

# ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

# Asist Alüminyum Profil San. ve Tic. A.Ş.

CERTIFICATE NUMBER

514

ASI STANDARD

PERFORMANCE  
STANDARD  
(V3.1 2023)

CERTIFICATION LEVEL

FULL  
CERTIFICATION

ASI ACCREDITED  
AUDITING FIRM

CETIZION VERIFICA

DATE OF ISSUE

18 DECEMBER 2025

DATE OF EXPIRY

17 DECEMBER 2028

CERTIFIED SINCE

18 DECEMBER 2025

AUTHORISED BY

CERTIFICATION SCOPE

Asist Alüminyum Profil San. ve Tic.  
A.Ş., facilities located in Kırklareli,  
Türkiye, engaged in the production  
of Aluminium profiles.

Aluminium Stewardship Initiative Ltd  
ACN 606 661 125, Australia  
[info@aluminium-stewardship.org](mailto:info@aluminium-stewardship.org)

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

# AUDIT REPORT

## PERFORMANCE

## STANDARD

### OVERVIEW

|                               |  |
|-------------------------------|--|
| MEMBER NAME                   | Asist Alüminyum Profil San. ve Tic. A.Ş.   |
| ENTITY NAME                   | Asist Alüminyum Profil San. ve Tic. A.Ş.   |
| CERTIFICATION SCOPE           | Asist Alüminyum Profil San. ve Tic. A.Ş., facilities located in Kırklareli, Türkiye, engaged in the production of Aluminium profiles.  |
| SUPPLY CHAIN ACTIVITIES       | <ul style="list-style-type: none"><li>Aluminium Re-melting/Refining</li><li>Casthouses</li><li>Semi-Fabrication</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</li></ul>  |
| AUDIT FIRM                    | CETIZION Verifica  |
| AUDIT DATE                    | <ul style="list-style-type: none"><li>18 – 22 August 2025</li></ul>  |
| AUDIT REPORT SUBMISSION       | <ul style="list-style-type: none"><li>4 November 2025</li></ul>  |
| AUDIT SCOPE                   | <p>The Audit Scope covers all activities relating to Asist Alüminyum Profil San. ve Tic. A.Ş., facilities located in Kırklareli, Türkiye, engaged in the production of Aluminium profiles.</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none"><li>Aluminium Re-melting/Refining</li><li>Casthouses</li><li>Semi-Fabrication</li></ul> <p>All applicable Criteria in the ASI Performance Standard were included in the Audit Scope.</p>  |
| AUDIT OUTCOME                 | Certification  |
| AUDIT METHODOLOGY DECLARATION | <p>The Auditors confirm that:</p> <ul style="list-style-type: none"><li><input checked="" type="checkbox"/> The information provided by the Entity is true and accurate to the best knowledge of the Auditor(s) preparing this report.</li><li><input checked="" type="checkbox"/> The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous.</li><li><input checked="" type="checkbox"/> 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.</li><li><input checked="" type="checkbox"/> The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.</li></ul> |

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| CERTIFICATION PERIOD | 18 December 2025 – 17 December 2028 |
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| NEXT AUDIT TYPE | Surveillance Audit |
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| NEXT AUDIT DATE | 17 June 2026 |
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| CERTIFICATE NUMBER | 514 |
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If you have an inquiry or complaint about this Certification, go to the third-party EthicsPoint portal at: <https://aluminium-stewardship.ethicspoint.com/>

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

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

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## ENTITY OVERVIEW

Asist Alüminyum Profil San. ve Tic. A.Ş. (the 'Entity') commenced operation in 1994 and is engaged in the manufacturing of Aluminium Billets and Aluminium Profiles. It is located at OIZ Industrial Estate, situated approximately five kilometres south-east of the town of Kırklareli, Türkiye. The Entity is well connected via road, with the nearest airport being Istanbul International Airport. The nearest residential areas are located in the nearby small town of Kızılcıkdere, approximately 500 metres west of the site.

The Entity's plant, machinery and major processes include melting, heat treatment, extrusion and powder coating. The production capacity is approximately 28,800 tonnes per annum. The Entity purchases a sizeable quantity of Post-Consumer Scrap as part of its sourcing strategy to produce low carbon products. The Entity produces building materials for residential and commercial applications, including door and window frames and profiles, as well as automotive components for a variety of manufacturers, including BMW, Ford and Daimler.

## MATURITY RATINGS

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

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

|                    | GOVERNANCE | ENVIRONMENT | SOCIAL | COMBINED RATING |
|--------------------|------------|-------------|--------|-----------------|
| <b>SYSTEMS</b>     | Medium     | Low         | Medium | MEDIUM          |
| <b>RISKS</b>       | Medium     | Medium      | Medium | MEDIUM          |
| <b>PERFORMANCE</b> | Medium     | Low         | Low    | LOW             |
| <b>OVERALL</b>     | MEDIUM     |             |        |                 |

## FINDINGS

| CRITERION  | RATING      | COMMENT   |
|--|-------------|---|
| <b>1. BUSINESS INTEGRITY</b>                                     |             |   |
| 1.1 Legal Compliance   | Conformance | <p>The Entity has defined the responsibility for legal Compliance, reporting to members of the Board of Directors. The Entity has identified applicable legal requirements with assistance from external legal counsel. Quarterly updates of the legal compliance register are undertaken.</p> <p>Periodic audits are undertaken by Government authorities, including the Ministry of Labour and Social Security, with some minor discrepancies noted during the audit which were corrected and the closure status confirmed by the competent authority.</p>  |
| 1.2 Anti-Corruption  | Conformance | <p>The Entity has developed policies addressing aspects of anti-Corruption. These include the Ethics Policy, available at: <a href="https://www.asistal.com/storage/policies/media/3779/pol02-our-ethics-policy.pdf">https://www.asistal.com/storage/policies/media/3779/pol02-our-ethics-policy.pdf</a></p> <p>A Third-Party managed ethics hotline is in place for Stakeholders to report any complaint related to anti-Corruption or other performance aspects of the Entity. Refer to: <a href="https://www.asistal.com/tr/etik">https://www.asistal.com/tr/etik</a> and <a href="http://www.speak-hub.com">www.speak-hub.com</a> and <a href="mailto:asistaletikhat@speak-hub.com">asistaletikhat@speak-hub.com</a></p> <p>A hotline (0212 800 65 15) is available for use by Stakeholders in both Turkish and English language. The Entity has conducted a risk assessment addressing exposed functions and activities with financial implications. The Entity provides periodic employees training on anti-Corruption and other ethical conduct.</p> |
| 1.3a-e Code of Conduct   | Conformance | <p>The Entity has developed its Code of Conduct, publicly available at: <a href="https://asistal.com/storage/etik/CODE%20OF%20ETHICS%20AND%20CONDUCT_.pdf">https://asistal.com/storage/etik/CODE%20OF%20ETHICS%20AND%20CONDUCT_.pdf</a></p> <p>A Third-Party managed ethics hotline is in place for Stakeholders to report any complaint related to anti-Corruption or other performance aspects of the Entity. Refer to: <a href="https://www.asistal.com/tr/etik">https://www.asistal.com/tr/etik</a> and <a href="http://www.speak-hub.com">www.speak-hub.com</a> and <a href="mailto:asistaletikhat@speak-hub.com">asistaletikhat@speak-hub.com</a></p>   |
| <b>2. POLICY AND MANAGEMENT</b>                                  |             |   |
| 2.1a-f Environmental, Social, and Governance Policy              | Conformance | <p>The Entity has developed and implemented policies to address environment, social and governance performance. The Policies are available at: <a href="https://www.asistal.com/tr/politika">https://www.asistal.com/tr/politika</a><a href="https://www.asistal.com/en/policies">https://www.asistal.com/en/policies</a></p>   |
| 2.2a-c Leadership  | Conformance | <p>The Entity's management approves all policies, allocates appropriate resources and has designated a senior management member to have overall responsibility for ASI Performance Standard implementation.</p>   |
| 2.3a Environmental and Social Management Systems – Environmental | Conformance | <p>The Entity has developed and implemented an Environment Management System, Certified to ISO 14001:2015. The most recent audit report noted one minor non-conformity relating to waste storage in a non-designated area, which had been corrected and noted during this Audit.</p>  |

| CRITERION   | RATING                | COMMENT  |
|---|-----------------------|--|
| 2.3b Environmental and Social Management Systems – Social | Conformance           | The Entity has developed a social Management System through policies, procedures, Key Performance Indicators relating to employees, and a Human Resource Handbook, which includes information on recruitment, working hours and training. Related policies are available at: <a href="https://www.asistal.com/en/policies">https://www.asistal.com/en/policies</a>   |
| 2.4a-e Responsible Sourcing                               | Minor Non-Conformance | <p>The Entity has developed the following suite of policies and guidelines that support its responsible sourcing framework:</p> <p>Responsible Procurement Policy:<br/> <a href="https://www.asistal.com/storage/policies/media/3784/pol13-responsible-procurement-policy.pdf">https://www.asistal.com/storage/policies/media/3784/pol13-responsible-procurement-policy.pdf</a></p> <p>Supplier Policy:<br/> <a href="https://www.asistal.com/storage/policies/media/3785/pol04-supplier-policy.pdf">https://www.asistal.com/storage/policies/media/3785/pol04-supplier-policy.pdf</a></p> <p>Supplier Code of Conduct:<br/> <a href="https://asistal.com/storage/etik/SUPPLIER%20CODE%20OF%20CONDUCT_.pdf">https://asistal.com/storage/etik/SUPPLIER%20CODE%20OF%20CONDUCT_.pdf</a></p> <p>The Supplier Code of Conduct includes information on how to report grievances, at: Tel: +90 212 800 65 15; Email: <a href="mailto:asistaletikhat@peak-hub.com">asistaletikhat@peak-hub.com</a></p> <p>Buyers are trained on supplier policies and records are maintained. An approved supplier list is maintained, and the Supplier Code of Conduct has been communicated and endorsed. A critical supplier list is also maintained and includes suppliers of input material incorporated into the product, such as Aluminium material, chemical and paints.</p> <p>A supply chain risk assessment has been conducted. The Entity purchases sizeable portions of its Aluminium input material in the form of Post-Consumer Scrap. The Entity has not however considered Human Rights risks and impacts are not assessed with respect to 'waste pickers' of Scrap material.</p> |
| 2.5a-g Environmental and Social Impact Assessments        | Conformance           | The Entity has increased its production capacity and capability by installing a larger paint shop and has undertaken a detailed Environment Impact Assessment (EIA) as per National Regulations. The detailed EIA is available upon request via relevant regulatory authorities and consists of social aspects under section V.2.4 of the EIA, including community Health and Safety, air quality and land use.  |
| 2.6a-h Human Rights Impact Assessment                     | Conformance           | <p>The Entity has increased its production capacity and capability by installing a larger paint shop and has undertaken a detailed Environment Impact Assessment (EIA) as per National Regulations. The detailed EIA is available upon request via relevant regulatory authorities and consists of social aspects under section V.2.4 of the EIA, including community Health and Safety, air quality and land use.</p> <p>Human Rights aspects are addressed in the EIA as part of the associated Stakeholder Engagement Plan (SEP) covering various Stakeholders, relevance to Human Rights and community engagement. The SEP is available at:<br/> <a href="https://www.asistal.com/storage/sustainabilityreportfiles/media/3787/stakeholder-engagement-plan.pdf">https://www.asistal.com/storage/sustainabilityreportfiles/media/3787/stakeholder-engagement-plan.pdf</a></p>   |
| 2.7a-f Emergency Response Plan                            | Conformance           | The Entity has documented a detailed Emergency Response Plan for the Casthouse and extrusion area specifically and incorporates  |

| CRITERION  | RATING      | COMMENT   |
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|  |             | <p>emergency situations including fire and leakages. The Emergency Response Team (ERT) comprises of male and female employees, and periodic training has been provided on the Plan. Emergency drills are conducted, at least annually.</p> <p>The full version of the Emergency Response Plan is available to external Stakeholders upon request and a summary is disclosed in the Entity's Sustainability Report (page 51):<br/> <a href="https://www.asistal.com/storage/sustainabilityreportfiles/media/3724/asistal-surdurulebilirlik-raporu-ingilizce.pdf">https://www.asistal.com/storage/sustainabilityreportfiles/media/3724/asistal-surdurulebilirlik-raporu-ingilizce.pdf</a></p> |
| 2.8a-d Suspended Operations  | Conformance | The Entity has developed an Emergency Situation Action Plan which defines possible business disruption situations that could lead to suspended operations, and includes scenario responses to issues such as natural disasters, supply chain disruption, electricity disruption and cyber security. The Entity conducts an annual simulation exercise relating to a potential situation of a suspended operation.   |
| 2.9a-b Mergers and Acquisitions  | Conformance | The Entity has developed and implemented a policy to address merger and acquisition scenarios with a consideration of environment, social and governance issues.  |
| 2.10a-b Closure, Decommissioning and Divestment                        | Conformance | The Entity has developed and implemented a policy to address closure, decommissioning and divestment scenarios with a consideration of environment, social and governance issues.   |
| <b>3. TRANSPARENCY</b>   |             |   |
| 3.1a-b Sustainability Reporting  | Conformance | <p>The Entity has disclosed a Sustainability Report, developed in accordance with the Global Reporting Initiative (GRI) Guidelines, available at:<br/> <a href="https://www.asistal.com/storage/sustainabilityreportfiles/media/3724/asistal-surdurulebilirlik-raporu-ingilizce.pdf">https://www.asistal.com/storage/sustainabilityreportfiles/media/3724/asistal-surdurulebilirlik-raporu-ingilizce.pdf</a></p> <p>At the time of the Audit, the Sustainability Report was being updated for the 2024 reporting period and was expected to be released by the end of 2025.</p>   |
| 3.2 Non-compliance and Liabilities                                     | Conformance | <p>There were no Material fines, judgments, penalties or non-monetary sanctions received by the Entity for failure to comply with Applicable Law, which is disclosed on page 20 of the Sustainability Report:<br/> <a href="https://www.asistal.com/storage/sustainabilityreportfiles/media/3724/asistal-surdurulebilirlik-raporu-ingilizce.pdf">https://www.asistal.com/storage/sustainabilityreportfiles/media/3724/asistal-surdurulebilirlik-raporu-ingilizce.pdf</a></p>  |
| 3.3a-c Payments to Governments   | Conformance | <p>The Entity makes obligatory payments to the Government for Value Added Tax (VAT), corporate tax and income tax. Further information on payments to Government are available on page 15 of the Sustainability Report:<br/> <a href="https://www.asistal.com/storage/sustainabilityreportfiles/media/3724/asistal-surdurulebilirlik-raporu-ingilizce.pdf">https://www.asistal.com/storage/sustainabilityreportfiles/media/3724/asistal-surdurulebilirlik-raporu-ingilizce.pdf</a></p>  |
| 3.4a-f Stakeholder Complaints, Grievances and Requests for Information | Conformance | <p>The Entity engages with its internal and external Stakeholders and engages a Third Party providers to independently manage any grievances. For more information, refer to:<br/> <a href="https://www.asistal.com/en/ethics-hotline">https://www.asistal.com/en/ethics-hotline</a></p> <p>A comprehensive Stakeholder Engagement Plan developed by the Entity is available at:</p>  |

| CRITERION  | RATING         | COMMENT   |
|--|----------------|---|
|  |                | <p><a href="https://www.asistal.com/storage/sustainabilityreportfiles/media/3787/stakeholder-engagement-plan.pdf">https://www.asistal.com/storage/sustainabilityreportfiles/media/3787/stakeholder-engagement-plan.pdf</a></p> <p>During Worker interviews undertaken during the Audit, it was found that Workers were aware about the 'Speak-up' mechanism and felt free to raise any grievance, without fear of reprisal. Training on the grievance mechanism is periodically provided using standard training contents in both English and Turkish. 'Speak-Up' posters are displayed at various work areas throughout the Entity.</p> <p>There have been no grievances reported since the Entity joined ASI.</p>   |
| <b>4. MATERIAL STEWARDSHIP</b>   |                |   |
| 4.1a Environmental Life Cycle Assessment   | Conformance    | The Entity has conducted Life Cycle Assessments (LCA) in accordance with both ISO 14040 and ISO 14044 which covers its major Products including Billets, Bare Extrusion profile, Anodized profiles and Painted Profiles. A 'cradle to gate' approach using the ecoinvent database and Simapro was applied.  |
| 4.1b-c Environmental Life Cycle Assessment - Disclosure  | Conformance    | <p>The Entity discloses a summary of major Product LCAs on page 46 of the Sustainability Report:</p> <p><a href="https://www.asistal.com/storage/sustainabilityreportfiles/media/3724/asistal-surdurulebilirlik-raporu-ingilizce.pdf">https://www.asistal.com/storage/sustainabilityreportfiles/media/3724/asistal-surdurulebilirlik-raporu-ingilizce.pdf</a></p>   |
| 4.2 Product Design   | Conformance    | <p>The Entity has an established Research and Development (R&amp;D) function which focuses on producing 'greener' products via improvements in manufacturing technology, recyclability and waste minimisation. It is guided by the Entity's Recycling Strategy which is available at:</p> <p><a href="https://www.asistal.com/storage/policies/media/3780/pol12-recycling-strategy-and-policy.pdf">https://www.asistal.com/storage/policies/media/3780/pol12-recycling-strategy-and-policy.pdf</a></p> <p>The Entity has also developed an Augmented Reality model for their customers to view products. For further information, refer to:</p> <p><a href="https://www.asistal.com/en/en-asistal-ar">https://www.asistal.com/en/en-asistal-ar</a></p>  |
| 4.3a-b Aluminium Process Scrap   | Conformance    | <p>The Entity segregates Aluminium Process Scrap, at both the Casthouse and extrusion area and maintains records using ERP with monthly review by management. The Entity's Recycling Strategy is available at:</p> <p><a href="https://www.asistal.com/storage/policies/media/3780/pol12-recycling-strategy-and-policy.pdf">https://www.asistal.com/storage/policies/media/3780/pol12-recycling-strategy-and-policy.pdf</a></p> <p>Machining chips are sold externally due to difficulty in internal re-melting, where the external supplier melts the Aluminium chips after initial treatment (de-oiling and drying) and converts these into ingots, which are purchased by the Entity.</p> <p>The Entity has a long-term target to recycle and/or re-use 100% of its process Scrap and is currently exploring investment for the internal remelting of machining chips.</p> |
| 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.   |



| CRITERION   | RATING                | COMMENT   |
|---|-----------------------|---|
| 4.4d Collection and Recycling of Products at End of Life                                | Conformance           | <p>The Entity has developed its recycling strategy confirming its commitment and efforts to work towards recycling. The Recycling Strategy is publicly available at: <a href="https://www.asistal.com/storage/policies/media/3780/poll2-recycling-strategy-and-policy.pdf">https://www.asistal.com/storage/policies/media/3780/poll2-recycling-strategy-and-policy.pdf</a></p> <p>The Entity is member of the Turkish Aluminium Industry Association (TALSAD): <a href="https://talsad.org.tr/members">https://talsad.org.tr/members</a>. The Entity's management team periodically participate in TALSAD events.</p>   |
| 5. GREENHOUSE GAS EMISSIONS   |                       |   |
| 5.1a-b Disclosure of GHG Emissions and Energy Use                                       | Minor Non-Conformance | <p>The Entity records fuel consumption and activity details contributing to GHG emissions for Scope 1, 2 and 3 emission types. GHG emissions were independently verified for 2024 by an external agency, in accordance with ISO 14064-3, which has provided an appropriate level of verification. Scope 1, 2 and 3 emissions are disclosed in the Entity's Sustainability Report, page 55: <a href="https://www.asistal.com/storage/sustainabilityreportfiles/media/3724/asistal-surdurulebilirlik-raporu-ingilizce.pdf">https://www.asistal.com/storage/sustainabilityreportfiles/media/3724/asistal-surdurulebilirlik-raporu-ingilizce.pdf</a></p> <p>GHG emissions for 2023 however were not independently verified.</p> |
| 5.2a Aluminium Smelter GHG Emissions Intensity – Started production after 2020          | Not Applicable        | This Criterion is not applicable to the Entity's Certification Scope.   |
| 5.2b Aluminium Smelter GHG Emissions Intensity – In production up to and including 2020 | Not Applicable        | This Criterion is not applicable to the Entity's Certification Scope.   |
| 5.3a GHG Emissions Reduction Plans  | Conformance           | The Entity has developed a Decarbonisation Plan including a GHG Emissions Reduction Pathway and reduction targets covering Scope 1, 2 and 3 emission types, using the ASI Entity GHG Pathways Calculation Tool (with a plotted Process Slope (Scopes 1 and 2) and Procurement Slope (Scope 3), with 2022 as baseline.   |
| 5.3b-e GHG Emissions Reduction Plans – Targets, review and disclosure                   | Minor Non-Conformance | <p>The Entity has developed a Decarbonisation Plan including a GHG Emissions Reduction Pathway and reduction targets covering Scope 1, 2 and 3 emission types, using the ASI Entity GHG Pathways Calculation Tool. The Plan includes a reduction target of 50.4% for Scope 1 and 2 emissions and 30% for Scope 3 emissions by 2032.</p> <p>The Plan however does not articulate both an end target (2050) nor regular intermediate targets, including an emissions intensity target within a five-year period from the baseline year of 2022.</p>   |
| 5.4 GHG Emissions Management  | Minor Non-Conformance | <p>Whilst the Entity has developed a Decarbonisation Plan and incorporated actions and initiatives into its management framework, there is no documented procedure relating to all GHG emissions sources within the Entity's scope and boundary.</p> <p>There is also no satisfactory evidence of cross-referencing GHG emissions reduction initiatives into action plans, capital expenditure programs and Business improvement strategies.</p>  |

| CRITERION   | RATING                | COMMENT   |
|---|-----------------------|---|
| <b>6. EMISSIONS, EFFLUENTS AND WASTE</b>                |                       |   |
| 6.1a-f Emissions to Air                                 | Conformance           | <p>The Entity periodically monitors emission levels through the engagement of an accredited external agency that is selected by the Environment Authority. Emission levels were found within permissible limits. A summary of Emissions to Air is provided on page 38 of Sustainability Report:</p> <p><a href="https://www.asistal.com/storage/sustainabilityreportfiles/media/3724/asistal-surdurulebilirlik-raporu-ingilizce.pdf">https://www.asistal.com/storage/sustainabilityreportfiles/media/3724/asistal-surdurulebilirlik-raporu-ingilizce.pdf</a></p>  |
| 6.2a-g Discharges to Water                              | Minor Non-Conformance | <p>The Entity undertakes primary treatment of wastewater (process and domestic) and discharges to the Kırklareli Industrial Zone (OIZ) common treatment plant. The Entity receives a monthly invoice for the treatment of wastewater from OIZ.</p> <p>The quality parameters of discharge water are randomly checked by OIZ and results shared. The Entity has not received any penalty due to exceeding of discharge water quality parameters. For further information, refer to page 41 of the Sustainability Report:</p> <p><a href="https://www.asistal.com/storage/sustainabilityreportfiles/media/3724/asistal-surdurulebilirlik-raporu-ingilizce.pdf">https://www.asistal.com/storage/sustainabilityreportfiles/media/3724/asistal-surdurulebilirlik-raporu-ingilizce.pdf</a></p> <p>There is no public disclosure however relating to water discharge quantities.</p>   |
| 6.3a-g Assessment and Management of Spills and Leakages | Conformance           | <p>The Entity has conducted a risk assessment and management plan relating to Spills and Leakages. Secondary containment is provided for large chemical storage vessels used in the anodising process. A management plan for chemicals management has been developed, and chemical spillage kits are provided throughout the site.</p> <p>Drills are conducted for Spills and Leakages scenarios, with records maintained.</p>  |
| 6.4a-b Public Disclosure of Spills and Leakages         | Conformance           | <p>The Entity provides disclosures on Spills and Leakages as part of the risk assessment process, and a summary is provided on page 51 of the Sustainability Report:</p> <p><a href="https://www.asistal.com/storage/sustainabilityreportfiles/media/3724/asistal-surdurulebilirlik-raporu-ingilizce.pdf">https://www.asistal.com/storage/sustainabilityreportfiles/media/3724/asistal-surdurulebilirlik-raporu-ingilizce.pdf</a></p> <p>There have been no Spills or Leakages since the Entity became an ASI Member.</p>   |
| 6.5a-c Waste Management and Reporting                   | Conformance           | <p>The Entity has developed a detailed waste management plan indicating different types of Hazardous and Non-Hazardous Waste, disposal method and waste identification in accordance with Turkish legislation. Specified procedures for handling certain types of waste have been developed.</p> <p>The Entity has received a 'Zero Waste Certificate' base level, issued by the Ministry of Environment, Urbanization and Climate Change. All types of Waste generated, disposal by quantity and the related waste codes are recorded in the Government portal 'Motat'.</p> <p>Related disclosures are provided in the Sustainability Report on page 36-37:</p> <p><a href="https://www.asistal.com/storage/sustainabilityreportfiles/media/3724/asistal-surdurulebilirlik-raporu-ingilizce.pdf">https://www.asistal.com/storage/sustainabilityreportfiles/media/3724/asistal-surdurulebilirlik-raporu-ingilizce.pdf</a></p> |
| 6.6a-g Bauxite Residue                                  | Not Applicable        | This Criterion is not applicable to the Entity's Certification Scope.   |

| CRITERION  | RATING                | COMMENT  |
|--|-----------------------|--|
| 6.7a-f Spent Pot Lining (SPL)  | Not Applicable        | This Criterion is not applicable to the Entity's Certification Scope.  |
| 6.8a-d Dross   | Conformance           | <p>The Entity has developed a detailed waste management plan that addresses Dross. The Entity has received a 'Zero Waste Certificate' base level, issued by Ministry of Environment, Urbanization and Climate Change. All types of waste generated (including Dross), their disposal by quantity and the related waste codes are recorded in the Government portal 'Motat'.</p> <p>The Entity is currently engaging with the Dross recycler and ingot purchaser, both of whom are recovering Aluminium from Dross. A summary is provided in the Sustainability Report 2023 on page 36: <a href="https://www.asistal.com/storage/sustainabilityreportfiles/media/3724/asistal-surdurulebilirlik-raporu-ingilizce.pdf">https://www.asistal.com/storage/sustainabilityreportfiles/media/3724/asistal-surdurulebilirlik-raporu-ingilizce.pdf</a></p>   |
| <b>7. WATER STEWARDSHIP</b>  |                       |  |
| 7.1a-b Water Assessment and Disclosure   | Minor Non-Conformance | <p>The Entity sources all its water requirements from the industrial zone authority, OIZ. Monthly consumption records are maintained. The Entity has completed a water footprint study with assistance from an external agency.</p> <p>Annual rainfall is moderate, with provision to store rainwater in one underground tank for irrigation purposes. The Entity has conducted a water risk assessment using the WRI Aqueduct with identified risks such as water depletion, drought risk, seasonal variation and water stress, and has assessed its water-related risks as medium to high.</p> <p>Whilst the Entity has developed a high-level water balance diagram it is deficient in data relating to water withdrawal/intake, water consumption by activity, use of rainwater, water loss and wastewater discharge.</p> <p>Related disclosures are provided in Sustainability Report, page 41: <a href="https://www.asistal.com/storage/sustainabilityreportfiles/media/3724/asistal-surdurulebilirlik-raporu-ingilizce.pdf">https://www.asistal.com/storage/sustainabilityreportfiles/media/3724/asistal-surdurulebilirlik-raporu-ingilizce.pdf</a></p> |
| 7.2a-e Water Management  | Conformance           | <p>The Entity has developed a Water Management Plan with a 10 percent reduction target between 2025-2030. Related disclosures are provided on page 41 of the Sustainability Report: <a href="https://www.asistal.com/storage/sustainabilityreportfiles/media/3724/asistal-surdurulebilirlik-raporu-ingilizce.pdf">https://www.asistal.com/storage/sustainabilityreportfiles/media/3724/asistal-surdurulebilirlik-raporu-ingilizce.pdf</a></p>  |
| <b>8. BIODIVERSITY AND ECOSYSTEM SERVICES</b>                                  |                       |  |
| 8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment            | Conformance           | <p>The Entity has conducted a detailed Biodiversity Baseline and Risk Assessment Report with support provided from an external agency. The study addressed the operational area of the Entity plus an additional 'buffer area' of two kilometres to identify, assess and evaluate biodiversity impacts on flora and fauna. Based on both the field survey and secondary 'desktop' data review, the study concluded that the impact on Biodiversity and Ecosystem Services is low.</p>  |
| 8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority | Not Applicable        | <p>This Criterion is not applicable to the Entity, as its activities do not pose any significant risk to Biodiversity and Ecosystem Services, as confirmed by the Entity's Biodiversity Baseline and Risk Assessment Report.</p>   |

| CRITERION   | RATING         | COMMENT   |
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| 8.2a-g Biodiversity Management                            | Not Applicable | This Criterion is not applicable to the Entity, as its activities do not pose any significant risk to Biodiversity and Ecosystem Services, as confirmed by the Entity's Biodiversity Baseline and Risk Assessment Report.   |
| 8.3a-c Management of Priority Ecosystem Services          | Not Applicable | This Criterion is not applicable to the Entity, as its activities are not dependent on any Priority Ecosystem Services, as confirmed by the Entity's Biodiversity Baseline and Risk Assessment Report.  |
| 8.4 Alien Species   | Conformance    | <p>The Entity's Biodiversity Baseline and Risk Assessment Report assessed risks relating to Alien Species. One invasive species was found in the buffer area, and the Entity has developed a plan to address it through actions such as identification, numbering, uprooting and monitoring.</p> <p>The Entity uses wooden pallets for product packaging which are fumigated to prevent introduction of Alien Species.</p>  |
| 8.5a-b Commitment to "No Go" in World Heritage Properties | Conformance    | There are 22 World Heritage Sites within Turkey, of which 20 are cultural and two are mixed, listed for both cultural and natural values. The nearest World Heritage site from the Entity is Bursa which is approximately 400 kilometres from the Entity. The Entity has committed to 'No Go' in World Heritage sites as part of any future business expansion.   |
| 8.6a-d Protected Areas                                    | Conformance    | There is no Protected Area negatively affected due to the Entity's activities, as the nearest Protected Area (Nitelikli Dogal Sit Alam Dir) is located approximately 25 kilometres from the Entity.   |
| 8.6e Protected Areas - Bauxite Mining                     | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope.   |
| 8.7a-i Mine Rehabilitation                                | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope.   |
| <b>9. HUMAN RIGHTS</b>                                    |                |   |
| 9.1a-d Human Rights Due Diligence                         | Conformance    | <p>The Entity has developed a Human Rights Policy in accordance with national laws and international guidelines, and is available at: <a href="https://www.asistal.com/storage/policies/media/3781/pol06-human-rights-policy.pdf">https://www.asistal.com/storage/policies/media/3781/pol06-human-rights-policy.pdf</a></p> <p>The Entity has conducted Human Rights Due Diligence via cross functional teams, covering major internal and external Stakeholder groups. Further information is presented in the Sustainability Report on page 52: <a href="https://www.asistal.com/storage/sustainabilityreportfiles/media/3724/asistal-surdurulebilirlik-raporu-ingilizce.pdf">https://www.asistal.com/storage/sustainabilityreportfiles/media/3724/asistal-surdurulebilirlik-raporu-ingilizce.pdf</a></p> |
| 9.2a-e Gender Equity and Women's Empowerment              | Conformance    | <p>The Entity has developed and implemented a Gender Equity Policy, which is publicly available at: <a href="https://www.asistal.com/storage/policies/media/3775/pol07-gender-equality-policy.pdf">https://www.asistal.com/storage/policies/media/3775/pol07-gender-equality-policy.pdf</a></p> <p>The Entity is aiming to increase the percents of women in employment from 5% in 2023 to 20% by 2030. Related disclosures are provided in the Sustainability Report on page 29: <a href="https://www.asistal.com/storage/sustainabilityreportfiles/media/3724/asistal-surdurulebilirlik-raporu-ingilizce.pdf">https://www.asistal.com/storage/sustainabilityreportfiles/media/3724/asistal-surdurulebilirlik-raporu-ingilizce.pdf</a></p>   |

| CRITERION   | RATING                | COMMENT  |
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|   |                       | A more detailed discussion as to the effectiveness of actions taken to increase gender diversity will be published in next Sustainability Report.  |
| 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.  |
| 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.  |
| 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           | The Entity has completed a cultural and heritage site identification exercise, and concluded that the nearest feature of cultural and/or sacred heritage is near Bursa and Cumalıkızık, located approximately 400 kilometres from the Entity.  |
| 9.5b Cultural and Sacred Heritage - Impacts                                   | Not Applicable        | This Criterion is not applicable to the Entity, as its operations are located within an established industrial zone and the nearest feature of cultural and/or sacred heritage is near Bursa and Cumalıkızık, located approximately 400 kilometres from the Entity.  |
| 9.6a-i Displacement   | Not Applicable        | This Criterion is not applicable to the Entity, as its operations are located within an established industrial zone and it has not caused displacement of community or economic interest.  |
| 9.7a-h Affected Populations and Organisations                                 | Conformance           | <p>The Entity has developed and implemented a detailed Stakeholder Engagement Plan that addresses neighbouring facilities and communities. Further information is available at: <a href="https://www.asistal.com/storage/sustainabilityreportfiles/media/3787/stakeholder-engagement-plan.pdf">https://www.asistal.com/storage/sustainabilityreportfiles/media/3787/stakeholder-engagement-plan.pdf</a></p> <p>During the consultation within the industrial area and related authority personnel, there were no indications of negative feedback from neighbouring industries and communities about the Entity's operations and activities.</p> <p>The Entity undertakes local community investment initiatives including food distribution and provision of medical equipment to the local hospital.</p> |
| 9.8a Conflict-Affected and High-Risk Areas - Strong management systems        | Minor Non-Conformance | The Entity has completed a supply chain risk assessment, and has implemented a Responsible Procurement Policy, Supplier Policy and Supplier Code of Conduct. It has not however formally integrated these aspects into their existing Management Systems.  |

| CRITERION  | RATING                | COMMENT   |
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| 9.8b Conflict-Affected and High-Risk Areas – Identify and assess risks   | Minor Non-Conformance | The Entity has completed a supply chain risk assessment, and has implemented a Responsible Procurement Policy, Supplier Policy and Supplier Code of Conduct. It has not however formally identified ‘red flags’ within its supply chain.  |
| 9.8c Conflict-Affected and High-Risk Areas – Strategy to respond to risks  | Minor Non-Conformance | Whilst the Entity has completed a supply chain risk assessment, and has implemented a Responsible Procurement Policy, Supplier Policy and Supplier Code of Conduct, there is no formal documented strategy to respond to CAHRA-specific risks in its Aluminium supply chain.  |
| 9.8d Conflict-Affected and High-Risk Areas – Audit of due diligence  | Conformance           | The Entity’s Due Diligence practices were audited during this ASI Audit, which meets the requirement for this Criterion.  |
| 9.8e Conflict-Affected and High-Risk Areas – Report annually   | Minor Non-Conformance | <p>The Entity provides a brief disclosure on supply chain and sustainability context during supplier selection and monitoring on page 45 of the Sustainability Report:<br/> <a href="https://www.asistal.com/storage/sustainabilityreportfiles/media/3724/asistal-surdurulebilirlik-raporu-ingilizce.pdf">https://www.asistal.com/storage/sustainabilityreportfiles/media/3724/asistal-surdurulebilirlik-raporu-ingilizce.pdf</a></p> <p>It has not however appropriately disclosed specific information on its Due Diligence activities on its Aluminium supply chain.</p>   |
| 9.9 Security practice  | Conformance           | <p>The Entity provides periodic training to all security guards on site and records are maintained. This was verified during interviews with security guards undertaken during the Audit.</p> <p>Security guards are permanent employees hired by Entity following a background check for use of firearms as well as required registration and approval via a Government database:<br/> <a href="https://ozelguvenlik.egm.gov.tr/my.policy">https://ozelguvenlik.egm.gov.tr/my.policy</a></p>   |
| <b>10. LABOUR RIGHTS</b>   |                       |   |
| 10.1a-c Freedom of Association and Right to Collective Bargaining  | Minor Non-Conformance | <p>The Entity commits to respect Workers’ right to Freedom of Association and Collective Bargaining, in accordance with Turkish Labor Laws and the International Labour Organization (ILO). During a review of the Human Rights Policy, there is however no specific reference and commitment made to respect and protect Workers rights of Freedom of Association and Collective Bargaining.</p> <p>During Worker interviews and management consultation, it was found that there is no Trade Union at the Entity, however Workers are free to come together, if they wish to talk with management on topics of collective concerns.</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 there is no restriction on the right to Freedom of Association and Collective Bargaining in Türkiye, where the Entity operates.  |
| 10.2a Child Labour   | Conformance           | The Entity has made a commitment to not employ any Child Labour in its business activities, which has been reflected in Entity’s Human Rights Policy as well as the Supplier Code of Conduct. Refer to:   |

| CRITERION                         | RATING      | COMMENT   |
|-----------------------------------|-------------|---|
|                                   |             | <p>Human Rights Policy:<br/> <a href="https://www.asistal.com/storage/policies/media/3781/pol06-human-rights-policy.pdf">https://www.asistal.com/storage/policies/media/3781/pol06-human-rights-policy.pdf</a></p> <p>Supplier Code of Conduct:<br/> <a href="https://www.asistal.com/storage/policies/media/3793/supplier-code-of-conduct.pdf">https://www.asistal.com/storage/policies/media/3793/supplier-code-of-conduct.pdf</a></p> <p>Sustainability Report (page 52):<br/> <a href="https://www.asistal.com/storage/sustainabilityreportfiles/media/3724/asistal-surdurulebilirlik-raporu-ingilizce.pdf">https://www.asistal.com/storage/sustainabilityreportfiles/media/3724/asistal-surdurulebilirlik-raporu-ingilizce.pdf</a></p> <p>A review of employment records undertaken during the Audit confirmed that there were no Workers or employees below the age of 18 years. The age of Workers is checked at the time of recruitment through the National ID system and education certificates.</p>  |
| 10.3a-c Forced Labour             | Conformance | <p>The Entity has made commitment to not engage in Forced Labour practices in its business activities which has been reflected in Entity's Human Rights Policy as well as the Supplier Code of Conduct. Refer to:</p> <p>Human Rights Policy:<br/> <a href="https://www.asistal.com/storage/policies/media/3781/pol06-human-rights-policy.pdf">https://www.asistal.com/storage/policies/media/3781/pol06-human-rights-policy.pdf</a></p> <p>Supplier Code of Conduct:<br/> <a href="https://www.asistal.com/storage/policies/media/3793/supplier-code-of-conduct.pdf">https://www.asistal.com/storage/policies/media/3793/supplier-code-of-conduct.pdf</a></p> <p>Sustainability Report (page 52):<br/> <a href="https://www.asistal.com/storage/sustainabilityreportfiles/media/3724/asistal-surdurulebilirlik-raporu-ingilizce.pdf">https://www.asistal.com/storage/sustainabilityreportfiles/media/3724/asistal-surdurulebilirlik-raporu-ingilizce.pdf</a></p> <p>The Entity's Modern Slavery Statement (March 2025), signed by Chairman of the Board, is available at:<br/> <a href="https://www.asistal.com/storage/policies/media/3783/pol09-modern-slavery-statement.pdf">https://www.asistal.com/storage/policies/media/3783/pol09-modern-slavery-statement.pdf</a></p> |
| 10.4a-c Non-Discrimination        | Conformance | <p>The Entity has made a commitment to prevent and avoid discriminatory practices in its business activities, which has been reflected in the following:</p> <p>Human Rights Policy:<br/> <a href="https://www.asistal.com/storage/policies/media/3781/pol06-human-rights-policy.pdf">https://www.asistal.com/storage/policies/media/3781/pol06-human-rights-policy.pdf</a></p> <p>Supplier Code of Conduct:<br/> <a href="https://www.asistal.com/storage/policies/media/3793/supplier-code-of-conduct.pdf">https://www.asistal.com/storage/policies/media/3793/supplier-code-of-conduct.pdf</a></p> <p>Sustainability Report (page 52):<br/> <a href="https://www.asistal.com/storage/sustainabilityreportfiles/media/3724/asistal-surdurulebilirlik-raporu-ingilizce.pdf">https://www.asistal.com/storage/sustainabilityreportfiles/media/3724/asistal-surdurulebilirlik-raporu-ingilizce.pdf</a></p> <p>During Worker interviews and a review of related records such as training and promotion, there is no indication of any of Discrimination at the Entity.</p>   |
| 10.5 Communication and engagement | Conformance | <p>The Entity communicates and engages with Workers in an ongoing basis, as confirmed during Worker and management interviews. The Entity also engages informally with Workers through events such as Women's Day, Turkish Republic Day, Ramadan feast, and new year dinner organisations. The Entity provides accessible means to raise</p>  |

| CRITERION   | RATING                | COMMENT   |
|---|-----------------------|---|
|   |                       | concerns related to workplace and compensation issues, without threat of reprisal, intimidation or Violence and Harassment.   |
| 10.6a-g Violence and Harassment                               | Minor Non-Conformance | <p>The Entity has made commitment to prevent and avoid Violence and Harassment in the workplace and in its business activities, which has been reflected in the following:</p> <p>Human Rights Policy:<br/> <a href="https://www.asistal.com/storage/policies/media/3781/pol06-human-rights-policy.pdf">https://www.asistal.com/storage/policies/media/3781/pol06-human-rights-policy.pdf</a></p> <p>Supplier Code of Conduct:<br/> <a href="https://www.asistal.com/storage/policies/media/3793/supplier-code-of-conduct.pdf">https://www.asistal.com/storage/policies/media/3793/supplier-code-of-conduct.pdf</a></p> <p>Sustainability Report (page 52):<br/> <a href="https://www.asistal.com/storage/sustainabilityreportfiles/media/3724/asistal-surdurulebilirlik-raporu-ingilizce.pdf">https://www.asistal.com/storage/sustainabilityreportfiles/media/3724/asistal-surdurulebilirlik-raporu-ingilizce.pdf</a></p> <p>During Worker interviews and a review of related records it was identified that the Entity's existing Policy framework does not sufficiently reference or address 'Violence', its associated risks or prevention and protection measures.</p> |
| 10.7a-c Remuneration  | Minor Non-Conformance | <p>The Entity provides remuneration above the Turkish minimum wage and includes additional benefits above the labour law including bonuses and family support to all employees. The remuneration is paid in full via bank transfer by the 5<sup>th</sup> of each month. Social security payments are paid to relevant authorities on or before 20<sup>th</sup> of each month.</p> <p>Although the Entity is paying above legal minimum wage and additional benefits, there has been no formal living wage calculation based on cost of living.</p>  |
| 10.8a-c Working Time  | Conformance           | The Entity adheres to National regulations on working hours and a duty roster is prepared accordingly. Attendance is recorded using a biometric tool, and annual leave is provided as per the labour laws and is based on the number of years' experience. Overtime working practices as determined from Worker's interviews and Human Resources Department records are considered appropriate.   |
| 10.9a-b Informing Workers of Rights                           | Conformance           | The Entity periodically provides communication and training to its all Workers about their Human Rights and legal rights. This was confirmed via a review of training records and Worker interviews.  |
| <b>11. OCCUPATIONAL HEALTH AND SAFETY</b>                     |                       |   |
| 11.1a Occupational Health and Safety (OH&S) Management System | Minor Non-Conformance | <p>The Entity has developed and implemented a Occupational Health and Safety (OH&amp;S) Management System which is independently certified to ISO 45001:2018. The Certificate is available at:<br/> <a href="https://www.asistal.com/storage/certificates/July2025/EQ7ta0vHbmIs6B9CpyMT.pdf">https://www.asistal.com/storage/certificates/July2025/EQ7ta0vHbmIs6B9CpyMT.pdf</a></p> <p>During the plant walkover as part of the Audit, it was found however that Workers in the anodizing area where sulphuric acid was in use, were not wearing protective clothing as per the Entity's chemical risk controls.</p>  |



| CRITERION  | RATING                | COMMENT   |
|--|-----------------------|---|
| 11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure | Minor Non-Conformance | <p>The Entity monitors and discloses OH&amp;S performance using both leading and lagging indicators. Refer to pages 60-61 of the Sustainability Report:<br/> <a href="https://www.asistal.com/storage/sustainabilityreportfiles/media/3724/asistal-surdurulebilirlik-raporu-ingilizce.pdf">https://www.asistal.com/storage/sustainabilityreportfiles/media/3724/asistal-surdurulebilirlik-raporu-ingilizce.pdf</a></p> <p>The Entity's OH&amp;S performance is also reported to the Turkish Government as required under National regulations.</p> <p>The Entity however has not publicly disclosed a comparative analysis of its OH&amp;S performance with peer Businesses and leading practice.</p> |
| 11.2 Employee engagement on Health and Safety  | Conformance           | <p>The Entity engages with employees on Occupational Health and Safety through safety training, workplace monitoring, signage, posters and employee feedback. Related disclosure on employee OH&amp;S training is provided on page 60 of the Sustainability Report:<br/> <a href="https://www.asistal.com/storage/sustainabilityreportfiles/media/3724/asistal-surdurulebilirlik-raporu-ingilizce.pdf">https://www.asistal.com/storage/sustainabilityreportfiles/media/3724/asistal-surdurulebilirlik-raporu-ingilizce.pdf</a></p>  |

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#### DOCUMENT CONTROL AND VERSION HISTORY

| REVISION | DATE             | NOTES  |
|----------|------------------|--|
| 0        | 18 December 2025 | Initial Certification Audit – Full Certification |