ASI CERTIFICATION **PERFORMANCE STANDARD**

PRESENTED TO

Aluminium Company of Egypt (Egyptalum)

CERTIFICATE NUMBER
391

ASI STANDARD
PERFORMANCE STANDARD (V3.1 2023)

CERTIFICATION LEVEL
PROVISIONAL CERTIFICATION

ASI ACCREDITED AUDITING FIRM
CETIZION VERIFICA

DATE OF ISSUE
23 OCTOBER 2026

DATE OF EXPIRY
22 OCTOBER 2027

CERTIFIED SINCE
18 OCTOBER 2024

AUTHORISED BY



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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

Manufacture and supply of Primary Aluminium products including ingots, wire rod, billets, T-bar, slabs, primary foundry alloys, flat rolled products and extrusions using casting, rolling, and extrusion processes at the Nag Hammadi site, Egypt. Including transportation of raw materials and finished products (Safaga port), carbon anode manufacturing, and industrial gases and compressed air production.

* Provisional Certification is valid for the period of one year, during which the company can address the non-conformances assessed and subsequently seek full certification.

AUDIT REPORT **PERFORMANCE STANDARD**

OVERVIEW

MEMBER NAME	Aluminium Company of Egypt (Egyptalum)
ENTITY NAME	Aluminium Company of Egypt (Egyptalum)
CERTIFICATION SCOPE	Manufacture and supply of Primary Aluminium products including ingots, wire rod, billets, T-bar, slabs, primary foundry alloys, flat rolled products and extrusions using casting, rolling, and extrusion processes at the Nag Hammadi site, Egypt. Including transportation of raw materials and finished products (Safaga port), carbon anode manufacturing, and industrial gases and compressed air production.
SUPPLY CHAIN ACTIVITIES	• Aluminium Smelting • Aluminium Re-melting/Refining • Casthouses • Semi-Fabrication • Material Conversion
ASI STANDARD	Performance Standard V3.1
AUDIT TYPE	• Initial Certification Audit (28 May – 4 June 2024) • Surveillance Audit (12 – 16 July 2026)
AUDIT FIRM	CETIZION Verifica
AUDIT DATE	• 28 May – 4 June 2024 (Initial Certification Audit) • 12 – 16 July 2026 (Surveillance Audit)
AUDIT REPORT SUBMISSION	• 27 August 2024 (Initial Certification Audit) • 28 September 2026 (Surveillance Audit)
AUDIT SCOPE	Initial Certification Audit (28 May – 4 June 2024) The Audit Scope includes the manufacture and supply of Primary Aluminium products including ingots, wire rod, billets, T-bar, slabs, primary foundry alloys, flat rolled products and extrusions using casting, rolling, and extrusion processes at the Nag Hammadi site, Egypt. Including the Alumina storage at the Safaga port in Safaga and related functions at the Head Office in Cairo. Supply chain activities included in the Audit Scope: • Aluminium Smelting • Aluminium Re-melting/Refining • Casthouses • Semi-Fabrication • Material Conversion All applicable Criteria in the ASI Performance Standard were included in the Audit Scope. Surveillance Audit (12 – 16 July 2026)

	The Audit Scope includes the manufacture and supply of Primary Aluminium products including ingots, wire rod, billets, T-bar, slabs, primary foundry alloys, flat rolled products and extrusions using casting, rolling, and extrusion processes at the Nag Hammadi site, Egypt. Including the Alumina storage at the Safaga port in Safaga and related functions at the Head Office in Cairo. Supply chain activities included in the Audit Scope: • Aluminium Smelting • Aluminium Re-melting/Refining • Casthouses • Semi-Fabrication • Material Conversion All applicable Criteria in the ASI Performance Standard were included in the Audit Scope.
AUDIT OUTCOME	• Provisional 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	23 October 2026 – 22 October 2027
NEXT AUDIT TYPE	Surveillance Audit
NEXT AUDIT DATE	22 October 2027
CERTIFICATE NUMBER	391
	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

The Aluminium Company of Egypt (Egyptalum) (the 'Entity') is a State-owned company affiliated to the Metallurgical Industries Holding Company, owned by the Egyptian Ministry of Public Business Sector. The joint-stock company is listed on the Egyptian stock exchange.

The Entity commenced commercial production in 1969 and has a current production capacity of 320,000 tonnes of Primary Aluminium with downstream activities including the production of flat product and extrusion profiles.

The Entity is located at the Nag Hammadi industrial complex, approximately 100 kilometres north of Luxor in the upper region of Egypt. It is well connected by train to major cities including Luxor and the capital city of Cairo. Alumina is received at Safaga port and transported to the smelter by enclosed body tankers. An agreement is presently in place (between Aluminium Company of Egypt (Egyptalum) and the Norwegian company, Scatec ASA) for the future establishment of a one gigawatt (GW) solar energy station to be located near the industrial complex to deliver a renewable energy source for the Entity.

The Entity is a major employer in the area, currently employing approximately 4,980 Workers and is a main driver of local economic growth, employment and infrastructure development.

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	Medium	Medium	MEDIUM
RISKS	Medium	Medium	Medium	MEDIUM
PERFORMANCE	Medium	Low	Medium	MEDIUM
OVERALL		MEDIUM		

FINDINGS

CRITERION	RATING	COMMENT
1. BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity maintains systems to identify and manage applicable legal and regulatory requirements across its operations. The 2026 Surveillance Audit reviewed the updated Legal and Other Requirements Compliance Register, the Sustainability and Environmental, Social and Governance (ESG) Policy, sampled permits, site observations and interviews with responsible employees. No significant fines, judgments, penalties or non-monetary sanctions for legal or regulatory non-Compliance were recorded in 2025.
1.2 Anti-Corruption	Conformance	The Entity maintains anti-Bribery and anti-Corruption measures addressing leadership oversight, risk assessment, procurement controls, employee training, confidential reporting, investigation and 'whistleblower' protection. The 2026 Surveillance Audit reviewed the relevant Policy, risk assessments, formally established Committee records, supporting procedure and employee awareness. The EGYPTALUM 2024-2025 Sustainability Report, pages 68-70, describes the Entity's 'zero-tolerance' approach to Corruption, reporting channels and its response to reported concerns: https://www.egyptalum.com.eg/Files/Sustainability/EGYPTALUM_2024-2025_Sustainability_Report.pdf Anti-Bribery information and the reporting channel are available on the Entity's website at: https://www.egyptalum.com.eg/complaints.aspx?LId=10
1.3a-e Code of Conduct	Conformance	The Entity has implemented and maintained an Employee Code of Conduct covering ethical business conduct, legal Compliance, anti-Bribery, workplace behaviour, Human Rights and grievance reporting. The 2026 Surveillance Audit confirmed that the Code is communicated through employee training, annual acknowledgement and established reporting channels, with relevant expectations also extended to suppliers. The Code is available at: https://www.egyptalum.com.eg/SustainabilityFile.aspx?id=2 Supporting information is provided in the EGYPTALUM 2024–2025 Sustainability Report, pages 68–69: https://www.egyptalum.com.eg/Files/Sustainability/EGYPTALUM_2024-2025_Sustainability_Report.pdf
2. POLICY AND MANAGEMENT		
2.1a-f Environmental, Social, and Governance Policy	Minor Non-Conformance	The Entity has established an Environmental, Social and Governance (ESG) Policy covering its activities and has communicated ESG commitments through workplace awareness and training activities. The 2026 Surveillance Audit reviewed the updated Sustainability and ESG Policy. Formal approval and consistent revision dates were not demonstrated during the Audit however, and the Entity's website continued to display the previous 2024 Policy rather than the current revision.
2.2a-c Leadership	Conformance	The Entity's Chief Executive Officer has provided the required resources, approvals/commitment and training to implement the ASI Performance Standard requirements.

CRITERION	RATING	COMMENT
		The Entity's Chief Executive Officer and Executive Managing Director retain overall leadership responsibility for implementation of the ASI Performance Standard. The Sustainability Committee and the LME, ASI and CBAM Committee provide cross-functional oversight of ESG Policies, resources, employee awareness, performance monitoring, data and reporting. The 2026 Surveillance Audit confirmed that leadership responsibilities, authority and supporting resources remain established.
2.3a Environmental and Social Management Systems – Environmental	Conformance	The Entity maintains environmental and social management arrangements across the Naga Hammadi plant and Safaga Port, supported by risk assessment, operational controls, performance monitoring and defined management responsibilities. The Entity's ISO 14001:2015 Environmental Management System certification remains valid until April 2027. The 2026 Surveillance Audit reviewed sampled Management System records, site implementation and interviews with responsible personnel.
2.3b Environmental and Social Management Systems – Social	Conformance	The Entity has implemented an Integrated Management System in accordance with the ISO 9001, ISO 14001 and ISO 45001 Standards. The Entity's Social Management System comprises Policies, work procedures, implementation records, reviews, public disclosures, and based on international guidance standards such as ISO 26000 and ISO 37001. The Entity's ESG Policies address both internal and external Stakeholders, including Local Communities: https://www.egyptalum.com.eg/SustainabilityFile.aspx?id=1
2.4a-e Responsible Sourcing	Conformance	The Entity has established and publicly communicated responsible sourcing requirements through its Supplier Code of Conduct and related responsible sourcing arrangements. Since the previous Audit, the Entity has implemented and conducted additional supplier-risk assessments, CAHRA Due- Diligence, source-country screening, supplier declaration, monitoring and reporting arrangements. The Entity's responsible sourcing commitments are described in the EGYPTALUM 2024-2025 Sustainability Report, pages 15-16: https://www.egyptalum.com.eg/Files/Sustainability/EGYPTALUM_2024-2025_Sustainability_Report.pdf Further information is available in the Entity's ESG Policies at: https://www.egyptalum.com.eg/SustainabilityFile.aspx?id=3
2.5a-g Environmental and Social Impact Assessments	Not Applicable	This Criterion is not applicable to the Entity, as no New Projects or Major Changes have entered approval, construction or implementation within the ASI Certification Scope during the Audit period. The Entity has established documented screening and impact-assessment arrangements for application to future qualifying Projects or Changes. At the time of the Audit, the proposed one gigawatt (GM) solar plant and smelter expansion were still in preliminary planning stage, with no internal or external approvals yet provided for construction of the facility or expansion.
2.6a-h Human Rights Impact Assessment	Not Applicable	This Criterion is not applicable to the Entity, as no New Projects or Major Changes have entered approval, construction or implementation within the ASI Certification Scope during the Audit period. The Entity has established documented screening and

CRITERION	RATING	COMMENT
		impact-assessment arrangements for application to future qualifying Projects or Changes. At the time of the Audit, the proposed one gigawatt (GM) solar plant and smelter expansion were still in preliminary planning stage, with no internal or external approvals yet provided for construction of the facility or expansion.
2.7a-f Emergency Response Plan	Conformance	The Entity maintains an Emergency Response Plan covering fire, medical emergencies, evacuation, hazardous material spills, gas leaks, severe weather, utility interruption and other identified emergency scenarios. The Plan is supported by defined emergency responsibilities, communication and evacuation arrangements, and emergency teams. The Plan is approved by the Egyptian Civil Defence authorities. The High Committee for Crisis, Disaster and Risk Reduction Management provides management oversight of preparedness, response and recovery arrangements. The 2026 Surveillance Audit reviewed the documented Plan, sampled implementation records, site arrangements and Worker awareness. The Emergency Response Plan is available to Stakeholders upon request. Further information is available in the EGYPTALUM 2024-2025 Sustainability Report, page 46: https://www.egyptalum.com.eg/Files/Sustainability/EGYPTALUM_2024-2025_Sustainability_Report.pdf
2.8a-d Suspended Operations	Minor Non-Conformance	The Entity maintains organisational risk assessments, geopolitical risk-screening arrangements and a procedure for the suspension and restart of operations. These arrangements address several circumstances that could disrupt or significantly alter operations. A complete, approved and implemented Business Resilience Plan covering all Facilities, Material ESG impacts and the required periodic and trigger-based reviews had not however been established.
2.9a-b Mergers and Acquisitions	Conformance	The Entity has established an ESG Due Diligence procedure for mergers and acquisitions requiring Material ESG risks and impacts to be assessed before relevant transactions are approved. The procedure defines cross-functional responsibilities and covers legal Compliance, environmental liabilities, Human Rights, Labour and Occupational Health and Safety, business integrity, responsible sourcing, community impacts and post-transaction integration. Management confirmed that no merger or acquisition has been completed or is under active Due Diligence review.
2.10a-b Closure, Decommissioning and Divestment	Conformance	The Entity has established ESG management arrangements applicable to the planning of closure, decommissioning and divestment activities, including consideration of legal obligations, Human Rights, Occupational Health and Safety (OH&S), community impacts and Legacy Impacts. Management confirmed during the Audit that no closure, decommissioning or divestment was planned, initiated or implemented since the previous Audit.
3. TRANSPARENCY		
3.1a-b Sustainability Reporting	Conformance	The Entity maintains sustainability reporting processes covering its governance approach and Material environmental, social and economic impacts, which are disclosed in the EGYPTALUM 2024-2025 Sustainability Report, available at:

CRITERION	RATING	COMMENT
		https://www.egyptalum.com.eg/Files/Sustainability/EGYPTALUM_2024-2025_Sustainability_Report.pdf The Report describes the Entity's sustainability governance approach on pages 64–67, Material environmental, social and economic impacts on pages 28–32 and includes a Global Reporting Initiative (GRI) Content Index on pages 78–86. A supporting Materiality assessment and KPI monitoring arrangements were also reviewed during the Audit.
3.2 Non-compliance and Liabilities	Conformance	The Entity publicly reports information concerning Material fines, judgments, penalties and non-monetary sanctions associated with legal and regulatory non-Compliance. The EGYPTALUM 2024–2025 Sustainability Report states that no fines or non-monetary sanctions for environmental non-compliance were recorded during 2024–2025, pages 22 and 70: https://www.egyptalum.com.eg/Files/Sustainability/EGYPTALUM_2024-2025_Sustainability_Report.pdf No breaches involving anti-competitive, anti-trust or monopoly legislation were reported.
3.3a-c Payments to Governments	Conformance	The Entity maintains financial controls designed to ensure that payments to Governments are made only on a legal or contractual basis. The management confirmed that payments to Governments were limited to applicable taxes, duties and statutory fees and that no financial or in-kind political contributions were made, either directly or through an intermediary. The Entity has disclosed its payments to Governments in the EGYPTALUM 2024-2025 Sustainability Report, page 70A: https://www.egyptalum.com.eg/Files/Sustainability/EGYPTALUM_2024-2025_Sustainability_Report.pdf
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	The Entity maintains complaints, grievance and information-request arrangements for employees, customers, communities and other Stakeholders. The EGYPTALUM 2024–2025 Sustainability Report describes the community grievance mechanism on page 43 and the available confidential and anonymous reporting channels, investigation arrangements, corrective actions and protection against retaliation on page 69: https://www.egyptalum.com.eg/Files/Sustainability/EGYPTALUM_2024-2025_Sustainability_Report.pdf The public complaints channel is available through the Entity's website: https://www.egyptalum.com.eg/complaints.aspx?LId=10
4. MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment	Minor Non-Conformance	The Entity has conducted a Life Cycle Assessment (LCA) for its Aluminium Products on a 'cradle-to-gate' basis based on 2022 activity data; the assessment was recently revised. The Entity's ISO 14067 Product Carbon Footprint study covering billets, extrusion profiles, foundry alloys, wire rods, rolling products and unwrought Aluminium was reviewed during the Audit. The study provides 'cradle-to-gate' Global Warming Potential results for the 2024 reporting year. The study does not however demonstrate a current evaluation of broader life cycle impacts across the Entity's major Product lines, and the updated LCA procedure remained in 'draft' status.

CRITERION	RATING	COMMENT
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	The Entity makes 'cradle-to-gate' life cycle environmental information available for its Aluminium Products and maintains arrangements to provide such information in response to customer requests. The Entity's ISO 14067 Product Carbon Footprint study covering billets, extrusion profiles, foundry alloys, wire rods, rolling products and unwrought Aluminium was reviewed during the Audit. The statement identifies the manufacturing site, reporting year, declared unit, system boundary, applicable methodology and product-level Global Warming Potential results. The EGYPTALUM 2024–2025 Sustainability Report, page 22, identifies the covered products and provides access to the Entity's publicly available ISO and Product Carbon Footprint information: https://www.egyptalum.com.eg/Files/Sustainability/EGYPTALUM_2024-2025_Sustainability_Report.pdf
4.2 Product Design	Conformance	The Entity manufactures primary and semi-fabricated Aluminium Products, including billets, ingots, T-bars, slabs, wire rods, rolled products and extrusion profiles. Sustainability considerations are integrated into product and process decisions include material and process efficiency, product specifications, internal recovery of Aluminium Process Scrap, recyclability and packaging.
4.3a-b Aluminium Process Scrap	Conformance	The Entity has implemented controls to minimise the generation of Aluminium Process Scrap and targets the collection, recycling and/or reuse of recoverable Process Scrap. The EGYPTALUM 2024–2025 Sustainability Report, page 34, confirms that Aluminium Scrap and shavings generated during production are separated and recycled internally: https://www.egyptalum.com.eg/Files/Sustainability/EGYPTALUM_2024-2025_Sustainability_Report.pdf Evidence reviewed in the Audit confirmed that Process Scrap is collected, identified, segregated by relevant alloy, grade or material category and transferred through controlled routes for internal reuse or remelting in the Casthouse.
4.4a-c Collection and Recycling of Products at End of Life - Material Conversion and other Manufacturing	Conformance	The Entity maintains a recycling strategy and RAR (RunAround) Scrap Management arrangements intended to support the collection and recycling of Aluminium-containing Products at 'end-of-life' and to increase the use of externally sourced recycled Aluminium where feasible. The EGYPTALUM 2024–2025 Sustainability Report, page 34, describes the internal recycling of Aluminium Scrap and the recyclability of the Entity's products and packaging materials: https://www.egyptalum.com.eg/Files/Sustainability/EGYPTALUM_2024-2025_Sustainability_Report.pdf The Audit confirmed that recycling objectives, relevant product families, external scrap opportunities and available recycling routes continue to be considered and monitored.
4.4d Collection and Recycling of Products at End of Life	Conformance	The Entity engages with relevant customers, scrap suppliers, approved recyclers, licensed waste-management service providers and governmental or regulatory authorities to support the collection, recovery and recycling of Aluminium materials. These arrangements support the identification of recycling routes, assessment of external scrap opportunities and collection of available weight, transfer and destination information.

CRITERION	RATING	COMMENT
		The EGYPTALUM 2024–2025 Sustainability Report, page 34, describes the Entity's internal Aluminium recycling arrangements and engagement with licensed external organisations for relevant waste-management and recycling activities: https://www.egyptalum.com.eg/Files/Sustainability/EGYPTALUM_2024-2025_Sustainability_Report.pdf
5. GREENHOUSE GAS EMISSIONS		
5.1a-b Disclosure of GHG Emissions and Energy Use	Minor Non-Conformance	The Entity calculates and publicly discloses its annual Scope 1, Scope 2 and Material Scope 3 Greenhouse Gas (GHG) emissions in the EGYPTALUM 2024-2025 Sustainability Report, page 22: https://www.egyptalum.com.eg/Files/Sustainability/EGYPTALUM_2024-2025_Sustainability_Report.pdf Independent third-party verification of the publicly disclosed 2025 GHG inventory however was not available. The available 2024 verification statement did not demonstrate full coverage of all Facilities within the ASI Certification Scope, including Safaga Port. The verified 2024 total emissions could also not be reconciled with the corresponding total disclosed in the Sustainability Report.
5.2a Aluminium Smelter GHG Emissions Intensity - Started production after 2020	Not Applicable	This Criterion not applicable to the Entity, as its Smelter operations commenced in 1969.
5.2b Aluminium Smelter GHG Emissions Intensity - In production up to and including 2020	Major Non-Conformance	The Entity was unable to achieve a 'mine to metal' GHG emissions intensity below 13.0 t CO2e/t Al by year 2025. The reported 2025 GHG emissions intensity of 16.17 tCO2e/t Al exceeds the currently applicable threshold of 13.0 tCO2e/t Al.
5.3a GHG Emissions Reduction Plans	Minor Non-Conformance	The Entity has prepared a GHG Emissions Reduction Plan and a 1.5°C-aligned pathway using the ASI Entity GHG Pathways Calculation Tool to achieve GHG emission of 12.01 tCO2e/t Al by 2027 and 10.65 tCO2e/t Al by year 2030. At the time of the Audit, the pathway remained a Controlled Draft for Management Review however, and the 2022 baseline intensity required correction and material calculation and project-quantification issues remained unresolved. Consequently, a final, technically validated and management-approved GHG Emissions Reduction Plan and Pathway was not demonstrated.
5.3b-e GHG Emissions Reduction Plans – Targets, review and disclosure	Minor Non-Conformance	The Entity has established intermediate GHG emissions intensity targets of no more than 12.01 tCO2e/t Al by 2027 and 10.65 tCO2e/t Al by 2030 in its draft GHG Pathway Report. At the time of the Audit, the Pathway and Plan had not however been demonstrated as approved, evidence of annual review and revision was not available, and the latest Pathway, Plan, targets and annual progress had not been officially disclosed on the Entity's website.
5.4 GHG Emissions Management	Minor Non-Conformance	The Entity maintains an ISO 50001:2018 certified Energy Management System covering the Nag Hammadi Plant, Safaga Port and Cairo Head Office. The EGYPTALUM 2024-2025 Sustainability Report 2024-2025, pages 21-23 and 65, discloses the Entity's energy and GHG performance, digital MRV and emissions tracking practices and management review arrangements:

CRITERION	RATING	COMMENT
		https://www.egyptalum.com.eg/Files/Sustainability/EGYPTALUM_2024-2025_Sustainability_Report.pdf Considering the performance gaps or weakness identified in the Audit, the existing GHG Management System was not however found to be adequate and effective. The Entity's relevant Standard Operating Procedure (SOP) remains identified as a 'Controlled Draft – effective upon approval' and 'Pending approval'. The final approved Procedure and completed supporting records demonstrating implementation of its GHG-specific Key Performance Indicators (KPI), Corrective and Preventative Action (CAPA) and management-review controls were not available for verification.
6. EMISSIONS, EFFLUENTS AND WASTE		
6.1a-f Emissions to Air	Conformance	The Entity has developed, implemented and disclosed its Environment, Health and Safety Monitoring Plan which addresses Emissions to Air at: https://www.egyptalum.com.eg/Files/Sustainability/Environmental_Monitoring_Plan-_final%20issue.pdf The Entity implements an environmental and air emissions monitoring programme supported by environmental permits, continuous and periodic monitoring arrangements and an Environmental, Health and Safety Monitoring Plan, updated in August 2026 to include the Safaga Port. The EGYPTALUM 2024-2025 Sustainability Report 2024-2025, pages 22-23, describes the Entity's emissions-monitoring approach: https://www.egyptalum.com.eg/Files/Sustainability/EGYPTALUM_2024-2025_Sustainability_Report.pdf No Material emissions-related fines or penalties were reported for the assessment period.
6.2a-g Discharges to Water	Conformance	The Entity has monitored its Discharges to Water (after treatment), and the parameters including pH, total suspended solids, chemical oxygen demand (COD), biological oxygen demand (BOD), and fluoride are within permissible limits. The Entity's treated domestic wastewater continues to be monitored and reused for irrigation within its premises. The majority of the reported parameters were within the applicable limits, while isolated results requiring further attention were identified for continued monitoring and follow-up. Information on Discharges to Water is available in the EGYPTALUM 2024-2025 Sustainability Report, pages 26-28: https://www.egyptalum.com.eg/Files/Sustainability/EGYPTALUM_2024-2025_Sustainability_Report.pdf
6.3a-g Assessment and Management of Spills and Leakages	Conformance	The Entity has assessed potential Spill and Leakage risks across its operations using a '5×5' risk assessment methodology. Preventive and response controls include secondary containment, inspection and maintenance, spill response arrangements and environmental monitoring. The assessment was revised in 2026 to reflect current operational risks and related improvement actions. The Entity's Spill and Leakage management plan is available in the EGYPTALUM 2024-2025 Sustainability Report, page 33: https://www.egyptalum.com.eg/Files/Sustainability/EGYPTALUM_2024-2025_Sustainability_Report.pdf
6.4a-b Public Disclosure of Spills and Leakages	Conformance	There were no Material Spills or Leakages reported during the period reviewed in this Audit. The Entity maintains arrangements for recording, escalating and communicating Spill and Leakage

CRITERION	RATING	COMMENT
		information and uses its Sustainability Report as its public disclosure channel. The related disclosure has been made on page 33 of the EGYPTALUM 2024-2025 Sustainability Report: https://www.egyptalum.com.eg/Files/Sustainability/EGYPTALUM_2024-2025_Sustainability_Report.pdf
6.5a-c Waste Management and Reporting	Conformance	The Entity's Waste management arrangements were reviewed during the Audit across the relevant waste streams, including Aluminium Dross, Spent Pot Lining (SPL), used oil and other Hazardous and non-Hazardous Wastes. The Entity maintains segregation, controlled storage and traceability arrangements for the relevant waste streams. Previous Audit evidence also demonstrated off-site transfer of regulated wastes, including SPL and used oil, through appropriately licensed contractors.
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 stores Spent Pot Lining (SPL) in a designated area with an impermeable surface and protection from moisture and weather conditions. SPL is transferred to an appropriately licensed waste management contractor, and the related risks are addressed through documented storage, containment, monitoring and transportation controls. No uncontrolled landfilling or discharge of SPL to freshwater, brackish water or marine environments was identified. The related disclosure is provided on page 34 of EGYPTALUM 2024-2025 Sustainability Report: https://www.egyptalum.com.eg/Files/Sustainability/EGYPTALUM_2024-2025_Sustainability_Report.pdf
6.8a-d Dross	Conformance	The Entity has completed and commenced use of a dedicated covered storage area for Aluminium Dross, with an impermeable surface preventing contact with soil and exposure to rainfall. Current records relating to Dross generation, processing, Aluminium recovery, residue transfer and closing stock were reviewed in this Audit, together with the evaluation of available recovery, recycling and disposal alternatives. Information on Waste quantities, Dross and SPL management, the use of licensed waste contractors and the Entity's recycling objective is disclosed in the EGYPTALUM Sustainability Report 2024–2025, pages 33–34: https://www.egyptalum.com.eg/Files/Sustainability/EGYPTALUM_2024-2025_Sustainability_Report.pdf
7. WATER STEWARDSHIP		
7.1a-b Water Assessment and Disclosure	Conformance	The Entity has identified and assessed its water sources, uses and water-related risks using World Resources Institute (WRI) Aqueduct information and an internal '5×5' risk-assessment methodology. The assessment considers water scarcity, drought and climate change, shared resource pressure, water losses, treatment reliability, discharge quality and potential impacts on groundwater, Biodiversity and Communities. Water management arrangements, water-use information, the water scarcity context and the Entity's water stewardship approach are disclosed in the EGYPTALUM Sustainability Report 2024–2025, pages 26–28:

CRITERION	RATING	COMMENT
		https://www.egyptalum.com.eg/Files/Sustainability/EGYPTALUM_2024-2025_Sustainability_Report.pdf
7.2a-e Water Management	Conformance	The Entity has implemented a Water Management Plan addressing its identified Material water-related risks through time-bound targets for freshwater reduction, treatment efficiency, wastewater reuse and water quality performance. The Plan includes defined responsibilities, operational monitoring and review at least every five years, as well as additional review following significant Business changes or indications of a control gap. The Entity's water management approach, water-use information, water scarcity context and improvement objectives are disclosed in the EGYPTALUM Sustainability Report 2024–2025, pages 26–28: https://www.egyptalum.com.eg/Files/Sustainability/EGYPTALUM_2024-2025_Sustainability_Report.pdf
8. BIODIVERSITY AND ECOSYSTEM SERVICES		
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	The Entity has assessed the Biodiversity and Ecosystem Services risks associated with its land use and operational activities. During the Surveillance Audit, the assessment scope was confirmed to include both the Naga Hammadi Aluminium Complex and Safaga Port. The Naga Hammadi assessment considers terrestrial habitats, vegetation, soil, invertebrates, birds and mammals, while the Safaga Port baseline addresses the marine water column, seabed and associated marine flora and fauna. Site-specific risk screening identifies the relevant impact pathways and mitigation measures for both locations. The Entity's Biodiversity and land-use management approach and monitoring criteria are disclosed in the EGYPTALUM 2024–2025 Sustainability Report, pages 29–32: https://www.egyptalum.com.eg/Files/Sustainability/EGYPTALUM_2024-2025_Sustainability_Report.pdf
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Not Applicable	This Criterion is not applicable to the Entity, as the Biodiversity assessment did not identify any Priority Ecosystem Services that are relevant to Affected Populations and Organisations.
8.2a-g Biodiversity Management	Conformance	The Entity has implemented a Land and Biodiversity Management Plan supported by time-bound Biodiversity targets covering the Naga Hammadi Aluminium Complex and Safaga Port. The Plan applies the Biodiversity Mitigation Hierarchy through avoidance, impact control, habitat protection, monitoring and rehabilitation measures and is informed by site-specific environmental and biodiversity assessments. The 2026 targets address habitat screening, wildlife monitoring, marine habitat protection, spill prevention, Alien Species controls, employee and contractor competence, Stakeholder engagement, management review and annual progress reporting. The Entity's Biodiversity management approach, action measures and monitoring criteria are disclosed in the EGYPTALUM 2024–2025 Sustainability Report, pages 29–30: https://www.egyptalum.com.eg/Files/Sustainability/EGYPTALUM_2024-2025_Sustainability_Report.pdf
8.3a-c Management of Priority Ecosystem Services	Not Applicable	This Criterion is not applicable to the Entity, as no Priority Ecosystem Services were identified.

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8.4 Alien Species	Conformance	The Entity has assessed the potential pathways for the accidental introduction of Alien Species at its Naga Hammadi operations and Safaga Port activities. Controls reviewed during the Audit included the fumigation of wooden packaging, screening of new landscaping and applicable vessel records, selection of suitable/native planting species, and monitoring for weeds and feral pests. The Entity's 2026 Biodiversity targets include screening all new landscaping and applicable vessel records and achieving zero invasive-species introductions attributable to its operations. No evidence of a Material Alien Species introduction attributable to the Entity was identified during the Audit.
8.5a-b Commitment to "No Go" in World Heritage Properties	Conformance	The Entity maintains a documented commitment not to explore or develop New Projects or make Major Changes in World Heritage Properties.
8.6a-d Protected Areas	Conformance	The Entity has assessed the presence of Protected Areas in relation to its Naga Hammadi production site and its warehouse and material-handling activities at Safaga Port. No designated Protected Area was identified within the Entity's operational footprint or immediate Area of Influence. The relevant Protected Area and land use information is disclosed in the EGYPTALUM 2024–2025 Sustainability Report, pages 29 and 32: https://www.egyptalum.com.eg/Files/Sustainability/EGYPTALUM_2024-2025_Sustainability_Report.pdf
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 publicly disclosed its ESG Policy and a Human Rights Risk Assessment covering its operations, supply chain and third-party engagements. The Entity's Human Rights Due Diligence process was assessed during this Audit through documentation review, site observations and interviews conducted. The EGYPTALUM 2024–2025 Sustainability Report describes Human Rights training on page 41, community engagement and grievance arrangements on page 43, ethics, grievance handling and remedial actions on pages 68–70, and responsible sourcing and supplier Due Diligence on pages 71–72: https://www.egyptalum.com.eg/Files/Sustainability/EGYPTALUM_2024-2025_Sustainability_Report.pdf
9.2a-e Gender Equity and Women's Empowerment	Conformance	The Entity implements measures to promote gender equity and women's empowerment through its employment practices, employee benefits, community programmes, management arrangements and grievance mechanisms. The EGYPTALUM 2024–2025 Sustainability Report describes maternity protection, workforce diversity and employment practices on page 47; the Women's Garment Workshop and women's economic empowerment on page 51; female representation in governance and Human Capital management on page 65; and diversity, anti-Harassment, grievance and remedial arrangements on pages 68–70:

CRITERION	RATING	COMMENT
		https://www.egyptalum.com.eg/Files/Sustainability/EGYPTALUM_2024-2025_Sustainability_Report.pdf
9.3a-i Indigenous Peoples	Not Applicable	This Criterion is not applicable to the Entity, as site-specific screening did not identify Indigenous Peoples or customary Indigenous lands, territories or resources within the operational boundaries or directly affected areas of the Nagaa Hammadi Plant and Safaga Port.
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 New Projects or Major Changes to existing infrastructure.
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 New Projects or Major Changes to existing infrastructure.
9.5a Cultural and Sacred Heritage – Identification	Conformance	The Entity has identified cultural, religious and archaeological heritage sites within the wider region and maintains controls to avoid and manage potential impacts. The EGYPTALUM 2024–2025 Sustainability Report states on page 36 that no known archaeological or protected cultural heritage sites were identified within the assessed operational area: https://www.egyptalum.com.eg/Files/Sustainability/EGYPTALUM_2024-2025_Sustainability_Report.pdf The Entity has also committed to ongoing heritage screening, consultation with competent authorities where required and the application of the Chance Find Procedure during future construction or excavation activities.
9.5b Cultural and Sacred Heritage – Impacts	Not Applicable	This Criterion is not applicable to the Entity, as site-specific screening did not identify Indigenous Peoples or customary Indigenous lands, territories or resources within the operational boundaries or directly affected areas of the Nagaa Hammadi Plant and Safaga Port. No current or planned project was identified that could significantly impact cultural, historical or spiritual heritage essential to the identity of Indigenous Peoples.
9.6a-i Displacement	Not Applicable	This Criterion is not applicable to the Entity, as there are no New Projects or Major Changes planned, however the Entity has made a commitment to assess displacement impacts related to New Projects and expansion plans.
9.7a-h Affected Populations and Organisations	Conformance	The Entity engages with Affected Populations and Organisations through ongoing dialogue, community needs assessments, a formal grievance mechanism and Corporate Social Responsibility (CSR) Committee oversight. Community programmes addressing education, healthcare, women's economic empowerment, sports, social services and support for children with special needs were verified during the Audit through documented information, site observations and Stakeholder interviews. The Entity has disclosed its

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		approach to Affected Population and Organisation management in the EGYPTALUM 2024–2025 Sustainability Report, pages 42-44: https://www.egyptalum.com.eg/Files/Sustainability/EGYPTALUM_2024-2025_Sustainability_Report.pdf
9.8a Conflict-Affected and High-Risk Areas - Strong management systems	Conformance	The Entity has established a responsible sourcing and supply chain Due Diligence Management System supported by Conflict-Affected and High-Risk Areas (CAHRAs) screening, supplier selection controls, risk assessment registers and defined responsibilities The Sustainability Report describes the Responsible Sourcing Program, supplier screening, enhanced Due Diligence, corrective action monitoring and supplier disengagement arrangements (if required), page 71-72: https://www.egyptalum.com.eg/Files/Sustainability/EGYPTALUM_2024-2025_Sustainability_Report.pdf
9.8b Conflict-Affected and High-Risk Areas - Identify and assess risks	Minor Non-Conformance	Whilst the Entity has established CAHRA screening and supplier risk assessment activities the methodology does not however yet demonstrate adequate and consistent coverage of all relevant suppliers and upstream supply chain routes.
9.8c Conflict-Affected and High-Risk Areas - Strategy to respond to risks	Conformance	The Entity has established a documented strategy for responding to identified supply chain risks. The process includes supplier engagement, enhanced Due Diligence, corrective and remediation measures, agreed timelines, ongoing monitoring, periodic reassessment and disengagement where corrective actions are not implemented.
9.8d Conflict-Affected and High-Risk Areas - Audit of due diligence	Conformance	The Entity's supply chain Due Diligence Management System and associated CAHRA risk management processes were independently evaluated through this ASI Performance Standard Surveillance Audit.
9.8e Conflict-Affected and High-Risk Areas - Report annually	Conformance	The Entity reports its responsible sourcing and supply chain Due Diligence performance annually through its Annual CAHRA Assessment Report and publicly available 2024–2025 Sustainability Report. The disclosures include supplier screening, supplier audits, corrective actions and ongoing monitoring arrangements. This information is available on pages 71-72 of the EGYPTALUM 2024–2025 Sustainability Report at: https://www.egyptalum.com.eg/Files/Sustainability/EGYPTALUM_2024-2025_Sustainability_Report.pdf
9.9 Security practice	Conformance	The Entity's Human Rights risk assessment addresses security practices, and security personnel are included in Human Rights and job-specific training arrangements. Interviews and site observations confirmed the continued implementation of security controls, and no security-related Human Rights concern was identified during the Audit.
10. LABOUR RIGHTS		
10.1a-c Freedom of Association and Right to Collective Bargaining	Conformance	The Entity recognises Workers' rights to form or join Trade Unions, elect representatives and bargain collectively without interference, discrimination or retaliation. Official election documentation, the Worker Rights Due Diligence Framework and consultations with

CRITERION	RATING	COMMENT
		Workers and representatives undertaken during this Audit confirmed the implementation of these rights.
10.1d Freedom of Association and Right to Collective Bargaining - Alternative means in context of Applicable Law	Not Applicable	This Criterion is not applicable to the Entity, as Egyptian law does not restrict the rights of Freedom of Association and Collective Bargaining.
10.2a-c Child Labour	Conformance	The Entity prohibits Child Labour and verifies Workers' ages through official identification records before employment. Record sampling, site observations and interviews undertaken during this Audit did not identify any Worker under 15 years of age or any Young Worker engaged in exploitative, hazardous or harmful work.
10.3a-c Forced Labour	Minor Non-Conformance	The Entity prohibits Forced Labour, compulsory labour, slavery, servitude, debt bondage and human trafficking throughout its operations and supply chain. The Entity has established documented controls addressing recruitment fees, retention of identity documents, freedom of movement, voluntary overtime, labour providers, suppliers, investigation and remedy. A review of sampled employment records, employee interviews and site observations undertaken during the Audit identified no indicators of Forced Labour or human trafficking. The Entity has not however publicly disclosed an annual Modern Slavery Statement for 2025 detailing their actions to address Modern Slavery. The most recent statement is available for 2024. Refer to: https://www.egyptalum.com.eg/Files/Sustainability/egyptalum%20policy%20on%20slavery%20and%20human%20trafficking%20statement.pdf
10.4a-c Non-Discrimination	Conformance	The Entity has established requirements prohibiting direct and indirect Discrimination and supporting equality and equal opportunity across recruitment, remuneration, performance appraisal, training, promotion, discipline and termination. Sampled employment records and employee interviews undertaken during the Audit indicated that employment-related decisions are based on documented job requirements, competence and performance, with no evidence of discriminatory treatment identified. The Entity's 2024–2025 Sustainability Report (pages 47 & 62) describes its commitment to diversity, gender equity, women's participation and employment protections provided to female employees: https://www.egyptalum.com.eg/Files/Sustainability/EGYPTALUM_2024-2025_Sustainability_Report.pdf
10.5 Communication and engagement	Conformance	The Entity has established multiple channels for open communication, consultation and engagement with Workers and their elected representatives. These channels include direct meetings, Labour Union engagement, worker committees, workplace notices, digital communication, training activities, suggestion systems and grievance mechanisms. Records reviewed and employee interviews during the Audit demonstrated that Workers can participate in workplace consultation and raise concerns directly or through their representatives without intimidation or retaliation.

CRITERION	RATING	COMMENT
10.6a-g Violence and Harassment	Conformance	The Entity has established and publicly disclosed a zero-tolerance Policy prohibiting workplace Violence, Harassment, sexual harassment, bullying, intimidation and retaliation. The Policy applies to employees, contractors, suppliers, security providers, visitors and other Stakeholders and establishes risk-prevention measures, accessible and confidential reporting channels, protection against retaliation, impartial investigation, effective remedy and disciplinary action. Employee interviews, site observations and the records reviewed during the Audit did not identify any evidence of workplace Violence, Harassment or retaliation during the Audit period. The Entity's Workplace Violence and Harassment Policy is available at: https://www.egyptalum.com.eg/Files/Sustainability/workplace%20violence%20and%20harassment%20policy.pdf
10.7a-c Remuneration	Conformance	The Entity maintains documented remuneration arrangements covering wages, benefits, overtime, deductions, social insurance and wage recordkeeping. Sampled payroll, itemised payslips, overtime calculations and bank transfer records demonstrated that wages are paid regularly and above the applicable statutory minimum wage. The living wage assessment, including applicable bonuses, benefits and in-kind support, demonstrated that total remuneration meets or exceeds the identified living wage reference. Employees interviewed during the Audit confirmed the regular receipt of wages, payslips, overtime payments and applicable benefits.
10.8a-c Working Time	Conformance	The Entity maintains documented arrangements governing working hours, overtime, rest periods, weekly rest days and statutory leave. A six-month sample of shift rosters and biometric and 'punch-card' attendance records reviewed during the Audit demonstrated that the average working day did not exceed eight hours and that employees received at least one rest day in every seven-day period. Overtime is approved, recorded and compensated through the payroll system, whilst records reviewed during the Audit confirmed the provision of applicable annual leave, sick leave, maternity leave and public holidays. Employee interviews confirmed the implementation of the documented working time arrangements.
10.9a-b Informing Workers of Rights	Conformance	The Entity informs workers of their rights through induction, periodic training, written employment documentation, workplace notices, visual displays, toolbox talks, digital communication and Labour Union meetings. The information covers Freedom of Association, Child Labour and Forced Labour prohibitions, non-Discrimination, protection from Violence and Harassment, remuneration, Working Time, leave and grievance channels. Information is communicated in Arabic in clear and accessible formats. Employees interviewed demonstrated awareness of their principal employment rights and the available channels for raising concerns without fear of retaliation or reprisal.
11. OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Management System	Conformance	The Entity has implemented an Occupational Health and Safety (OH&S) Management System certified to ISO 45001:2018. The system is supported by a site-wide OH&S risk assessment, operational controls, accident and incident management arrangements, employee training and emergency-preparedness procedures. Site observations

CRITERION	RATING	COMMENT
		confirmed the implementation of relevant controls, including Personal Protective Equipment (PPE), emergency equipment, fire protection arrangements and workplace safety signage. Employees interviewed demonstrated awareness of key hazards, emergency arrangements and incident reporting requirements.
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Minor Non-Conformance	The Entity has developed an Occupational Health and Safety (OH&S) Key Performance Indicator (KPI) framework providing for both leading and lagging indicators and publicly reports selected safety information in its 2024–2025 Sustainability Report, page 38-40 at: https://www.egyptalum.com.eg/Files/Sustainability/EGYPTALUM_2024-2025_Sustainability_Report.pdf The revised KPI register remained pending formal approval at the time of the Audit however, and completed and traceable results demonstrating effective monitoring of all defined indicators were not available. The Entity had also not completed a documented comparison of its Occupational Health and Safety (OH&S) performance against peer smelters or recognised leading industry practices.
11.2 Employee engagement on Health and Safety	Conformance	The Entity maintains a joint Occupational Health and Safety (OH&S) Committee comprising six elected Worker representatives and six employer representatives. The Committee meets at least quarterly and provides a formal mechanism for Workers to raise and discuss health and safety concerns, alerts and improvement proposals. Worker engagement is further supported through the Labour Union, safety training, workplace communication and direct consultation. Employee interviews undertaken during this Audit confirmed their participation in safety awareness activities and their ability to raise Health and Safety concerns through available channels.

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DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	18 October 2024	Initial Certification Audit - Full Certification
1	23 October 2026	Surveillance Audit – Provisional Certification