
ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

ALCOMET AD

CERTIFICATE
NUMBER

280

ASI
STANDARD

PERFORMANCE
STANDARD
(V2 2017)

CERTIFICATION
LEVEL

FULL
CERTIFICATION

ASI ACCREDITED
AUDITOR

TÜV RHEINLAND
CERT GMBH

DATE OF ISSUE

21 JULY 2023

DATE OF EXPIRY

20 JULY 2026

CERTIFIED SINCE

20 APRIL 2023

AUTHORISED BY

A handwritten signature in black ink, appearing to be 'J. H.', written over a horizontal line.

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

CERTIFICATION SCOPE

Aluminium re-melting/refining, extruded and rolled products manufacturing at the Shumen production facilities located in Bulgaria.

SUMMARY AUDIT REPORT

PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Alcomet AD
ENTITY NAME	Alcomet AD
CERTIFICATION SCOPE	Aluminium re-melting/refining, extruded and rolled products manufacturing at the Shumen production facilities located in Bulgaria.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthousesSemi-Fabrication
ASI STANDARD	<ul style="list-style-type: none">Performance Standard V2
AUDIT TYPE	<ul style="list-style-type: none">Initial Certification Audit (1 – 10 November 2022)Surveillance Audit (3 – 5 May 2023)Surveillance Audit (3 – 4 December 2024)
AUDIT FIRM	TÜV Rheinland Cert GmbH
AUDIT DATE	<ul style="list-style-type: none">1 – 10 November 2022 (Initial Certification Audit)3 – 5 May 2023 (Surveillance Audit)3 – 4 December 2024)
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">12 March 2023 (Initial Certification Audit)11 July 2023 (Surveillance Audit)11 June 2026 (Surveillance Audit)
AUDIT SCOPE	<p><u>Initial Certification Audit (1 – 10 November 2022)</u></p> <p>The Audit Scope includes extruded and rolled products manufacturing at the Shumen production facilities located in Bulgaria.</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none">CasthousesSemi-Fabrication <p>All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.</p>

Surveillance and Scope Change Audit (3 – 5 May 2023)

The Audit Scope includes aluminium re-melting/refining, extruded and rolled products manufacturing at the Shumen production facilities located in Bulgaria.

Supply chain activities included in the Audit Scope:

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

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

Surveillance Audit (3 – 4 December 2024)

The Audit Scope includes aluminium re-melting/refining, extruded and rolled products manufacturing at the Shumen production facilities located in Bulgaria.

Supply chain activities included in the Audit Scope:

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

Criteria in the ASI Performance Standard included in the Audit Scope predominately addressed the governance and social themes and the one previous non-conformance.

AUDIT
OUTCOME

- Certification

AUDIT
METHODOLOGY
DECLARATION

The Auditors confirm that:

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

CERTIFICATION
PERIOD

21 July 2023 – 20 July 2026

NEXT AUDIT
TYPE

Re-Certification Audit

NEXT AUDIT
DUE DATE

20 July 2026

CERTIFICATE
NUMBER

280

SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	A robust system exists at the Entity to ensure compliance with related laws, regulations and other requirements. An internal legal department has been established with in-house legal personnel including lawyers and other support staff. Registers on legal requirements are held under the Entity's quality documentation system. Regular reviews are conducted periodically and communicated.
1.2 Anti-Corruption	Conformance	The Entity's senior management has officially structured a system against Corruption including Extortion and Bribery, coherent with Applicable Laws. Policies and procedures regarding donations, payments, gifts, and third-party involvement are defined, issued, updated and publicly available at: https://www.alcomet.eu/sustainability/responsibility
1.3 Code of Conduct	Conformance	The Entity has implemented a Code of Conduct including commitments for environmental, social and governance Compliance and performance that aligns with the ASI Performance Standard. It is ensured that all parties working for or on behalf of the Entity are aware of the Code. Regular reviews are undertaken. Both internal and external publications of Code of Conduct documents (including 'Regulations for Business Conduct and Ethics' and 'Suppliers' Code of Conduct') are available at: https://www.alcomet.eu/sustainability/responsibility
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	The Entity has established and implemented stand-alone Policies and procedures for aspects including Quality, Environment, Occupational Health and Safety and Social Governance including clear declarations and commitments on related topics. These Policies are consistent with on-site practices and the scale of the business.
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	The Entity demonstrates management support for the ASI Performance Standard requirements and its Environmental, Social and Governance (ESG) Policies, with senior management ensuring provision of resources at all levels. The Entity's ESG Policies are reflected in operational processes and embedded throughout the organisation. Policies and related resource requirements are regularly reviewed,

CRITERION	RATING	COMMENT
		discussed and/or updated during annual senior management meetings.
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	The Entity provides open communication of ESG Policies to all interested Stakeholders, including via the Entity's website (https://alcomet.eu), upon request, at the site entrance, posters for Visitors, induction and refresher training, the Entity's intranet and staff notice boards. The Entity's level of communication has improved since the previous Audit.
2.2 Leadership	Conformance	The Entity has nominated a Management Representative who has overall responsibility and authority for the requirements of the ASI program. Capacity building activities including ASI training and webinars are in place and continue with the participation of all related departments inside the Entity.
2.3a Environmental and Social Management Systems (environmental)	Conformance	The Entity had established and implemented an Environmental Management System (EMS) that has been in operation for several years and is compatible with all legal requirements and the environmental management Criteria of the ASI Performance Standard. The EMS addresses the entire site and all activities of the Entity, and it is regularly audited by a global independent certification body.
2.3b Environmental and Social Management Systems (social)	Conformance	The Entity has established and implemented a Social Management System that is compatible with the legal requirements and the social management Criteria of the ASI Performance Standard. This system is regularly under surveillance by local authorities, independent third-party audit companies and end-clients.
2.4 Responsible Sourcing	Conformance	The Entity has developed a Responsible Sourcing Policy and a Supplier's Code of Conduct, which are accepted by all critical sourcing partners for raw materials, alloying elements, tools and components providers. These documents are available at: https://www.alcomet.eu/sustainability/responsibility Risks and opportunities relating to procurement have been defined and evaluated under the Entity's Quality Management System documentation and integrated with Entity's responsible sourcing system. It is also internally communicated and distributed, and addresses environmental, social and governance issues. Progress and performance are regularly monitored by the Entity's Procurement department with questionnaires, self-assessment forms and on-site audits.

CRITERION	RATING	COMMENT
2.5 Impact Assessments	Conformance	There have been no New Projects or Major Changes at the Entity. However, the Entity has established Impact Assessment procedures related to the environment, social and Health and Safety aspects.
2.6 Emergency Response Plan	Conformance	Emergency response is managed under the Integrated Management Systems (Environment & OH&S). Comprehensive emergency plans that cover different scenarios have been developed, and drills are undertaken regularly. In 2024, more than 1000 personnel attended the Entity's regular emergency and first aid drills.
2.7 Mergers and Acquisitions	Conformance	Although no mergers or acquisitions have occurred or are planned, the risks and opportunities are defined under the Quality Management System structure where risk registers reference potential future mergers and acquisitions.
2.8 Closure, Decommissioning and Divestment	Conformance	No closure, decommissioning and divestment had been realised nor planned. However, if this occurs in the future, the Entity can review and manage this process under its Integrated (Quality, Environment, OH&S) Management Systems infrastructure against environmental, social and governance issues.
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	The Entity has prepared its Sustainability Report according to Global Reporting Initiative (GRI) guidelines for the calendar year 2023, available at: https://www.alcomet.eu/sustainability/sustainability-reports At the time of this ASI Audit, the 2024 Sustainability Report was in the data preparation stage.
3.2 Non-compliance and liabilities	Conformance	If any significant fines, judgments, penalties and non-monetary sanctions against the Entity for failure to comply with Applicable Law are realised, it is mandatory to report and disclose this information publicly as the Entity is a stock exchange listed company. The Entity is also audited regularly by independent financial third-party companies. Additionally, related public disclosure is included in the Alcomet 2023 Sustainability Report, pages 50-52: https://www.alcomet.eu/sustainability/sustainability-reports
3.3a Payments to governments (legal and contractual)	Conformance	The Anti-Bribery & Corruption Policy is consistent with Applicable Laws, and is available at: https://www.alcomet.eu/sustainability/responsibility

CRITERION	RATING	COMMENT
		<p>Policies and procedures regarding payments, donations, Corruption and Bribery issues, gifts and third-party involvements were defined. Direct participation and monitoring of the Entity's in-house legal department on the topics are ensured.</p> <p>Additionally, related public disclosure is included in the Alcomet 2023 Sustainability Report, pages 37 and 62: https://www.alcomet.eu/sustainability/sustainability-reports</p>
3.3b Payments to governments (disclosure – bauxite mining)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
3.4 Stakeholder complaints, grievances and requests for information	Conformance	<p>A well-structured feedback and complaints management procedure has been defined and implemented under the Quality Management System. Both internal and external requests, complaints and grievances are recorded and followed by the legal department, quality department and other related responsible areas. An accessible and transparent communication mechanism with contact information is available in the Complaints Management Procedure: https://www.alcomet.eu/contacts/other-contacts</p>
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	The Entity has defined its major product lines in two different groups as rolled products and extruded products, and the life cycle impacts of these main product lines are evaluated. This work was completed with the cooperation of an external, competent company and undertaken in accordance with the relevant ISO group of standards.
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	Life Cycle Assessment (LCA) reports of the Entity for the two main product lines (rolled products and extruded products) were developed using the cradle-to-gate methodology. These reports are available for distribution upon request of customers or other relevant parties.
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	As disclosed on the Entity's website, LCA information is available to all interested parties upon request: https://www.alcomet.eu/sustainability/environment
4.2 Product design	Conformance	The Entity has established and integrated environmental and material recycling objectives in the design and development process for products or components. Sustainability concerns were taken into consideration with the result of projects including environmental life cycle impact assessments for semi-fabrication and/or manufacture of consumer/commercial products.

CRITERION	RATING	COMMENT
		Products with a lower carbon footprint and higher recycled content ratios will lead the Entity to become more circular and sustainable.
4.3a Aluminium Process Scrap (targets)	Conformance	The Entity is working to minimise the generation of Aluminium Process Scrap within its operations. There are designated targets for scrap handling including collection and recycling. The Entity has plans in its environmental program to establish a new thin foil production line with the aim of reaching the desired 100% recycling target for the Aluminium Scrap generated on-site.
4.3b Aluminium Process Scrap (alloy separation)	Conformance	The Entity seeks to separate alloys and grades for recycling during its operations. The planning/purchasing departments of the Entity have a pre-defined plan to seek more detail for post-consumer and post-industry-based aluminium materials (for different varieties of alloys and grades) for the following years.
4.4a Collection and recycling of products at end-of-life (strategy)	Conformance	The Entity has increased efforts to implement a collection and recycling strategy for the products at End of Life. A dedicated recycling team from different disciplines has been established inside the plant focusing on recycling methods and alternatives for End of Life products. Between the years 2023-2024 the Entity had revised its internal environmental program with two new targets to increase the amount of external Scrap, through increased use of End of Life product and increasing the ratio of Post-Consumer Scrap (End of Life products) to pre-consumer material.
4.4b Collection and recycling of products at end-of-life (engagement)	Conformance	The Entity has increased efforts to implement a collection and recycling strategy for their products at End of Life. Between the years 2023-2024, the Entity commenced and continued to implement a collaboration with the local authority (Shumen municipality) to collect End of Life products throughout the city, which is the first initiative in the city's history. The campaign includes local TV, radio, news portal and billboard announcements and advertisements, and the participation of 24 different schools in the city. Handling and recycling of these End of Life products gathered at collection points will be undertaken and monitored by the Entity.
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		
5.1 Disclosure of GHG emissions and energy use	Conformance	The Entity has prepared, communicated and publicly disclosed its account for Greenhouse Gases (GHG) emissions (Scope 1 and Scope 2) and energy use by source for the year 2020 within its Sustainability

CRITERION	RATING	COMMENT
		Report. This report is available at: https://www.alcomet.eu/sustainability/sustainability-reports The updated reporting for the years 2021 and 2022 was still in preparation and it is expected to be issued in early-mid 2023.
5.2 GHG emissions reductions	Conformance	The Entity's Environmental Department, with the support of senior management is responsible for the accounting of both Direct and Indirect GHG emissions. With the last revision of the Entity's environmental program as of April 2023, the Entity had defined its time-bound GHG emission reduction target, which is at least a 2.5% decrease on CO ₂ generation compared to previous year. The plan to achieve this target includes the optimisation of production lines with new technologies and installation of rooftop solar panels.
5.3a Aluminium Smelting (management system)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.3b Aluminium Smelting (up to and including 2020)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.3c Aluminium Smelting (after 2020)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
PRINCIPLE 6 EMISSIONS, EFFLUENTS AND WASTE		
6.1 Emissions to Air	Conformance	The Entity has developed an inventory and baseline of Emissions to Air that may have adverse effects on humans or the environment. Air emissions are regularly quantified, reported and monitored and all applicable regulatory air emissions and atmospheric air quality standards were met. Additionally, with the last revision of the Entity's environmental program as of April 2023, the Entity had defined its time-bound reduction targets and required actions for different pollutants including dust, total organic carbon (TOC) and NOx.
6.2 Discharges to Water	Conformance	The Entity has developed an inventory and baseline relating to Discharges to Water that have adverse effects on humans or the environment. Discharges were regularly quantified, reported and monitored and all applicable regulatory discharge amounts and quality standards were met. A management plan, including benchmark targets (11% reduction against the previous year), related actions and monitoring - evaluation steps to decrease water discharge is available.
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	Areas in operations where Spills and Leakage may have a contamination risk have been defined and assessed in two different methods. One uses the official mandatory

CRITERION	RATING	COMMENT
		Environmental Impact Assessment (EIA) reports, whilst the other is an internal environmental risk assessment forms under the Environmental Management System ISO 14001.
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	The Entity has developed a management procedure and practice for Spills and Leakages. Communications, compliance controls and monitoring methods are in place. On-site precautions are implemented with relevant staff and resources, internal and external communication plans, emergency responses, and drills are in place.
6.4a Reporting of Spills (immediate disclosure)	Conformance	The Entity has a country-specific mandatory obligation according to the environmental legislations to report immediately to the local authorities (environment agency, municipality) any significant environmental incident including Spills and Leakages. This is also reported to the same authorities as part of an annual environmental report.
6.4b Reporting of Spills (regular reporting)	Conformance	The Entity has a country-specific mandatory obligation according to the environmental legislations. All environmental incidents, actions and any other significant issues (including Spills and Leakages) should annually be reported to the local authorities like the Bulgarian Environment Agency and related municipalities. These issues are also publicly disclosed by the Entity within the annual Sustainability Report to all related shareholders.
6.5a Waste management and reporting (strategy)	Conformance	The Entity's practices for waste management address all waste generated within the relevant scope of operations. Wastes are characterised according to source, composition and treatment method. Risks associated with the off-site movement and transportation of waste have been considered. Waste reduction targets, proposed activities and defined timelines for waste minimisation are available according to the Waste Mitigation Hierarchy in the Entity's waste management strategy.
6.5b Waste management and reporting (disclosure)	Conformance	The Entity's reporting for waste management addresses all waste generated within the relevant scope of operations. Wastes are characterised according to source, composition and treatment method. All data including wastes to be reused, recycled, recovered, to be sent to landfills (hazardous and non-hazardous) are recorded and reported publicly via Entity's Sustainability Report at:

CRITERION	RATING	COMMENT
		https://www.alcomet.eu/sustainability/sustainability-reports
6.6a Bauxite Residue (storage construction)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6b Bauxite Residue (integrity checks and controls)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6c Bauxite Residue (water discharge)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6d Bauxite Residue (marine and aquatic environments)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6e Bauxite Residue (state of the art technologies)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6f Bauxite Residue (remediation)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7a Spent Pot Lining (SPL) (storage and management)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7b Spent Pot Lining (SPL) (recovery and recycling)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7c Spent Pot Lining (SPL) (Untreated SPL)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7d Spent Pot Lining (SPL) (review of alternatives)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7e Spent Pot Lining (SPL) (marine and aquatic environments)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8a Dross (recovery)	Conformance	There is an implemented dross and dross residues handling strategy. The Entity was regularly seeking alternative methods to have more efficient dross management like checking different suppliers and/or better technologies for better flocs to generate less dross, or alternative methods & revisions on the production lines (like dross pressing). Also, the Entity had defined a dedicated operational efficiency rate target, actions and deadline to increase the recovery of aluminium from dross and dross residues. For the maximization of recycling of dross residues, there is an ongoing search for different internal and/or external recycling technologies, and also for alternative suppliers with better recycling conditions and performance.

CRITERION	RATING	COMMENT
6.8b Dross (recycling)	Conformance	There is an implemented dross and dross residues handling strategy. The Entity was regularly seeking alternative methods to have more efficient dross management like checking different suppliers and/or better technologies for better flocs to generate less dross, or alternative methods & revisions on the production lines (like dross pressing). Also, the Entity had defined a dedicated operational efficiency rate target, actions and deadline to increase the recovery of aluminium from dross and dross residues. For the maximization of recycling of dross residues, there is an ongoing search for different internal and/or external recycling technologies, and also for alternative suppliers with better recycling conditions and performance.
6.8c Dross (review of alternatives)	Conformance	Dross residues are continuously reviewed for alternative handling opportunities rather sending to the landfills as final waste. Cooperation with different Stakeholders, good practice has been implemented with some customers to use the Entity's non-aluminium Dross residues for desulphurisation and dephosphorisation in iron and steel production.
PRINCIPLE 7 WATER STEWARDSHIP		
7.1a Water assessment (mapping)	Conformance	The Entity has a detailed register and mapping (inventory) for its water sources and types. Name and location of water sources, water quantities and ultimate source of the water are presented. Water discharge points, location and quantity, including the destination or ultimate receiving water body are also presented. Therefore, water balance can be monitored via the flow of water in and out during the operations.
7.1b Water assessment (risk assessment)	Conformance	The Entity has evaluated its water-related risks in Watersheds in the Entity's Area of Influence with two different methods. One is the official mandatory Environmental Impact Assessment (EIA) reports, and the other is the internal environmental risk assessment forms under the Entity's Environmental Management System.
7.2a Water management (management plans)	Conformance	The Entity has developed and implemented water consumption reduction targets and continuous monitoring relevant to time-bound water management plans.
7.2b Water management (monitoring)	Conformance	The Entity monitors the effectiveness of its plans. Reporting is undertaken using two different methods: One is the official reporting to the authorities according to local legislations, and the other is the annual sustainability reporting.

CRITERION	RATING	COMMENT
7.3 Disclosure of water usage and risks	Conformance	The Entity has a detailed register and mapping (inventory) for its water sources and types. Name and location of water sources, water quantities and ultimate source of the water are presented. Water balance can be monitored via the flow of water in and out during the operations. The Entity publicly reports water withdrawal and usage data and water-related risks annually via its Sustainability Report at: https://www.alcomet.eu/sustainability/sustainability-reports
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	The Entity is located in an official industrial zone as designed by the government, and biodiversity risks have been assessed as low. Additionally, the Entity assessed the risk and materiality of the impacts on biodiversity from the land use and activities in the Entity's Area of Influence using two different methods: Mandatory environmental impact assessment (EIA) reports according to local environmental legislation and environmental risk assessments carried out under Environmental Management System risk and opportunities procedures.
8.2a Biodiversity management (biodiversity action plans)	Not Applicable	This Criterion is not applicable as biodiversity risks have been determined as low, as the Entity is located in an official industrial zone.
8.2b Biodiversity management (consultation and mitigation hierarchy)	Not Applicable	This Criterion is not applicable as biodiversity risks have been determined as low, as the Entity is located in an official industrial zone.
8.2c Biodiversity management (reporting)	Not Applicable	This Criterion is not applicable as biodiversity risks have been determined as low, as the Entity is located in an official industrial zone.
8.3 Alien Species	Conformance	Risks relating to Alien Species have been assessed as low according to Environmental Impact Assessment (EIA) reports. The Entity separately assesses these risks via environmental risk assessment forms under Environmental Management System risk and opportunities procedures.
8.4a Commitment to "No Go" in World Heritage properties (exploration and new mines)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.4b Commitment to "No Go" in World Heritage properties (existing mines)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
8.5a Mine rehabilitation (best available techniques)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.5b Mine rehabilitation (financial provisions)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
PRINCIPLE 9 HUMAN RIGHTS		
9.1a Human Rights Due Diligence (policy)	Conformance	The Entity has established and implemented stand-alone Policies and procedures for different aspects including social compliance, Human Rights and its governance. These Policies are consistent with on-site practices and business scale, and are in line with the ASI Standards requirements. A policy commitment on Human Rights is included in the Social Responsibility Policy, the Code of Conduct and Ethics and internal human resources procedures, which are also focused and disclosed in detail via Entity's annual Sustainability Reports, available at: https://www.alcomet.eu/sustainability/sustainability-reports
9.1b Human Rights Due Diligence (process)	Conformance	The Entity respects Human Rights and has implemented specific Due Diligence and Impact Assessment processes in line with local and global schemes. Recently implemented evaluations and updated procedures cover impacts and risks on topics including Human Rights, women rights, Child Labour, Local Communities, Forced Labour, Human Trafficking, Discrimination and gender equity.
9.1c Human Rights Due Diligence (remediation)	Conformance	There is no evidence on-site of any negative Human Rights practices, either observed during the Audit or as assessed in the Entity's risk assessment and Due Diligence practices, and no remediation is required.
9.2 Women's Rights	Conformance	Both local laws and the Entity's practices demonstrate a commitment to women's rights. An example is the ratio of female Workers among blue-collar staff, which is significantly higher in comparison to the general Aluminium sector. Respect for the rights and interests of women is practically implemented. The Entity has recently revised its Policies, risk assessments and internal human resources procedures on women's rights.
9.3 Indigenous Peoples	Not Applicable	This Criterion is not applicable as there are no Indigenous Peoples in or around the Entity's Area of Influence.

CRITERION	RATING	COMMENT
9.4 Free, Prior, and Informed Consent (FPIC)	Not Applicable	This Criterion is not applicable as there are no Indigenous Peoples in or around the Entity's Area of Influence.
9.5 Cultural and sacred heritage	Not Applicable	This Criterion is not applicable as there are no Indigenous Peoples in or around the Entity's Area of Influence.
9.6a Resettlements (avoid or minimise)	Not Applicable	This Criterion is not applicable as no resettlements are being considered or have taken place since joining ASI, or through changes since the last Audit, or are expected to occur during the Certification Period.
9.6b Resettlements (where unavoidable)	Not Applicable	This Criterion is not applicable as no resettlements are being considered or have taken place since joining ASI, or through changes since the last Audit, or are expected to occur during the Certification Period.
9.7a Local Communities (rights and interests)	Conformance	According to EU and local Bulgarian legislations, the Entity must respect (and respects) the legal and customary rights and interests of Local Communities in their lands and livelihoods. The Entity is located in a state-defined industrial zone with minimum effects on the use of natural resources of the surrounding region.
9.7b Local Communities (impacts)	Conformance	The Entity is located in a state-defined industrial zone and there are no reported or observed negative impacts on Local Communities. The Entity has positive relationships with the local municipality, schools, hospitals, sports clubs, relevant chambers and unions in the neighbourhood. The Entity takes appropriate steps to prevent and address any adverse impacts on Local Community livelihoods.
9.7c Local Communities (livelihoods)	Conformance	The Entity takes appropriate steps to prevent and address any adverse impacts on the Local Community's livelihoods. The Entity explores with Local Communities (hospitals, schools, sports clubs etc.) opportunities to respect and support their livelihoods.
9.8 Conflict-Affected and High-Risk Areas	Conformance	There are no direct activities from the Entity in, or from Conflict-Affected and High-Risk Areas (CAHRAs) and the Entity does not contribute to armed conflict or Human Rights abuses. Supplier selection, evaluation and audit procedures were implemented and potential suppliers with similar risks from these areas are prioritised to be controlled strictly. For the next ASI Re-Certification Audit in 2026, The Entity has commenced a review of its CAHRAs process.

CRITERION	RATING	COMMENT
9.9 Security practice	Conformance	The Entity engages a third-party supplier for security services (unarmed) on-site, who are administratively managed by the Entity's Human Resources department. The security personnel are provided with the same training, oversight and discipline procedures as internal staff. The Entity ensures that security providers respect Human Rights in line with recognised legislations, standards and good practices.
PRINCIPLE 10 LABOUR RIGHTS		
10.1a Freedom of Association and Right to Collective Bargaining (freedom of association)	Conformance	Employees at the Entity have Freedom of Association as proclaimed in the Universal Declaration of Human Rights and guaranteed through both EU and local Bulgarian legislation. Two different Labour Unions are actively representing Workers in the Entity. All Workers have the same unlimited right to join any Union, as well as be representatives at Worker's councils and committees.
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Conformance	Collective Bargaining is an open and free process at the Entity, as guaranteed under EU and local Bulgarian laws. All Unions at the Entity (currently two) have the same right to participate in Collective Bargaining on salaries and/or additional social rights and compensations and to sign a collective labour and social program agreement with the Entity. Workers who are not members of any Unions have the same right to benefit from these Collective Bargaining contracts.
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Not Applicable	This Criterion is not applicable to the Entity, as there is no restriction to Freedom of Association and Collective Bargaining in Bulgaria. Both are covered by local laws and EU legislation.
10.2a Child Labour (minimum age)	Conformance	The Entity does not involve, nor support Child Labour as defined by national legislation, EU legislation and ILO Conventions C138 and C182. The minimum legal working age is 16, and for any possible hazardous, heavy, difficult, dangerous or harmful job, the minimum age is 18 years. The Entity only allows staff who are 18 years old to work on-site. School interns or trainees aged between 16 and 17 can only work outside of production lines in lighter jobs such as administration or office duties. All suppliers of the Entity must accept and sign a Suppliers' Code of Conduct against any kind of Child Labour.
10.2b Child Labour (hazardous)	Conformance	The Entity does not involve, nor support Child Labour as defined by national legislation, EU legislation and ILO Conventions C138 and C182. The minimum legal working age is 16, and for any possible hazardous,

CRITERION	RATING	COMMENT
		heavy, difficult, dangerous or harmful job, the minimum age is 18 years. The Entity only allows staff who are 18 years old to work on-site. School interns or trainees aged between 16 and 17 can only work outside of production lines in lighter jobs such as administration or office duties. All suppliers of the Entity must accept and sign a Suppliers' Code of Conduct against any kind of Child Labour.
10.2c Child Labour (worst forms)	Conformance	The Entity does not engage or support Worst Forms of Child Labour which are strictly prohibited by national law, EU legislation and ILO Conventions C138 and C182. All suppliers of the Entity must accept and sign the Suppliers' Code of Conduct against any kind of Child Labour.
10.3a Forced Labour (human trafficking)	Conformance	The Entity has implemented corporate procedures and rules against Human Trafficking. There is no evidence of Human Trafficking. The Entity neither engages in nor supports the use of Forced Labour in any kind or form, according to local country laws, EU legislations and related ILO Conventions. This is also clearly defined in the Entity policy and procedures like the Business Code of Conduct and Ethics, and Suppliers' Code of Conduct (all suppliers of the Entity have to accept and sign this document) via: https://www.alcomet.eu/sustainability/responsibility
10.3b Forced Labour (deposits, fees, advances)	Conformance	The Entity has implemented corporate procedures and rules against taking deposits or any other payments. There is no evidence of Human Trafficking. The Entity neither engages in nor supports the use of Forced Labour in any kind or form, according to local country laws, EU legislations and related ILO Conventions. This is also clearly defined in the Entity policy and procedures like the Business Code of Conduct and Ethics, and Suppliers' Code of Conduct (all suppliers of the Entity have to accept and sign this document) via: https://www.alcomet.eu/sustainability/responsibility
10.3c Forced Labour (migrant workers)	Conformance	There were no Migrant Workers employed during the audit at the Entity. The Entity neither engages in nor supports the use of Forced Labour in any kind or form, according to local country laws, EU legislations and related ILO Conventions. This is also clearly defined in the Entity policy and procedures like the Business Code of Conduct and Ethics, and Suppliers' Code of Conduct (all suppliers of the Entity have to accept and sign this document) via: https://www.alcomet.eu/sustainability/responsibility

CRITERION	RATING	COMMENT
10.3d Forced Labour (debt bondage)	Conformance	There is no indication for Debt Bondage or similar practice has been observed during the audit, including site tour and worker interviews. The Entity neither engages in nor supports the use of Forced Labour in any kind or form, according to local country laws, EU legislations and related ILO Conventions. This is also clearly defined in the Entity policy and procedures like the Business Code of Conduct and Ethics, and Suppliers' Code of Conduct (all suppliers of the Entity have to accept and sign this document) via: https://www.alcomet.eu/sustainability/responsibility
10.3e Forced Labour (freedom of movement)	Conformance	There is no indication against freedom of movement or similar practice has been observed during the audit, including procedures and documentation checks, site tour and worker interviews. The Entity neither engages in nor supports the use of Forced Labour in any kind or form, according to local country laws, EU legislations and related ILO Conventions.
10.3f Forced Labour (retention of identity papers, permits, certificates)	Conformance	There is no indication of the retention of identity papers or similar practice has been observed during the audit, including procedures and documentation checks, site tour and worker interviews.
10.3g Forced Labour (freedom to terminate employment)	Conformance	Freedom to terminate employment is guaranteed by local law, defined in the Entity's procedures and included in worker contracts. The notice period is defined by laws and included in contracts of employment. No contrary practice was observed during the audit.
10.4 Non-Discrimination	Conformance	The Entity maintains a firm position against any kind of Discrimination which is supported by publicly disclosed corporate policy, internal Human Resources procedures and on-site practices. According to interviews and observations, it was clear that employees have equal opportunities, and that the Entity does not engage in any kind of Discrimination in hiring, salary, promotion or termination of any job contract on the basis of gender, race, national or social origin, religion, disability, political affiliation, sexual orientation, marital status and age.
10.5 Communication and engagement	Conformance	Communication channels are open with all employees and their representatives (freely elected unions, delegates etc.) inside the Entity. There are defined communication and grievance/complaint solution procedures and practical mechanisms for any feedback including working conditions, workplace and compensation issues. Staff have the possibility to provide feedback anonymously.

CRITERION	RATING	COMMENT
10.6 Disciplinary practices	Conformance	Internal disciplinary procedures are in accordance with harmonised national legislation under EU regulations, acknowledged by employees and monitored by the in-house legal department. There is no evidence of any kind of abusive disciplinary practices at the Entity.
10.7a Remuneration (living wage)	Conformance	Whilst there is a defined official minimum wage in the country, the Entity offers a starting salary significantly above this legal minimum wage. Also, general remuneration at the Entity is higher than the region and sector minimum. There are Labour Unions' Collective Bargaining contracts and sectoral agreements including the Bulgarian Association of the Metallurgical Industry, which ensure the rights of Workers to a living wage and salaries to be sufficient to meet the basic needs plus some discretionary income for employees.
10.7b Remuneration (method of payment)	Conformance	The Entity pays wages in full and on time into the bank accounts of employees, and all processes are documented both physically and electronically, in accordance with local legal regulations.
10.8 Working Time	Conformance	The Entity complies with local laws and industry standards on working hours. Working Time for staff with heavy duties, such as those related to the re-melting furnaces, are less, as defined by laws that the Entity complies with. Overtime working hours are paid per hour and the Entity also meets the requirements for public holidays and paid annual leave. The Entity monitors to ensure that Workers do not work over the legal Overtime threshold. Also, social compliance audits from official state inspectors and different third-party companies confirm this situation.
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	The Entity has implemented a detailed stand-alone Occupational Health and Safety (OH&S) Policy. The Policy is reviewed regularly (last review in March 2024) and endorsed by senior management. The Policy has been communicated via the Entity's website, internal web portal, printed brochures, posters and notice boards. The Policy and further information are available at: https://www.alcomet.eu/sustainability/health-and-safety
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	The OH&S Policy has been communicated via the Entity's website, internal web portal, printed brochures, posters and notice boards. The Policy applies to both Workers (including Contractors) and Visitors across all operational areas.

CRITERION	RATING	COMMENT
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Conformance	The Entity has implemented a detailed stand-alone OH&S Policy which includes related commitments to comply with Applicable Law and international standards on Workers' health and safety.
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	The Entity has implemented a detailed stand-alone Occupational Health and Safety Policy. A statement on the Workers' right to understand the hazards and safe practices for their work, and the authority to refuse or stop unsafe work is incorporated into the Policy.
11.2 OH&S Management System	Conformance	The Entity has established and properly implemented an OH&S management strategy addressing all activities and locations. All related nominations, documentation, records and reports are available. The system is certified by an independent third-party certification company against ISO 45001:2018. The last surveillance audit was conducted in 2024 and certification was renewed.
11.3 Employee engagement on health and safety	Conformance	The Entity has established a Health and Safety Committee which includes participation from employees and Labour Union representatives, production Workers, administrative staff and medical personnel. The Committee meets periodically (quarterly) to discuss and determine Health, Safety and Environment (HSE) actions and elevate these to senior management for their consideration and approval.
11.4 OH&S performance	Conformance	The Entity records, reports and evaluates its OH&S performance periodically using different indicators and objectives to meet best practices and implement continuous improvement. The Entity monitors the effectiveness of the system and maintains various records logs. Official State Inspectorate audit records, which are conducted twice a year at minimum, indicate no vulnerabilities regarding the Entity's performance. A dangerous situations register was developed and implemented in early 2023, and employees have contributed to the register.

Document Control and Version History

Revision	Date	Notes
0	20 April 2023	Initial Certification Audit – Provisional Certification
1	21 July 2023	Surveillance Audit – Full Certification
2	17 June 2026	Surveillance Audit