ASI CERTIFICATION
PERFORMANCE STANDARD

PRESENTED TO

Alumex PLC - Sapugaskanda

CERTIFICATE NUMBER	ASI STANDARD	CERTIFICATION LEVEL	ASI ACCREDITED AUDITING FIRM
469	PERFORMANCE STANDARD (V3.1 2023)	FULL CERTIFICATION	DNV BUSINESS ASSURANCE SERVICES UK LTD.
DATE OF ISSUE	**DATE OF EXPIRY**	**CERTIFIED SINCE**	
20 OCTOBER 2026	19 OCTOBER 2029	11 JUNE 2025	

AUTHORISED BY



CERTIFICATION SCOPE

Remelting and refining of Secondary Aluminium and in-house billet manufacturing, and manufacturing of Aluminium alloy extrusions with value-added processes, at Sapugaskanda, Sri Lanka.

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

AUDIT REPORT **PERFORMANCE STANDARD**

OVERVIEW

MEMBER NAME	Alumex PLC
ENTITY NAME	Alumex PLC - Sapugaskanda
CERTIFICATION SCOPE	Remelting and refining of Secondary Aluminium and in-house billet manufacturing, and manufacturing of Aluminium alloy extrusions with value-added processes, at Sapugaskanda, Sri Lanka.
SUPPLY CHAIN ACTIVITIES	• Aluminium Re-melting/Refining • Casthouses • Semi-Fabrication
ASI STANDARD	Performance Standard V3.1
AUDIT TYPE	• Initial Certification Audit
AUDIT FIRM	DNV Business Assurance Services UK Ltd.
AUDIT DATE	• 17 – 21 February 2025 (Initial Certification Audit) • 4 May – 8 October 2026 (Surveillance Audit)
AUDIT REPORT SUBMISSION	• 10 April 2025 (Initial Certification Audit) • 4 September 2026 (Surveillance Audit)
AUDIT SCOPE	<u>Initial Certification Audit (17 – 21 February 2025)</u> The Audit Scope included the remelting and refining of Secondary Aluminium and in-house billet manufacturing, and manufacturing of Aluminium alloy extrusions and value-added process at the Sapugaskanda Facility, Sri Lanka. 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. <u>Surveillance Audit (4 May – 8 October 2026)</u> The Audit Scope included the remelting and refining of Secondary Aluminium and in-house billet manufacturing, and manufacturing of Aluminium alloy extrusions and value-added process at the Sapugaskanda Facility, Sri Lanka. 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.
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	20 October 2026 – 19 October 2029
NEXT AUDIT TYPE	Surveillance Audit
NEXT AUDIT DATE	19 April 2028
CERTIFICATE NUMBER	469
	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

Alumex PLC (the 'Group') is an Aluminium extrusion manufacturer, with operations located at Makola North, Sapugaskanda, and Alumex Prime Facility, Ekala in Sri Lanka. Established in 1986, the Group holds over 45% market share in the domestic Aluminium extrusion industry. Alumex PLC is a fully integrated manufacturer of extruded Aluminium proprietary architectural, hardware, and light engineering profiles, supplying a range of products including doors, windows, shop fronts, facades and other specialised applications. Alumex PLC – Sapugaskanda (the 'Entity') is Alumex PLC's Head Office & Primary Production Site.

The Entity operates with Aluminium manufacturing facilities that include processing of Aluminium scrap from post-consumer and pre-consumer sources, melting and casting Aluminium billets, and extruding to produce mill-finished, anodised, powder-coated, and wood-effect Aluminium profiles, as well as value-added components. These operations are supported by internationally certified management systems. Alumex PLC has an annual production capacity exceeding 20,000 tonnes across its facilities.

Over the past six years, Alumex PLC has expanded its global export footprint, delivering responsibly manufactured products to 15 countries across five continents, increasing both its international market presence and its contribution to national export earnings. Key export markets include USA, UK, Canada, India, Maldives, New Zealand, Australia & Europe.

The Entity provides on-site infrastructure, including employee welfare facilities, a cafeteria, a medical centre, health and safety amenities, and parking areas. The Entity currently employs approximately 570 staff members across its facilities at the Sapugaskanda premises.

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	Low	Medium	Medium	MEDIUM
RISKS	Low	Medium	Low	LOW
PERFORMANCE	Medium	High	Medium	MEDIUM
OVERALL		MEDIUM		

FINDINGS

CRITERION	RATING	COMMENT
1. BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity adheres to a structured legal Compliance process to identify and manage Applicable Laws, regulations and agreements. This process includes identification of obligations related to environmental standards, labour laws, health and safety, financial reporting, and industry-specific requirements. All legal requirements are documented and maintained in the centralised 'Legal Requirements Register', ensuring a comprehensive and up-to-date record. Additionally, the Entity has a Legal Compliance Procedure Manual, which was reviewed during the Audit. The Manual is reviewed and signed by the Executive Director and Managing Director.
1.2 Anti-Corruption	Conformance	The Entity has implemented an Anti-Corruption and Bribery Policy, which is signed by the Managing Director and last updated in October 2024. The Policy is available on the Entity's website at: https://alumexgroup.com/wp-content/uploads/2024/09/12.-Policy-on-Bribery-and-Anti-Corruption.pdf Employees receive anti-Corruption training every six months, with sessions conducted by Transparency International Sri Lanka through the Employment Federation of Ceylon. Additionally, new employees undergo training as part of their orientation, with details outlined in the employee handbook, which is also available in the local language. The Entity has entered into a Memorandum of Understanding (MOU) with Transparency International Sri Lanka to support the Business Integrity Club in its efforts to combat Corruption.
1.3a-e Code of Conduct	Conformance	The Entity's Code of Conduct has recently been updated to reflect the commissioning of the new powder coating facility and is disclosed at: https://alumexgroup.com/wp-content/uploads/2026/04/5.-Policy-on-Internal-Code-of-Business-Conduct-and-Ethics.pdf
2. POLICY AND MANAGEMENT		
2.1a-f Environmental, Social, and Governance Policy	Conformance	The Entity has published its Environmental Policy on its website: https://alumexgroup.com/wp-content/uploads/2024/09/8-a-Policy-on-Environment-Social-and-Governance-Sustainability.pdf The Environmental Policy is developed in compliance with the Colombo Stock Exchange listing rules. The Policy was last updated in October 2024. The Entity has disclosed its social Policies through its Environmental, Social and Governance (ESG) strategy, outlined in the Elevate ESG Roadmap, page 41: https://alumexgroup.com/wp-content/uploads/2025/01/Alumax-ESG-Report.pdf
2.2a-c Leadership	Conformance	The Managing Director of Alumex Group is the ASI Management Representative, holding overall responsibility for driving the implementation of the policy framework. Details of the appointment are documented in the Group Management Committee minutes. Group-wide governance on ESG matters is provided by the Group ESG Steering Committee, which is comprised of three Executive Directors and three Group Management Committee members. It is responsible for monitoring progress against the Group's ESG roadmap, and

CRITERION	RATING	COMMENT
		reports to the Board of Directors. The governance structure is outlined in the Elevate ESG Report, page 20: https://alumexgroup.com/wp-content/uploads/2025/01/Alumax-ESG-Report.pdf
2.3a Environmental and Social Management Systems – Environmental	Conformance	The Entity's Environmental Management System is certified to ISO 14001, with certification issued by the Sri Lanka Standards Institution (the national standards body), valid to July 2028. The ISO certification falls within the scope of this ASI Certification.
2.3b Environmental and Social Management Systems – Social	Conformance	The Entity has developed and implemented a robust Social Management System. Additionally, it has publicly reaffirmed its commitment at the policy level to the Elevate ESG Roadmap which fully integrates the social pillar commitments, including those outlined in the Social Management System. The Entity's Human Rights Policy covers both Human and Labour Rights, while the Health and Safety Policy focuses on employee well-being and workplace safety. A Social Impact Assessment was conducted, considering the perspectives of employees, communities, contractors, and suppliers. The assessment provides insights into social risks, their severity, and mitigation strategies.
2.4a-e Responsible Sourcing	Conformance	The Entity has developed a Procurement Policy that outlines its commitment to responsible sourcing, which is disclosed in the Elevate ESG Report, page 65: https://alumexgroup.com/wp-content/uploads/2025/01/Alumax-ESG-Report.pdf This Policy has been recently revised to include elements on Human and Labour Rights. The Policy was updated in December 2025 and is available at: https://alumexgroup.com/wp-content/uploads/2026/04/Procument-policy.pdf
2.5a-g Environmental and Social Impact Assessments	Conformance	The Entity has conducted an Environmental Impact Assessment (EIA) covering all activities, including anodising, die manufacturing and correction, extrusion, powder coating, remelting, and value-added manufacturing. The impact register includes detailed risks, risk ratings, and mitigation measures, which were developed by the Sustainability and Environmental Health and Safety (EHS) Departments. An EIA undertaken for the Powder Coating Facility (PCF) in 2024 was reviewed during the Audit. Conducted by internal experts, the assessment was based on the *National Environmental Act SL*, ISO 14001 Environment Management Systems, OSHA regulations, and the *Factory Ordinance Act for Worker Safety*. The Entity has also conducted Social Impact Assessment associated with the recently commissioned powder coating facility.
2.6a-h Human Rights Impact Assessment	Conformance	The Entity has completed a Human Rights Impact Assessment (HRIA) for the commissioning of the PC4 facility, with gender equity explicitly included as a key assessment area. The assessment covered both internal and external Stakeholders, including employees, third-party suppliers, contractors, and the Local Community. The transition from PC1 to PC4 involved redeployment of the existing workforce, with no redundancies reported. Given that the technology and operations of PC4 are broadly similar to PC1, employees were

CRITERION	RATING	COMMENT
		already familiar with the processes and did not require significant additional training.
2.7a-f Emergency Response Plan	Conformance	The Emergency Preparedness and Response Plan was reviewed during the Audit, with the latest update recorded in June 2024. The Emergency Response Plan is comprehensive, covering various scenarios, including potential fire incidents in neighbouring facilities. The Facility is registered with the Department of Labour and complies with the *Factories Ordinance No. 45 of 1942*, which mandates health and safety measures in industrial settings. The Emergency Response Plan is not publicly disclosed but will be made available to Stakeholders upon request.
2.8a-d Suspended Operations	Conformance	The Entity's Business Resilience Plan (BRP) was updated in October 2024 following the commissioning of Powder Coating Facility 4 (PCF4). The Plan includes provisions for supply chain resilience, such as diversifying suppliers and maintaining multiple supplier agreements. This was particularly relevant when disruptions in the Middle East required sourcing from new regions with adequate Due Diligence. The BRP is approved by the Executive Director and Managing Director, and governance and stewardship roles are disclosed in the FY25 Annual Report, available at: https://alumexgroup.com/wp-content/uploads/2025/06/Alumex-PLC-2024-25-Annual-report.pdf
2.9a-b Mergers and Acquisitions	Conformance	The Entity has developed a Legal Compliance Procedure for Mergers and Acquisitions. The acquisition process mandates that the Entity assesses the financial, environmental, and social compatibility of the other company before proceeding with a merger or acquisition. The Entity has developed a structured framework to manage potential mergers and decommissioning processes. No mergers or acquisitions have occurred to date.
2.10a-b Closure, Decommissioning and Divestment	Conformance	The Entity has developed and implemented a Closure, Decommissioning, and Divestment Procedure, which was last updated in October 2024. This procedure outlines the Entity's commitment to complying with all legal and regulatory requirements, including labour and environmental laws set by the local government. A detailed Closure, Decommissioning, and Divestment Plan was developed for PC1. The plan was approved by management and implemented between March and May 2026, which was also verified during the Audit. It includes an assessment of both environmental and social risks, along with an evaluation of the overall closure impacts. Relevant authorities were engaged to ensure proper handling and disposal of Waste, including hazardous materials. The Plan is formally approved and signed by the General Manager (Production), along with other responsible managers and engineers.
3. TRANSPARENCY		
3.1a-b Sustainability Reporting	Conformance	The Entity's Sustainability Report is included in the 2024/25 Annual Report, which is available at: https://alumexgroup.com/wp-content/uploads/2025/06/Alumex-PLC-2024-25-Annual-report.pdf Additionally, all ESG targets are available on Elevate, a publicly accessible platform, available at: https://alumexgroup.com/wp-content/uploads/2025/01/Alumax-ESG-Report.pdf

CRITERION	RATING	COMMENT
		These reports provide detailed insights into Greenhouse Gas Emissions (Scope 1, 2 and 3), Discharges to Water, water withdrawal, Waste management, and other key sustainability metrics.
3.2 Non-compliance and Liabilities	Conformance	The Entity has not been subject to any monetary fines or legal action due to non-compliance of regulatory requirements, in the current financial year. No incidents of Bribery or Corruption, or any other ethics violations were reported in the current financial year, as disclosed in page 98 of the Entity's Annual Report: https://alumexgroup.com/wp-content/uploads/2025/06/Alumex-PLC-2024-25-Annual-report.pdf There are no Material litigation, disputes, and contingent liabilities for the reporting period.
3.3a-c Payments to Governments	Conformance	The Entity prepares an annual audited financial report, which is publicly disclosed in the Annual Report: https://alumexgroup.com/wp-content/uploads/2025/06/Alumex-PLC-2024-25-Annual-report.pdf As a publicly listed Entity, the Entity adheres to the regulations set by the Securities and Exchange Commission of Sri Lanka. The Entity does not provide funding to political parties or engage in lobbying activities.
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	The Entity has developed a 'Whistleblowing' Policy, which is available at: https://alumexgroup.com/wp-content/uploads/2024/10/11.-Policy-on-Whistleblowing.pdf The Entity also has a procedure for handling customer complaints. The Entity website has a 'Contact Us' section where complaints from external Stakeholders can be lodged and then managed internally: https://alumexgroup.com/contact-us/ The Entity has contracted NAVEX and is in the process of integrating the system into its website, with full implementation planned for late 2026.
4. MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment	Conformance	The Life Cycle Assessment (LCA) has been completed by the National Cleaner Production Centre (NCPC) for the Entity. The LCA reports were reviewed during the Audit and were found to be aligned with ISO 14040:2006 and ISO 14044 Standards.
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	The Entity has committed to publicly disclosing the LCA results to customers upon request. The LCA studies have been concluded and will be provided to the customers based upon request, and is also disclosed at: https://alumexgroup.com/esg/
4.2 Product Design	Conformance	The Entity's Product design process is primarily driven by customer requirements, with approximately 95% of the specifications coming from external customers, particularly those in the export market. The design team conducts feasibility studies for optimal extrusion, considering both functional and aesthetic requirements. Customers can specify finishing options, and the quality team collaborates with the design team to ensure compliance with required standards. Information on circularity and local billet sourcing is described in the Elevate ESG Report, page 29, at: https://alumexgroup.com/wp-content/uploads/2025/01/Alumax-ESG-Report.pdf

CRITERION	RATING	COMMENT
4.3a-b Aluminium Process Scrap	Conformance	The Entity maintains an efficient extrusion process with an 84% yield. The Entity generates mainly billet Scrap and butt ends, all of which are fully recycled through re-melting. On-site, segregation areas are clearly marked to ensure proper handling, which was verified during the Audit. The Entity has developed a Standard Operating Procedure for Process Scrap collection, which all employees are trained in. The quality department conducts internal audits to verify compliance with established protocols.
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	To promote Post-Consumer Scrap collection, the Entity has established incentive programs for its Scrap suppliers. The pricing structure is adjusted based on the quantity of Scrap supplied, encouraging increased collection. The Entity's commitment to Post-Consumer Scrap collection aligns with its Sustainable Development Goals. The Entity has established used beverage can collection centres to further enhance post-consumer Aluminium recovery. Further information is available in the Entity's Annual Report and news article at: https://alumexgroup.com/wp-content/uploads/2024/08/Alumex-Annual-Report-2023-24.pdf https://www.alcircle.com/news/alumex-reinforces-sustainability-with-its-aluminium-ubc-collection-project-launch-83489
5. GREENHOUSE GAS EMISSIONS		
5.1a-b Disclosure of GHG Emissions and Energy Use	Conformance	Greenhouse Gas (GHG) emissions are disclosed in the Annual Report with Scope 1, 2 and 3 emissions disclosed on page 129, and energy data disclosed on page 128 in the 2024/25 Annual Report: https://alumexgroup.com/wp-content/uploads/2025/06/Alumex-PLC-2024-25-Annual-report.pdf The independent assurance statement confirms that the non-financial assurance was conducted in accordance with SLSAE 3000 for non-financial KPIs in Page 185 of the Annual Report: https://alumexgroup.com/wp-content/uploads/2025/06/Alumex-PLC-2024-25-Annual-report.pdf The assurance scope is clearly defined as 'Alumex PLC's Economic, Environment, Social and Governance indicators'.
5.2a Aluminium Smelter GHG Emissions Intensity - Started production after 2020	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.2b Aluminium Smelter GHG Emissions Intensity - In production up to and including 2020	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
5.3a GHG Emissions Reduction Plans	Conformance	The Entity has used the International Aluminium Institute (IAI) methodology to establish a GHG Emissions Reduction Plan and set their GHG emission reduction targets, which includes a 2030 target from a 2023/24 baseline. The Entity's GHG Emissions Reduction Plan is disclosed on page 26 of the Elevate ESG Report: https://alumexgroup.com/wp-content/uploads/2025/01/Alumax-ESG-Report.pdf The Entity has disclosed its 1.5°C pathway, which is available on its website https://alumexgroup.com/wp-content/uploads/2026/05/GHG-Strategy.pdf In addition, a third-party provider has been engaged to verify the baseline emissions data. This verification was conducted for the FY24 baseline, with the methodology aligned to ASI requirements, particularly in defining boundary conditions.
5.3b-e GHG Emissions Reduction Plans – Targets, review and disclosure	Conformance	The Entity has committed to reducing Scope 1 emission intensity by 16% and Scope 2 emission intensity by 40% by 2030. The Entity has developed an energy and emissions reduction roadmap, and it's 2030 Intermediate Targets are disclosed in the Elevate ESG Report, page 26: https://alumexgroup.com/wp-content/uploads/2025/01/Alumax-ESG-Report.pdf The Entity's decarbonisation pathway, reduction plan, and progress are disclosed, however at the time of the Audit, data for FY 2025-26 were pending publication as the Annual Report has not yet been released. Context relating to GHG emissions management is disclosed at: https://alumexgroup.com/wp-content/uploads/2026/05/GHG-Strategy.pdf
5.4 GHG Emissions Management	Conformance	The Entity has implemented a structured management system for collecting, verifying, and maintaining the integrity of emissions-related information. The Entity's emissions management plan has been finalised to align with the 1.5°C warming scenario, disclosed at: https://alumexgroup.com/wp-content/uploads/2026/05/GHG-Strategy.pdf
6. EMISSIONS, EFFLUENTS AND WASTE		
6.1a-f Emissions to Air	Minor Non-Conformance	The Entity's Emissions to Air are tested and reported on by a Third Party, and the Entity is required to submit Emissions to Air data to the Central Environmental Authority (CEA) for the melting plant, as part of its Environmental Protection License (EPL) renewal process. In addition to this regulatory requirement, the Entity has proactively conducted voluntary emission testing and reporting. The Entity has disclosed an Emissions Management Policy on page 36 of the Elevate ESG Report: https://alumexgroup.com/wp-content/uploads/2025/01/Alumax-ESG-Report.pdf Whilst the Entity has disclosed the Emission Monitoring Plan (refer to: https://alumexgroup.com/wp-content/uploads/2026/05/Emission-Monitoring-Plan.pdf) and demonstrated compliance for each emission source, detailed air emissions data have not been publicly disclosed.

CRITERION	RATING	COMMENT
6.2a-g Discharges to Water	Minor Non-Conformance	The Entity's water discharge quantity is disclosed on page 27 of the 2024 Annual Report: https://cdn.cse.lk/cmt/upload_report_file/1323_1748600615099.25.pdf The Entity has disclosed the wastewater monitoring plan and has stated that it is compliant with applicable local regulations: at: https://alumexgroup.com/wp-content/uploads/2026/05/Waste-Water-Monitoring-Plan.pdf The exact wastewater discharge data (i.e., quantified values) however have not been publicly disclosed.
6.3a-g Assessment and Management of Spills and Leakages	Conformance	The Entity has completed a comprehensive risk assessment for Spills and Leakages, along with a corresponding mitigation plan. The Entity also addresses this requirement through disclosure of an updated Spills and Leakages Prevention and Management Plan. Refer to: https://alumexgroup.com/wp-content/uploads/2026/05/Spills-and-leakages-prevention-plan-update-for-spill-response.pdf
6.4a-b Public Disclosure of Spills and Leakages	Conformance	The Entity has not publicly disclosed any Spills or Leakages as no such Material events have occurred. This was confirmed during the Audit and in interviews with the regulator (CEA).
6.5a-c Waste Management and Reporting	Conformance	The Entity discloses quantities of both Hazardous and Non-Hazardous Waste, and the respective disposal methods on page 129 of its Annual Report. Refer to: https://cdn.cse.lk/cmt/upload_report_file/1323_1748600615099.25.pdf The Entity also tracks and uploads Waste management data on a monthly basis to the Hayleys sustainability portal.
6.6a-g Bauxite Residue	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7a-f Spent Pot Lining (SPL)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8a-d Dross	Conformance	The Entity operates an in-house Dross recovery system to extract and reuse Aluminium in its production process. Any remaining Aluminium ash that cannot be processed internally is managed through a partnership with an overseas buyer in India. This buyer is legally authorised and equipped with advanced technology to further recover Aluminium from the ash.
7. WATER STEWARDSHIP		
7.1a-b Water Assessment and Disclosure	Conformance	The Entity's water withdrawal data are disclosed in the Annual Report, page 129, with comparison to the previous year: https://cdn.cse.lk/cmt/upload_report_file/1323_1748600615099.25.pdf The Entity has conducted and disclosed a water risk assessment, available at: https://alumexgroup.com/wp-content/uploads/2026/05/WATER-RISK-ASSESSMENT-REPORT.pdf
7.2a-e Water Management	Conformance	The Entity has disclosed its Water Management Policy in the Elevate ESG Report, page 37: https://alumexgroup.com/wp-content/uploads/2025/01/Alumax-ESG-Report.pdf

CRITERION	RATING	COMMENT
		While the Entity has not yet determined the requirement to develop a water management plan, it has implemented various measures to reduce water consumption.
8. BIODIVERSITY AND ECOSYSTEM SERVICES		
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	The Entity is located within an industrial zone where Biodiversity is relatively limited. A Biodiversity impact assessment has been conducted, and the assessment was reviewed during the Audit. The Biodiversity assessment concluded that the Facility's operations do not pose a significant impact on the Biodiversity of the local flora and fauna.
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Not Applicable	This Criterion is not applicable to the Entity, as the Entity is located within an industrial zone where the risks to Biodiversity have been demonstrated as low.
8.2a-g Biodiversity Management	Conformance	The Biodiversity impact assessment concluded that the Facility's impact on biodiversity is minimal. As part of its Corporate Social Initiatives the Entity and its parent Group have collaborated with several schools to support reforestation efforts. These efforts extend around the facility and into central Sri Lanka. Additionally, the Entity is involved in a project to cultivate medicinal plants across Sri Lanka. The Entity's Biodiversity commitments can be found in the Biodiversity and Ecosystem Management Policy on page 40 of the Elevate ESG Report: https://alumexgroup.com/wp-content/uploads/2025/01/Alumax-ESG-Report.pdf
8.3a-c Management of Priority Ecosystem Services	Not Applicable	This Criterion is not applicable to the Entity, as the Entity is located in an industrial zone with no Priority Ecosystem Services identified.
8.4 Alien Species	Conformance	The Entity undertakes a fumigation process for wooden cartons used in packaging before export. For imported materials, the Entity verifies the fumigation certificates provided by suppliers to ensure compliance with regulatory standards. Scrap collection does not involve any packaging. Additionally, the Biodiversity risk assessment confirmed that no Alien Species were identified at the Facility.
8.5a-b Commitment to "No Go" in World Heritage Properties	Conformance	There are no World Heritage Sites near the property, nor are there any in or around Colombo.
8.6a-d Protected Areas	Conformance	There are no Protected Areas within the Entity's Area of Influence.
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	Minor Non-Conformance	Internal audits are conducted at the Group-level and the Entity is responsible for addressing any Human Rights-related queries raised during the process. The Entity's Human Rights Policy is aligned with the

CRITERION	RATING	COMMENT
		UN Guiding Principles on Business and Human Rights and is disclosed at: https://alumexgroup.com/wp-content/uploads/2024/09/8.-b-Policy-on-Environment-Social-and-Governance-Sustainability.pdf The Human Rights Policy was last updated in October 2024 and is signed by the Managing Director. The Policy is also discussed during new employee orientation at both management and Worker levels. The Entity has demonstrated sound efforts in establishing a Human Rights Due Diligence (HRDD) risk register aligned with its HRDD procedure. The Entity's current risk register is relatively generic in nature however and requires further strengthen via a more 'activity-specific' risk identification and incorporating a more detailed and thorough review of the underlying information and risk drivers.
9.2a-e Gender Equity and Women's Empowerment	Conformance	The Entity is committed to creating a workplace that offers equal opportunities and promotes gender equity. This commitment is publicly made in the Chairman's Statement on page 12 of the 2023/24 Annual Report: https://alumexgroup.com/wp-content/uploads/2024/08/Alumex-Annual-Report-2023-24.pdf The Entity maintains pay equity, ensuring no gender pay gap for Workers with equivalent qualifications. Recruitment, salaries and promotions are based solely on merit. Disclosure on the performance of the gender equity initiatives are reported on page 83 of the Annual Report. The Entity operates an inclusive workplace with amenities such as restrooms based on gender. The Entity's Anti-Harassment Policy is a part of the Human Rights Policy publicly disclosed at: https://alumexgroup.com/wp-content/uploads/2024/09/8.-b-Policy-on-Environment-Social-and-Governance-Sustainability.pdf
9.3a-i Indigenous Peoples	Not Applicable	This Criterion is not applicable to the Entity, as it is located in an industrial zone where there are no Indigenous Peoples present.
9.4a Free, Prior, and Informed Consent (FPIC) - New Projects or Major Changes	Not Applicable	This Criterion is not applicable to the Entity, as it is located in an industrial zone where there are no Indigenous Peoples present.
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 it is located in an industrial zone where there are no Indigenous Peoples present.
9.5a Cultural and Sacred Heritage – Identification	Not Applicable	This Criterion is not applicable to the Entity, as it is located in an industrial zone where there are no Indigenous Peoples present. There is no presence of cultural or sacred heritage sites or values.
9.5b Cultural and Sacred Heritage – Impacts	Not Applicable	This Criterion is not applicable to the Entity, as it is located in an industrial zone where there are no Indigenous Peoples present. There is no presence of cultural or sacred heritage sites or values.

CRITERION	RATING	COMMENT
9.6a-i Displacement	Not Applicable	This Criterion is not applicable to the Entity, as it is located in an industrial zone where there are no Indigenous Peoples present. There are no records of displacement.
9.7a-h Affected Populations and Organisations	Conformance	The Entity is dedicated to upholding the legal and customary rights of Affected Populations and Organisations, particularly concerning land use, livelihoods, and access to natural resources. To support this commitment, the Entity has implemented a comprehensive framework to identify, prevent, monitor, and mitigate any significant health, safety, social, cultural, Human Rights, and environmental impacts associated with its operations. The Entity has carried out a social Impact Assessment that includes Community considerations. Environmental impacts on the Community are low due to strict adherence to environmental management standards, regulatory guidelines, and license requirements. The Entity engages in initiatives to benefit the Community, such as a free 'Fabricators Training Program', and annual blood donation campaigns. These initiatives are described on page 27 and page 92 of the Annual Report: https://alumexgroup.com/wp-content/uploads/2024/08/Alumex-Annual-Report-2023-24.pdf
9.8a Conflict-Affected and High-Risk Areas - Strong management systems	Conformance	The Entity's Procurement Policy describes the social and environmental compliance requirements for suppliers. The Entity purchases its primary metal from ASI Certified suppliers only, whose ASI Certificates were reviewed during the Audit. The Entity does not import any Scrap and uses Scrap from local suppliers only. The Procurement Policy is disclosed on page 65 of the Elevate ESG Report: https://alumexgroup.com/wp-content/uploads/2025/01/Alumax-ESG-Report.pdf
9.8b Conflict-Affected and High-Risk Areas - Identify and assess risks	Conformance	All Aluminium sourcing activities are required to be conducted in alignment with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (CAHRA) as disclosed at: https://alumexgroup.com/wp-content/uploads/2026/04/Procument-policy.pdf Suppliers of Aluminium materials are expected to provide transparent and accurate information regarding material origin, source country, and smelter/refinery details, where applicable, and to fully cooperate with the Entity's Due Diligence and risk assessment processes. The Entity has developed an OECD Due Diligence procedure for its responsible Aluminium supply chain, which was last updated in December 2025.
9.8c Conflict-Affected and High-Risk Areas - Strategy to respond to risks	Conformance	The Entity has conducted a CAHRA risk assessment as per the OECD Due Diligence Guidelines which found no high risks.
9.8d Conflict-Affected and High-Risk Areas - Audit of due diligence	Conformance	This ASI Performance Standard Audit satisfies the requirements of this Criterion.
9.8e Conflict-Affected and High-Risk Areas - Report annually	Conformance	The Entity has conducted a CAHRA risk assessment as per the OECD Due Diligence Guidelines which found no high risks, which will be

CRITERION	RATING	COMMENT
		subsequently disclosed in the Annual Report for FY25/26. The Annual Report was yet to be published by the Entity at the time of the Audit.
9.9 Security practice	Conformance	The Entity has an annual service agreement with a local security company which provides trained security personnel. During the site visit, it was confirmed that the security personnel are unarmed, in line with the Group Security Policy. The security company conducts regular training programs for its personnel, ensuring they are well-prepared to observe, record incidents, and maintain decorum within the premises. Security personnel are responsible for maintaining gate passes, vehicle passes, and visitor registers.
10. LABOUR RIGHTS		
10.1a-c Freedom of Association and Right to Collective Bargaining	Conformance	The Entity operates under the Free Trade Zone and General Services Employee Union, which serves as the parent Union for both the Entity Staff Branch Union and the Entity Factory Employee Branch Union. At employee inductions it is clearly communicated that the Entity is a unionised organisation. During Worker interviews, it was confirmed that Union membership is entirely voluntary, with no coercion from the management or Union representatives.
10.1d Freedom of Association and Right to Collective Bargaining - Alternative means in context of Applicable Law	Not Applicable	This Criterion is not applicable as the Entity operates in a country where Applicable Law does not restrict the right to Freedom of Association and Collective Bargaining.
10.2a-c Child Labour	Conformance	The Entity strictly adheres to Child Labour regulations, ensuring that no individuals under the age of 18 are employed. Even within the apprenticeship program, participants must be at least 18 years old and are restricted from working night shifts or operating heavy machinery. The Entity's Human Rights Policy includes a clear clause on Child Labour, as disclosed in their Annual Report Page 93: https://alumexgroup.com/wp-content/uploads/2024/08/Alumex-Annual-Report-2023-24.pdf This Policy also extends to suppliers and contractors, who are required to comply with the same standards.
10.3a-c Forced Labour	Conformance	The Entity has a strict policy against Forced Labour, outlined in its Human Rights Policy, which is available on page 64 of the Elevate ESG Report: https://alumexgroup.com/wp-content/uploads/2025/01/Alumax-ESG-Report.pdf The Entity aligns with Sri Lanka's stance on modern slavery, which is reinforced through the ratification of the ILO Forced Labour Protocol, demonstrating a commitment to preventing Forced Labour, protecting victims, and ensuring access to justice and compensation. The Entity has published its Modern Slavery Statement at: https://alumexgroup.com/wp-content/uploads/2026/04/Modern_Slavery_Statement_Alumex.pdf
10.4a-c Non-Discrimination	Conformance	The 'fair treatment' section of the Entity's Human Rights Policy explicitly addresses non-Discrimination as disclosed on the page 93 of the Annual Report: https://alumexgroup.com/wp-content/uploads/2024/08/Alumex-Annual-Report-2023-24.pdf

CRITERION	RATING	COMMENT
		The Entity ensures that employees and job applicants are not discriminated against based on gender, sexual orientation, religion, political opinion or any other such factor.
10.5 Communication and engagement	Conformance	Workers confirmed they were satisfied with the communication tools used by the Entity. Workers at the Entity expressed satisfaction with both the training they received and the Grievance Mechanism procedure, indicating that they felt adequately informed and supported in addressing any concerns.
10.6a-g Violence and Harassment	Conformance	The Entity's Human Rights Policy clearly outlines a commitment to preventing all forms of Harassment, including physical, psychological, or sexual. The Policy was last updated in October 2024. Employees receive training on this Policy during their induction, and it is further reinforced through the Entity's 'We Care' program. The Policy is disclosed in the Elevate ESG Report, page 64: https://alumexgroup.com/wp-content/uploads/2025/01/Alumax-ESG-Report.pdf
10.7a-c Remuneration	Conformance	The remuneration provided by the Entity is significantly higher than the national minimum wage. Overtime payments were examined and found to be in line with the actual Overtime hours worked by employees. The Overtime compensation adhered to local labour regulations, with clear distinctions made for Overtime worked on weekends and holidays which was reflected transparently in the Worker's payslips. Worker interviews confirmed that the employees were satisfied with their remuneration.
10.8a-c Working Time	Conformance	The Entity adheres to Sri Lankan labour laws regarding Working Time and Overtime compensation, ensuring that employees are fairly remunerated for additional hours worked. The Entity operates with a clear and structured shift system, with overtime pay and public holiday compensation in line with legal requirements.
10.9a-b Informing Workers of Rights	Conformance	The Entity ensures that Workers are informed about their rights, including Freedom of Association and Collective Bargaining, during the orientation process. Employees are aware of their rights and can freely engage in Union activities or Collective Bargaining processes. This was confirmed during Worker interviews and the Workers were satisfied with the communication tools used by the Entity.
11. OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Management System	Conformance	The Entity's Occupational Health and Safety (OH&S) Management System is ISO 45001 certified, with certification issued by the Sri Lanka Standards Institution (a government body) and valid until July 2027. The Entity maintains an Environmental and Occupational Health and Safety Manual, last updated in October 2023, along with an OH&S Management Systems Procedure Manual, also updated in October 2023. The EHS Manager is responsible for maintaining these documents.

CRITERION	RATING	COMMENT
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Conformance	The Entity has publicly disclosed its Lost Time Injury Rate (LTIR) and occupational ill-health data in the Alumex PLC Annual Report 2024/25 (page 114): https://alumexgroup.com/wp-content/uploads/2025/06/Alumex-PLC-2024-25-Annual-report.pdf The Entity has conducted and disclosed a peer analysis of OH&S performance, which is available at: https://alumexgroup.com/wp-content/uploads/2026/05/Peer-analysis.pdf The benchmarking is based on the Entity's performance against industry competitors within Sri Lanka based on publicly available disclosures.
11.2 Employee engagement on Health and Safety	Conformance	The Entity has a Health and Safety Committee consisting of 20 members, equally representing management and workshop employees including Union representatives. Regular training on OH&S is conducted. The Entity has also conducted psychological safety training for both Workers and senior management. Employee awareness of health and safety training, as well as the adequacy of the training programs, was confirmed during Worker interviews. Workers also expressed their satisfaction with the training provided.

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DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	11 June 2025	Initial Certification Audit – Provisional Certification
1	20 October 2026	Surveillance Audit – Full Certification. Six-month certification extension granted to Entity by ASI.