due Diligence processes within the management system. Relevant Policies are available at: https://www.alro.ro/en/sustainability/policies-reports-certifications
2.5a-g Environmental and Social Impact Assessments	Not Applicable	This Criterion is not applicable to the Entity, as there are no New Projects or Major Changes to Facilities.
2.6a-h Human Rights Impact Assessment	Not Applicable	This Criterion is not applicable to the Entity, as there are no New Projects or Major Changes to Facilities.
2.7a-f Emergency Response Plan	Conformance	<p>The Entity has implemented site-specific Emergency Response Plans developed in collaboration with employees, local authorities, and the Inspectorate for Emergency Situations (ISU). These Plans define clear measures for the prevention, management, and mitigation of potential incidents such as fires, chemical Spills, explosions, or natural disasters.</p> <p>The Entity tests the effectiveness of these plans annually through documented drills and regular employee training, with results reviewed during OSH Committee CSSM meetings and management reviews. The Entity ensures periodic updates and public communication of all relevant emergency preparedness information at: https://www.alro.ro/en/sustainability/policies-reports-certifications</p>
2.8a-d Suspended Operations	Conformance	The Entity has developed and implements a Business Continuity and Resilience Plan that ensures operational stability in unforeseen circumstances such as energy interruptions, climate events, geopolitical crises, or pandemics. The Plan integrates environmental, social, and governance risk assessments and defines clear measures for prevention, mitigation, and safe recovery of operations. Senior management periodically reviews the plan's effectiveness and ensures adequate resources for its implementation.
2.9a-b Mergers and Acquisitions	Conformance	The Entity has integrated rigorous ESG Due Diligence processes into all merger and acquisition activities to identify, assess, and manage potential risks and impacts. In the event of a merger or acquisitions, the Entity will apply the principles of transparency and accountability, ensuring consultation with Affected Communities and Organisations

CRITERION	RATING	COMMENT
		when evaluating and mitigating historical impacts of Aluminium operations.
2.10a-b Closure, Decommissioning and Divestment	Conformance	The Entity has established plans to implement closure, decommissioning, and divestment processes responsibly, integrating ESG assessments into every stage. In the event of closure, decommissioning and divestment, the Entity will apply the procedures for identifying and managing Material and legacy impacts, ensuring consultation and, where possible, participation of Affected Communities and Organisations. Monitoring and remediation plans are periodically reviewed to ensure compliance with legal requirements and sustainability principles.
3. TRANSPARENCY		
3.1a-b Sustainability Reporting	Conformance	The Entity has published an annual Sustainability Report detailing its governance structure, environmental, safety, and energy performance, as well as its economic and social contributions. Senior management ensures the integration of ESG principles across all decision-making processes and monitors the achievement of objectives defined in the Environmental Management Program 2022–2030 and the Climate Change Action Plan 2050. The Entity's 2024 Sustainability Report is available at: https://www.alro.ro/storage/2025/9/5784/ALRO-Group-Sustainability-Report-2024.pdf
3.2 Non-compliance and Liabilities	Conformance	The Entity has demonstrated it fully complies with all applicable legislation and maintains a robust legal compliance and monitoring system that ensures transparency and integrity across its operations. During the reporting period, no Material fines, sanctions, or judgments were recorded related to environmental, social, or governance non-compliance. The Entity discloses its legal compliance status and audit results annually through the Sustainability Report and official public communications. All relevant information is publicly available at: https://www.alro.ro/en/sustainability/policies-reports-certifications
3.3a-c Payments to Governments	Conformance	The Entity ensures full transparency and integrity in all financial interactions with public institutions and Government authorities, making payments solely on a legal and contractual basis. The Entity strictly prohibits any direct or indirect political contributions or unauthorised payments, in line with its Anti-Corruption Policy and Code of Ethics. All payments to Government entities are audited, documented, and publicly reported through financial statements and the Sustainability Report. Related Policies and disclosures are available at: https://www.alro.ro/en/sustainability/policies-reports-certifications
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	The Entity operates a transparent, equitable, and accessible Complaints Resolution Mechanism that enables employees, suppliers, partners, and affected communities to confidentially report any grievance or request for information related to the Entity's operations. The process is documented and publicly available, ensuring objective investigation and predictable resolution in accordance with principles of ethics, integrity, and respect for Human Rights. Senior management supports the mechanism's implementation and periodically reviews its effectiveness during management reviews. The mechanism is publicly accessible at: https://www.alro.ro/en/information-on-how-to-collect-investigate-and-respond-to-petitions

CRITERION	RATING	COMMENT
4. MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment	Conformance	<p>The Entity has evaluated the environmental impacts throughout the full life cycle of its main Aluminium Product lines, in accordance with the ASI Performance Standard and the international standards, ISO 14040:2006 and ISO 14044:2006. The assessment covers all activities—casting, hot rolling, homogenisation, heat treatment, and mechanical processing, as well as the main Product groups: slabs, billets, wire rods, plates, and sheets.</p> <p>The Life Cycle Assessment (LCA) is updated annually for existing processes and products in serial production, and the most recent update was performed in November 2023 by a multidisciplinary team. For new Products, the assessment is conducted both before and after production. The results are independently verified through Environmental Product Declarations (EPD) for Aluminium hard plates and wire rods, valid until January 2030. The EPD Reports are publicly available at: https://www.alro.ro/en/sustainability/certifications</p>
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	<p>The Entity has independently verified and published through EPD for Aluminium hard plates and wire rods, valid until January 2030. The Entity publicly discloses methodologies, system boundaries, and calculation assumptions used in accordance with ISO 14040:2006 and ISO 14044:2006 standards. The EPD Reports are available at: https://www.alro.ro/en/sustainability/certifications</p>
4.2 Product Design	Conformance	<p>The Entity has integrated clear sustainability and circular economy objectives into the design and development of its Aluminium Products, promoting efficient resource use, recycling, and carbon footprint reduction. The Entity applies LCA principles and relies on independently verified EPD to enhance product environmental and energy performance. Its Environmental Management and Climate Change Programs set measurable targets for waste reduction and material recovery, supporting the transition toward a truly circular economy. Refer to: https://www.alro.ro/en/sustainability/policies-reports-certifications</p>
4.3a-b Aluminium Process Scrap	Conformance	<p>The Entity applies circular economy principles by minimising Aluminium Process Scrap generation and ensuring 100% collection and recycling of all internal production waste. The Entity enforces strict procedures for identification, separation by alloy type, and complete reintegration of metal Scrap into the casting process, achieving zero recyclable Aluminium sent to landfill. These activities directly support energy efficiency and emissions reduction objectives as defined in the Entity's Environmental Management Program 2022–2030 and the Climate Change Action Plan 2050. These documents are available at: https://www.alro.ro/en/sustainability/policies-reports-certifications</p>
4.4a-c Collection and Recycling of Products at End of Life - Material Conversion and other Manufacturing	Not Applicable	<p>This Criterion is not applicable to the Entity's Certification Scope.</p>
4.4d Collection and Recycling of Products at End of Life	Conformance	<p>The Entity actively supports the circular economy through the operation of its ECO-Recycling Facility, commissioned in 2019, dedicated to re-melting Aluminium recovered from the sector. The Entity collaborates with local and international partners for Scrap</p>

CRITERION	RATING	COMMENT
		purchasing and recycling, ensuring full traceability and reintegration of secondary Aluminium into production. Through these initiatives, the Entity engages with national and European recycling systems, contributing to improved accuracy of recycling data and a reduced carbon footprint. Further information on the Entity's recycling activities is available at: https://www.alro.ro/en/recycling
5. GREENHOUSE GAS EMISSIONS		
5.1a-b Disclosure of GHG Emissions and Energy Use	Conformance	<p>The Entity monitors, reports, and independently verifies its energy use and Greenhouse Gas (GHG) emissions in accordance with European Union requirements and international standards. All data are verified annually by an accredited third-party verifier (SARC), as confirmed in the Emissions Verification Report (January 2025), and are published in the 2024 Sustainability Report. The assessment was performed in accordance with the GHG Protocol methodology and ISO 14064-1:2018 standard, ensuring full traceability and accuracy of the reported data.</p> <p>The Entity operates an ISO 50001:2019 certified Energy Management System and an ISO 14001:2015 certified Environmental Management System, ensuring accurate measurement and continuous reduction of emissions. The 2024 Sustainability Report that contains all verified GHG data is available at: https://www.alro.ro/storage/2025/9/5784/ALRO-Group-Sustainability-Report-2024.pdf</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, as the Entity started production in 1965.
5.2b Aluminium Smelter GHG Emissions Intensity – In production up to and including 2020	Conformance	<p>The Entity has achieved a significant reduction in Greenhouse Gas (GHG) emissions intensity for its Aluminium production, in accordance with both ASI Performance Standard requirements and EU climate objectives. The smelter's specific emissions decreased from 6.59 tCO₂/tAl in 2021 to 5.63 tCO₂/tAl in 2023, representing a cumulative reduction of over 14.5% across three consecutive years. All data are independently verified by an accredited third party (SRAC) under the EU Emissions Trading System (EU ETS).</p> <p>Through its Climate Change Action Plan 2050 and Environmental Management Program 2022–2030, the Entity continues to implement energy efficiency, technological modernisation, and Recycled Aluminium initiatives. The verified data are publicly available at: https://www.alro.ro/en/sustainability/policies-reports-certifications</p>
5.3a GHG Emissions Reduction Plans	Conformance	<p>The Entity has established and is implementing a Greenhouse Gas (GHG) Emissions Reduction Plan aligned with a 1.5°C global warming scenario, as defined in its Climate Change Action Plan 2050 and Climate Neutrality Action Plan. The Entity has set measurable intermediate reduction targets – 4.402 tCO₂/tAl by 2030 and 2.4684 tCO₂/tAl by 2040 – with the goal of achieving full 'climate neutrality' by 2050.</p> <p>Progress is monitored monthly and reported annually at the senior management level, with independent third-party verification provided. The GHG Emissions Reduction Plan and verified results are publicly available at: https://www.alro.ro/en/sustainability/policies-reports-certifications and in the 2024 Sustainability Report (pages 79 to 113),</p>

CRITERION	RATING	COMMENT
		available at: https://www.alro.ro/storage/2025/9/5784/ALRO-Group-Sustainability-Report-2024.pdf
5.3b-e GHG Emissions Reduction Plans – Targets, review and disclosure	Conformance	<p>In addition to the GHG Emissions Reduction Plan (refer to: https://www.alro.ro/en/sustainability/policies-reports-certifications) and information in the 2024 Sustainability Report (refer to: https://www.alro.ro/storage/2025/9/5784/ALRO-Group-Sustainability-Report-2024.pdf (pages 79 to 113), information specific to the Entity's emissions reduction slopes and related Action Plans is publicly disclosed through in the Alro Climate Action Plan 2050 and its Climate Neutrality Action Plan, which has been consolidated into the 'ALRO-Net-Zero-by-2050' document which is available at: https://www.alro.ro/storage/2025/11/5849/ALRO-Net-Zero-by-2050.pdf</p> <p>This document describes in detail the specific steps, intermediate targets, and reduction trajectories up to 2050, which have been developed in accordance with the Science-Based Targets Initiative (SBTi), and are consistent with a 1.5°C warming scenario and the ASI emissions reduction pathway methodology.</p>
5.4 GHG Emissions Management	Conformance	<p>The Entity operates an Integrated Management System certified to ISO 14001:2015 and ISO 50001:2019, ensuring operational control, monitoring, and continuous improvement of Greenhouse Gas (GHG) emissions reduction performance. The Entity applies structured evaluation and measurement procedures aligned with its GHG Reduction Plan and long-term targets for 2030 and 2050. Through dedicated process optimisation and technological modernisation programs, the Entity achieves continuous, independently verified emission reductions. Verified reports and supporting documentation are available at: https://www.alro.ro/en/sustainability/policies-reports-certifications</p>
6. EMISSIONS, EFFLUENTS AND WASTE		
6.1a-f Emissions to Air	Conformance	<p>The Entity continuously monitors, reports, and reduces air emissions from its industrial operations in compliance with legal requirements and international environmental standards. All major emissions – including carbon dioxide (CO₂), oxides of nitrogen (NO_x), sulphur dioxide (SO₂), particulate matter (PM₁₀), fluoride (F) compounds, and Volatile Organic Compounds (VOCs) are measured, independently verified, and reported annually to authorities and the public in accordance with Environmental Permit No. 1/29.01.2016 and GHG Authorisation No. 90/01.03.2021.</p> <p>Through its Environmental Management Program 2022–2030 and Climate Change Action Plan 2050, the Entity implements dedicated emission reduction programs and measures to protect employees and surrounding communities. Further information is available at: https://www.alro.ro/en/sustainability/policies-reports-certifications</p>
6.2a-g Discharges to Water	Conformance	<p>The Entity responsibly manages water resources and maintains strict control over all discharges to the aquatic environment, ensuring compliance with legal requirements and international environmental standards. All discharges, such as process, sanitary, and stormwater, are periodically monitored by accredited laboratories, independently verified, and reported annually to authorities and the public in accordance with Environmental Permit No. 1/29.01.2016.</p> <p>Through its Water Management Policy and Environmental Program 2022–2030, the Entity continuously reduces water consumption,</p>

CRITERION	RATING	COMMENT
		<p>increases recirculation rates, and prevents pollution. Verified results and updated plans are publicly available at: https://www.alro.ro/en/sustainability/policies-reports-certifications</p>
6.3a-g Assessment and Management of Spills and Leakages	Conformance	<p>The Entity has implemented a sound prevention, monitoring, and control system for Spills and Leakages that could affect air, water, or soil. Major risk areas are periodically assessed, and preventive infrastructure includes retention basins, impermeable flooring, oil separators, and double-walled tanks. No significant Spill incidents were recorded during 2023–2024, with all minor events immediately contained and remediated.</p> <p>Through the Spill Prevention and Response Procedure and the Environmental Management Program 2022–2030, the Entity ensures legal compliance and environmental protection, reviewing the effectiveness of implemented measures annually. Verified plans and performance results are publicly available at: https://www.alro.ro/en/sustainability/policies-reports-certifications</p>
6.4a-b Public Disclosure of Spills and Leakages	Conformance	<p>The Entity has established clear procedures for immediate notification and public communication in the event of any Spill or Leakage with potential environmental impact. No Material Spills or Leakages were recorded during 2023–2024, and all minor incidents were promptly contained and remediated. In accordance with the Spill Prevention and Response Procedure and Emergency Preparedness Plan, the Entity ensures timely reporting to authorities and affected Stakeholders, root cause analysis, and full documentation of corrective actions. Performance and transparency are confirmed through the Sustainability Report 2024, available at: https://www.alro.ro/storage/2025/9/5784/ALRO-Group-Sustainability-Report-2024.pdf</p>
6.5a-c Waste Management and Reporting	Conformance	<p>The Entity manages all Hazardous and Non-Hazardous waste streams generated from its operations, ensuring full traceability, recycling, and compliant disposal in accordance with environmental legislation. Through the Waste Management Procedure and Waste Management Plan, the Entity applies the waste mitigation hierarchy, such as prevention, reuse, recycling, energy recovery, and disposal, and cooperates exclusively with certified waste management operators. Data are independently verified and reported annually in the 2023 Waste Balance and 2024 Environmental Report, confirming continuous progress in reducing total waste volumes and increasing recycling rates.</p> <p>Verified information and performance results are publicly available at: https://www.alro.ro/en/sustainability/policies-reports-certifications</p>
6.6a-g Bauxite Residue	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7a-f Spent Pot Lining (SPL)	Conformance	<p>The Entity manages Spent Pot Lining (SPL) waste under strict environmental and safety controls, preventing any release or leachate contamination of air, water, or soil. SPL materials are temporarily stored in designated, sealed, and marked containment areas as illustrated in the ALRO General Plan, and are periodically removed only by legally authorised operators. Management is governed by Waste Management Form and Procedure PS-16, while trained personnel ensure safe and appropriate handling. The Entity continuously</p>

CRITERION	RATING	COMMENT
		<p>evaluates alternative recovery solutions for carbon and refractory materials, as evidenced by the Baustoff Institute Project.</p> <p>All activities comply with ISO 14001:2015 and national environmental legislation. Verified information and performance data are publicly available at: https://www.alro.ro/en/sustainability/policies-reports-certifications</p>
6.8a-d Dross	Conformance	<p>The Entity manages Aluminium Dross in a controlled and environmentally responsible manner, preventing any release to the environment and maximising Aluminium recovery through dedicated treatment and recycling processes. All operations are conducted in accordance with the Dross Management Procedure and Dross Handling and Recovery Plan, within impermeable and designated areas authorised under the Environmental Permit No. 1/29.01.2016.</p> <p>Certified operators treat Dross residues exclusively, and alternative recovery options are reviewed annually to minimise landfill dependency. Verified recovery performance and results are published annually in the Sustainability Report 2024, available at: https://www.alro.ro/storage/2025/9/5784/ALRO-Group-Sustainability-Report-2024.pdf</p>
7. WATER STEWARDSHIP		
7.1a-b Water Assessment and Disclosure	Conformance	<p>The Entity monitors and reports its total water withdrawal and use annually, disaggregated by source and type, ensuring transparency and compliance with legal and international sustainability standards. Water is sourced from surface, groundwater, municipal, and internal recirculation systems, all monitored in accordance with Environmental Permit No. 1/29.01.2016.</p> <p>Annual risk assessments for the Olt River watershed confirm a low level of environmental and community impact. The Entity's Water Management Policy and Environmental Program 2022–2030 both set clear objectives to reduce water consumption and increase recirculation efficiency. Verified data and annual performance results are publicly available at: https://www.alro.ro/en/sustainability/policies-reports-certifications</p>
7.2a-e Water Management	Not Applicable	This Criterion is not applicable to the Entity, as it has identified water-related risks as low.
8. BIODIVERSITY AND ECOSYSTEM SERVICES		
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	<p>The Entity conducts all its operations in accordance with the principles of Biodiversity and ecosystem protection and restoration, as outlined in the 'Protection and Restoration of Biodiversity and Ecosystem' document. Periodic environmental assessments confirm that the Entity's industrial Facilities are located outside protected zones and do not generate significant impacts on natural habitats.</p> <p>According to the 'Declaration of the Authority Responsible for Authorising Natura 2000 Sites', the Entity's activities do not affect any Natura 2000 conservation areas. Compliance with all applicable Biodiversity legislation is monitored through the Entity's 'List of Legal Provisions Regarding Biodiversity', and Biodiversity evaluations are integrated into the permitting and investment planning processes, as defined in internal procedures.</p>

CRITERION	RATING	COMMENT
		<p>Verified Biodiversity protection information is available at: https://www.alro.ro/en/sustainability/policies-reports-certifications</p>
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment – Priority	Not Applicable	This Criterion is not applicable to the Entity, as it has determined that the risk to and impacts on Biodiversity and Ecosystem Services are low.
8.2a–g Biodiversity Management	Not Applicable	This Criterion is not applicable to the Entity, as it has determined that the risk to and impacts on Biodiversity and Ecosystem Services are low.
8.3a–c Management of Priority Ecosystem Services	Not Applicable	This Criterion is not applicable to the Entity, as no Priority Ecosystem Services have been identified in its Area of Influence.
8.4 Alien Species	Conformance	<p>The Entity proactively prevents the accidental or deliberate introduction of Alien Species that could impact Biodiversity or Ecosystem Services. According to the internal procedure ‘Environmental Aspects, Assessment of Significant Environmental Aspects’, activities undertaken on site do not introduce Alien Species into the ecosystems within the Entity’s Area of Influence.</p> <p>Preventive and control measures are defined in the document ‘Protection and Restoration of Biodiversity and Ecosystem’, while risk assessments confirm the absence of any potential impact. The competent authority responsible for monitoring Natura 2000 sites has officially confirmed that no alien species or related effects are associated with the Entity’s activities.</p> <p>All controls are integrated within the ISO 14001:2015 Environmental Management System, and a summary of relevant information is available at: https://www.alro.ro/en/sustainability/policies-reports-certifications and specifically at: https://www.alro.ro/storage/2025/11/5832/Biodiversitate_2024_eng_v1.pdf</p>
8.5a–b Commitment to “No Go” in World Heritage Properties	Conformance	<p>The Entity conducts its operations exclusively within authorised industrial areas and does not explore, develop, or modify projects that could affect World Heritage properties or protected natural sites. According to the ‘Declaration of the Authority Responsible for Monitoring Natura 2000 Sites’, the Entity’s Facilities are located outside conservation zones and do not generate any impact on habitats, species, or ecosystem services.</p> <p>The Entity applies strict environmental management and risk prevention measures in accordance with the document ‘Protection and Restoration of Biodiversity and Ecosystem’ and the ISO 14001:2015 Environmental Management System.</p>
8.6a–d Protected Areas	Conformance	<p>The Entity operates exclusively within authorised industrial zones and has no Protected Areas, Natura 2000 sites, or UNESCO World Heritage properties within its Area of Influence. According to the ‘Declaration of the Authority Responsible for Monitoring Natura 2000 Sites’, the Entity’s operations do not affect the integrity of natural habitats or the values for which these areas were designated. Refer to: https://www.alro.ro/storage/2025/11/5832/Biodiversitate_2024_eng_v1.pdf</p>

CRITERION	RATING	COMMENT
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 respects Human Rights and applies the UN Guiding Principles on Business and Human Rights, ensuring equality, workplace safety, and zero tolerance for Discrimination or Harassment. The Entity's Human Rights Policy and Equal Treatment Policy are gender-responsive, approved by senior management, and periodically reviewed. These are supported by the Code of Ethics, Supplier Code of Conduct, and the Collective Labour Agreement 2025–2026, which guarantee Freedom of Association, fair working conditions, and transparent grievance resolution mechanisms.</p> <p>All complaints recorded in 2024 were resolved within defined timelines, and Human Rights performance and compliance are reviewed annually through the Entity's senior management review process and publicly reported in the 2024 Sustainability Report. Human Rights Policies and commitments are publicly available at: https://www.alro.ro/en/sustainability/policies-reports-certifications (Human Rights Policy, pages 1-8)</p>
9.2a-e Gender Equity and Women's Empowerment	Conformance	<p>The Entity promotes gender equity and women's empowerment through dedicated policies and programs ensuring equal opportunities in employment, training, procurement, and management activities. The Entity's Gender Equity and Women's Empowerment Program is established with measurable objectives for balanced female participation across all organisational levels and the elimination of discrimination and harassment.</p> <p>Procedures are in place that define the prevention and resolution process for harassment cases, while the Collective Labour Agreement 2025–2026 guarantees equal opportunities, maternity protection, and fair pay. The effectiveness of measures is reviewed annually during the Management Review (last held May 2025) and publicly communicated through the 2024 Sustainability Report (pages 30, 204 and 206). Gender equity policies and results are publicly available at: https://www.alro.ro/en/sustainability/policies-reports-certifications - Harassment Policy (pages 1-7)</p>
9.3a-i Indigenous Peoples	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples within the Entity's Area of Influence. However, the Entity has established processes to identify minorities based on linguistics, and social characteristics and conduct public consultations on the impact of every new development or investment. Related Policies and processes are reviewed annually.
9.4a Free, Prior, and Informed Consent (FPIC) – New Projects or Major Changes	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples within the Entity's Area of Influence.

CRITERION	RATING	COMMENT
9.4b Free, Prior, and Informed Consent (FPIC) - Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9.4c Free, Prior, and Informed Consent (FPIC) - Demonstrate support	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples within the Entity's Area of Influence.
9.5a Cultural and Sacred Heritage - Identification	Conformance	<p>The Entity takes appropriate measures to prevent or remedy impacts on cultural and spiritual heritage and to ensure continued access to sacred or culturally significant sites and values within its Area of Influence. According to the Entity's Sustainability Manual and commitments outlined in the 'Environmental Permit No. 1/29.01.2016' and 'Management Manual MC-01', priority is given to avoid any significant impact on the cultural, historical, or spiritual heritage sites essential to the identity of neighbouring communities.</p> <p>All actions are undertaken in consultation with Stakeholders and in compliance with applicable legislation and relevant international standards.</p>
9.5b Cultural and Sacred Heritage - Impacts	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples within the Entity's Area of Influence.
9.6a-i Displacement	Not Applicable	This Criterion is not applicable to the Entity, as no New Projects or Major Changes have occurred since joining ASI and it has undertaken its activities in accordance with its construction permit.
9.7a-h Affected Populations and Organisations	Conformance	<p>The Entity respects the legal and customary rights and interests of Affected Populations and Organisations by implementing an integrated system to identify, prevent, and monitor environmental, social, cultural, and Human Rights impacts. In accordance with the Integrated Environmental Authorisation No. 1/19.01.2016 and the ALRO Group Sustainability and Responsible Sourcing Manual, the Entity maintains ongoing dialogue with Stakeholders, ensures protection of health and safety, and the environment, and supports local community development.</p> <p>The Entity's 'Plan to Prevent and Combat Accidental Pollution' and the 'Construction Permit Procedure' include risk assessments and community consultations. Commitments and performance outcomes are reported in the 2024 Sustainability Report, available at: https://www.alro.ro/storage/2025/9/5784/ALRO-Group-Sustainability-Report-2024.pdf</p>
9.8a Conflict-Affected and High-Risk Areas - Strong management systems	Conformance	<p>The Entity has implemented a robust risk-based Due Diligence system to prevent involvement in armed conflict or Human Rights abuses within its Aluminium supply chain, in accordance with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (CAHRAs).</p> <p>The Entity's Responsible Sourcing and Due Diligence Policy and the ALRO Group Sustainability and Responsible Sourcing Manual, defines governance responsibilities, supplier risk assessment procedures, and monitoring mechanisms. According to the Entity's Supplier Code of Conduct and Procurement Procedure, all suppliers are required to adhere to ethical business practices, Human Rights standards, and conflict-free sourcing principles.</p>

CRITERION	RATING	COMMENT
		<p>Performance and Due Diligence outcomes are reported annually via the 2024 Sustainability Report, available at: https://www.alro.ro/storage/2025/9/5784/ALRO-Group-Sustainability-Report-2024.pdf</p>
9.8b Conflict-Affected and High-Risk Areas – Identify and assess risks	Conformance	<p>According to the Entity's Supplier Code of Conduct and Self-Assessment Questionnaire for Suppliers, all suppliers are periodically evaluated based on raw material origin, Human Rights compliance, and adherence to responsible sourcing principles. For materials and raw materials purchased from outside the country, the Entity maintains a supplier self-evaluation system and conducts assessments using the CMRT – Conflict Minerals Reporting Template and ALRO's LME Red Flag assessment procedure.</p> <p>The latest update of the Entity's Risk Register (May 2025) confirmed that no suppliers were identified as operating in CAHRAs. Supplier Due Diligence results and responsible sourcing commitments are disclosed in the 2024 Sustainability Report, available at: https://www.alro.ro/storage/2025/9/5784/ALRO-Group-Sustainability-Report-2024.pdf</p>
9.8c Conflict-Affected and High-Risk Areas – Strategy to respond to risks	Conformance	<p>The Entity has implemented a comprehensive risk management strategy for its Aluminium supply chain, consistent with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas. The strategy is defined in the Entity's Responsible Sourcing and Due Diligence Policy and Sustainability and Responsible Sourcing Manual, outlines corrective actions, responsibilities, and timelines for supplier monitoring.</p> <p>The effectiveness of mitigation measures is reviewed annually in the Entity's management review process and publicly disclosed in the 2024 Sustainability Report.</p>
9.8d Conflict-Affected and High-Risk Areas – Audit of due diligence	Conformance	<p>The Entity's Due Diligence practices were included in this ASI Performance Standard Certification Audit, which addresses this requirement.</p>
9.8e Conflict-Affected and High-Risk Areas – Report annually	Conformance	<p>The Entity reports annually on its supply chain Due Diligence process in alignment with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from CAHRAs. The 2024 Sustainability Report presents a summary of supplier assessments, risk analyses, corrective actions, and confirmation that no suppliers were identified in CAHRAs. The data are verified through internal audits, the Management Review, and independent assessments including EcoVadis 2025, the ASI Surveillance Audit 2025, and the Conflict Minerals Verification Report – January 2025. All Due Diligence results and supporting policies are disclosed in the 2024 Sustainability Report, available at: https://www.alro.ro/storage/2025/9/5784/ALRO-Group-Sustainability-Report-2024.pdf</p>
9.9 Security practice	Conformance	<p>In accordance with the Entity's Human Rights Policy, Code of Ethics, and Prevention and Protection Plan 2024, all security operations are conducted lawfully, proportionately, and without Discrimination, violence, or abuse. Both internal and external security staff receive annual Human Rights and ethics training, while Contractor performance is verified via internal audits and the management review process. Both functions recently confirmed full compliance with</p>

CRITERION	RATING	COMMENT
		national legislation and international standards, with zero reported incidents.
10. LABOUR RIGHTS		
10.1a-c Freedom of Association and Right to Collective Bargaining	Conformance	<p>The Entity fully respects Workers' rights to freely associate, join labour unions, and participate in collective bargaining, in line with ILO Conventions No. 87 and 98 and the Romanian Labour Code (Law No. 53/2003). The Entity maintains a valid Collective Labour Agreement (2025-2026) signed between management and six active Trade Unions, which covers 78% of employees. The Entity's Human Rights Policy, Social Responsibility Policy, and Code of Ethics ensure Freedom of Association, non-Discrimination, and fair social dialogue.</p> <p>Employee representatives actively participate in the OSH Committee CSSM No.576/25.09.2025, and all Collective Bargaining processes are conducted transparently and in good faith. Information on employee rights and collective agreements is disclosed in the 2024 Sustainability Report and publicly available at: https://www.alro.ro/storage/2025/9/5784/ALRO-Group-Sustainability-Report-2024.pdf</p>
10.1d Freedom of Association and Right to Collective Bargaining - Alternative means in context of Applicable Law	Not Applicable	This Criterion is not applicable to the Entity, as it operates in Romania only (an EU member country). Fundamental rights (including the right to form Trade Unions) are guaranteed by the applicable legislation.
10.2a Child Labour	Conformance	<p>The Entity fully complies with national legislation and international standards prohibiting Child Labour, in accordance with ILO Conventions No. 138 and 182, the UN Convention on the Rights of the Child, and the Romanian Labour Code (Law No. 53/2003). As stated in the Human Rights Policy, Code of Ethics, and Recruitment and Selection Procedure, the Entity does not employ any person under 18 years of age and enforces strict age verification procedures during recruitment.</p> <p>An internal Audit on labour practices confirmed the absence of any Child Labour or exploitation cases. The Entity's Social Responsibility Policy and Supplier Code of Conduct extend these requirements to suppliers. Results are publicly disclosed in the 2024 Sustainability Report, available at: https://www.alro.ro/storage/2025/9/5784/ALRO-Group-Sustainability-Report-2024.pdf</p>
10.3a-c Forced Labour	Conformance	<p>The Entity upholds a zero-tolerance Policy against Forced Labour, Human Trafficking, and any form of exploitation, in accordance with ILO Conventions No. 29 and 105, the UN Guiding Principles on Business and Human Rights, and international Modern Slavery standards.</p> <p>Employment at the Entity is strictly voluntary, with no retention of identity documents, recruitment fees, or restrictions on freedom of movement. The Entity's commitments are documented in the Declaration on Combating Modern Slavery, Human Rights Policy (section "Forced labour, human trafficking and working time" (page 2)), Code of Conduct (section 2.2 Human Rights and Labour Rights), Harassment Policy, Collective Labour Agreement 2025-2026 and Internal Regulations.</p> <p>No instances of Forced Labour or Human Trafficking were identified according to the Human Resource Audit 2024 and Management</p>

CRITERION	RATING	COMMENT
		Review in May 2025. The Entity's annual Modern Slavery Statement is available at: https://www.alro.ro/storage/2025/9/5783/Declaration-on-combating-modern-slavery.pdf
10.4a-c Non-Discrimination	Conformance	<p>The Entity ensures equal opportunities for all employees and strictly prohibits any form of Discrimination based on gender, age, origin, religion, disability, sexual orientation, political views, or any other condition in all aspects of employment, such as recruitment, pay, promotion, training, and termination.</p> <p>The Entity's Human Rights and Equal Treatment Policy, Code of Ethics, Social Responsibility Policy, and Harassment Policy define the Entity's commitment to equality, diversity, and respect. Performance appraisals and recruitment procedures are strictly merit-based, ensuring pay equity in accordance with the Collective Labour Agreement 2025–2026. No Discrimination-related complaints were reported in 2025. Results are publicly disclosed in the 2024 Sustainability Report: https://www.alro.ro/storage/2025/9/5784/ALRO-Group-Sustainability-Report-2024.pdf</p>
10.5 Communication and engagement	Conformance	<p>The Entity ensures an open, respectful, and transparent working environment that promotes direct communication and constructive dialogue between employees, their representatives, and management, without fear of reprisal, intimidation, or harassment. In compliance with Law No. 62/2011 on Social Dialogue and the Romanian Labour Code (Law No. 53/2003), the Entity guarantees employees' freedom of expression and Trade Union participation in discussions on working and pay conditions.</p> <p>Formal mechanisms are established through the Collective Labour Agreement 2025–2026, OSH Committee CSSM 576/25.09.2025, and the Complaint Register 2025, with no cases of intimidation or Harassment reported. External inspections by the Territorial Labour Inspectorate confirmed compliance with labour and occupational safety legislation. Relevant policies (Human Rights Policy, Code of Ethics and Harassment Policy) are publicly available at: https://www.alro.ro/en/sustainability/policies-reports-certification</p>
10.6a-g Violence and Harassment	Conformance	<p>The Entity ensures a safe, and respectful workplace based on zero tolerance toward any form of Violence, Harassment, or intimidation. The approach is defined in the Harassment Policy, developed in consultation with Worker representatives and integrated within the Occupational Health and Safety (OH&S) Management System.</p> <p>Psychosocial risks are assessed through the Risk Assessment for Workplace Harassment and Psychosocial Factors and managed under the Occupational Health and Safety Policy. Employees receive annual training on Violence and Harassment prevention. The Entity's Complaint Register for 2025 confirms zero reported incidents. Results were validated in the Management Review (May 2025) and publicly reported in the 2024 Sustainability Report, available at: https://www.alro.ro/storage/2025/9/5784/ALRO-Group-Sustainability-Report-2024.pdf</p>
10.7a-c Remuneration	Conformance	The Entity ensures fair, transparent, and legally compliant working conditions by providing all employees with written employment contracts in Romanian that clearly define the rights, obligations, working hours, and remuneration terms. According to the Entity's Human Rights Policy, the Entity guarantees timely wage payments

CRITERION	RATING	COMMENT
		<p>made in legal currency, fair compensation above the statutory minimum, and proper documentation of all salary elements.</p> <p>Internal procedures 'Personnel Remuneration', 'Competence, Awareness and Training', and 'Handling Requests and Complaints' ensure payroll transparency and open communication regarding employment or wage-related issues. Under the Collective Labour Agreement 2025–2026, Overtime is compensated with at least a 25% premium, and base salaries exceed the legal minimum.</p> <p>Inspections by the Territorial Labour Inspectorate confirmed full compliance with national labour laws. Results are publicly disclosed in the 2024 Sustainability Report, available at: https://www.alro.ro/storage/2025/9/5784/ALRO-Group-Sustainability-Report-2024.pdf</p>
10.8a–c Working Time	Conformance	<p>The Entity fully complies with applicable legislation on working time, Overtime, public holidays, and paid annual leave, in line with the Romanian Labour Code (Law No. 53/2003) and EU Working Time Directive 2003/88/EC. According to the Entity's Human Rights Policy and the Collective Labour Agreement 2025–2026, the standard working schedule is eight hours per day and 40 hours per week, ensuring at least one day of rest every seven days and a minimum of 21 working days of paid annual leave.</p> <p>Overtime is voluntary and compensated either by a premium of at least 25% or equivalent time off, as defined in the internal procedure 'Personnel Salaries'. The Territorial Labour Inspectorate has confirmed full legal compliance, with no non-conformities identified. These results are reflected in the Management Review (May 2025) and publicly reported in the 2024 Sustainability Report, available at: https://www.alro.ro/storage/2025/9/5784/ALRO-Group-Sustainability-Report-2024.pdf</p>
10.9a–b Informing Workers of Rights	Conformance	<p>The Entity ensures continuous awareness of all employees regarding their fundamental rights, including Freedom of Association, collective bargaining, fair treatment, and access to grievance mechanisms, in full compliance with national legislation and international standards (ILO Conventions 87 and 98, Romanian Labour Code).</p> <p>Rights and obligations are communicated through the Human Rights Policy, Code of Ethics, 'Procedure PO-426 – Code of Ethics, Human Rights and CSR Policy', and 'Antibribery and Anticorruption Actions Code'. Documented training confirms that all employees have been informed of their rights and can report any concerns without fear of retaliation. All related policies are publicly available at: https://www.alro.ro/en/sustainability/policies-reports-certification</p>
11. OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Management System	Conformance	<p>The Entity maintains a fully documented and certified Occupational Health and Safety (OH&S) Management System in accordance with ISO 45001:2018, valid until May 2026, and is applicable to all employees, contractors and visitors. The Management System encompasses all required elements, such as organisational context, leadership and Worker participation, planning, support, operation, performance evaluation, and improvement and is implemented through the Management Manual, Prevention and Protection Plan, Occupational</p>

CRITERION	RATING	COMMENT
		<p>Health and Safety (OH&S) Policy and the General Manager's Declaration.</p> <p>Risk assessments and the Annual Environmental and OH&S Report confirm a proactive and effective approach to workplace safety. Results are publicly disclosed in the 2024 Sustainability Report, available at: https://www.alro.ro/storage/2025/9/5784/ALRO-Group-Sustainability-Report-2024.pdf</p>
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Conformance	<p>The Entity conducts annual reviews of its OH&S Management System in compliance with ISO 45001:2018 and the commitments outlined in the Occupational Health and Safety (OH&S) Policy and General Manager's Declaration. The latest management review, held in May 2025, confirmed the system's effectiveness and continuous improvement, reflected in reduced incident frequency and a stronger safety culture.</p> <p>Performance indicators (including LTIFR, severity rate, closed corrective actions, and safety training hours) are tracked and benchmarked annually against the Aluminium industry averages. Results and progress for both employees and Contractors are publicly disclosed in the Annual Environmental and OH&S Report and the 2024 Sustainability Report, pages 215-226: https://www.alro.ro/storage/2025/9/5784/ALRO-Group-Sustainability-Report-2024.pdf</p>
11.2 Employee engagement on Health and Safety	Conformance	<p>The Entity ensures active employee participation in the identification, analysis, and resolution of OH&S issues through the Joint Health and Safety Committee, composed of twelve members representing management, Workers, and Trade Unions. The Committee's activity is governed by Law No. 319/2006 on Occupational Health and Safety and supported by dedicated procedures such as 'Hazard Identification, Planning, Risk Assessment and Control', 'Training of OSH Workers', and 'Instructions on Worker Movement'.</p> <p>Performance is verified through internal and external audits and validated in the Management Review in February 2025. Worker participation and OH&S performance results are publicly disclosed in the 2024 Sustainability Report, available at: https://www.alro.ro/storage/2025/9/5784/ALRO-Group-Sustainability-Report-2024.pdf</p>

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DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	13 January 2022	Initial Certification Audit – Full Certification

1	12 August 2024	Surveillance and Scope Change; Updated 'Supply Chain Activities' to remove 'Material Conversion' and added 'Semi-Fabrication'
2	15 December 2025	Re-Certification Audit – Full Certification
