

ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

Qatar Aluminium Limited (QATALUM)

CERTIFICATE NUMBER
195

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

CERTIFICATION
LEVEL
**FULL
CERTIFICATION**

ASI ACCREDITED
AUDITING FIRM
**DNV BUSINESS
ASSURANCE SERVICES
UK LTD.**

DATE OF ISSUE
28 MARCH 2024

DATE OF EXPIRY
27 MARCH 2027

CERTIFIED SINCE
11 APRIL 2022

AUTHORISED BY

A handwritten signature in black ink, consisting of a stylized 'A' followed by a long horizontal line.

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*Validity of this Certificate is subject to
continued conformance with the
applicable ASI Standard and can be
verified at
www.aluminium-stewardship.org*

CERTIFICATION SCOPE

Aluminium Smelting and
Cathouse operations for the
manufacture of extrusion ingots
and primary foundry alloy in
Mesaieed Industrial City (MIC),
Qatar.

AUDIT REPORT PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Qatalum
ENTITY NAME	Qatar Aluminium Limited (QATALUM)
CERTIFICATION SCOPE	Aluminium Smelting and Casthouse operations for the manufacture of extrusion ingots and primary foundry alloy in Mesaieed Industrial City (MIC), Qatar.
SUPPLY CHAIN ACTIVITIES	- Aluminium Smelting - Casthouses
ASI STANDARD	Performance Standard V3.1
AUDIT TYPE	- Initial Certification Audit (28 November – 16 December 2021) - Re-Certification Audit and Scope Change (22 – 26 October 2023) - Surveillance Audit (25 – 29 January 2026)
AUDIT FIRM	DNV Business Assurance Services UK Ltd.
AUDIT DATE	28 November – 16 December 2021 (Initial Certification Audit) 22 – 26 October 2023 (Re-Certification Audit and Scope Change) 25 – 29 January 2026 (Surveillance Audit)
AUDIT REPORT SUBMISSION	1 March 2022 (Initial Certification Audit) 19 February 2024 (Re-Certification Audit and Scope Change) 23 June 2026 (Surveillance Audit)
AUDIT SCOPE	<u>Initial Certification Audit (28 November – 16 December 2021)</u> The Audit Scope included the smelter and Casthouse operations, carbon plant, power plant, port and storage facilities and Head Office functions such as human resources, supply chain, health and safety, security, environment and sustainability, emergency/ fire, marketing and sales, internal audit, medical first aid, finance and legal. Supply chain activities included in the Audit Scope: - Aluminium Smelting - Casthouses All relevant criteria in the ASI Performance Standard were included in the Audit Scope. <u>Re-Certification Audit and Scope Change (22 – 26 October 2023)</u> The Audit Scope included the smelting and Casthouse operations for the manufacture of extrusion ingots and primary foundry alloy. Supply chain activities included in the Audit Scope: - Aluminium Smelting

- Casthouses

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

Surveillance Audit (25 – 29 January 2026)

The Audit Scope included the smelting and Casthouse operations for the manufacture of extrusion ingots and primary foundry alloy.

Supply chain activities included in the Audit Scope:

- Aluminium Smelting
- Casthouses

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

AUDIT OUTCOME

- Certification

GHG PERFORMANCE EXEMPTION

The Entity has been approved for an exemption relating to its GHG emissions performance under Criteria 5.3a and/or 5.4. Under this exemption, Major Non-Conformance(s) will not count towards any Provisional Certification status, and the Entity must develop Corrective Action Plans and demonstrate progress over time.

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

28 March 2024 – 27 March 2027

NEXT AUDIT TYPE

Re-Certification Audit

NEXT AUDIT DATE

27 March 2027

CERTIFICATE NUMBER

195



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

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

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

ENTITY OVERVIEW

Qatalum (the ‘Entity’) operates an, Qatar, approximately 40 kilometres south of Doha. The facilities at the Entity include a carbon plant, a reduction plant, a Casthouse, port and storage facilities as well as a captive power plant. Qatalum produces more than 650,000 tonnes of high-quality Primary Aluminium Products per annum. The operations commenced in 2009. The Potline and Rectifier is 1.2 km in length, there are 704 pots in total, 352 cells in two potrooms and 14 pot tending machines.

The market for the Entity’s Extrusion Ingots includes Asia, Europe/Türkiye and the United States, which are used in residential and commercial building and construction products, predominantly door and window frames, curtain walling, and some automotive applications in HVAC systems, crush systems and battery pack cells. The market for the Entity’s Primary Foundry alloys is similar and predominantly used in alloy wheel production and other automotive applications.

The Entity is currently implementing an Electrolysis Process Optimisation Project to increase Aluminium production. Beyond the routine relining of pots, and apart from its rectifiers, no other modifications are required achieve a production increase. There is no change to the layout of the plant.

MATURITY RATINGS

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

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

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

FINDINGS

CRITERION	RATING	COMMENT
1. BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity maintains a structured legal and compliance framework, including annual environmental risk registers and mandatory Entity-wide training. External audits, Worker welfare reviews, and guidance from Qatar Energy strengthen oversight. Legal compliance is centrally managed, with the General Counsel & Company Secretary—Legal reporting directly to the Chief Executive Officer (CEO).
1.2 Anti-Corruption	Conformance	The Entity has implemented a robust anti-Corruption framework within its Code of Conduct, which is available at: https://www.qatalum.com/wp-content/uploads/2023/11/QTLM_Code-of-Conduct-Booklet-V3.pdf The Entity has controls in place with clear reporting channels and internal audit oversight.
1.3a-e Code of Conduct	Conformance	The Entity has established a Code of Conduct, which incorporates guidance from both Qatar Energy and Hydro, is reviewed every two years and approved by the Board before being signed by the CEO. It is available at: https://www.qatalum.com/wp-content/uploads/2023/11/QTLM_Code-of-Conduct-Booklet-V3.pdf The Code is supported by a separate Supplier Code of Conduct. Mandatory Code of Conduct training is delivered to all employees and contractors through the RamBase platform, with a two-year refresher cycle.
2. POLICY AND MANAGEMENT		
2.1a-f Environmental, Social, and Governance Policy	Conformance	The Entity has developed a standalone HSE Policy, signed by the CEO outlining commitments to health, safety, and environmentally responsible operations. It is visibly displayed across all areas of the facility to support awareness and compliance. The CSR Directive and Social Sustainability Policy outline the organisation's commitment to social responsibility, including conducting Social Impact Assessments and escalating any non-compliances to the CEO. These Policies are currently being updated for publication, with key elements already reflected in the Sustainability Report and supported by related directives.
2.2a-c Leadership	Conformance	The Entity has appointed the Environment and Sustainability Manager as having overall responsibility and authority for ensuring Conformance with the ASI Performance Standard as stated in the issued job description.
2.3a Environmental and Social Management Systems – Environmental	Conformance	The Entity has documented, implemented and is maintaining a HSE Management System as per ISO 14001 and ISO 45001 standards, which is certified by an external third party auditor.
2.3b Environmental and Social Management Systems – Social	Conformance	The Entity has established a Worker Welfare Management System to ensure that it is managing Human Rights risks. The Entity has committed to establish, implement, maintain, and continually improve its Worker welfare system to promote respect for the Human Rights of employees, consumers, and communities and to perform Due

CRITERION	RATING	COMMENT
		Diligence on Human Rights impacts of its operations, as guided by the UN Guiding Principles on Business and Human Rights and the OECD Due Diligence Guidance for Responsible Business Conduct. The Entity has strengthened existing processes and has taken significant measures to improve contractor safety and welfare.
2.4a-e Responsible Sourcing	Conformance	The Entity has established a Responsible Sourcing Policy which outlines supplier risk mapping, expectations, and development initiatives, including the promotion of ASI Certification and participation in the Tawteen program, an initiative across several Gulf countries designed to boost localisation. The Responsible Sourcing Policy is available at: https://www.qatalum.com/wp-content/uploads/2026/01/Responsible-Sourcing-Policy-Final-15.02.24.pdf Supplier Due Diligence activities include third-party risk assessments, supplier ratings by third parties, and ongoing supplier audits.
2.5a-g Environmental and Social Impact Assessments	Conformance	The Entity is currently implementing an Electrolysis Process Optimisation Project to increase Aluminium production at the plant. Beyond the routine relining of pots, and apart from its rectifiers, no other modifications are required to achieve this production increase. An Environmental Impact Assessment (EIA) was completed by third-party consultants in February 2024 to support an increase in production capacity. The EIA identified no major environmental risks, and management provided responses to the recommendations raised. The Ministry for Environment approved the EIA in 2024. The CSR Directive and Social Sustainability Policy are CEO-approved top-level documents that require Social Impact Assessments for Major Changes. The key elements of Social Impacts are disclosed in its 2024 Sustainability Report: https://www.qatalum.com/wp-content/uploads/2025/09/Qatalum-Sustainability-Report-2024-EN.pdf. Social-related information is already partially available online via its revised HSE, Environmental, Social Sustainability, and Human Rights Policies: https://www.qatalum.com/sustainability/
2.6a-h Human Rights Impact Assessment	Conformance	The Entity conducts an annual human and labour rights risk assessment, with the most recent completed in January 2026 which was reviewed during the Audit. The assessment included direct employees, contractors, recruitment agents, Worker accommodation, and transport. The Entity has disclosed key outcomes in its 2024 Sustainability Report: https://www.qatalum.com/wp-content/uploads/2025/09/Qatalum-Sustainability-Report-2024-EN.pdf Whilst the Impact Assessment was conducted for the amperage increase, it was identified it did not have Material impact on human and labour rights as it predominantly relates to a technical adjustment to certain operational parameters.
2.7a-f Emergency Response Plan	Conformance	The Entity has developed emergency response, and evacuation plans in collaboration with potentially affected Stakeholder groups including the Mesaieed Industrial City (MIC), nearby industries, Workers, and their representatives. The Emergency Response Plan is disclosed in the Sustainability Report 2024, page 59:

CRITERION	RATING	COMMENT
		https://www.qatalum.com/wp-content/uploads/2025/09/Qatalum-Sustainability-Report-2024-EN.pdf
2.8a-d Suspended Operations	Conformance	The Entity has established a comprehensive and systematic Enterprise Risk Management (ERM) system to protect its operations from unplanned disruptions. The ERM system includes a communication and consultation process, scope context and criteria establishment, risk assessment, risk treatment, and monitoring and review. The communication and consultation process ensures that different areas of expertise consider various viewpoints during the risk assessment, and ensures relevant interested parties are consulted at all stages of the risk Management System. This helps ensure that the potential risks are identified and understood, and that objectives are better understood and considered. The Business Continuity Plan (BCP) was reviewed during the Audit, and confirms the plan provides a formal process for managing operational disruptions, including scenarios involving suspended operations. The BCP was last updated in October 2025 and is reviewed annually or following significant operational changes.
2.9a-b Mergers and Acquisitions	Conformance	While the Entity cannot engage in any scope of merger or acquisition being a Joint Venture smelter project, it has committed to a Due Diligence process including environmental, social and governance issues in case any mergers and acquisitions are undertaken under the control of the Entity.
2.10a-b Closure, Decommissioning and Divestment	Conformance	The Entity has addressed all requirements related to the management of closure, decommissioning and divestment needs as they arise from the business strategy. The Joint Venture Agreement also includes a review of environmental, social and governance issues in the planning process.
3. TRANSPARENCY		
3.1a-b Sustainability Reporting	Conformance	The Entity has issued its Sustainability Report for 2024, available at: https://www.qatalum.com/wp-content/uploads/2025/09/Qatalum-Sustainability-Report-2024-EN.pdf ESG governance is addressed in the Sustainability Report (page 28). The Entity's Board of Directors is responsible for approving the ESG and sustainability strategies and ensuring they align with the company's governance and operational priorities. The Materiality Assessment is also disclosed (page 29).
3.2 Non-compliance and Liabilities	Conformance	The Entity has publicly disclosed information on significant fines, judgments, penalties in the Sustainability Report 2024, page 89: https://www.qatalum.com/wp-content/uploads/2025/09/Qatalum-Sustainability-Report-2024-EN.pdf
3.3a-c Payments to Governments	Conformance	In accordance with its Code of Conduct (https://www.qatalum.com/wp-content/uploads/2026/04/Qatalum-Code-of-Conduct-2026.pdf), the Entity does not make payments aside from taxes to governments or political parties. Financial statements are independently audited, ensuring that all financial disclosures are transparent, accurate, and publicly accountable. The Entity has disclosed its Economic Performance in the Sustainability

CRITERION	RATING	COMMENT
		Report 2024, page 83: https://www.qatalum.com/wp-content/uploads/2025/09/Qatalum-Sustainability-Report-2024-EN.pdf
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	The Entity has disclosed the Grievance Management System, including the ethics and compliance hotline details in the Sustainability Report 2024, pages 60 and 88: https://www.qatalum.com/wp-content/uploads/2025/09/Qatalum-Sustainability-Report-2024-EN.pdf The Entity has established a 'Conduct Violation Hotline' in its Code of Conduct, available at: https://www.qatalum.com/wp-content/uploads/2023/11/QTLM_Code-of-Conduct-Booklet-V3.pdf
4. MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment	Conformance	The Entity has conducted a Life Cycle Assessment (LCA) for one of its low carbon Aluminium Products which has been verified by a third-party. LCA information is available in the Sustainability Report 2024, pages 15-19: https://www.qatalum.com/wp-content/uploads/2025/09/Qatalum-Sustainability-Report-2024-EN.pdf
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	One 'low-carbon' Aluminium product was independently verified in 2025, based on a review of the internal LCA. The verification reports are shared with customers upon request, and one such report was reviewed during the audit. In addition, the Entity provides cradle to gate Product footprint to customers. LCA information is available in the Sustainability Report 2024, pages 15-19: https://www.qatalum.com/wp-content/uploads/2025/09/Qatalum-Sustainability-Report-2024-EN.pdf
4.2 Product Design	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.3a-b Aluminium Process Scrap	Conformance	The Entity considers recovery targets on an annual basis for different grades of Products to minimise the generation of Process Scrap. The Entity re-uses/recycles 100% of the generated Scrap in a controlled manner. The Entity separates Scrap of different alloys and grades for recycling. The Scrap is kept in bins which are provided with a barcoded label that provides the alloy code.
4.4a-c Collection and Recycling of Products at End of Life - Material Conversion and other Manufacturing	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.4d Collection and Recycling of Products at End of Life	Conformance	The Entity has plans in place to engage with local collection and recycling systems in Qatar to support accurate measurement and efforts to increase recycling rates for their Products containing Aluminium.

CRITERION	RATING	COMMENT
5. GREENHOUSE GAS EMISSIONS		
5.1a-b Disclosure of GHG Emissions and Energy Use	Conformance	The Entity has disclosed their energy consumption data, Scopes 1 and 2 emissions, along with corresponding intensity metrics and is publicly disclosed in the Sustainability Report 2024, pages 34 and 36: https://www.qatalum.com/wp-content/uploads/2025/09/Qatalum-Sustainability-Report-2024-EN.pdf Scope 3 emissions are available upon request. The Greenhouse Gas (GHG) emissions data are externally verified, however, have been determined by major Shareholder as commercially confidential and are therefore available only to customers upon request.
5.2a Aluminium Smelter GHG Emissions Intensity – Started production after 2020	Not Applicable	This Criterion is not applicable to the Entity, as it commenced Aluminium production before 2020.
5.2b Aluminium Smelter GHG Emissions Intensity – In production up to and including 2020	Conformance	The emissions intensity from ‘cradle to gate’ has been verified for 2025, which is lower than the ASI threshold of 11 tCO ₂ e/t, demonstrating compliance with ASI performance requirements.
5.3a GHG Emissions Reduction Plans	Major Non-Conformance	The Entity has disclosed its 1.5-degree Pathway against ASI’s pathway and publicly disclosed in its website https://www.qatalum.com/wp-content/uploads/2026/05/Qatalum-ASI-GHG-Public-Disclosure-V3.0.pdf The Entity was unable to demonstrate that its GHG emissions intensity reduction performance aligns with its ASI Method-derived GHG Emissions Reduction Pathway. As per the Criteria 5.3a & 5.4 Exemption Process, both Non-Conformances are exempt from the Certification outcomes and member obligations resulting from non-conformance as outlined in the ASI Assurance Manual. It is expected that the Entity will be required to ongoingly disclose its performance and to meet the other requirements of the GHG emissions related criteria and to reduce its emissions intensity (all conditions of exemption). At subsequent Audits, the Entity’s ability to meet the conditions of exemption will be reviewed, should the Major Non-Conformances remain.
5.3b-e GHG Emissions Reduction Plans – Targets, review and disclosure	Conformance	The Entity has publicly disclosed its emission reduction plan (https://www.qatalum.com/wp-content/uploads/2026/05/Qatalum-ASI-GHG-Public-Disclosure-V3.0.pdf) as well as the emissions reduction trajectory. The document (on page 4) provides a summary of the key emissions reduction initiatives proposed by the Entity.
5.4 GHG Emissions Management	Major Non-Conformance	Despite these ongoing efforts, the Entity is not expected to achieve the targeted emissions intensity of 5.2 tCO₂e/t Al. Some of the initiatives are currently not feasible due to constraints at the regional level, including limited availability of required technologies and infrastructure, as well as a legislative and regulatory landscape that does not yet support their implementation. The Entity has also publicly disclosed its emission reduction plan in (https://www.qatalum.com/wp-content/uploads/2026/05/Qatalum-ASI-GHG-Public-Disclosure-V3.0.pdf). The document (page 4) provides a summary of the key emission reduction initiatives

CRITERION	RATING	COMMENT
		proposed by the Entity. Additionally, through this document, they have also presented the challenges to achieve emission reduction targets and sought an exemption from ASI. The Entity has not been able to demonstrate that its GHG emissions intensity reduction performance is in line with its ASI Method-derived GHG Emissions Reduction Pathway and as such is non-conformant with Criteria 5.3 (a) and 5.4. This is the Certification Period across which the Entity has been above its GHG Pathway-required emissions reduction slope. As per GHG-performance-exemption these Non-Conformances are exempt from the Certification Outcomes and Member Obligations Resulting from Non-Conformance outlined in the ASI Assurance Manual. However, the expectation is that the Entity will continue to be required to publicly disclose its performance and to meet the other requirements of the GHG Emissions related Criteria and to reduce its emissions intensity (all a condition of Exemption). At subsequent Audits, the Entity's ability to meet the conditions of Exemption will be reviewed, should the Non-Conformance(s) remain.

6. EMISSIONS, EFFLUENTS AND WASTE

6.1a-f Emissions to Air	Conformance	The Entity has quantified its Emissions to Air that have potential adverse effects on humans and/or the environment and has established programs for the reduction of these emissions in accordance with local regulations and their own standards. Emissions to Air are disclosed in the Sustainability Report 2024, pages 38 and 39: https://www.qatalum.com/wp-content/uploads/2025/09/Qatalum-Sustainability-Report-2024-EN.pdf
6.2a-g Discharges to Water	Conformance	The Entity discharges the cooling and scrubbing water used in the power plant and fume treatment plants into the ocean and has a system in place to quantify and report on these discharges. The Sustainability Report also discloses the quantity of water discharged to third parties for recycling. Information on the volume of water recycled and reused, including both process and sanitary water, is available in the Sustainability Report 2024, page 45: https://www.qatalum.com/wp-content/uploads/2025/09/Qatalum-Sustainability-Report-2024-EN.pdf
6.3a-g Assessment and Management of Spills and Leakages	Conformance	The Entity has assessed the areas where Spills or Leakages may potentially occur through a risk assessment and registry process. The Entity maintains an Environmental Management System that has adequate procedures to prevent and detect Spills and Leakages. Bore wells for groundwater monitoring are available and are being tested periodically as per legal requirements.
6.4a-b Public Disclosure of Spills and Leakages	Conformance	Monetary sanctions for non-compliance with environmental laws and regulations is disclosed in the Sustainability Report, page 42: https://www.qatalum.com/wp-content/uploads/2025/09/Qatalum-Sustainability-Report-2024-EN.pdf The Entity has not reported any significant Spills since 2019.

CRITERION	RATING	COMMENT
6.5a-c Waste Management and Reporting	Conformance	The Entity has published data on the quantity of Hazardous and Non-Hazardous Waste generated, as well as Waste recycling data and its Waste Management Strategy in the Sustainability Report 2024, page 42: https://www.qatalum.com/wp-content/uploads/2025/09/Qatalum-Sustainability-Report-2024-EN.pdf
6.6a-g Bauxite Residue	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7a-f Spent Pot Lining (SPL)	Conformance	The Entity has developed a long term strategy to manage Spent Pot Lining (SPL) waste handling and recycling/disposal. The Entity has five year strategic plans for pot relining and SPL recycling that aim to optimise the processes for the recovery and recycling of carbon and refractory materials, segregating SPL materials and recycling in other industries as an energy supplement. The Entity does not landfill Untreated SPL and hence there is no potential for adverse environmental effects that may arise from landfilling. The Entity has both short term and long-term strategies that are reviewed both monthly and annually for options to increase SPL recycling rates. The Entity does not landfill SPL as it does not undertake treatment of SPL. The Entity does not discharge SPL to marine and aquatic environments. This position is confirmed via Policies and procedures.
6.8a-d Dross	Conformance	The Entity treats its Dross produced from the Casthouse by sending it to an external recycling company and the recovered Aluminium is used in the Entity's Casthouse. The Entity has demonstrated that they have considered alternative plans and options to landfilling of Dross residues. While the current recycling partner operates abroad, a contract has been awarded to a local company to implement this processing facility project to serve as the long term solution for Dross management.
7. WATER STEWARDSHIP		
7.1a-b Water Assessment and Disclosure	Conformance	The Entity's water consumption is disclosed in its 2024 Sustainability Report in (pages 44-45) and is managed under an approved Water Management Plan: https://www.qatalum.com/wp-content/uploads/2025/09/Qatalum-Sustainability-Report-2024-EN.pdf Process water is treated at the Effluent Treatment Plant (ETP) before being recycled for irrigation purposes. Water quality parameters are monitored to ensure compliance with regulatory limits before reuse. No water is discharged to land or ocean. The Water Management Plan was reviewed during the Audit, and water consumption data are regularly reported to the Ministry in support of the Consent to Operate (CTO) requirements. In addition, seawater temperature monitoring is conducted in accordance with the conditions of the CTO, due to the use of seawater for cooling purposes. Water-related risks are considered in the Enterprise Risk Register, where they are assessed as low. Mitigation actions have been identified to address these risks.

CRITERION	RATING	COMMENT
7.2a-e Water Management	Conformance	The Entity has implemented suitable water management plans, with time-bound targets that address Material risks identified through the enterprise risk assessment process. The Entity has publicly disclosed the Water Management in its 2024 Sustainability Report, page 44: https://www.qatalum.com/wp-content/uploads/2025/09/Qatalum-Sustainability-Report-2024-EN.pdf
8. BIODIVERSITY AND ECOSYSTEM SERVICES		
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	Before constructing the smelter, the Entity conducted an initial Environmental Impact Assessment. One of the Biodiversity risks identified was the impact on an existing reed bed area. According to the Entity's assessment, construction activity led to the removal of a portion of the reed bed, confirming it as a significant Biodiversity risk. The latest EIA for the proposed amperage increase project builds on these previous studies, and no significant additional risks have been identified. Biodiversity risks and protection measures are managed through a Biodiversity Management Plan and Impact Register, the details of which are disclosed in the Sustainability Report.
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Conformance	The Entity's Biodiversity risk assessment included thorough surveys of terrestrial and marine ecosystems, evaluating potential impacts on flora, fauna, endangered species, and sensitive ecosystems. It addressed habitat loss from construction activities, as well as noise, dust, and sedimentation effects on marine life. Proposed mitigation measures and monitoring plans aimed to minimise impacts and protect Biodiversity. Legal protection and conservation status of habitats and species are taken into account, with the overarching goal of carefully evaluating and mitigating the project's environmental impact on Biodiversity to ensure minimal adverse effects. The EIA determined that there are no Priority Ecosystem Services.
8.2a-g Biodiversity Management	Conformance	A Biodiversity Action Plan has been developed by third-party consultants which, includes the construction of an on-site bird sanctuary and initial planting of 50 plants (as Phase 1). Phase 2 targets expanded tree planting to a total of 150 plants by Q1 2026; survival rates are currently 60–65%, with active replanting and monitoring ongoing. Water quality in the sanctuary is regularly tested and remains within regulatory limits, and Biodiversity actions will be disclosed in the 2025 Sustainability Report.
8.3a-c Management of Priority Ecosystem Services	Not Applicable	This Criterion is not applicable to the Entity, as the EIA determined that there are no Priority Ecosystem Services. The Qatalum plant site and port are located in an existing heavily industrialised area with, for the most part, little reported vegetation or areas of ecological significance.
8.4 Alien Species	Conformance	The Entity has conducted an EIA through a specialised third party consultant. The scope included an assessment of accidental or deliberate introduction of Alien Species that could have significant adverse impacts on Biodiversity. The existing controls were considered sufficient to mitigate the risk of the introduction of Alien Species.

CRITERION	RATING	COMMENT
8.5a-b Commitment to “No Go” in World Heritage Properties	Conformance	While the Entity does not operate in World Heritage Properties and has no short-term or medium-term plans to explore more areas for operation expansion, the Entity respects the universal value for which these properties are listed, and the Entity’s future operations will not put the integrity of these properties at risk.
8.6a-d Protected Areas	Conformance	Based on the Entity’s EIA report, none of the habitats or areas within the site or in the vicinity of the site are legally protected, nor have they been nominated for inclusion as Biosphere Reserves according to studies by UNESCO for the Supreme Council for the Environment and Natural Reserves (SCENR).
8.6e Protected Areas – Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity’s Certification Scope.
8.7a-i Mine Rehabilitation	Not Applicable	This Criterion is not applicable to the Entity’s Certification Scope.
9. HUMAN RIGHTS		
9.1a-d Human Rights Due Diligence	Conformance	The Entity has established and implemented a Corporate Social Responsibility (CSR) Directive, which includes a commitment to respecting Human Rights. The Entity has implemented a Worker Welfare Program comprising various documents and programs. The CSR Directive is well supported by the Human Rights Policy, Supply Chain Directive, Supplier Code of Conduct and supporting documents in terms of the implementation of processes needed to protect Human Rights. The Human Rights Policy is available at: https://www.qatalum.com/wp-content/uploads/2026/01/Human-Rights-Policy.pdf
9.2a-e Gender Equity and Women’s Empowerment	Conformance	The Entity has implemented a Gender Equity and Women’s Empowerment Program, which is designed to promote gender equality, protect Human Rights, and empower women within the organisation and the broader community. The program includes but is not limited to the following principles: Non-Discrimination; Gender Equity; Gender Equality Promotion; Violence and Harassment Free Workplace; Access to Education and Training; Externally Evaluated Job Grading; Salary Band Based Compensation; Community Engagement; and Raising Awareness. The Entity internally tracks the effectiveness of the program and is establishing how it can align the disclosure of the program with the agreement of its government shareholder. Women employee data are disclosed in its 2024 Sustainability Report, page 63: https://www.qatalum.com/wp-content/uploads/2025/09/Qatalum-Sustainability-Report-2024-EN.pdf
9.3a-i Indigenous Peoples	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples or their lands, territories or resources identified.
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 or their lands, territories or resources identified.

CRITERION	RATING	COMMENT
9.4b Free, Prior, and Informed Consent (FPIC) - Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9.4c Free, Prior, and Informed Consent (FPIC) - Demonstrate support	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples or their lands, territories or resources identified.
9.5a Cultural and Sacred Heritage - Identification	Not Applicable	This Criterion is not applicable to the Entity, as there are no sacred or cultural heritage sites and values within the Entity's Area of Influence and there are no Indigenous Peoples or their lands, territories or resources identified. The Entity is based in a dedicated industrial area.
9.5b Cultural and Sacred Heritage - Impacts	Not Applicable	This Criterion is not applicable to the Entity, as there are no sacred or cultural heritage sites and values within the Entity's Area of Influence and there are no Indigenous Peoples or their lands, territories or resources identified. The Entity is based in a dedicated industrial area.
9.6a-i Displacement	Not Applicable	This Criterion is not applicable to the Entity, as there have been no New Projects or Major Changes since the Entity joined ASI nor social impacts that required Resettlement at the time of plant construction.
9.7a-h Affected Populations and Organisations	Conformance	The Entity has participated in local industrial community meetings and operates in accordance with local obligations to respect the legal and customary rights and interests of Local Communities. The Entity participates in the Mesaieed Industrial City (MIC) Environment Sub-Committee meeting together with other organisations in the industrial city as a collaborative mechanism to discuss and address any concerns.
9.8a Conflict-Affected and High-Risk Areas - Strong Management Systems	Conformance	The Entity is committed to responsible sourcing and does not knowingly source materials, including minerals, from conflict-affected or high-risk areas. This commitment reflects the Entity's approach to upholding Human Rights, ethical business practices, and regulatory compliance across its supply chain. The Entity has disclosed this commitment in the Sustainability Report 2024, pages 80-81: https://www.qatalum.com/wp-content/uploads/2025/09/Qatalum-Sustainability-Report-2024-EN.pdf To strengthen oversight and risk identification, the Entity has implemented a third-party risk analyses platform to enable enhanced screening and ongoing monitoring of suppliers and business partners. The platform supports the identification of geopolitical, regulatory, Human Rights and reputational risks, allowing for a more proactive, risk-based approach to supply chain management.
9.8b Conflict-Affected and High-Risk Areas - Identify and assess risks	Conformance	The Entity has established a Code of Conduct and Sponsorship Donation and Supply Chain Directives that are well communicated and implemented to prevent contributing to armed conflict or Human Rights abuses in Conflict-Affected and High-Risk Areas (CAHRAs) either directly or indirectly through the supply chain. The Entity maintains a register for Sanctions and Conflict-Affected High-Risk Areas and any procurement from these areas receives additional Due Diligence through the Legal Department. Without limiting the foregoing, the Entity's general Policy is that it does not source from CAHRAs.

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		With the support of an external agency that specialises in assessments of the supply chains, the Entity has completed key strategic supply chain assessments and is in the process of completing its supply chain mapping and a Materiality and risk assessment.
9.8c Conflict-Affected and High-Risk Areas – Strategy to respond to risks	Conformance	The Entity has established a Code of Conduct and Sponsorship Donation and Supply Chain Directives that are well communicated and implemented to prevent contributing to armed conflict or Human Rights abuses in CAHRAs either directly or through the supply chain. The established management procedures comprise: 1. Supply chain risk screening; 2. A phased supplier Due Diligence approach (both desk-based and, where necessary, site-based); 3. Risk identification measures and controls in a form of initial assessment based on supplier activity and geographical location; 4. Requests for further information for potential high risks suppliers through the use of a bespoke ESG questionnaire; 5. Qatalum, Hydro and a third party to lead Due Diligence investigations of potential or existing supply chain partners to enable Qatalum's further understanding of potential degree of risk; 6. Internal management accountabilities with clear roles assigned; 7. Requirement for new and existing suppliers to conduct their business in a manner commensurate with Qatalum's responsible sourcing policies' priorities; 8. Provision of a grievance reporting mechanism available to Qatalum's business partners.
9.8d Conflict-Affected and High-Risk Areas – Audit of due diligence	Conformance	The Entity follows risk-based Due Diligence over its supply chain in accordance with the OECD Due Diligence Guidance of Minerals from Conflict-Affected and High-Risk Areas (OECD Guidance). Risks related to CAHRAs are mapped including functions, relevant business units, risk descriptions, likelihood, and description and effectiveness of existing controls. The Entity's Due Diligence practices have been audited as part of this ASI Audit.
9.8e Conflict-Affected and High-Risk Areas – Report annually	Conformance	The Entity reports annually on supply chain Due Diligence activities in its Sustainability Report 2024, pages 80-81: https://www.qatalum.com/wp-content/uploads/2025/09/Qatalum-Sustainability-Report-2024-EN.pdf
9.9 Security practice	Conformance	The Entity has implemented security practices that respect Human Rights. The Entity has engaged a private security service provider and ensures that security practices including the Voluntary Principles on Security and Human Rights, are adhered to.
10. LABOUR RIGHTS		
10.1a-c Freedom of Association and Right to Collective Bargaining	Not Applicable	This Criterion is not applicable to the Entity as it currently respects Freedom of Association and the right to Collective Bargaining in accordance with Applicable Law in Qatar. However, the Entity neither promotes nor rejects 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. ILO Conventions are not ratified by the State and hence not considered. There are no agreements for Collective Bargaining at the Entity. Though the Applicable Law has provisions for

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		such agreements, this has not been practiced by Workers as a choice. The Entity has a commitment to respect the rights of Workers to Collective Bargaining, participate in any Collective Bargaining process in good faith, and adhere to Collective Bargaining agreements where they exist.
10.1d Freedom of Association and Right to Collective Bargaining - Alternative means in context of Applicable Law	Conformance	The Entity supports alternative means of association for Workers such as HSE Committees and employs a range of mechanisms, including town hall meetings, hazard and incident reporting, grievance reporting mechanisms for both employees and contractors, as well as HSE forums for gathering feedback and suggestions from Stakeholders.
10.2a Child Labour	Conformance	The Entity has implemented Policies and employment regulations to prevent the hiring of Child Labour. The Entity ensures the enforcement of this Policy throughout its supply chain by requiring suppliers to declare their commitment to these principles. The Policies neither use nor support the use of Child Labour, including the Worst Forms of Child Labour, as defined in ILO Conventions C138 and C182, and comply with related national and international law. The minimum age of employment is 21.
10.3a-c Forced Labour	Minor Non-Conformance	The Entity has robust Policies and controls in place to prevent Human Trafficking, whether it occurs directly or through recruitment agencies. The Entity maintains well-established Policies, including a Supplier Code of Conduct, which prohibit collecting any form of Deposit or Recruitment Fee from its employees, whether through direct means or via recruitment agencies; holding Workers in Debt Bondage; restricting Workers' freedom of movement in the workplace or housing; retaining passport or other personal documents; and denying Workers the freedom to terminate their employment. The Entity's Supplier Code of Conduct is available at: https://www.qatalum.com/suppliers The Entity has also established an Accommodation Standard for Workers based in Qatar that includes the provision of housing, food, laundry, recreational facilities, transportation to shopping areas, internet access, and other elements to ensure the health, safety, and welfare of employees. Contractor compliance with these standards is monitored by the Entity and supported by contractual provisions. Accommodation Guidance Standard is publicly disclosed at: https://www.qatalum.com/suppliers/ The Entity has included a statement in the Sustainability Report on its commitment to safeguarding Human Rights, including Forced Labour and Human Trafficking, and prepared a Human Rights Statement available in the 2024 Sustainability Report, pages 62-65, and 80-81: www.qatalum.com/wp-content/uploads/2025/09/Qatalum-Sustainability-Report-2024-EN.pdf While the Entity aligns with the substance and intent of Modern Slavery legislation, it does not currently publish a stand-alone 'Modern Slavery Statement'. Instead, the Entity sets out its key risks, mitigation actions, and future plans in its Sustainability Report. Entity is willing to produce a standalone document in the future, although it may not refer to it as a 'Modern Slavery Statement' due to concerns about this specific term held by the Entity and its local Stakeholders. There is no objection to the content typically included in such statements, and all relevant disclosures are fully addressed in the Human Rights Policy. However, the use of the specific term 'Modern Slavery Statement' is not

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		authorised, which restricts the Entity from publishing one independently. While the Entity has indicated its willingness to develop and publish a standalone document addressing modern slavery risks in the future, the absence of such a document at present constitutes a minor non-conformance.
10.4a-c Non-Discrimination	Conformance	The Entity's Code of Conduct (https://www.qatalum.com/wp-content/uploads/2023/11/QTLM_Code-of-Conduct-Booklet-V3.pdf) addresses Discrimination, Section 4.2 has specified 'Qatalum shall treat all employees fairly and with respect. In pursuing the Company's objectives, employees and business units shall use merit, qualifications and other professional criteria as the basis for employee-related decisions in Qatalum, such as recruitment, training, compensation and promotion'. Refer to: https://www.qatalum.com/wp-content/uploads/2023/11/QTLM_Code-of-Conduct-Booklet-V3.pdf The Entity has also disclosed publicly through its Human Rights Policy (https://www.qatalum.com/wp-content/uploads/2026/01/Human-Rights-Policy.pdf) that it will not tolerate any Discrimination on the grounds of race, age, disability, gender or political or religious beliefs. Additionally, the Entity has established an Ethics and Compliance Hotline that allows employees and other Stakeholders to anonymously raise concerns related to Discrimination. The Entity has demonstrated its commitment to investigating and addressing such issues, and this mechanism is disclosed in its Sustainability Report 2024, page 88: https://www.qatalum.com/wp-content/uploads/2025/09/Qatalum-Sustainability-Report-2024-EN.pdf
10.5 Communication and engagement	Conformance	The Entity has adequate processes and mechanisms governed by its Code of Conduct to ensure open communication and direct engagement with Workers regarding working conditions and the resolution of workplace and compensation issues. An open dialogue culture is visible where Workers can express their concerns without threat of reprisal, intimidation or Harassment supported by grievance management procedure.
10.6a-g Violence and Harassment	Conformance	The Entity maintains transparent disciplinary procedures that are aligned with national labour laws. Disciplinary actions are carried out impartially through the employee relations process. The Entity has a documented and formal disciplinary process that neither engages in nor tolerates the use of corporal punishment, mental or physical coercion, Harassment, and gender-based Violence including sexual Harassment, or verbal abuse of Workers. Disciplinary action is provided in a uniform and fair manner. Violence and Harassment are addressed in the Entity's Code of Conduct and training is provided to all employees: https://www.qatalum.com/AboutUs/Sustainability/Documents/QTLM_Code%20of%20Conduct%20Booklet%20V3.pdf
10.7a-c Remuneration	Conformance	The Entity performs periodic compensation benchmarking analysis and reviews its compensation respecting the rights of Workers to a living wage and ensuring that wages paid for a normal working month are consistent with or above the industry standard. Monetary compensation includes salary and other discretionary allowances. The Entity has adequate processes and controls to make wage

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		payments that are timely, in legal tender and fully documented and shared with employees in payslips.
10.8a-c Working Time	Conformance	The Entity provides its employees with access to the Human Resources Policy Manual through the Entity's intranet. This Policy outlines details such as normal working hours (40 hours per week), Overtime regulations, days off, public holidays, annual leave entitlements, and other relevant information, all in accordance with local laws. The Entity implements effective processes and controls to ensure Compliance with Applicable Law and the Entity's standard on Working Time (including Overtime working hours), public holidays, paid annual leave and other leave entitlements as per the Human Resources Policy Manual.
10.9a-b Informing Workers of Rights	Conformance	The Entity, through its Human Resources department, informs new Workers about their rights and how the organisational Policies provide protection of their rights and assistance to assert their rights.
11. OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Management System	Conformance	The Entity was issued ISO 45001:2018 Certification for its Occupational Health and Safety Management System in 2024, with no non-conformities identified. The certificate was reviewed during the Audit and remains valid until 2027 for the entire facility.
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Conformance	The Entity's EHS Management System is ISO 45001 Certified and conforms with requirements for review. The Entity's Occupational Health and Safety (OH&S) performance data and information are disclosed in the Sustainability Report 2024, pages 51-54: https://www.qatalum.com/wp-content/uploads/2025/09/Qatalum-Sustainability-Report-2024-EN.pdf
11.2 Employee engagement on Health and Safety	Conformance	The Entity has provided employees with various mechanisms such as joint health and safety committees, by which they can raise, discuss, and participate in the resolution of OH&S issues with management.

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DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	11 April 2022	Initial Certification Audit – Full Certification
1	28 March 2024	Re-Certification and Scope Change Audit – Full Certification Scope Change to apply ASI PS V3
2	31 July 2026	Surveillance Audit