ASI CERTIFICATION **PERFORMANCE STANDARD**

PRESENTED TO

Arslan Alüminyum A.Ş.

CERTIFICATE NUMBER
429

ASI STANDARD
PERFORMANCE STANDARD (V3.1 2023)

CERTIFICATION LEVEL
FULL CERTIFICATION

ASI ACCREDITED AUDITING FIRM
CETIZION VERIFICA

DATE OF ISSUE
10 FEBRUARY 2025

DATE OF EXPIRY
9 FEBRUARY 2028

CERTIFIED SINCE
10 FEBRUARY 2025

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 production of Aluminium extrusion profiles, anodising, other associated activities and recycling facility and foundries at Arslan Alüminyum Factory 1, Factory 2 and Factory 3 located in Bilecik, Türkiye.

AUDIT REPORT **PERFORMANCE STANDARD**

OVERVIEW

MEMBER NAME	Arslan Alüminyum A.Ş.
ENTITY NAME	Arslan Alüminyum A.Ş.
CERTIFICATION SCOPE	Manufacture and production of Aluminium extrusion profiles, anodising, other associated activities and recycling facility and foundries at Arslan Alüminyum Factory 1, Factory 2 and Factory 3 located in Bilecik, Türkiye.
SUPPLY CHAIN ACTIVITIES	• Aluminium Re-melting/Refining • Casthouses • Semi-Fabrication • Material Conversion
ASI STANDARD	• Performance Standard V3.1
AUDIT TYPE	• Initial Certification Audit (12 – 16 August 2024) • Surveillance Audit (18 – 20 June 2026)
AUDIT FIRM	CETIZION Verifica
AUDIT DATE	• 12 – 16 August 2024 (Initial Certification Audit) • 18 – 20 June 2026 (Surveillance Audit)
AUDIT REPORT SUBMISSION	• 9 December 2025 (Initial Certification Audit) • 27 September 2026 (Surveillance Audit)
AUDIT SCOPE	Initial Certification Audit (12 – 16 August 2024) The Audit Scope included the manufacture and production of Aluminium extrusion profiles, anodising, other associated activities and recycling facility and foundries at Arslan Alüminyum Factory 1, Factory 2 and Factory 3. Supply chain activities included in the Audit Scope: • 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 (18 – 20 June 2026) The Audit Scope included the manufacture and production of Aluminium extrusion profiles, anodising, other associated activities and recycling facility and foundries at Arslan Alüminyum Factory 1, Factory 2 and Factory 3. Supply chain activities included in the Audit Scope: • 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	• 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	10 February 2025 – 9 February 2028
NEXT AUDIT TYPE	Re-Certification Audit
NEXT AUDIT DATE	9 February 2028
CERTIFICATE NUMBER	429
	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

Arslan Alüminyum (the 'Entity'), established in 1970, is one of the oldest Aluminium companies in Türkiye and currently has 624 employees. It operates four factories located in the 1st and 2nd Organised Industrial Zones in the Bilecik province. Each factory focuses on different production activities:

- Factory 1: Extrusion profile production and anodising facility.
- Factory 2: Extrusion profile production, painting lines, wood coating unit, mould shop, and mechanical processing sections.
- Factory 3: Recycling facility and foundries.
- Factory 4: A recent addition focused on extrusion profile production, which is not included in the ASI Certification Scope.

The Entity's products primarily serve the building and construction sector, and include Aluminium systems such as windows, doors, facades and curtain walls. It has an overall production capacity of 240,000 tonnes per annum of which 90,000 tonnes are extrusion profiles, with an annual production of saleable profiles at 22,368 tonnes. It is well-equipped with advanced machinery, including a 45 MN extrusion press and two fully automatic solar frame profile processing lines, which have a daily capacity of 7,000 sets.

Bilecik is strategically located between the major cities of Istanbul and Ankara, making the Entity well-connected by road and rail. The nearest airports are located in Istanbul and Ankara.

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

FINDINGS

CRITERION	RATING	COMMENT
1. BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity has delegated the legal compliance responsibility to the Assistant General Manager, which is outlined in the Entity's organisational chart. The Entity has identified applicable legal requirements (e.g. regulations to disclose GHG emissions due to stationary combustion, Turkish regulations). The Entity has submitted its verified annual report for 2025 to the Ministry of Environment, Urbanization and Climate Change through an online portal. It also fulfils its obligations under Turkish laws and to registered institutions, organisations, and industry chambers. The Entity has the required valid legal permits to operate a recycling facility (Factory 3), issued by the Ministry of Environment, Urbanization and Climate Change, and periodic capacity reports are submitted.
1.2 Anti-Corruption	Conformance	The Entity has established rules and procedures related to anti-Corruption in its business procedures and work plans, available at: https://www.arslanaluminyum.com/documents/2026/en/ANTI-BRIBERY-AND-ANTI-CORRUPTION-POLICY.pdf Stakeholders can raise any grievances related to anti-Bribery via the Ethics Line (+90 228 216 0221 (368)). The functioning of the telephone number was checked on-site and was found to be working satisfactorily. Additionally, the Entity has formed an Ethics Committee with the participation of the senior management team and is working on principles, monitoring mechanisms, and awareness. The latest Ethics Committee meeting was held in January 2026. The risk assessment covering anti-Bribery has been conducted as part of the Human Rights risk assessment, and there are no reported incidents of Bribery.
1.3a-e Code of Conduct	Conformance	The Entity has established an employee Code of Conduct in Turkish and English, available at: https://www.arslanaluminyum.com/documents/2026/ETIK-KURALLAR.pdf Employees are trained on the Code of Conduct and training records are maintained.
2. POLICY AND MANAGEMENT		
2.1a-f Environmental, Social, and Governance Policy	Conformance	The Entity has established and implemented various Environmental, Social, and Governance (ESG) Policies, including Sustainability, Environmental, OH&S, and Human Rights Policies, available at: https://www.arslanaluminyum.com/documents/2026/SURDURULEBILIRLIK-POLITIKASI.pdf
2.2a-c Leadership	Conformance	The General Manager has designated the Assistant General Manager with the overall responsibility to effectively implement the ASI requirements. Related Policies are approved, and necessary resources are provided.

CRITERION	RATING	COMMENT
2.3a Environmental and Social Management Systems - Environmental	Conformance	The Entity has implemented an ISO 14001:2015 certified Environment Management System covering all three manufacturing locations, including the head office. The certification is valid to December 2026. One minor non-conformity was identified in the last audit and the necessary corrective action has been completed.
2.3b Environmental and Social Management Systems - Social	Conformance	The Entity has developed a Social Management System in generally conformance to national and international standards: https://www.arslanaluminyum.com/documents/surdurulebilirlik/en/human-rights-policy.pdf
2.4a-e Responsible Sourcing	Conformance	The Entity has established a Sustainable Supply Chain Policy, available at: https://www.arslanaluminyum.com/documents/2026/SURDURULEBILIR-TEDARIK-ZINCIRI-POLITIKASI.pdf A detailed supplier handling procedure is in place covering suppliers of Primary Aluminium, Scrap material and alloying elements. The suppliers of Pre-Consumer Scrap and Post-Consumer Scrap was assessed using ESG criteria. The Entity also has agreement with its Turkey-based customer to collect their process Scrap, as part of Entity's circularity program. The Post-Consumer Scrap is sourced from within Türkiye, mainly through intermediate companies. The Entity sources Primary Aluminium in form of ingots from Smelters and/or Traders and assess the presence of Conflict-Affected and High-Risk areas (CAHRAs).
2.5a-g Environmental and Social Impact Assessments	Not Applicable	This Criterion is not applicable to the Entity, as there are no New Projects or Major Changes and is therefore not required to conduct Environmental and Social Impact Assessments.
2.6a-h Human Rights Impact Assessment	Not Applicable	This Criterion is not applicable to the Entity, as there are no New Projects or Major Changes and is therefore not required to conduct a Human Rights Impact Assessment.
2.7a-f Emergency Response Plan	Conformance	The Entity has developed a specific emergency response plan, which addresses the emergency response team structure, emergency scenarios and annual drills to review emergency readiness. The drill records containing photos and employees' signatures are maintained. Emergency response team members are trained by an external competent person issued by the Ministry of Labour and Social Security. The full version of the emergency plan is available to Stakeholders upon request, as per the management statement. Further information on emergency planning is in the Sustainability Report 2024, page 43: https://www.arslanaluminyum.com/documents/2026/en/Arslan-Aluminyum-Sustainability-Report-2024.pdf
2.8a-d Suspended Operations	Conformance	The Entity has developed a business continuity or resilience plan including an emergency response plan for suspended operations. The Entity has also committed to address ESG criteria in case of suspended operations, via the Sustainability Policy: https://www.arslanaluminyum.com/documents/surdurulebilirlik/en/sustainability-policy.pdf

CRITERION	RATING	COMMENT
2.9a-b Mergers and Acquisitions	Conformance	The Entity has made provisions to undertake ESG Due Diligence in for mergers or acquisitions to avoid or reduce the negative effect of ESG aspects. The Entity has also committed to address ESG criteria in case of mergers and acquisitions via the Sustainability Policy: https://www.arslanaluminyum.com/documents/surdurulebilirlik/en/sustainability-policy.pdf
2.10a-b Closure, Decommissioning and Divestment	Conformance	The Entity has committed to address ESG criteria in case of closure, decommissioning and divestment via the Sustainability Policy: https://www.arslanaluminyum.com/documents/surdurulebilirlik/en/sustainability-policy.pdf
3. TRANSPARENCY		
3.1a-b Sustainability Reporting	Conformance	The Entity has prepared a Sustainability Report 2024 in accordance with the Global Reporting Initiative (GRI) reporting framework and includes a Materiality assessment (page 16), stakeholder analysis and engagement (page 18) and GRI Content and ASI Performance Indexes (pages 63-67): https://arslanaluminyum.com/documents/2026/en/Arslan-Aluminyum-Sustainability-Report-2024.pdf The Entity is also working to finalise the 2025 Sustainability Report.
3.2 Non-compliance and Liabilities	Conformance	The Entity has established an ethical business framework to conduct business in a compliant and ethical manner. There are no Material fines, judgments, penalties, or non-monetary sanctions for failure to comply with Applicable Law during the reporting period. Related disclosures are included the Sustainability Report page 24: https://arslanaluminyum.com/documents/2026/en/Arslan-Aluminyum-Sustainability-Report-2024.pdf
3.3a-c Payments to Governments	Conformance	The Entity has made payments to the government as part of its legal requirements, such as corporate tax, and Value Added Tax (VAT), in accordance with their Business Code of Ethics, point 7: https://www.arslanaluminyum.com/documents/surdurulebilirlik/en/code-of-ethics.pdf Related information is disclosed in the Sustainability Report 2024, page 27: https://arslanaluminyum.com/documents/2026/en/Arslan-Aluminyum-Sustainability-Report-2024.pdf There were no financial and in-kind political contributions made by the Entity during the reporting period. Due to the confidentiality and non-obligatory nature of these data as per country legislation, the financial results are not publicly disclosed.
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	The Entity has established Policies and procedures for Stakeholders to raise grievances and for the review of grievances by the Ethics Committee. The Stakeholder Engagement Plan (SEP) has recently been reviewed and updated, available at: https://arslanaluminyum.com/documents/2026/en/STAKEHOLDER-ENGAGEMENT-PLAN.pdf Sections 9 and 10 of the SEP address the Complaints Mechanism in terms of accessibility, responsibility, investigation process, lead time, and key performance indicators. Stakeholders can raise grievances via the publicly available email address: etik@arslanaluminyum.com

CRITERION	RATING	COMMENT
		No grievances have been received from external Stakeholders. Grievances raised by internal Stakeholders are being handled in accordance with the Entity's procedure. Workers interviews during the Audit confirmed that Worker found the Complaints Mechanism satisfactory. The related disclosures are included in the Sustainability Report 2024, page 19: https://arslanaluminyum.com/documents/2026/en/Arslan-Aluminyum-Sustainability-Report-2024.pdf
4. MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment	Conformance	The Entity has conducted a Life Cycle Assessment (LCA) for all its Products, including the 'Green Billet' product, which follow a 'cradle-to-gate' approach and applicable ISO standards. The Global Warming Potential (GWP) for Green Billet is calculated as 2.27 kg CO_2e/kg. The LCA is independently verified with an Environmental Product Disclosure (EPD) in accordance with ISO 14025:2006.
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	The Entity has conducted a Life Cycle Assessment (LCA) for all its Products, including the 'Green Billet' product, which follow a 'cradle-to-gate' approach and applicable ISO standards. The Global Warming Potential (GWP) for Green Billet is calculated as 2.27 kgCO_2e/kg. The LCA is independently verified with an Environmental Product Disclosure (EPD) in accordance with ISO 14025:2006, available at: https://www.arslanaluminyum.com/documents/2026/EPD/EPD-document-EPD-IES-0026303_001-GREEN-BILLET.pdf
4.2 Product Design	Conformance	The Entity has implemented processes to improve product and process design, including to reduce quality rejection and improve the overall productivity level. The Entity has implemented a structured project that is tracked under the overall supervision of the Research & Development team and progress is reported. Examples of the measures include optimisation of extrusion press speed, metallurgy (Si & Mn), and installation of IOT (Internet of Things) device to monitor and control process data.
4.3a-b Aluminium Process Scrap	Conformance	The Entity collects and consumes 100% of its Aluminium Process Scrap in its Casthouse. The Entity has a process to collect, segregate and weigh Process Scrap according to different alloy grades, which was confirmed during on-site observations during the Audit. The total Process Scrap quantities are collected from different manufacturing processes. To melt chips from profile cutting, the Entity has a special twin chamber furnace to reduce melt loss.
4.4a-c Collection and Recycling of Products at End of Life - Material Conversion and other Manufacturing	Conformance	The Entity has developed its Recycling and Scrap Policy, available at: https://www.arslanaluminyum.com/documents/surdurulebilirlik/en/recycling-and-scrap-policy.pdf The Entity has developed targets and time-based management strategies for the collection, processing, and recovery of Scrap which includes Post-Consumer Scrap. These are outlined in the 'Recycling and collecting recycle product' document, which provides detailed guidelines (e.g. 10% increase in sourcing of scrap from the previous year). The Entity publishes its targets and practices related to Scrap in the Sustainability Report 2024:

CRITERION	RATING	COMMENT
		https://arslanaluminyum.com/documents/2026/en/Arslan-Aluminyum-Sustainability-Report-2024.pdf
4.4d Collection and Recycling of Products at End of Life	Conformance	The Entity is a member of the Türkiye Alüminyum Sanayicileri Derneği (TALSAD), and a member of European Aluminium, which promote the recycling and collection of Aluminium products at End of Life. https://talsad.org.tr/en
5. GREENHOUSE GAS EMISSIONS		
5.1a-b Disclosure of GHG Emissions and Energy Use	Conformance	The Entity has calculated its 2024 Greenhouse Gas (GHG) emissions in accordance with ISO 14064-1 and the GHG Protocol. The Entity's GHG emissions are externally verified in accordance with ISO 14064-3 to confirm data accuracy and consistency. The Entity has disclosed its GHG emissions Scope 1-3 and energy use data in the Sustainability Report 2024, pages 49-50: https://arslanaluminyum.com/documents/2026/en/Arslan-Aluminyum-Sustainability-Report-2024.pdf
5.2a Aluminium Smelter GHG Emissions Intensity - Started production after 2020	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.2b Aluminium Smelter GHG Emissions Intensity - In production up to and including 2020	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.3a-e GHG Emissions Reduction Plans	Conformance	The Entity has established a GHG Emissions Reduction Pathway with Intermediate Targets that is consistent with a 1.5°C warming scenario using the ASI Entity GHG Pathways Method and Calculation Tool. The Entity has installed renewable (solar) energy infrastructure and generated approximately 15,200,000 kWh, an increase from the previous year, while total GHG emissions reduced 10% from the previous year. The Entity's Climate Transition Pathway is disclosed in the Sustainability Report 2024, pages 35-36: https://arslanaluminyum.com/documents/2026/en/Arslan-Aluminyum-Sustainability-Report-2024.pdf
5.3b-e GHG Emissions Reduction Plans - Targets, review and disclosure	Conformance	The Entity has established a GHG Emissions Reduction Pathway with Intermediate Targets that is consistent with a 1.5°C warming scenario using the ASI Entity GHG Pathways Method and Calculation Tool. 'Year-on-year' GHG emissions data and the Climate Transition Pathway is disclosed in the Sustainability Report 2024, pages 35-36: https://arslanaluminyum.com/documents/2026/en/Arslan-Aluminyum-Sustainability-Report-2024.pdf
5.4 GHG Emissions Management	Conformance	The Entity has developed and implemented an ISO 50001:2018 Third Party certified Energy Management System. Further information is available in the Sustainability Report 2024, page 30: https://arslanaluminyum.com/documents/2026/en/Arslan-Aluminyum-Sustainability-Report-2024.pdf

CRITERION	RATING	COMMENT
		The Entity has implemented on-line real time monitoring of natural gas (e.g. furnaces) to improve utilisation.
6. EMISSIONS, EFFLUENTS AND WASTE		
6.1a-f Emissions to Air	Conformance	The Entity has implemented a procedure for air emissions monitoring in compliance with Turkish Law. The parameters for particulate matter (PM), Total Organic Compounds (TOC), carbon monoxide (CO), sulphur dioxide (SO_2), and nitrogen oxides (NOx) are within legally permissible limits. Emissions reduction initiatives and Emissions to Air are disclosed in the Sustainability Report 2024, page 52: https://arslanaluminyum.com/documents/2026/en/Arslan-Aluminyum-Sustainability-Report-2024.pdf
6.2a-g Discharges to Waters	Conformance	The Entity collects wastewater from both domestic and industrial sources, performs primary treatment to achieve discharge water quality parameters, and releases it to the industrial area drainage system. The related disclosures are included in the Sustainability Report 2024, page 48: https://www.arslanaluminyum.com/documents/2026/en/Arslan-Aluminyum-Sustainability-Report-2024.pdf
6.3a-g Assessment and Management of Spills and Leakages	Conformance	The Entity has conducted a risk assessment related to chemical leaks and a Health and Safety risk analysis through a consultative process with human resources, safety specialists, medical staff, and Worker's representatives. Control measures have been implemented and related training has been provided to Workers. Interviews with Workers and on-site observations undertaken during the Audit confirmed that the control measures were implemented. The Entity has disclosed its emergency planning and strategies in the Sustainability Report 2024: https://arslanaluminyum.com/documents/2026/en/Arslan-Aluminyum-Sustainability-Report-2024.pdf
6.4a-b Public Disclosure of Spills and Leakages	Conformance	Whilst there were no Spills or Leakages, the Entity has however disclosed information on Spills in the Sustainability Report 2024, page 42, https://arslanaluminyum.com/documents/2026/en/Arslan-Aluminyum-Sustainability-Report-2024.pdf In addition, the Entity has engaged an approved external safety specialist to conduct a workplace safety assessment, which addressed Spills and Leakages. The report was submitted to the relevant government authority.
6.5a-c Waste Management and Reporting	Conformance	The Entity has developed and implemented waste management practices in accordance with legal regulations. The waste management procedure addresses various types of waste, including Dross. The waste disposal is conducted by an external, licenced agency in accordance with the waste code prescribed by the Ministry of Environment, Urbanisation, and Climate Change., and the Entity's compliance was confirmed using the secure login access. The Entity has reported a 30% reduction in Hazardous Waste in 2024 from the previous year. Waste-related disclosures, including the management approach and quantities are disclosed in the Sustainability Report 2024, pages 37 &

CRITERION	RATING	COMMENT
		51: https://arslanaluminyum.com/documents/2026/en/Arslan-Aluminyum-Sustainability-Report-2024.pdf
6.6a-g Bauxite Residue	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7a-f Spent Pot Lining (SPL)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8a-d Dross	Conformance	The Entity records and tracks Dross generation daily and reports monthly to the government portal (Ministry of Environment, Urbanization and Climate Change). Recovered Aluminium is purchased back in the form of ingots from the Dross recycler. As per Turkish Law, Dross residue is used in cement co-processing and does not go to landfill. The Entity's overall waste management approach, including the quantities of Dross are disclosed in the Sustainability Report 2024, page 37 & 51: https://arslanaluminyum.com/documents/2026/en/Arslan-Aluminyum-Sustainability-Report-2024.pdf
7. WATER STEWARDSHIP		
7.1a-b Water Assessment and Disclosure	Conformance	The Entity has conducted a water risk assessment using the WRI Aqueduct Tool, with an overall water risk of low-medium (1-2). The water stress assessment for future business scenarios has been conducted, and the outcome is low. The industrial zone authority supplies all water to the Entity. The Entity implements water-related practices, including periodic monitoring by external experts, and the Entity's water footprint is verified against ISO 14046. No water leakage or water loss was identified during the Audit. Further information is disclosed in the Sustainability Report 2024, pages 30 & 68: https://www.arslanaluminyum.com/documents/2026/en/Arslan-Aluminyum-Sustainability-Report-2024.pdf
7.2a-e Water Management	Not Applicable	This Criterion is not applicable to the Entity, as the risks related to water in the Watersheds are low. The Entity has however conducted a detailed water footprint study to establish a 2022 baseline year and underwent an environment audit from an external agency covering water management. Further information on their water management strategy, usage, operations, and goals is disclosed in the Sustainability Report 2024, pages 31 and 68: https://www.arslanaluminyum.com/documents/2026/en/Arslan-Aluminyum-Sustainability-Report-2024.pdf
8. BIODIVERSITY AND ECOSYSTEM SERVICES		
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	In 2024, the Entity conducted a detailed on-site Biodiversity assessment using external experts and addressed both a core and buffer area using three monitoring stations. The nearest Protected Area is located approximately 33 kilometres from the Entity. The flora and fauna assessment was conducted using IUCN, BERN, and CITES

CRITERION	RATING	COMMENT
		guidelines through observation and literature review. Whilst no critical or vulnerable flora species were identified some invasive species however were identified. Further information is available in the Sustainability Report 2024, page 38: https://www.arslanaluminyum.com/documents/2026/en/Arslan-Aluminyum-Sustainability-Report-2024.pdf
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Not Applicable	This Criterion is not applicable to the Entity, as there were no priority ecosystem risks or impacts identified during the Biodiversity and Ecosystem Services risk and impact assessment.
8.2a-g Biodiversity Management	Not Applicable	This Criterion is not applicable to the Entity, as the Biodiversity risks and potential impacts are assessed and documented as low. The Entity has, however, developed a Biodiversity management plan and works with the nearby community, schools, and Workers' families to promote Biodiversity aspects such as water conservation, vegetation, waste disposal, and protection of natural habitats. Further information is available in the Sustainability Report 2024, page 38: https://www.arslanaluminyum.com/documents/2026/en/Arslan-Aluminyum-Sustainability-Report-2024.pdf
8.3a-c Management of Priority Ecosystem Services	Not Applicable	This Criterion is not applicable to the Entity, as no Priority Ecosystem Services impacts have been identified in the Biodiversity and Ecosystem Services risk and impact assessment.
8.4 Alien Species	Conformance	As part of Biodiversity assessment, the Entity identified the presence of invasive species. Mitigation measures have been identified and implemented.
8.5a-b Commitment to "No Go" in World Heritage Properties	Conformance	The Entity has made a commitment to "No Go" in World Heritage Properties as part of future business expansion. There are no World Heritage Properties located near the Entity.
8.6a-d Protected Areas	Conformance	The Entity has confirmed there are no Protected Areas located near the Entity.
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 developed and recently updated its Human Rights Policy, available at: https://www.arslanaluminyum.com/documents/2026/en/HUMAN-RIGHTS-POLICY.pdf The Entity has conducted Human Rights Due Diligence covering Human Rights topics including Child Labour, equal opportunities, freedom of speech, and employee benefits including social services, working hours, and Remuneration.

CRITERION	RATING	COMMENT
9.2a-e Gender Equity and Women's Empowerment	Conformance	The current 'male-to-female' ratio at the Entity is 74:26. Whilst there are limitations to employing women in hazardous areas, including the Casthouse, the Entity actively encourages female employment in other areas such as packaging and office positions. Female Workers are permitted to work night shifts, but their hours are limited to 7.5 hours in accordance with Turkish law. Explanations and regulations regarding women's rights are organised in accordance with internal Policies: https://www.arslanaluminyum.com/documents/2026/KADIN-HAKLARI-POLITIKASI.pdf The Entity is continuously working to promote diversity, equity and inclusion and monitors its related performance (e.g. monthly monitoring of new hires by gender). The number of female employees has fluctuated over time with a slight decline from 2024 to 2025. For the 2026 year to date, 36% of total new hires were female. Interviews with female employees during the Audit confirmed satisfactory working conditions. Related disclosures are available in the Sustainability Report 2024, pages 41 and 55: https://www.arslanaluminyum.com/documents/2026/en/Arslan-Aluminyum-Sustainability-Report-2024.pdf
9.3a-i Indigenous Peoples	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples in the Entity's Area of Influence, as confirmed via the International Work Group for Indigenous Affairs (IWGIA) resource - https://iwgia.org/en/countries.html
9.4a Free, Prior, and Informed Consent (FPIC) - New Projects or Major Changes	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples in the Entity's Area of Influence, and there are no Major Changes or project expansions. According to Turkish Law, in case of any major expansion/change, there is a requirement to conduct an Environmental Impact Assessment which includes external stakeholder consultation.
9.4b Free, Prior, and Informed Consent (FPIC) - Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9.4c Free, Prior, and Informed Consent (FPIC) - Demonstrate support	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples in the Entity's Area of Influence.
9.5a Cultural and Sacred Heritage - Identification	Conformance	The Entity is not located near any cultural or sacred heritage sites. The nearest cultural sites, which are designated on the UNESCO World Heritage List, are in the city of Bursa and village of Cumalikizik, located approximately 100 kilometres away. There are no negative impacts from the Entity's activities on these cultural and heritage sites.
9.5b Cultural and Sacred Heritage - Impacts	Conformance	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples in the Entity's Area of Influence.
9.6a-i Displacement	Not Applicable	This Criterion is not applicable to the Entity, as there are no New Projects or Major Changes planned, and no Business activities that have resulted in displacement or resettlement.

CRITERION	RATING	COMMENT
9.7a-h Affected Populations and Organisations	Conformance	The Entity has developed, and recently revised its Stakeholder Engagement Plan, available at: https://www.arslanaluminyum.com/documents/2026/en/STAKEHOLDER-ENGAGEMENT-PLAN.pdf The Plan details various types of affected Stakeholders, the impact and responses, corporate social responsibility activities and the Grievance Mechanism. The Entity is actively working with other neighbouring industries and trade associations to address environmental and social challenges. The Entity's Chairperson of the Board is also the President of the Biliecik 1 Industrial Organization Zone, where the Entity is located, and working on a common effluent treatment plant, developing shared daycare facilities (creche), and accessibility to water resources. The related disclosure is included in the Sustainability Report 2024, page 44-45: https://www.arslanaluminyum.com/documents/2026/en/Arslan-Aluminyum-Sustainability-Report-2024.pdf
9.8a Conflict-Affected and High-Risk Areas - Strong Management Systems	Conformance	The Entity has developed and implemented a Sustainable Supply Chain Policy that requires suppliers to follow requirements related to Conflict-Affected and High-Risk Areas (CAHRAs): https://www.arslanaluminyum.com/documents/surdurulebilirlik/en/sustainable-supply-chain-policy.pdf The Sustainable Supply Chain Policy has been communicated, and the Entity has developed a mechanism to monitor supplier progress on Policy requirements.
9.8b Conflict-Affected and High-Risk Areas - Identify and assess risks	Conformance	The Entity has established a practice to assess and evaluate the presence of CAHRAs and the associated risks within its supply chains for Primary Aluminium and Pre- and Post-Consumer Scrap, which follows structured questions that are aligned with OCED Guidance. The Entity has assessed its Tier 1 or immediate suppliers for any involvement in CAHRAs and confirmed they are not within a CAHRAs.
9.8c Conflict-Affected and High-Risk Areas - Strategy to respond to risks	Conformance	The Entity has established a practice to assess and evaluate the presence of CAHRAs and the associated risks within its supply chains for Primary Aluminium and Pre- and Post-Consumer Scrap, and develop mitigation plans as necessary. The Entity has revised its sourcing strategy to increase the sourcing of Aluminium Scrap, mainly Pos-Consumer Scrap within Turkey, to exercise better control and transparency.
9.8d Conflict-Affected and High-Risk Areas - Audit of due diligence	Conformance	The Entity's Due Diligence processes were included in this ASI Performance Standard Certification Audit, which addresses this requirement.
9.8e Conflict-Affected and High-Risk Areas - Report annually	Conformance	The Entity has disclosed information on its supply chain Due Diligence in the Sustainability Report 2024, page 26: https://arslanaluminyum.com/documents/2026/en/Arslan-Aluminyum-Sustainability-Report-2024.pdf
9.9 Security practice	Conformance	The Entity has conducted Human Rights Due Diligence covering security services. There are both male and female security guards deployed on site who work in three shifts and are hired through an external agency. The security personnel have received training in

CRITERION	RATING	COMMENT
		Human Rights and other work-related matters including emergency preparedness and response.
10. LABOUR RIGHTS		
10.1a-c Freedom of Association and Right to Collective Bargaining	Conformance	The Entity respects employees' right to Freedom of Association and Collective Bargaining as part of national regulations and international instruments. Each factory has elected its Workers' representative in accordance with Turkish labour regulations, which comprise both male and female Workers. Re-election of Worker representatives for Factories 1 and 2 were recently held in 2025 and 2026 Periodic meetings (Factory 1 & 2 every two months and Factory 3 every month due to an increased hazard level and Turkish law) between management and Workers' representatives are held and minutes are recorded, checked and signed by all participants.
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 the Turkish laws do not restrict Freedom of Association and Collective Bargaining.
10.2a Child Labour	Conformance	The Entity has established a Business Ethics and Code of Conduct Procedure that addresses Child Labour, available at: https://www.arslanaluminyum.com/documents/surdurulebilirlik/en/business-ethics-and-code-of-conduct-procedure.pdf The Sustainable Supply Chain Policy addresses Child Labour: https://www.arslanaluminyum.com/documents/surdurulebilirlik/en/sustainable-supply-chain-policy.pdf Anyone under the age of 15 is defined as a child. During the on-site visit as part of the Audit, there were no suspected cases of Child Labour identified, and 30 employees randomly selected for interview were confirmed to be above 15 years of age. The age of employees is verified by the Entity through national identification (ID) documents, and their age is captured in the application form along with other personal details along with a declaration to use personal data in a confidential manner.
10.3a-c Forced Labour	Conformance	The Entity has established a Sustainable Supply Chain Policy addressing internal work practices and the supply chain, which prohibits the use of Forced Labour and modern slavery: https://www.arslanaluminyum.com/documents/surdurulebilirlik/en/sustainable-supply-chain-policy.pdf The Entity's Business Ethics and Code of Conduct Procedure addresses Forced Labour: https://www.arslanaluminyum.com/documents/surdurulebilirlik/en/business-ethics-and-code-of-conduct-procedure.pdf A list of information and documents (as copies only) is required from new employees e.g. national ID copy, education/diploma certificate, bank account, pre-employment medical examination records etc. According to Turkish regulations, employees are subject to a notice period of two or four weeks, depending on the length of their employment. There are no indicators or conditions of employment that suggest the presence of Forced Labour or modern slavery. The

CRITERION	RATING	COMMENT
		Modern Slavery Statement, signed by the Deputy General Manager, is available at: https://arslanaluminyum.com/documents/2026/Modern-Kolelik-Beyani.pdf The Entity's commitments on modern slavery are included in Modern Slavery Policy, available at https://arslanaluminyum.com/documents/2026/MODERN-KOLELIK-POLITIKASI.pdf
10.4a-c Non-Discrimination	Conformance	The Entity's commitment and practices do not discriminate based on race, gender and other attributes as outlined in the Business Ethics and Code of Conduct Procedure: https://www.arslanaluminyum.com/documents/surdurulebilirlik/en/business-ethics-and-code-of-conduct-procedure.pdf A review of training, promotion and recruitment documentation confirms there are no discriminatory practices.
10.5 Communication and engagement	Conformance	The Entity communicates and engages employees regarding working conditions through various mechanisms including campaigns (e.g. awards & recognition), training, human resources-related Policies on the website, notice board, and videos streaming in work areas. The Stakeholder Engagement Plan regarding complaints is available at: https://www.arslanaluminyum.com/documents/surdurulebilirlik/en/STAKEHOLDER-ENGAGEMENT-PLAN.pdf
10.6a-g Violence and Harassment	Conformance	The Entity has addressed requirements related to Violence and Harassment through its various Policies implemented. Refer to: Human Resources Policy: https://www.arslanaluminyum.com/documents/surdurulebilirlik/en/human-resources-policy.pdf Code of Ethics: https://www.arslanaluminyum.com/documents/surdurulebilirlik/en/code-of-ethics.pdf Employees are trained on the Code of Ethics and the reporting mechanism to report any incidents of Violence and Harassment.
10.7a-c Remuneration	Conformance	The Entity pays Remuneration above the legal minimum wage. Overtime pay is provided at a premium rate in accordance with Turkish law, which stipulates a 150% premium. The calculations for Remuneration were reviewed during the Audit and confirmed to be accurate. The cost of living is considered to determine the salary level above the legal minimum wage. Statutory deductions such as income tax and social security are considered, and salaries are paid twice a month through bank transfer. A Remuneration slip is provided to all employees. The Entity is currently reviewing its wage structure considering the country's inflation rate, with the objective to support and retain employees. Additional benefits are provided including various bonuses, heating bill support, seniority bonus, and religious holiday reward.
10.8a-c Working Time	Conformance	Working hours are organised into three shifts, and employees are entitled to annual leave. Working hours, including Overtime, are

CRITERION	RATING	COMMENT
		tracked using a card system. The Entity monitors the working hours data monthly. The Entity implements practices to restrict Overtime to within 270 hours per year as per Turkish regulations. Year-on-year working hours analysis has been undertaken which demonstrates improvement since the previous Audit. Overall, excessive working hours have been reduced to within permissible limits, as confirmed during review record of working hour records of randomly selected Workers and by Worker interviews undertaken during the Audit.
10.9a-b Informing Workers of Rights	Conformance	The Entity has informed employees of their rights through various mechanisms such as induction training, human resources-related Policies, the notice board, and videos streaming provided in work areas.
11. OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Management System	Conformance	The Entity has a valid ISO 45001:2018 certified Occupational Health and Safety (OH&S) Management System, including documented OH&S procedures covering various aspects of OH&S including medical examinations and workplace accidents. The Entity has maintained its OH&S Management System and practices since the last ASI Audit. The effectiveness of past corrective measures, such as the safe use of compressed air, were found satisfactory. Safety audits are conducted by external safety specialists that are approved and registered by the Government, in addition to the regulatory requirements.
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Minor Non-Conformance	The Entity reviews OH&S performance data monthly for each factory. This review is conducted by a Safety Committee that consists of eight members, which includes management representatives, Worker representatives, a doctor, and a safety specialist. Employees may be included as required based on the nature of the actions, and meeting minutes are maintained. The Entity periodically reviews its OH&S performance which illustrates improvement (e.g. total number of Lost Time Incidents for year 2023: 230, year 2024: 183 and year 2025: 154). Detailed disclosure is provided in the Sustainability Report, pages 53-54, available at: https://arslanaluminyum.com/documents/2026/en/Arslan-Aluminyum-Sustainability-Report-2024.pdf There is however no information disclosed on comparative analyses of OH&S performance with peer Businesses and leading practice.
11.2 Employee engagement on Health and Safety	Conformance	The Entity has formed a Safety Committee, and employees are regularly engaged through safety training, and toolbox talks that address topics such as 'Basic Occupational Health and Safety'. The Entity is provides safe working conditions. The Entity continues to provide regular training by competent employees and/or safety specialist and maintained records addressing issues including safe working methods, protect and causes of work accident, participants undergo a written exam after training to assess the level of knowledge and skills gained.

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DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	10 February 2025	Initial Certification Audit – Full Certification
1	28 October 2026	Surveillance Audit