

# ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

# ASAŞ Alüminyum

CERTIFICATE NUMBER  
**238**

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

CERTIFICATION  
LEVEL  
**FULL  
CERTIFICATION**

ASI ACCREDITED  
AUDITING FIRM  
**CETIZION VERIFICA**

DATE OF ISSUE  
**9 DECEMBER 2025**

DATE OF EXPIRY  
**8 DECEMBER 2028**

CERTIFIED SINCE  
**9 DECEMBER 2022**

## AUTHORISED BY

Aluminium Stewardship Initiative Ltd  
ACN 606 661 125, Australia  
info@aluminium-stewardship.org

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

## CERTIFICATION SCOPE

Manufacture of Aluminium flat products, Aluminium profiles and Aluminium composite panels, as well as PVC profiles and shutter products at the Akyazi and Karapürçek Facilities, and the ASAŞ Alüminyum Headquarters located at Istanbul, Türkiye.

# AUDIT REPORT PERFORMANCE STANDARD

## OVERVIEW

MEMBER NAME	ASAŞ Alüminyum San. Ve Tic. A.Ş.
ENTITY NAME	ASAŞ Alüminyum
CERTIFICATION SCOPE	Manufacture of Aluminium flat products, Aluminium profiles and Aluminium composite panels, as well as PVC profiles and shutter products at the Akyazi and Karapürçek Facilities, and the ASAŞ Alüminyum Headquarters located at Istanbul, Türkiye.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none"><li>Aluminium Re-melting/Refining</li><li>Casthouses</li><li>Material Conversion</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 (22 – 29 August 2022)</li><li>Surveillance Audit (27 – 30 November 2023)</li><li>Re-Certification Audit and Scope Change (17 – 19 November 2025)</li></ul>
AUDIT FIRM	CETIZION Verifica
AUDIT DATE	<ul style="list-style-type: none"><li>22 – 29 August 2022 (Initial Certification Audit)</li><li>27 – 30 November 2023 (Surveillance Audit)</li><li>17 – 19 November 2025 (Re-Certification Audit and Scope Change)</li></ul>
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none"><li>7 November 2022 (Initial Certification Audit)</li><li>29 January 2023 (Surveillance Audit)</li><li>9 February 2026 (Re-Certification Audit and Scope Change)</li></ul>
AUDIT SCOPE	<p><u>Initial Certification Audit (22 – 29 August 2022)</u></p> <p>The Audit Scope covers the Akyazi and Karapürçek Facilities, Türkiye which manufacture Aluminium Flat Products, Aluminium Profile &amp; Composite Panels and PVC Profile &amp; Shutter Products, as well as ASAŞ Alüminyum Headquarters located at Akyazi/Sakarya, Türkiye.</p> <p>The 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>Material Conversion (Production and Transformation)</li></ul> <p>All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.</p> <p><u>Surveillance Audit (27 – 30 November 2023)</u></p> <p>The Audit Scope covers the Akyazi and Karapürçek Facilities, Türkiye which manufacture Aluminium Flat Products, Aluminium Profile &amp; Composite Panels and</p>

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PVC Profile & Shutter Products, as well as ASAŞ Alüminyum Headquarters located at Akyazı/Sakarya, Türkiye.

The supply chain activities included in the Audit Scope:

- Aluminium Re-melting/Refining
- Casthouses
- Material Conversion (Production and Transformation)

All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.

Re-Certification Audit and Scope Change (17 – 19 November 2025)

The Audit Scope covers the Akyazi and Karapürçek Facilities, Türkiye which manufacture Aluminium Flat Products, Aluminium Profile & Composite Panels and PVC Profile & Shutter Products, as well as ASAŞ Alüminyum Headquarters located at Akyazı/Sakarya, Türkiye.

The supply chain activities included in the Audit Scope:

- Aluminium Re-melting/Refining
- Casthouses
- Material Conversion

All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.

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AUDIT OUTCOME ● Certification

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AUDIT METHODOLOGY  
DECLARATION

The Auditors confirm that:

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

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CERTIFICATION PERIOD 9 December 2025 – 8 December 2028

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NEXT AUDIT TYPE Surveillance Audit

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NEXT AUDIT DATE 9 June 2027

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CERTIFICATE NUMBER 238



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

ASAS Alüminyum San. Ve Tic. A.Ş. (the 'Entity') is located in Akyazı and Karapürçek, Türkiye and produces a diverse range of products, including Aluminium profiles, composite panels, flat-rolled Aluminium, PVC profiles, and roller shutter systems. The Entity is an integrated Facility situated over a 1.3 million square metre (m<sup>2</sup>) area, with approximately 400,000 m<sup>2</sup> of covered production space.

The Entity's current production capacities include:

- Aluminium Profile production Facility
  - Aluminium Billet: 100,000 metric tonnes per annum
  - Aluminium Profile: 90,000 metric tonnes per annum
  - Anodised Profile: 40,000 metric tonnes per annum
  - Powder-Coated Profile: 15,000 metric tonnes per annum
- Aluminium Composite Panel production Facility: 7.5 million m<sup>2</sup>/year
- Flat Rolled product production Facility
  - Casting: 240,000 metric tonnes per annum
  - Rolling: 150,000 metric tonnes per annum
  - Foil: 120,000 metric tonnes per annum
  - Painted Sheet: metric tonnes per annum
- PVC Profile production Facility: 40,000 metric tonnes per annum

The Entity is well connected via road, rail and air routes with the nearest airport and port located in Istanbul, approximately 165 kilometres from the Facilities.

## 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	Medium	Medium	MEDIUM
<b>RISKS</b>	Medium	Medium	Low	MEDIUM
<b>PERFORMANCE</b>	Medium	Medium	Medium	MEDIUM
<b>OVERALL</b>	MEDIUM			

## FINDINGS

CRITERION	RATING	COMMENT
<b>1. BUSINESS INTEGRITY</b>		
1.1 Legal Compliance	Conformance	<p>The Entity's Internal Audit and Compliance Director reports to both the Board and Chairperson and has overall responsibility for legal compliance. The Entity has established and implemented Legal Compliance Tracking Lists and Corporate Compliance Policy, available at: <a href="https://www.asastr.com/Sites/1/upload/files/GN-PT-03_0_Kurumsal_Uyum_Politikasi_en_US-2333.pdf">https://www.asastr.com/Sites/1/upload/files/GN-PT-03_0_Kurumsal_Uyum_Politikasi_en_US-2333.pdf</a></p> <p>The Entity periodically assesses the status of various legal compliances as per the annual audit plan. A Legal Compliance Monitoring Report is prepared and submitted to senior management. The applicable legal requirements are mapped to the responsible department and monitored (e.g. Environmental and Social Management System).</p> <p>To strengthen ethical compliance, the Code of Business Ethics has been communicated to employees and supported with annual training. The Entity has improved its legal compliance monitoring system recently through digital application under document Management System 'QDMS'.</p>
1.2 Anti-Corruption	Conformance	<p>The Entity has established and implemented Anti-Bribery and Anti-Corruption Policy, available at: <a href="https://www.asastr.com/Sites/1/upload/files/Anti-Bribery_and_Anti-Corruption_Policy-2351.pdf">https://www.asastr.com/Sites/1/upload/files/Anti-Bribery_and_Anti-Corruption_Policy-2351.pdf</a></p> <p>The reporting mechanism has been publicly disclosed in the Anti-Bribery and Anti-Corruption Policy, and includes contact details via email (i.e. <a href="mailto:ethics@asastr.com">ethics@asastr.com</a>), and the ethics committee telephone number (+90 216 680 15 82).</p> <p>The Entity has developed written procedures to manage the receiving and giving of gifts, donations and sponsorships. These procedures are regularly communicated to all Workers and supported with internal control processes. The related disclosure is included in the 2024 Sustainability Report, page 20: <a href="https://www.asastr.com/sites/1/upload/files/ASAS_Corporate_Sustainability_2024-2356.pdf">https://www.asastr.com/sites/1/upload/files/ASAS_Corporate_Sustainability_2024-2356.pdf</a></p> <p>The Entity has a formal management commitment that addresses anti-Corruption, in accordance with Turkish law.</p> <p>An internal Ethics Committee is responsible for overall ethical practices, including the establishment of a hotline, which is directly accessed by Ethics Committee members. There is a system to track the number of reported cases. There have been no complaints raised to date that relate to Corruption.</p>
1.3a-e Code of Conduct	Conformance	<p>The Entity has developed bilingual Business Ethics Codes, available at: <a href="https://www.asastr.com/sites/1/upload/files/ASAS_Corporate_Sustainability_2024-2356.pdf">https://www.asastr.com/sites/1/upload/files/ASAS_Corporate_Sustainability_2024-2356.pdf</a></p> <p>The Business Ethics Codes is approved by Chairperson of Board of ASAŞ Alüminyum San. ve Tic. A.Ş. and was adopted in April 2019.</p> <p>The Code of Ethics is reviewed annually and updated, when necessary, with knowledge and approval of the Board of Directors. It is included as a part of the induction program for new employees, as well as supported by regular training, both online and with induction packages The training is supported by an examination, with results</p>

CRITERION	RATING	COMMENT
		<p>recorded. There is single point of contact (SPOC) in all major facilities locations to oversee Business Ethics Code implementation and training.</p> <p>The Entity's Code of Ethics is available at:  <a href="https://www.asastr.com/corporate-/codes-of-conduct/">https://www.asastr.com/corporate-/codes-of-conduct/</a></p>
<b>2. POLICY AND MANAGEMENT</b>		
2.1a-f Environmental, Social, and Governance Policy	Conformance	<p>The Entity's senior management has designated a member of the senior management team to develop, establish and effectively maintain ASI Performance Standard requirements.</p> <p>The Entity's management has internally and publicly communicated its Health, Safety and Environmental Policy. Refer to:  <a href="https://www.asastr.com/corporate-/sustainability">https://www.asastr.com/corporate-/sustainability</a></p> <p>Governance Policies are addressed in the Code of Conduct. Refer to:  <a href="https://www.asastr.com/corporate-/codes-of-conduct">https://www.asastr.com/corporate-/codes-of-conduct</a></p>
2.2a-c Leadership	Conformance	<p>The Entity has designated a member of senior management with overall responsibility for implementing the ASI Performance Standard requirements.</p>
2.3a Environmental and Social Management Systems - Environmental	Conformance	<p>The Entity holds a valid Environmental Management System 5, which has been independently verified to ISO 14001.</p>
2.3b Environmental and Social Management Systems - Social	Conformance	<p>The Entity has established a Social Management System through the development of various human resources mechanisms, employee safety Policies, procedures, training records and risk assessment processes in accordance with Turkish Labour Laws.</p>
2.4a-e Responsible Sourcing	Conformance	<p>The Entity has established and implemented a Sustainable Supply Chain Policy, available at: <a href="https://www.asastr.com/corporate-/policies/sustainable-supply-chain-policy">https://www.asastr.com/corporate-/policies/sustainable-supply-chain-policy</a></p> <p>The Entity has established a Sustainable Procurement Committee, which meets once every six months to review the status and progress of Key Performance Indicators (KPIs), including the signing the Code of Conduct, and completion of supplier self-assessments. The Entity has undergone independent audits as per sustainable procurement guidelines consistent with ISO 20400:2017.</p> <p>Suppliers have been identified based upon their criticality, priority level, and risk level and represent above 80 percent of the Entity's total spend value. Assessments were undertaken using a structured questionnaire, and subsequent corrective action plans are under implementation and follow-up.</p>
2.5a-g Environmental and Social Impact Assessments	Not Applicable	<p>This Criterion is not applicable to the Entity as it has not undertaken any new construction projects or made significant changes to existing facilities and processes.</p>
2.6a-h Human Rights Impact Assessment	Not Applicable	<p>This Criterion is not applicable to the Entity as it has not undertaken any new construction projects or made significant changes to existing facilities and processes.</p>

CRITERION	RATING	COMMENT
2.7a-f Emergency Response Plan	Conformance	<p>The Entity has documented emergency planning procedures, including potential emergency scenarios such as chemical spillage, gas leakage, earthquake and fire. The response action plan for each type of emergency has been detailed, and the team has been trained on the Emergency Response Plan. An annual planning for drill events is maintained. During the Audit it was verified that previous audit non-conformities had been effectively closed (e.g. windsocks are provided and considered during gas leakage emergency scenarios).</p> <p>The Entity provides emergency response plans to Stakeholders upon request.</p>
2.8a-d Suspended Operations	Conformance	<p>The Entity has conducted Enterprise Risk Management (ERM) addressing financial, operational, reputational, and supply chain risks that may result in business suspension. The Entity has identified necessary mitigation measures including environment, social and governance criteria.</p>
2.9a-b Mergers and Acquisitions	Conformance	<p>The Entity has established processes for Due Diligence, addressing Environmental, Social and Governance (ESG) issues during merger, acquisition and post-merger phases. It also addresses strategic risk.</p> <p>The Entity recently acquired Eurofoil France. Refer to: <a href="https://aluminiumtoday.com/news/asas-acquires-eurofoil-france">https://aluminiumtoday.com/news/asas-acquires-eurofoil-france</a></p>
2.10a-b Closure, Decommissioning and Divestment	Conformance	<p>The Entity has established a Due Diligence process that addresses ESG issues in the planning process for closure, decommissioning, and divestment. No closure, decommissioning and/or shutdown has taken place since the Entity becoming an ASI Member.</p>
<b>3. TRANSPARENCY</b>		
3.1a-b Sustainability Reporting	Conformance	<p>The Entity has developed a Sustainability Report for the period January 2024 to December 2024, following the GRI reporting framework, as well as mandatory disclosure of ASI Performance Standard requirements with external assurance for selected performance disclosures. The Stakeholder engagement and Materiality assessment (pages 31-25) has been conducted to identify relevant environment, social and governance and develop response plan.</p> <p>The 2024 Sustainability Report is available at: <a href="https://www.asastr.com/sites/1/upload/files/ASAS_Corporate_Sustainability_2024-2356.pdf">https://www.asastr.com/sites/1/upload/files/ASAS_Corporate_Sustainability_2024-2356.pdf</a></p>
3.2 Non-compliance and Liabilities	Conformance	<p>The Entity has not received any significant fines, judgments, penalties and non-monetary sanctions for failure to comply with Applicable Law since joining ASI membership, other than routine items such as traffic fines. The related disclosure is included in the 2024 Sustainability Report, page 19: <a href="https://www.asastr.com/sites/1/upload/files/ASAS_Corporate_Sustainability_2024-2356.pdf">https://www.asastr.com/sites/1/upload/files/ASAS_Corporate_Sustainability_2024-2356.pdf</a></p>
3.3a-c Payments to Governments	Conformance	<p>The Entity makes payments to governments for statutory taxes, value added tax and social security payments on a legal and/or contractual basis and are declared in accordance with the applicable legal regulations.</p> <p>Financial results are publicly disclosed on an annual basis through the ASAŞ Alüminyum TFRS, according to the Turkish Financial Reporting</p>

CRITERION	RATING	COMMENT
		<p>Standards (IFRS) and the Independent Financial Auditor's Report. These reports are included in the Board of Directors' Annual Activity Report to meet transparency and corporate governance requirements and are made accessible to Stakeholders.</p> <p>The related disclosure is included in the 2024 Sustainability Report, page 19:  <a href="https://www.asastr.com/sites/1/upload/files/ASAS_Corporate_Sustainability_2024-2356.pdf">https://www.asastr.com/sites/1/upload/files/ASAS_Corporate_Sustainability_2024-2356.pdf</a></p>
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	<p>The Entity has reviewed and updated its Stakeholder engagement plan which includes details on its complaint mechanism and requisite forms and templates. Refer to:  <a href="https://www.asastr.com/sites/1/upload/files/ASAS%CC%A7_SEP_EN_REV04_10_11_2025-2345.pdf">https://www.asastr.com/sites/1/upload/files/ASAS%CC%A7_SEP_EN_REV04_10_11_2025-2345.pdf</a></p> <p>The Entity's grievance system is aligned with International Finance Corporation (IFC) Standards. There are three levels to respond to any grievance both internal and external Stakeholders (over a 14, 30 or 180 day period). There have been no significant changes in this practice since the previous ASI Audit to manage Stakeholder Complaints, Grievances and Requests for Information.</p> <p>The related disclosures are included in the 2024 Sustainability Report, pages 31-32:  <a href="https://www.asastr.com/sites/1/upload/files/ASAS_Corporate_Sustainability_2024-2356.pdf">https://www.asastr.com/sites/1/upload/files/ASAS_Corporate_Sustainability_2024-2356.pdf</a></p>
<b>4. MATERIAL STEWARDSHIP</b>		
4.1a Environmental Life Cycle Assessment	Conformance	<p>The Entity has conducted a Life Cycle Assessment (LCA) and obtained Environmental Product Declarations (EPDs) in accordance with international standards for all major Product categories including flat rolled Aluminium and composite panels. The assessment follows a 'cradle-to-gate' approach.</p> <p>During this Audit cycle, the Entity presented its new 'low-carbon' 'NexAL' Aluminium billet, supported by an independently verified EPD, demonstrating significant reductions in greenhouse gas emissions through renewable energy use and increased recycled content.</p>
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	<p>The Entity continues to evaluate the life cycle impacts of its major Aluminium product lines and maintains verified Environmental Product Declarations (EPDs). During this Audit cycle, the Entity also introduced its publicly disclosed 'low-carbon' 'NexAL' billet with an independently verified EPD. Information on LCA and EPD activities is included in the 2024 Sustainability Report, pages 57-58, and 82:  <a href="https://www.asastr.com/sites/1/upload/files/ASAS_Corporate_Sustainability_2024-2356.pdf">https://www.asastr.com/sites/1/upload/files/ASAS_Corporate_Sustainability_2024-2356.pdf</a></p> <p>EPD Documents: <a href="https://www.asastr.com/corporate-sustainability/epd-documents">https://www.asastr.com/corporate-sustainability/epd-documents</a></p>
4.2 Product Design	Conformance	<p>The Entity is the first licensed Research and Development (R&amp;D) centre in the Turkish Aluminium sector. It is subject to periodic review by government authorities and is equipped with leading practice processes and is operated by qualified Research and Development (R&amp;D) personnel. Product design focus areas include new material compositions, weight reduction and functionality improvements. The Entity also works closely with national and global research centres.</p>

CRITERION	RATING	COMMENT
4.3a-b Aluminium Process Scrap	Conformance	<p>The Entity has developed a Scrap Policy, available at: <a href="https://www.asastr.com/corporate-/policies/scrap-policy/">https://www.asastr.com/corporate-/policies/scrap-policy/</a>.</p> <p>The Entity has established Key Performance Indicators (KPIs) for Scrap for relevant functions and tracked for actual performance through internal Quality Document Management System. The Audit confirmed that process Scrap generated is segregated and reused 100% in Casthouses (for extrusion and flat products), except for painted Scrap, which is sent to an approved recycler. Aluminium is recovered and returned to the Entity in ingot form. Aluminium Scrap is segregated as per alloys and fed to Casthouses accordingly. There are detailed review data analysis of Scrap generation and usage.</p> <p>Information on Waste Management and Circularity is included in the 2024 Sustainability Report, page 89: <a href="https://www.asastr.com/sites/1/upload/files/ASAS_Corporate_Sustainability_2024-2356.pdf">https://www.asastr.com/sites/1/upload/files/ASAS_Corporate_Sustainability_2024-2356.pdf</a></p>
4.4a-c Collection and Recycling of Products at End of Life - Material Conversion and other Manufacturing	Conformance	<p>The Entity's recycling strategy is detailed within its Scrap Policy with clear objectives and targets, available at: <a href="https://www.asastr.com/corporate-/policies/scrap-policy/">https://www.asastr.com/corporate-/policies/scrap-policy/</a></p> <p>The Entity is working on approach of 'ALWIS' ( i.e. Aluminium Raw Material, Light weight, Wise performance, Infinite source, Sustainable product) with an objective to improve material collection at end of life, higher content of secondary Aluminium. Some initiatives include collaboration with external recyclers, technological intervention to handle contaminated Aluminium Scrap and active participation in Türkiye national program of 'Green Aluminium' production.</p> <p>Related disclosures are available in the 2024 Sustainability Report, pages 57, 81, and 90: <a href="https://www.asastr.com/sites/1/upload/files/ASAS_Corporate_Sustainability_2024-2356.pdf">https://www.asastr.com/sites/1/upload/files/ASAS_Corporate_Sustainability_2024-2356.pdf</a></p>
4.4d Collection and Recycling of Products at End of Life	Conformance	<p>Collection and recycling of material is defined in the Entity's Scrap Policy. The Entity is engaged in ensuring both consumer and customer awareness is increased and practices relating to the collection and recycling of products at the End of Life.</p> <p>An external recycling company is contracted by the Entity to collect and recycled contaminated Aluminium Scrap (including painted, lacquered, food contaminated and oil.).</p>
<b>5. GREENHOUSE GAS EMISSIONS</b>		
5.1a-b Disclosure of GHG Emissions and Energy Use	Conformance	<p>The Entity calculates, verifies and publicly reports its Greenhouse Gas (GHG)emissions and energy use in accordance with ISO 14064-1:2018. The Entity has calculated its GHG emissions for 2024 and successfully completed the independent verification process covering Scopes 1 and 2. In 2024, the Entity also recalculated its corporate carbon footprint for 2021-2023, using supplier- and country-specific emission factors, resulting in more accurate Scope 3 calculations and a fully updated historical dataset.</p> <p>Scopes 1, 2 and 3 emissions types, energy data and GHG verification are disclosed in the 2024 Sustainability Report, pages 83-88, 101-103, and 134-135: <a href="https://www.asastr.com/sites/1/upload/files/ASAS_Corporate_Sustainability_2024-2356.pdf">https://www.asastr.com/sites/1/upload/files/ASAS_Corporate_Sustainability_2024-2356.pdf</a></p>

CRITERION	RATING	COMMENT
5.2a Aluminium Smelter GHG Emissions Intensity - Started production after 2020	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.2b Aluminium Smelter GHG Emissions Intensity - In production up to and including 2020	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.3a GHG Emissions Reduction Plans	Conformance	<p>The Entity has developed a decarbonisation roadmap report, in alignment with a science based 1.5°C warming scenario and an ASI reduction pathway. The stated target is to reduce GHG emissions by at least 50% from base year 2021 levels by 2030. The Entity has conducted scenario analysis with inputs (primary, secondary) in short term (year 2025-26), mid-term (2027-30), and long term (year 2031-40). The Entity maintains its decarbonisation pathway, with targets of 4 tCO<sub>2</sub>e/t product by 2025 and 2030, and 'net-zero' emissions by 2050, publicly presented in the Corporate Sustainability Report.</p> <p>The Audit Team verified that GHG reductions are supported by structured actions such as energy efficiency projects, trigeneration enhancements, heat recovery feasibility studies, and digital monitoring systems. The Entity recalculated its 2021-2023 emissions in 2024, using improved supplier- and country-specific factors, and monitors progress annually against stated intensity targets.</p> <p>The related disclosure is included in the 2024 Sustainability Report, page 85-88:  <a href="https://www.asastr.com/sites/1/upload/files/ASAS_Corporate_Sustainability_2024-2356.pdf">https://www.asastr.com/sites/1/upload/files/ASAS_Corporate_Sustainability_2024-2356.pdf</a></p>
5.3b-e GHG Emissions Reduction Plans - Targets, review and disclosure	Minor Non-Conformance	<p>The Entity has developed a comprehensive decarbonisation strategy supported by independently verified GHG inventory data. In 2024, the Entity recalculated and re-verified its 2021-2023 emissions and published the updated methodology and results in its Sustainability Report 2024 (page 83). A detailed Decarbonisation Roadmap has been established, outlining climate targets and key mitigation actions. The Entity has conducted scenario analysis with inputs (primary, secondary) with Intermediate Targets in short-term (2025-26), mid-term (2027-30) and long-term (2031-40),</p> <p>The Entity monitors emissions annually, tracks multiple intensity indicators (per tonne Aluminium, revenue, and Primary Aluminium purchased), and discloses verified results in its annual Sustainability Report.</p> <p>The related disclosures are included in the 2024 Sustainability Report, pages 85-88:  <a href="https://www.asastr.com/sites/1/upload/files/ASAS_Corporate_Sustainability_2024-2356.pdf">https://www.asastr.com/sites/1/upload/files/ASAS_Corporate_Sustainability_2024-2356.pdf</a></p> <p>The GHG Emissions Pathway with Intermediate Targets related information however is not sufficiently disclosed.</p>
5.4 GHG Emissions Management	Conformance	The Entity has implemented an Energy Management System, based on ISO 50001, and operational controls to monitor, calculate and evaluate its GHG emissions in alignment with the decarbonisation targets. Annual corporate GHG inventories are compiled in accordance with ISO 14064-1, and documented through a structured

CRITERION	RATING	COMMENT
		<p>calculation tool, which includes Scopes 1, 2 and 3 categories. The calculation model, updated for 2024, reflects revised activity data, emission factors and verification outcomes, and is used as the primary mechanism for tracking progress toward reduction milestones.</p> <p>Regular internal reviews and verification of energy consumption, fuel use, production volumes and emission factors demonstrate that the system is operational and effectively supports the implementation of the GHG Reduction Plan. The Entity also integrates the results into management decision-making process through annual Sustainability Reporting and executive review processes.</p> <p>The Entity has established an Energy Policy, available at: <a href="https://www.asastr.com/corporate-/policies/energy-policy">https://www.asastr.com/corporate-/policies/energy-policy</a></p>
<b>6. EMISSIONS, EFFLUENTS AND WASTE</b>		
6.1a-f Emissions to Air	Conformance	<p>The Entity publicly discloses its Material air emissions and conducts periodic monitoring through accredited laboratories for all relevant stacks. Measurement results for 2023–2024 confirm compliance with legal emission limits and are not Material, including particulate matter (PM) and Volatile Organic Compounds (VOC) parameters. The Entity has implemented improvement actions such as RTO installation and electrification of furnace systems to further reduce emissions. Relevant environmental information is reported through regulatory submissions and sustainability disclosures.</p> <p>Air Emissions related disclosures are included in the 2024 Sustainability Report, page 84: <a href="https://www.asastr.com/sites/1/upload/files/ASAS_Corporate_Sustainability_2024-2356.pdf">https://www.asastr.com/sites/1/upload/files/ASAS_Corporate_Sustainability_2024-2356.pdf</a></p>
6.2a-g Discharges to Water	Conformance	<p>The Entity monitors its water consumption and wastewater discharges across all production units and operates fully equipped treatment systems with continuous control of pH, flow and treatment performance. Treated wastewater is analysed monthly by accredited laboratories, consistently meeting regulatory discharge limits. Water-efficiency actions and routine KPI tracking support ongoing improvements, and relevant water impacts are publicly disclosed through environmental reporting.</p> <p>Discharges to Water related disclosures are included in the 2024 Sustainability Report, pages 93 and 103: <a href="https://www.asastr.com/sites/1/upload/files/ASAS_Corporate_Sustainability_2024-2356.pdf">https://www.asastr.com/sites/1/upload/files/ASAS_Corporate_Sustainability_2024-2356.pdf</a></p>
6.3a-g Assessment and Management of Spills and Leakages	Conformance	<p>The Entity maintains documented procedures and controls for preventing and managing Spills and unplanned releases. Monthly Health, Safety, and Environment (HSE) inspections are conducted to verify compliance, and employees receive regular training on spill prevention and response. Spill kits are available across operational areas and are periodically checked and maintained. During the Audit, no Leakages or spillages were observed, and overall practices were found to be effective and consistent with the established risk management measures.</p> <p>The related disclosure is included in the 2024 Sustainability Report, page 91:</p>

CRITERION	RATING	COMMENT
		<a href="https://www.asastr.com/sites/1/upload/files/ASAS_Corporate_Sustainability_2024-2356.pdf">https://www.asastr.com/sites/1/upload/files/ASAS_Corporate_Sustainability_2024-2356.pdf</a>
6.4a-b Public Disclosure of Spills and Leakages	Conformance	<p>There are no Material Spills or Leakages reported during the past three years. Appropriate secondary containment systems have been implemented for chemical storage areas, and chemical spill response kits are available, routinely inspected and maintained. Spill response responsibilities and procedures are implemented across operations.</p> <p>Related disclosures are included in the 2024 Sustainability Report, page 91:  <a href="https://www.asastr.com/sites/1/upload/files/ASAS_Corporate_Sustainability_2024-2356.pdf">https://www.asastr.com/sites/1/upload/files/ASAS_Corporate_Sustainability_2024-2356.pdf</a></p>
6.5a-c Waste Management and Reporting	Conformance	<p>The Entity's waste management practices are implemented in accordance with national legal requirements and its internal Waste Management Procedure. Waste streams are segregated at their source, safely stored, and transferred to licensed recovery and disposal companies, with all Hazardous Waste transport tracked through the governmental Mobile Waste Tracking System (MoTAT) system. The MoTAT system is a mandatory Turkish government digital system managed by the Ministry of Environment, Urbanization, and Climate Change, designed to monitor the collection, transportation, and disposal of Hazardous Waste in 'real-time'. Annual waste declarations for each Facility have been completed, and monthly HSE inspections confirm compliance with segregation, labelling and housekeeping requirements.</p> <p>Hazardous and Non-Hazardous Waste Data are disclosed in the 2024 Sustainability Report, pages 89-91:  <a href="https://www.asastr.com/sites/1/upload/files/ASAS_Corporate_Sustainability_2024-2356.pdf">https://www.asastr.com/sites/1/upload/files/ASAS_Corporate_Sustainability_2024-2356.pdf</a></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)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8a-d Dross	Conformance	<p>The Entity works with multi-Stakeholders including a local smelter and technical university to assess Dross management options. Dross generated from melting and Casthouse operations is collected and stored in designated restricted areas and transferred to authorised processors for Aluminium recovery. All Dross movements are recorded in the national MoTAT system.</p> <p>During the Audit, storage and handling practices were found consistent with internal procedures. The Entity also reviews, at least annually, alternative recovery options to minimise landfilling and maximise Aluminium recovery.</p>
<b>7. WATER STEWARDSHIP</b>		
7.1a-b Water Assessment and Disclosure	Conformance	<p>The Entity annually documents and publicly discloses its water sources, consumption, and site-level water balances. Groundwater and municipal water are monitored through calibrated meters, and all withdrawal and use data are recorded in internal tracking systems.</p> <p>Water-related risks have been assessed through the environmental risk assessment, in accordance with ISO 14001 requirements, and</p>

CRITERION	RATING	COMMENT
		<p>relevant mitigation measures are implemented. Water consumption is categorised by process water, domestic use, and gardening irrigation.</p> <p>Water related disclosures are included in the 2024 Sustainability Report, pages 92–93, and 103:  <a href="https://www.asastr.com/sites/1/upload/files/ASAS_Corporate_Sustainability_2024-2356.pdf">https://www.asastr.com/sites/1/upload/files/ASAS_Corporate_Sustainability_2024-2356.pdf</a></p>
7.2a-e Water Management	Conformance	<p>The Entity discusses ongoing improvements including increased treated water reuse, upgraded metering, and water efficiency projects, are available in the 2024 Sustainability Report, pages 92–93 and 103:  <a href="https://www.asastr.com/sites/1/upload/files/ASAS_Corporate_Sustainability_2024-2356.pdf">https://www.asastr.com/sites/1/upload/files/ASAS_Corporate_Sustainability_2024-2356.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 Biodiversity and Ecosystem Services assessment within its Area of Influence. The study was undertaken with the support of an external agency and university specialists, identified two sensitive areas (Sapanca Lake on the west side and a protected mountain area on the east side). A follow-up Biodiversity observation visit was conducted in 2023, confirming that no new Biodiversity risks or potential impacts have emerged.</p> <p>Biodiversity-related commitments and disclosures are included in the 2024 Sustainability Report, page 94:  <a href="https://www.asastr.com/sites/1/upload/files/ASAS_Corporate_Sustainability_2024-2356.pdf">https://www.asastr.com/sites/1/upload/files/ASAS_Corporate_Sustainability_2024-2356.pdf</a></p>
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Conformance	<p>The Entity has conducted a systematic Biodiversity and Ecosystem Services Risk and Impact Assessment in line with ASI and IFC requirements, with support from an external environmental consultancy and university experts. The assessment identifies sensitive ecological areas within the Entity's Area of Influence, including Sapanca Lake and a protected mountain ecosystem, and evaluates potential impacts on Biodiversity and Priority Ecosystem Services. A follow-up external field observation in 2023 confirmed that no new Biodiversity risks have emerged. Relevant mitigation and monitoring measures, including riparian-area management and vegetation control, are in place and documented.</p> <p>Biodiversity-related commitments and disclosures are included in the 2024 Sustainability Report, page 94:  <a href="https://www.asastr.com/sites/1/upload/files/ASAS_Corporate_Sustainability_2024-2356.pdf">https://www.asastr.com/sites/1/upload/files/ASAS_Corporate_Sustainability_2024-2356.pdf</a></p>
8.2a-g Biodiversity Management	Conformance	<p>The Entity has updated and implemented its Biodiversity Action Plan, supported by the 2022 Biodiversity Baseline Assessment and annual Biodiversity Monitoring Plan. Progress has been demonstrated through systematic habitat monitoring, invasive species control activities (including <i>Ailanthus altissima</i> removal), and signage erected to protect sensitive ecological areas within the Area of Influence. The Biodiversity Action Plan continues to be developed in consultation with relevant Stakeholders and is aligned with the Biodiversity Mitigation Hierarchy.</p> <p>Biodiversity-related commitments and disclosures are included in the 2024 Sustainability Report, page 94:</p>

CRITERION	RATING	COMMENT
		<a href="https://www.asastr.com/sites/1/upload/files/ASAS_Corporate_Sustainability_2024-2356.pdf">https://www.asastr.com/sites/1/upload/files/ASAS_Corporate_Sustainability_2024-2356.pdf</a>
8.3a-c Management of Priority Ecosystem Services	Conformance	<p>The Entity has identified Priority Ecosystem Services within its Area of Influence, primarily related to the freshwater resources of Sapanca Lake and the ecological functions of the protected mountain area to the east. These services were assessed through the Biodiversity Baseline Study and subsequent monitoring with no adverse operational impacts identified. Measures aligned with the Biodiversity Mitigation Hierarchy, including invasive species control and river buffer protection, have been implemented to maintain the value and functionality of these services.</p> <p>Further information is publicly disclosed in the 2024 Sustainability, pages 94:  <a href="https://www.asastr.com/sites/1/upload/files/ASAS_Corporate_Sustainability_2024-2356.pdf">https://www.asastr.com/sites/1/upload/files/ASAS_Corporate_Sustainability_2024-2356.pdf</a></p>
8.4 Alien Species	Conformance	The Entity has identified the invasive species <i>Ailanthus altissima</i> through its Biodiversity Assessment and continues to implement an annual removal and monitoring programme to mitigate related Biodiversity and ecosystem service risks. Preventive controls, including the fumigation of wooden pallets and inspections of incoming materials, have been implemented to avoid the introduction of additional Alien Species.
8.5a-b Commitment to “No Go” in World Heritage Properties	Conformance	The Entity confirmed that its operations and planned activities are not located within, or in proximity to any UNESCO World Heritage Properties. A GIS-based screening exercise demonstrated no overlap or adjacency risks, and the Entity maintains a corporate commitment to ‘No-Go’ in World Heritage areas. No impacts to the Outstanding Universal Value of any World Heritage Property were identified.
8.6a-d Protected Areas	Conformance	<p>The Entity has identified Protected Areas within its Area of Influence using GIS-based screening and external Biodiversity assessments. No Facility operations are located inside any nationally or internationally designated Protected Area. Management measures addressing nearby sensitive zones—such as the Sapanca Lake ecosystem and the protected mountain area—have been incorporated into the Biodiversity Action Plan and verified during the site visit.</p> <p>The related disclosure is included in the 2024 Sustainability Report, pages 94:  <a href="https://www.asastr.com/sites/1/upload/files/ASAS_Corporate_Sustainability_2024-2356.pdf">https://www.asastr.com/sites/1/upload/files/ASAS_Corporate_Sustainability_2024-2356.pdf</a></p>
8.6e Protected Areas - Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity’s Certification Scope.
8.7a-i Mine Rehabilitation	Not Applicable	This Criterion is not applicable to the Entity’s Certification Scope.
<b>9. HUMAN RIGHTS</b>		
9.1a-d Human Rights Due Diligence	Minor Non-Conformance	The Entity has established a Human Rights Policy, which references and includes a commitment to adhere with UN Guiding principle on Business and Human Rights, United Nations Global Impact and United Nations Convention on Elimination of All Forms of Discrimination

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		<p>Against Women (CEDAW), Universal Declaration of Human Rights and ILO Declaration on Fundamental Principles and Rights at Work and similar regulations. The Entity's Human Rights Policy is available at: <a href="https://www.asastr.com/corporate-/policies/human-rights-policy/">https://www.asastr.com/corporate-/policies/human-rights-policy/</a></p> <p>The Entity has conducted a comprehensive stakeholder engagement activity and outcome report, available at: <a href="https://www.asastr.com/sites/1/upload/files/ASAS%CC%A7_SEP_EN_RE_V04_10_11_2025-2345.pdf">https://www.asastr.com/sites/1/upload/files/ASAS%CC%A7_SEP_EN_RE_V04_10_11_2025-2345.pdf</a></p> <p>A Human Rights risk assessment has been undertaken and includes assessment on issues including Child Labour, working hours and others, from internal and external perspectives. The risk assessment has been completed, and mitigation measures have been implemented.</p> <p>There is no satisfactory evidence however that the Entity's Human Rights Due-Diligence Process is aligned with the UN Guiding Principles on Human &amp; Business Rights, Universal Declaration of Human Rights, including training of responsible employees working on behalf of Entity and responsible for Human Rights Due Diligence activity.</p> <p>Related disclosures are included in the 2024 Sustainability Report, pages 37, 44, 71, and 105-107: <a href="https://www.asastr.com/sites/1/upload/files/ASAS_Corporate_Sustainability_2024-2356.pdf">https://www.asastr.com/sites/1/upload/files/ASAS_Corporate_Sustainability_2024-2356.pdf</a></p>
9.2a-e Gender Equity and Women's Empowerment	Conformance	<p>The Entity holds a Kagider Equal Opportunities Model (FEM) - a Gender equality certification as part of its commitment and practices of Gender Equity and Women Empowerment. The Entity continues to promote women's empowerment, including the assignment of more Women in production roles and to encourage the spouses of existing employees to join the Entity.</p> <p>Related disclosures are included in the 2024 Sustainability Report, pages 34-38, 61, 69-70, and 100: <a href="https://www.asastr.com/sites/1/upload/files/ASAS_Corporate_Sustainability_2024-2356.pdf">https://www.asastr.com/sites/1/upload/files/ASAS_Corporate_Sustainability_2024-2356.pdf</a></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.
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	<p>This Criterion is not applicable to the Entity, as there are no communities considered Indigenous by international definitions in the regions where Entity is operating within Türkiye.</p> <p>The Entity however has established communication channel and information processes with Local Communities within the scope of their activities are safeguarded by the Stakeholder Engagement Plan, available at: <a href="https://www.asastr.com/sites/1/upload/files/ASAS%CC%A7_SEP_EN_RE_V04_10_11_2025-2345.pdf">https://www.asastr.com/sites/1/upload/files/ASAS%CC%A7_SEP_EN_RE_V04_10_11_2025-2345.pdf</a></p>

CRITERION	RATING	COMMENT
		<p>Within the scope of the Stakeholder engagement plan, communication, information, consultation, and consent processes with affected parties are conducted on a voluntary basis.</p>
9.5a Cultural and Sacred Heritage - Identification	Conformance	<p>The Entity operations are not located within areas of historical, cultural, or religious significance. There are sacred or cultural heritage sites and values present within the Entity's Area of Influence.</p> <p>The Entity's Stakeholder Engagement Plan (<a href="https://www.asastr.com/sites/1/upload/files/ASAS%CC%A7_SEP_EN_R EV04_10_11_2025-2345.pdf">https://www.asastr.com/sites/1/upload/files/ASAS%CC%A7_SEP_EN_R EV04_10_11_2025-2345.pdf</a>), confirms the above, and site assessments have also confirmed that the Entity's boundaries are far from protected cultural heritage areas.</p> <p>The Entity has however developed a Cultural Heritage Management Plan (CHM) in case they exist in future business expansion, mergers, and acquisitions. As confirmed by Management, in case of cultural heritage assets being encountered during potential new investments, expansion, or infrastructure projects, the Entity is committed to acting in accordance with the principles of IFC Performance Standard 8 (Cultural Heritage) and implementing conservation measures in coordination with relevant public institutions.</p>
9.5b Cultural and Sacred Heritage - Impacts	Not Applicable	<p>This Criterion is not applicable to the Entity, as there are no presence of sacred or cultural heritage sites and values within the Entity's Area of Influence.</p> <p>The Entity's production operations are not located within areas of historical, cultural, or religious significance.</p>
9.6a-i Displacement	Not Applicable	<p>This Criterion is not applicable to the Entity, as there are no resettlements taking place during the period since joining ASI. Their activities do not require the displacement of any community or the impact on their habitat. The existing and planned production Facilities are located within industrial zones, away from residential areas.</p>
9.7a-h Affected Populations and Organisations	Conformance	<p>The Entity directly engages with the Local Community in the Akyazi area by supporting the basketball club, donating saplings through the TEMA Foundation, and raising environmental awareness was funded by the Entity. Local Community and Corporate Social Responsibility (CSR) project areas including sports Facilities and dog shelters were visited during the Audit. Related information is disclosed in the 2024 Sustainability Report, page 77-78 <a href="https://www.asastr.com/sites/1/upload/files/ASAS_Corporate_Sustainability_2024-2356.pdf">https://www.asastr.com/sites/1/upload/files/ASAS_Corporate_Sustainability_2024-2356.pdf</a></p> <p>There are no negative impacts identified on Populations and Organisations from the Entities activities. The Entity has positively impacted livelihood of Local Communities through offering local employment, contribution in local economy.</p>
9.8a Conflict-Affected and High-Risk Areas - Strong management systems	Minor Non-Conformance	<p>The Entity has established a Sustainable Supply Chain Policy, available at: <a href="https://www.asastr.com/corporate-/policies/sustainable-supply-chain-policy">https://www.asastr.com/corporate-/policies/sustainable-supply-chain-policy</a></p> <p>This Policy however does not include a commitment to carry out risk-based Due Diligence over its Aluminium supply chain in accordance with the OECD Due Diligence Guidance of Minerals from Conflict-Affected and High-Risk Areas (OECD Guidance) following the five-step</p>

CRITERION	RATING	COMMENT
		<p>framework and commitment to identify, assess and respond to risks including at a minimum those identified in the OECD guidance. Refer to:</p> <p><a href="https://www.oecd.org/content/dam/oecd/en/publications/reports/2016/04/oecd-due-diligence-guidance-for-responsible-supply-chains-of-minerals-from-conflict-affected-and-high-risk-areas_glg65996/9789264252479-en.pdf">https://www.oecd.org/content/dam/oecd/en/publications/reports/2016/04/oecd-due-diligence-guidance-for-responsible-supply-chains-of-minerals-from-conflict-affected-and-high-risk-areas_glg65996/9789264252479-en.pdf</a></p>
9.8b Conflict-Affected and High-Risk Areas - Identify and assess risks	Minor Non-Conformance	The Entity has not undertaken appropriate identification and assessment (including 'Red Flag') of potential CAHRAs risks in its Aluminium supply chain, in accordance with the OECD Due Diligence Guidance of Minerals from Conflict-Affected and High-Risk Areas (OECD Guidance).
9.8c Conflict-Affected and High-Risk Areas - Strategy to respond to risks	Minor Non-Conformance	The Entity does not have a written strategy to respond to identified risks and over its Aluminium supply chain, in accordance with the OECD Due Diligence Guidance for Minerals from Conflict-Affected and High-Risk Areas (OECD Guidance) requirements.
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 Responsible supply chain management in the 2024 Sustainability Report, page 44: <a href="https://www.asastr.com/sites/1/upload/files/ASAS_Corporate_Sustainability_2024-2356.pdf">https://www.asastr.com/sites/1/upload/files/ASAS_Corporate_Sustainability_2024-2356.pdf</a></p> <p>The sustainability report does not however sufficiently disclose information about its Due Diligence activities undertaken, outcome and action taken over its Aluminium supply chain in accordance with the OECD Due Diligence Guidance of Minerals from Conflict-Affected and High-Risk Areas (OECD Guidance) requirements.</p>
9.9 Security practice	Conformance	<p>The security guards are full-time employees of the Entity which is staffed by security guards 24 hours a day, 365 days a year, with entry-exit points, perimeter boundary fencing and CCTV monitoring.</p> <p>The security guards are un-armed, received training on Human Rights, and have accredited certificates as per national regulation. There is also training provided on communication and behaviour expectations.</p>
<b>10. LABOUR RIGHTS</b>		
10.1a-c Freedom of Association and Right to Collective Bargaining	Conformance	<p>The Entity respects the rights of Workers to associate freely in Labour Unions, seek representation and join Workers' councils without interference to the extent possible under Applicable Law, which is reflected in its Human Resources Policies.</p> <p>Worker's representatives were elected by Workers, with the last election occurring in 2025. The Worker's Council is comprised of Worker's representatives and management meets periodically.</p> <p>The Entity respects the rights of Workers to Collective Bargaining and to participate in any Collective Bargaining process in good faith to the extent possible under Applicable Law. This is reflected in its Human Resources Policies and the employee Code of Conduct, available at:</p>

CRITERION	RATING	COMMENT
		<a href="https://www.asastr.com/corporate-/policies/human-resources-policy">https://www.asastr.com/corporate-/policies/human-resources-policy</a> <a href="https://www.asastr.com/corporate-/codes-of-conduct">https://www.asastr.com/corporate-/codes-of-conduct</a>
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 Turkish Law does not restrict the right to Freedom of Association and Collective Bargaining.
10.2a Child Labour	Conformance	<p>The Entity does not engage in, nor support Hazardous Child Labour and Worst Forms of Child Labour. The minimum age of hiring at the Entity is 18 years which is verified via proof of age as well as the applicants' education certificate and national identification. The Entity's Human Resources Policy is available at:</p> <p><a href="https://www.asastr.com/corporate-/policies/human-resources-policy">https://www.asastr.com/corporate-/policies/human-resources-policy</a></p>
10.3a-c Forced Labour	Minor Non-Conformance	<p>The Entity does not engage in or support Human Trafficking, directly or through employment or recruitment agencies. The Entity does not require any deposit, recruitment fee, equipment advance, or security payment from Workers, including Migrant Workers, at any time during employment. The Entity does not hold Workers in Debt Bondage or force them to work to repay debt. The Entity does not restrict Workers' freedom of movement to, from, or within the workplace, retain original identity or employment documents, or deny Workers the freedom to terminate employment without penalty, provided notice is given per mutually agreed contract conditions.</p> <p>This was confirmed during the Audit via interviews with Workers and a review of employment documentation.</p> <p>The Entity however does not publicly disclose an annual Modern Slavery Statement detailing their actions to address Modern Slavery.</p>
10.4a-c Non-Discrimination	Conformance	<p>The Entity ensures that all employees are informed on their rights and the Policy of Non-Discrimination through training. The Human Resources Policy states that no Discrimination is allowed. If Workers feel they are discriminated, raise the issue with the Entity's Ethics Committee.</p> <p>There was no indication of discriminatory behaviour by the Entity, as confirmed through interviews with randomly selected Workers and review of Entity practices (hiring, training, promotion and career advancement).</p>
10.5 Communication and engagement	Conformance	<p>The Entity has implemented various channels of communication and engagement with employees, through training and performance evaluations. The Entity has developed a stakeholder engagement plan, which explains how the Entity communicates with Stakeholders and Grievance Mechanisms.</p> <p><a href="https://www.asastr.com/sites/1/upload/files/ASAS%CC%A7_SEP_EN_RE V04_10_11_2025-2345.pdf">https://www.asastr.com/sites/1/upload/files/ASAS%CC%A7_SEP_EN_RE V04_10_11_2025-2345.pdf</a> The Entity has conducted an annual engagement survey for 2025, which has been completed and is under results evaluation. The 2024 engagement survey report with Net Promoter Score (NPS), which measures employee loyalty and engagement, and showed a 10.5% score improvement.</p>
10.6a-g Violence and Harassment	Conformance	Violence and Harassment, and disciplinary procedures are addressed in the Employee Code of Conduct and the related Human Resources

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		<p>Policy. There is no wage deduction for any disciplinary reasons, which was confirmed via document review and Worker interviews.</p> <p>Violence and Harassment is addressed in the following Policies:</p> <p>Corporate Compliance Policy: <a href="https://www.asastr.com/Sites/1/upload/files/GN-PT-03_0_Kurumsal_Uyum_Politikasi_en_US-2333.pdf">https://www.asastr.com/Sites/1/upload/files/GN-PT-03_0_Kurumsal_Uyum_Politikasi_en_US-2333.pdf</a></p> <p>Codes of Conduct: <a href="https://www.asastr.com/corporate-/codes-of-conduct/">https://www.asastr.com/corporate-/codes-of-conduct/</a></p> <p>Human Resources Policy: <a href="https://www.asastr.com/corporate-/policies/human-resources-policy/">https://www.asastr.com/corporate-/policies/human-resources-policy/</a></p>
10.7a-c Remuneration	Conformance	<p>The Entity pays wages for a normal working week monthly via bank transfer, according to legal or industry minimum standards, to meet the basic needs of Workers. The Entity has conducted a wage survey to estimate living wages.</p> <p>The Entity is paying above legal minimum wage by 165% (minimum) and 224% (median value), with an objective to support employees due to the country's current high inflation rate.</p>
10.8a-c Working Time	Conformance	<p>Working hours are recorded through a system called 'Biometric'. Overtime is not regularly undertaken by Workers, and is paid at a premium rate according to Turkish Labour Law.</p> <p>Working hours are recorded through Biometric with 45 hours per week normal working, 270 hours annually Overtime hours. The Human Resource Management System (HRMS) monitors working hours to ensure they remain within legal limits.</p>
10.9a-b Informing Workers of Rights	Conformance	<p>The Entity provides regular information (email, display, training, and Town Hall meetings) on their legal, ethical, and corporate rights, and has an accessible complaint mechanism in case of potential violations. The Entity has established and implemented underlying policies and management plans covering Workers Rights.</p> <p>The Workforce Management Plan (WMP) includes informing employees about their rights, obligations, and corporate policies from the recruitment process onward, as well as outlining the channels available for recourse in cases of ethical violations, or other rights violations.</p>
<b>11. OCCUPATIONAL HEALTH AND SAFETY</b>		
11.1a Occupational Health and Safety (OH&S) Management System	Conformance	<p>The Entity has an Occupational Safety and Health (OH&amp;S) Management System as per ISO 45001:2018. The Entity has established Health, Safety &amp; Environment Policy, available at: <a href="https://www.asastr.com/corporate-/policies/health-safety-and-environmental-policy">https://www.asastr.com/corporate-/policies/health-safety-and-environmental-policy</a></p> <p>The Entity has installed an AI-enabled camera within the workplace for the early detection of OH&amp;S-related incidents and near misses, and to support incident investigations.</p> <p>The Entity utilises the Fine &amp; Kinney method to systematically identify potential hazards, assess their severity, and determine the necessary preventive actions. The Entity has qualified and approved safety</p>

CRITERION	RATING	COMMENT
		<p>officers as per Turkish Law requirements, with additional safety officers are available, as well as contingency plans.</p> <p>The Entity has periodically reviewed and updated Explosion Protection Study conducted by external agency for: a) Flat Rolling Factory, b) Extrusion Factory, c) PVC Factory. The activities are periodically tracked and discussed in HSE committee meetings.</p> <p>The Entity is operating 24 hours, 7 day a week Occupational Health Centre (OHC) with doctors and nurses. There are First Aid Boxes installed at various locations and checked monthly basis. The medical examination of Workers has been carried out yearly for high-risk activities, and once in two years for general activities.</p> <p>During the Audit, it was observed that general OHC measures in place such as clear aisle, use of PPE, provision of fire safety arrangements and emergency preparedness.</p> <p>During 2024, , as part of their efforts to strengthen HSE culture, the Entity had conducted two HSE culture evaluations and 52 HSE field inspections.</p>
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Minor Non-Conformance	<p>The Entity conducts periodic OH&amp;S performance reviews of leading and lagging indicators e.g. OH&amp;S training hours per employee (person-hours) (i.e. 10.9 hours in 2024 shows increase of 28% from 2023.)</p> <ul style="list-style-type: none"> <li>- Direct employee (Absenteeism Due to Illness): 17,995 in 2024 shows reduction of 7.1% from 2023.</li> <li>- Number of accidents, increase to 285 in 2024 from 273 in 2023.</li> </ul> <p>Leading and lagging indicators are disclosed in the 2024 Sustainability Report, page 108:  <a href="https://www.asastr.com/sites/1/upload/files/ASAS_Corporate_Sustainability_2024-2356.pdf">https://www.asastr.com/sites/1/upload/files/ASAS_Corporate_Sustainability_2024-2356.pdf</a></p> <p>The Entity however has not 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 regularly engaged with its employee for the matters related to Occupational Health and Safety. A safety committee meeting including the participation of Workers representative is held every two months.</p>

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## DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	9 December 2022	Initial Certification Audit – Full Certification
1	29 February 2024	Surveillance Audit; Updated Audit Firm from LiberoAssurance to CETIZION Verifica
2	19 March 2026	Re-Certification Audit and Scope Change – Full Certification; Scope Change from 'Material Conversion (Production and Transformation)' to 'Material Conversion' and from V2 to V3.1 of the ASI Performance Standard.

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