ASI CERTIFICATION **PERFORMANCE STANDARD**

PRESENTED TO

Nemak İzmir Döküm Sanayi A.Ş.

CERTIFICATE NUMBER
426

ASI STANDARD
PERFORMANCE STANDARD (V3.1 2023)

CERTIFICATION LEVEL
FULL CERTIFICATION

ASI ACCREDITED AUDITING FIRM
TÜV RHEINLAND CERT GMBH

DATE OF ISSUE
22 JANUARY 2025

DATE OF EXPIRY
21 JANUARY 2028

CERTIFIED SINCE
22 JANUARY 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 of Aluminium components at Nemak İzmir Döküm Sanayi A.Ş., located in Izmir, Türkiye.

AUDIT REPORT **PERFORMANCE STANDARD**

OVERVIEW

MEMBER NAME	Nemak S.A.B de C.V
ENTITY NAME	Nemak İzmir Döküm Sanayi A.Ş.
Certification Scope	Manufacture of Aluminium components at Nemak İzmir Döküm Sanayi A.Ş., located in Izmir, Türkiye.
SUPPLY CHAIN ACTIVITIES	• Casthouses • Material Conversion
ASI STANDARD	• Performance Standard V3.1
AUDIT TYPE	• Initial Certification Audit (10 – 14 June 2024) • Surveillance Audit (1 July 2026)
AUDIT FIRM	TÜV Rheinland Cert GmbH
AUDIT DATE	• 10 – 14 June 2024 (Initial Certification Audit) • 1 July 2026 (Surveillance Audit)
AUDIT REPORT SUBMISSION	• 4 December 2024 (Initial Certification Audit) • 17 September 2026 (Surveillance Audit)
AUDIT SCOPE	<u>Initial Certification Audit (10 – 14 June 2024)</u> The Audit Scope includes all activities undertaken at the Nemak İzmir Döküm Sanayi A.Ş., located in the Atatürk Organised Industrial Zone (IAOSB), Izmir, Türkiye. Supply chain activities included in the Audit Scope: • Casthouses • Material Conversion All relevant Criteria in the ASI Performance Standard were included in the Audit Scope. <u>Surveillance Audit (1 July 2026)</u> The Audit Scope includes all activities undertaken at the Nemak İzmir Döküm Sanayi A.Ş., located in the Atatürk Organised Industrial Zone (IAOSB), Izmir, Türkiye. Supply chain activities included in the Audit Scope: • Casthouses • Material Conversion The Audit was undertaken as a 'desktop' exercise consistent with the Entity's overall maturity level and the Audit type. Criteria that were identified as non-conformities from the previous Audit and related Criteria 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	22 January 2025 – 21 January 2028
NEXT AUDIT TYPE	Re-Certification Audit
NEXT AUDIT DATE	21 January 2028
CERTIFICATE NUMBER	426
	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

Nemak is a leading company in the automotive sector, dedicated to producing and developing innovative solutions for high-quality Aluminium components. It is considered as a strategic partner for the leading automakers.

Nemak, S.A.B. de C.V. is noted as a leading provider of innovative lightweight solutions for the global automotive industry, specialising in developing and manufacturing Aluminium components for e-mobility, structure and chassis, and internal combustion engine (ICE) powertrain applications. Nemak currently employs approximately 24,000 people at 38 production facilities worldwide, with approximately 900 at the Entity.

The Nemak İzmir Döküm Sanayi A.Ş. (Nemak Turkey) (the 'Entity') plant has been in operation since 1997 and was acquired by Nemak Group in 2016. The Facility continues its operations in the Atatürk Organised Industrial Zone (IAOSB), Izmir, Türkiye.

MATURITY RATINGS

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

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

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

FINDINGS

CRITERION	RATING	COMMENT
1. BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity was founded in 1997 in Izmir, Türkiye and has been a part of the Nemak Group since 2016. Both the Entity and the Group have systems, processes and procedures in place to ensure awareness of and Compliance with Applicable Laws, local and global regulations and other legally binding obligations. The Entity is certified against several Management System standards including automotive industry and quality, environment, energy, and Occupational Health & Safety (OH&S); and legal compliance is also structured and managed in an integrated team across these schemes.
1.2 Anti-Corruption	Conformance	The Entity has established and implemented a system to eliminate Corruption in all its forms. A global Code of Conduct, Business Code for Suppliers, and several Policies including an Anti-Corruption Policy, Antitrust and Fair-Trade Policy, Anti-Money Laundering and Sanctions Compliance Policy are available via the Entity's corporate website in the Policies and Documents section at: https://www.nemak.com/sustainability Documented procedures and records for identifying and monitoring parts of the Entity that have an inherently high Bribery risk have been implemented. Evidence has been provided that Bribery-related risks have been identified and assessed and that personnel are periodically trained in Corruption risk. The parent company Nemak S.A.B. de C.V. is traded on the Mexican Stock Exchange and subjected to strict financial audits and public disclosure. The topic is also discussed in the global Annual Report 2025 (Sustainability - Business Ethics section, page 89 and Financial section, page 131), available at: https://www.nemak.com/documents/content/S1AhA5YxQcSc_LaH_hMKjAo2f2?download=false
1.3a-e Code of Conduct	Conformance	The Nemak Group has issued and publicly communicated its global Code of Conduct, recently updated in 2025, available in all languages where the Group has plants worldwide. Both English and Turkish versions of this Code are available at: English: https://www.nemak.com/documents/content/WsHjN2auSXK_7eWMDNEtOQoa5?download=false Turkish: https://www.nemak.com/documents/content/Lf19nMHYQRGQRHsN5HMpyAo7e?download=false The Code is developed and reviewed by senior management, communicated internally (e.g. notice boards and intranet) and periodically and mandatorily trained to existing and new employees.
2. POLICY AND MANAGEMENT		
2.1a-f Environmental, Social, and Governance Policy	Conformance	The Entity has issued and communicated its Policies and statements via several platforms including the company website, posters, leaflets, screens, e-mail notifications and employee training. In 2025 and 2026, senior management issued new Policies as required whilst regularly

CRITERION	RATING	COMMENT
		reviewing existing ones to ensure their endorsement and support with the required resources. The Nemak Global Policy documents are available at: https://www.nemak.com/sustainability Locally translated documents in operating countries including Türkiye are available at: https://www.nemak.com/tr/library The Entity has established an integrated Management System to ensure effective implementation of ASI requirements. Several facets of the Management System have been certified against international Management System Standards (e.g. ISO 14001, ISO 45001, ISO 50001).
2.2a-c Leadership	Conformance	The Entity's local Health, Safety, and Environment (HSE) Manager maintains management representation in several environment and sustainability, Occupational Health & Safety (OH&S) and social compliance related schemes and has overall responsibility for the implementation of ASI requirements and leads internal and external communication of ASI processes at the Entity. The HSE Manager is supported by a global sustainability team and local ASI working groups including Human Resources and Production teams. Organisational roles are defined; and resources provided are sufficient throughout the Entity.
2.3a Environmental and Social Management Systems - Environmental	Conformance	The Entity has implemented and maintains an integrated Environmental and Energy Management System certified under International Standards ISO 14001:2105 and ISO 50001:2018 by an accredited Third Party certification body. Recent audit reports from the certification body did not identify any non-conformances and as such, both system certificates remain valid.
2.3b Environmental and Social Management Systems - Social	Conformance	The Entity has established a documented and active Occupational Health & Safety (OH&S) and Social Management System as part of its integrated management approach. The OH&S System has been created based on the ISO 45001:2018 Occupational Health & Safety Standard and certified by an accredited third-party certification body. A social compliance approach is guided by both local and international legislation and via the SA 8000 Social Accountability Standard. Nemak's Annual Report 2025 includes a Sustainability Framework and 2030 Roadmap, which addresses the Material topics for social governance disclosed in various sections of the Report.
2.4a-e Responsible Sourcing	Conformance	As part of Nemak Group's supply chain management, suppliers are systematically assessed and evaluated not only on quality and delivery conditions but also on environmental, social, and governance (ESG) topics. Selection and contracting for critical raw materials like alloys are handled not by local teams but by a centralised global purchasing team according to Nemak global procedures. The Nemak Global Sustainable Purchasing Policy (recently updated in 2025) and Business Code for Suppliers are available on the Nemak website, in the Policies section: https://www.nemak.com/sustainability The Entity's Policies and Ethics Code are valid for each supplier, and these documents are distributed by the Entity as a contract annex or with written communication methods. At the time of the Audit, a

CRITERION	RATING	COMMENT
		significant amount of all suppliers has accepted the Entity's responsible work rules.
2.5a-g Environmental and Social Impact Assessments	Not Applicable	This Criterion is not applicable to the Entity, there are no New Projects or Major Changes since the Entity became an ASI member in 2022. The Environmental, Social, Cultural, and Human Rights Impact Assessments are implemented in each of the Entity's various departments. The identified risks to social, environmental, OH&S, and governance were assessed, and the associated control measures were established and implemented.
2.6a-h Human Rights Impact Assessment	Not Applicable	This Criterion is not applicable to the Entity, there are no New Projects or Major Changes since the Entity became an ASI member in 2022. The Environmental, Social, Cultural, and Human Rights Impact Assessments are implemented in each of the Entity's various departments. The identified risks to social, environmental, OH&S, and governance were assessed, and the associated control measures were established and implemented.
2.7a-f Emergency Response Plan	Conformance	The Entity has developed and implemented an Emergency Response Plan which addresses various emergency topics and has been prepared according to ISO 45001 Standard and two separate local legislations (emergency response and fire protection) which is also submitted, audited and accepted by local authorities. The Emergency Response Plan includes interested parties' participation and drill practices with neighbour plants and local authorities like the fire brigade. Records show that at least three drills are conducted annually including all three shifts, and related training are in place. The Entity's public report (Turkey ASI Plant Report 2024), discloses that the Emergency Response Plan is available upon request for interested parties via: https://www.nemak.com/library/?sc=0#sectionLibrary
2.8a-d Suspended Operations	Conformance	As confirmed through document review and interviews undertaken during the Audit, the Entity has incorporated business resilience into its planning for abnormal situations. A local Crisis Management Manual, which may be classified as a good practice example, has been issued and is regularly reviewed.
2.9a-b Mergers and Acquisitions	Conformance	The Nemak Global Business Development team oversees the management of mergers or acquisitions (M&A) and divestments. A global Due Diligence procedure is in place and applicable for any local activity on M&A and divestments is in place which covers environmental, governance and social aspects and includes questionnaires and checklists. At the time of the Audit, no projected or anticipated M&A and/or divestment activity is planned locally.
2.10a-b Closure, Decommissioning and Divestment	Conformance	The Nemak Global Business Development team oversees the management of mergers or acquisitions (M&A) and divestments. A global Due Diligence procedure is in place and applicable for any local activity on M&A and divestments is in place which covers environmental, governance and social aspects and includes questionnaires and checklists.

CRITERION	RATING	COMMENT
		At the time of the Audit, no projected or anticipated M&A and/or divestment activity (including closure) is planned at the Entity.
3. TRANSPARENCY		
3.1a-b Sustainability Reporting	Conformance	Nemak Group continuously prepares and issues an Annual Report that addresses Governance, Performance (Environment & Energy, Labour & Human Rights, Work Conditions, Occupational Health and Safety), Responsible Sourcing, Corporate Citizenship and Public Charity topics. The 2025 Annual Report is available at: https://www.nemak.com/documents/content/S1AhA5YxQcSc_LaH_hMKjAo2f2?download=false The Report is based on the Global Reporting Initiative (GRI) framework and is integrating aspects of the European Sustainability Reporting Standards (ESRS) and Corporate Sustainability Reporting Directive (CSRD) to prepare for future reporting obligations.
3.2 Non-compliance and Liabilities	Conformance	Nemak has included statements both in its global and local (plant) Annual Reports. The corporate Annual Report states that there were no Material fines, judgments, penalties or non-monetary sanctions for failure to comply with Applicable Law, no reported cases of Bribery or Corruption, refer page 93: https://www.nemak.com/documents/content/S1AhA5YxQcSc_LaH_hMKjAo2f2?download=false The Entity-specific report includes a similar non-compliance and liabilities statement under the Transparency section, page 4: https://www.nemak.com/documents/content/72arXKaHQM-nJARQ8jtOJwo20a0?download=false
3.3a-c Payments to Governments	Conformance	In accordance with Nemak Gorup's anti-Corruption Policy, no payments to Governments were made other than taxes, fees and alike. The Entity has established and implemented a system to eliminate Corruption in all its forms. A global Code of Conduct, Business Code for Suppliers, and several Policies like Anti-Corruption Policy, Antitrust and Fair-Trade Policy, Anti-Money Laundering and Sanctions Compliance Policy are available at: https://www.nemak.com/sustainability Nemak has included the statement in its Nemak Group Annual Report for 2025 (page 93) that there were no payments to Governments building on existing audit and assurance systems. Nemak also states not to make direct or indirect, financial or in-kind, political contributions on an annual basis. Taxes paid to governments are included in the Financial section of the Annual Report. Refer to: https://www.nemak.com/documents/content/S1AhA5YxQcSc_LaH_hMKjAo2f2?download=false
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	The Entity has implemented a Complaints Resolution Mechanism and has made the mechanism locally and globally available on its website in multiple local languages including Turkish. Refer to: https://nemak.com/transparency-helpline An e-mail and toll-free phone access is also available. The design of the complaints mechanism was developed to align with Principle 31 of the United Nations 'Guiding Principles on Business and Human Rights`.
4. MATERIAL STEWARDSHIP		

CRITERION	RATING	COMMENT
4.1a Environmental Life Cycle Assessment	Minor Non-Conformance	The Nemak Group has a global Life Cycle Assessment (LCA) procedure, has identified its major Product lines, uses a reputable software with a 'cradle-to-gate' approach and has completed several LCA studies globally with its 'in-house' and external environmental experts. The 2025 Corporate Report discloses a clear 2030 roadmap target on a global perspective, to provide 100% externally assured LCAs for all Electric Vehicle (EV) portfolio products. At the local level, the Entity had already completed LCA works of five main Products for its customers which approximately cover 70% of the whole manufacturing process of the plant.
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	'Cradle-to-gate' LCAs for the Entity's Products are made available upon customer request. Both the Nemak Group Annual Report and the Türkiye Plant Report include detailed information in several sections on LCA studies in 2025, which explains that these studies are shared with customers and interested parties upon request.
4.2 Product Design	Not Applicable	This Criterion is not applicable to the Entity, as all Product specifications are provided by their customers and the Entity's Product Design Center (not within the scope of the Entity). In this regard, the Entity has no design activities.
4.3a-b Aluminium Process Scrap	Conformance	The Entity has implemented a process to minimise and monitor the generation of Aluminium Process Scrap. There are measures and plans in place to decrease the generation of process Scrap and achieve a 100% recycling rate. Whilst Scrap quantities are regularly reviewed, generated Scrap is either recycled internally or sent to licensed local recycling facilities. According to KPI records, the Entity operates with an approximate 95% material efficiency in its process lines and a 96-98% recycling rate for all waste streams in general.
4.4a-c Collection and Recycling of Products at End of Life - Material Conversion and other Manufacturing	Conformance	As a manufacturer of automotive parts, the Entity does not supply directly to consumers but rather has a 'Business-to-Business' (B2B) market. The Entity actively contributes to the circular economy and not only recycles its internal Scrap but also purchases Recycled Aluminium. In addition to following local practices, a documented global recycling strategy including specific timelines, activities and targets is publicly available in the Nemak Group Annual Report 2023, page 19: https://investorcloud.s3.amazonaws.com/nemak/InformacionFinanciera/ReportesAnuales/IA-2023-en.pdf
4.4d Collection and Recycling of Products at End of Life	Conformance	As a manufacturer of automotive parts, the Entity does not supply directly to consumers but rather has a 'Business-to-Business' (B2B) market. The Entity actively contributes to a circular economy, and locally and globally participates in sectoral initiatives or clusters.
5. GREENHOUSE GAS EMISSIONS		
5.1a-b Disclosure of GHG Emissions and Energy Use	Conformance	Plant-specific data for the Entity regarding Greenhouse Gas (GHG) emissions, including Scopes 1-3 and energy use for 2023 is available in the Nemak Global Annual Report 2023, pages 42 to 47: https://investorcloud.s3.amazonaws.com/nemak/InformacionFinanciera/ReportesAnuales/IA-2023-en.pdf GHG data for Scopes 1 and 2 have been independently verified by a third-party company with a random sampling method from all plants

CRITERION	RATING	COMMENT
		globally. At the time of the Audit, Scope 3 emissions verification for 2023 was still underway. Other data including energy use and GHG emissions specific to the Entity and its local operations, is publicly available in the Turkey ASI Plant Report 2024: https://www.nemak.com/media/3241/turkey-asi_plant-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's validated targets were re-certified by the Science Based Targets Initiative (SBTi) in 2023 and are established based on a below 2°C warming scenario'. However, Nemak's goals and transition plan are supportive of a 1.5°C scenario in line with its aim to be Net Zero by 2050. The Nemak Group has publicly disclosed its approach and GHG reduction pathway in its annual Sustainability Report 2023, pages 32-36: https://www.nemak.com/sustainability/?sc=0#sustainabilityData At the Entity level, the Entity is incorporated into the corporate GHG reduction plan with Entity-specific actions and deadlines and has identified energy efficiency and renewable energy initiatives to be executed. Entity-specific emission reduction pathways have been developed, and targets have been set. The ASI methodology has not been used at the time of the Audit (June 2024), however this was prior to the introduction of the ASI-mandated use of this tool (July 2024).
5.4 GHG Emissions Management	Conformance	The Entity has a system and processes in place to implement its GHG emission management and reduction targets. Specific initiatives such as the purchasing of renewable energy have been identified. The Entity operates under an integrated ISO 14001 Environmental Management System and ISO 50001 Energy Management System, both of which are independently certified.
6. EMISSIONS, EFFLUENTS AND WASTE		
6.1a-f Emissions to Air	Conformance	The Entity operates in an organised industrial zone with a mandatory environmental license covering air emissions, which is valid until 2026 and requires periodic measurements by independent authorised bodies. Emission sources are defined, and each are strictly monitored. The Entity has quantified and publicly reports on relevant Emissions to Air (particulate matter (PM), sulphur dioxide (SO_2), and nitrogen oxides (NOx)). Actions and efforts to minimise exposure to, and impacts from, Emissions to Air have been demonstrated and been described in a documented improvement plan which is published in the Entity's site Report, available at: https://www.nemak.com/library/?sc=0#sectionLibrary

CRITERION	RATING	COMMENT
6.2a-g Discharges to Water	Conformance	The Entity operates its own biological and chemical water treatment systems with treated wastewater delivered into the wastewater network of the Izmir Atatürk organized industrial zone. The Entity has its own license for this wastewater connection, and regular sampling and testing are conducted by the local authority monthly. Discharged water volumes are published by the Entity as well as wastewater concentrations are publicly disclosed. Based on the Entity's Materiality and risk assessment studies, the Entity is considered a high-risk level by corporate management and several targets and actions are implemented, such as reducing water consumption by 2% annually and a new lubricant waste treatment project is defined under the Water Management Plan of the plant. Further information is accessible at: https://investorcloud.s3.amazonaws.com/nemak/InformacionFinanciera/ReportesAnuales/IA-2023-en.pdf (page 51) and https://www.nemak.com/media/3241/turkey-asi_plant-report-_2024.pdf (page 8)
6.3a-g Assessment and Management of Spills and Leakages	Conformance	The Entity has assessed major risk areas of operations including Spills and Leakages and a Spill prevention plan and spill drills are implemented. There have not been any related significant incidents in the previous years. The effectiveness of spill prevention is regularly checked via internal and external audits as well by local authority inspections.
6.4a-b Public Disclosure of Spills and Leakages	Conformance	Management of Spills and Leakages are assessed by the Entity and shared with related parties via the Turkey ASI Plant Report 2024, page 9: https://www.nemak.com/media/3241/turkey-asi_plant-report-_2024.pdf According to the plant emergency response plan, in the event of Material Spills or Leakages, this would be reported immediately by the Entity and depending on the severity of the Spill and in compliance with local legislation, additional steps would be taken to inform potentially affected parties, including the relevant authority.
6.5a-c Waste Management and Reporting	Conformance	The Entity has documented and established its waste management strategy and plan, which is designed in accordance with the Waste Mitigation Hierarchy and handled under an integrated ISO 14001 Environmental Management System. Procedures, risk and Materiality assessments and efficient on-site implementation activities are in place. The quantity of Hazardous and Non-Hazardous Waste generated from Entity activities are disclosed both in Nemak Group and plant-level in the public reports: https://investorcloud.s3.amazonaws.com/nemak/InformacionFinanciera/ReportesAnuales/IA-2023-en.pdf (page 49) and https://www.nemak.com/media/3241/turkey-asi_plant-report-_2024.pdf (page 10)
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	A site tour, interviews and document review all confirmed that Dross is managed in an appropriate way, collected and stored separately,

CRITERION	RATING	COMMENT
		and is 100% recycled. The Entity reviews the quantity of Dross produced annually and has demonstrated its efforts to minimise the generation of Dross (e.g. tuning of burners in the furnaces).
7. WATER STEWARDSHIP		
7.1a-b Water Assessment and Disclosure	Conformance	The Entity has demonstrated that water withdrawal and use by source and type have been identified and mapped in a detailed way. Water consumption is monitored as a KPI within the Environmental Management System. Aggregated data on water intake is available in Nemak Group Annual Report, and site-specific data can be found in Nemak Turkey Plant ASI Report: https://investorcloud.s3.amazonaws.com/nemak/InformacionFinanciera/ReportesAnuales/IA-2023-en.pdf (page 51) and https://www.nemak.com/media/3241/turkey-asi_plant-report-_2024.pdf (pages 8-9) Based on the Entity's Materiality and risk assessment studies, the Entity is considered a high-risk by the corporate management and a Water Management Plan has been prepared.
7.2a-e Water Management	Conformance	Based on the Entity's Materiality and risk assessment studies both under Environmental Management System documentation and on the Aqueduct platform by the World Resources Institute (WRI), the Entity has been determined as high-risk for water resources by the corporate management. Several targets and actions are defined under the Water Management Plan of the plant. At the time of the Audit, the official plan was prepared and pending for final approval for public disclosure, however, most of the details are already publicly available via the Turkey ASI Plant Report 2024, pages 8-9: https://www.nemak.com/media/3241/turkey-asi_plant-report-_2024.pdf
8. BIODIVERSITY AND ECOSYSTEM SERVICES		
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	The Entity operates under strict local environmental regulations and licenses and has implemented an ISO 14001 certified Environmental Management System (EMS). Environmental impacts, including Biodiversity were assessed both from legislative and EMS perspectives. Risks to, and potential effects on Biodiversity and Ecosystem Services have been assessed within the Entity's Area of Influence (5 km radius) using the IBAT STAR Assessment Tool for a global assessment of all Nemak locations including Turkey. As a conclusion, the impact on Biodiversity and Ecosystem Services has been evaluated as low to very low for the Entity. The Entity has published a stand-alone Biodiversity and Ecosystem Services Policy which is available at: https://www.nemak.com/media/2574/biodiversity-ecosystem-services-policy-public.pdf The Nemak Group Annual Sustainability Report (page 52) and the Turkey ASI Plant Report 2024 (page 11) also include separate Biodiversity sections: https://investorcloud.s3.amazonaws.com/nemak/InformacionFinanciera/ReportesAnuales/IA-2023-en.pdf and https://www.nemak.com/media/3241/turkey-asi_plant-report-_2024.pdf

CRITERION	RATING	COMMENT
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Not Applicable	This Criterion is not applicable to the Entity, the Biodiversity and Ecosystem Services Impact Assessment concluded that the Entity is not dependent on specific Ecosystem Services and that the risk and impact on Biodiversity is low. Regulatory Environmental Impact Assessment and other local legislative environmental licenses confirm this.
8.2a-g Biodiversity Management	Not Applicable	This Criterion is not applicable to the Entity, as the Biodiversity and Ecosystem Services Impact Assessment concluded that the Entity is not dependent on a specific ecosystem and the impact on Biodiversity is low, an action plan has not been developed.
8.3a-c Management of Priority Ecosystem Services	Not Applicable	This Criterion is not applicable to the Entity, as the Biodiversity and Ecosystem Services Impact Assessment concluded that the Entity is not dependent on a specific ecosystem and the impact on Biodiversity is low, an action plan has not been developed.
8.4 Alien Species	Conformance	Nemak has implemented its global procedure on Biodiversity, which addresses Alien Species and is addressed in Nemak's Business Code for Suppliers (Section II). A risk assessment of potential impacts from Alien Species was included in the Biodiversity risk assessment, and a specific instruction is in place for the control of incoming pallets and/or Material packages from abroad against invasive threats.
8.5a-b Commitment to 'No Go' in World Heritage Properties	Conformance	The Entity does not operate or plan to explore or develop New Projects in, or adjacent to World Heritage Properties. There are not any World Heritage Properties near the Entity's Area of Influence.
8.6a-d Protected Areas	Minor Non-Conformance	The Entity has implemented appropriate Policies and procedures on Biodiversity assessments and Protected Areas and has conducted related Impact Assessments that concluded a low-risk rating. The Entity is located within a controlled industrial use area on the border of the buffer to the Gediz Delta wetland. Whilst the Entity has communicated with Stakeholders, strengthened its position on Protected Areas and has demonstrated a positive approach to the nearby Protected Area, a greater level of implementation is required, including the development of management plans with local authorities and Non-Government Organisations (NGO's).
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	Nemak has issued its Human Rights Policy at: https://www.nemak.com/media/1646/nemak-global-human-rights-policy.pdf Human Rights is also addressed in other Policy documents including the Entity's Code of Conduct, Global Diversity & Inclusion Policy, Business Code for Suppliers and Sustainable Purchasing Policy. Refer to: https://www.nemak.com/sustainability/?sc=0#sustainabilityPolicies

CRITERION	RATING	COMMENT
		The Entity has conducted a documented gender-sensitive Human Rights Due Diligence assessment, which has identified Human Rights issues that the Entity aims to prevent or mitigate through action plans.
9.2a-e Gender Equity and Women's Empowerment	Conformance	Nemak has subscribed to the UN Global Compact and joined the initiative's target gender equality program in 2021 to set and deliver on corporate targets for female representation and leadership. In 2022, Nemak also became a signatory to the UN's Women's Empowerment Principles (WEPs). The Entity is committed to maintaining and promoting a workplace free of Discrimination and Harassment by actively promoting programs devoted to further developing all aspects of Diversity and Inclusion (D&I) in the workplace. Information on the effectiveness of the measures taken to promote gender equity is made publicly available at: https://investorcloud.s3.amazonaws.com/nemak/InformacionFinanciera/ReportesAnuales/IA-2023-en.pdf (pages 79-82) and the Bloomberg Gender Equality Index Survey https://nemak.com/media/2777/bloomber-gei-v2.pdf
9.3a-i Indigenous Peoples	Not Applicable	This Criterion does not apply to the Entity, as Indigenous Peoples or their lands, territories and resources are not present or directly affected by the Entity's operations.
9.4a Free, Prior, and Informed Consent (FPIC) - New Projects or Major Changes	Not Applicable	This Criterion does not apply to the Entity, as Indigenous Peoples or their lands, territories and resources are not present or directly affected by the Entity's operations.
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 does not apply to the Entity, as Indigenous Peoples or their lands, territories and resources are not present or directly affected by the Entity's operations.
9.5a Cultural and Sacred Heritage – Identification	Not Applicable	This Criterion does not apply to the Entity, as there are no sacred sites or values, or cultural heritage within the Entity's Area of Influence, according to the list of World Heritage Sites declared by UNESCO (https://www.unesco.org/en). Izmir is a metropolitan city with high-density urbanisation, and the plant is in an area defined and organised as an industrial zone by the government.
9.5b Cultural and Sacred Heritage – Impacts	Not Applicable	This Criterion does not apply to the Entity, as there are no sacred sites or values, or cultural heritage within the Entity's Area of Influence, according to the list of World Heritage Sites declared by UNESCO (https://www.unesco.org/en). Izmir is a metropolitan city with high-density urbanisation, and the plant is in an area defined and organised as an industrial zone by the government.
9.6a-i Displacement	Not Applicable	This Criterion does not apply to the Entity, as no ongoing or planned expansion projects will require displacements.

CRITERION	RATING	COMMENT
9.7a-h Affected Populations and Organisations	Conformance	Nemak has issued a Corporate Citizenship Policy which has been implemented at the Entity and declares its main goal as contributing to higher standards of living and quality of life for the communities in which the Entity operates, while maintaining profitability for Stakeholders: https://www.nemak.com/media/3133/corporate-citizenship-policy-public.pdf Nemak's global Sustainability Committee oversees all corporate citizenship goals and measures, and local entities follow corporate Policy and procedures for supporting community development. The Entity undertakes social, cultural, and community projects including supporting local NGOs on children's health (LÖSEV) and youth education (TEGV), as well as contributing donations and support initiatives such as earthquake support, apprenticeship schools and vocational competence centres.
9.8a Conflict-Affected and High-Risk Areas - Strong Management Systems	Conformance	The Entity has demonstrated that there are processes to ensure risk-based Due Diligence over its Aluminium supply chain. The Entity's management regularly conducts documented risk assessments, and the latest assessment confirmed that the Entity does not source from Conflict-Affected and High-Risk Areas (CAHRAs). Several corporate Policies and the Nemak Group Annual Report 2023 include separate sections and statements detailing responsible supply chain management, including conflict materials.
9.8b Conflict-Affected and High-Risk Areas - Identify and assess risks	Conformance	The Entity has processes and procedures for its supply chain in place, which clearly define rules and expectations for suppliers, Contractors, and others with whom Nemak does business. The Entity has implemented a supplier evaluation and selection process based on a documented risk rating. The latest assessments confirmed that the Entity is not sourcing from CAHRAs. Several corporate Policies and the Nemak Group Annual Report 2023 include separate sections and statements detailing responsible supply chain management, including conflict materials.
9.8c Conflict-Affected and High-Risk Areas - Strategy to respond to risks	Conformance	The Entity has implemented a strategy to respond to identified risks in their supply chain. Entity management regularly conducts documented risk assessments, and the latest assessment confirmed that Nemak is not sourcing from CAHRAs. Regular monitoring of supplier progress against commitments is undertaken by the Entity's Supplier Risk Committee, with action plans created to mitigate any instances of non-conformance.
9.8d Conflict-Affected and High-Risk Areas - Audit of due diligence	Conformance	As the Entity was audited against the ASI Performance Standard, this addresses the requirements of this Criterion.
9.8e Conflict-Affected and High-Risk Areas – Report annually	Conformance	Nemak's Annual Report includes information on Value Chain Engagement and Business Integrity which covers Responsible Sourcing and Human Rights Due Diligence, underlines that the Company's Global Business Code for Suppliers requires all suppliers to adhere to internationally accepted Human Rights. All suppliers must sign this Code and require their suppliers to make similar commitments. A regular internal audit is conducted to ensure that Nemak's current suppliers have signed the Code meeting the required Human Rights criterion. More information can be found in Nemak

CRITERION	RATING	COMMENT
		Group Annual Reports 2022 and 2023: https://investors.nemak.com/financiera/informacion_anual
9.9 Security practice	Conformance	The Entity hires security personnel through a local reputable security company externally. Working conditions for security services are defined by the local laws and they work under strict regulatory rules. Security personnel are unarmed, do not conduct body searches and have no influence or disciplinary control over the Entity's employees, their duty is primarily limited to external risks such as uncontrolled entrances, theft or robbery. The Entity ensures that the security supplier conforms to the Nemak Supplier Code of Conduct and Human Rights Policy.
10. LABOUR RIGHTS		
10.1a-c Freedom of Association and Right to Collective Bargaining	Conformance	Nemak respects the Freedom of Association and the employees' right to Collective Bargaining and this is incorporated into their Human Rights Policy, Code of Conduct, as well as in the Business Code for Suppliers. These documents are regularly reviewed, communicated and are accessible on the Entity's website at: https://www.nemak.com/sustainability/?sc=0#sustainabilityPolicies The Entity hosts an active and strong Workers Union and Union representatives are freely elected by Workers. A Collective Bargaining Agreement is in place, which was last reviewed in 2024.
10.1d Freedom of Association and Right to Collective Bargaining - Alternative means in context of Applicable Law	Not Applicable	This Criterion is not applicable, as the Entity operates in a country (Türkiye) where Applicable Law does not restrict the right to Freedom of Association and Collective Bargaining. The Entity recognises and respects Freedom of Association and the right to Collective Bargaining.
10.2a Child Labour	Conformance	Via the Nemak global Human Rights Policy, the Entity strictly prohibits the use of Child Labour, refer to: https://www.nemak.com/sustainability/?sc=0#sustainabilityPolicies The prohibition of Child Labour is also stated in Nemak's Business Code for Suppliers. The Entity adheres to all regulations and laws related to Child Labour, Forced or compulsory Labour and does not employ any person under the age of 18.
10.3a-c Forced Labour	Conformance	The Entity prohibits the use of all forms of Forced Labour, including indentured labour, bonded labour, slave labour and any form of Human Trafficking. It is not working directly, nor through any direct or contracted employment or recruitment agencies. Additionally, the Entity has a stance on zero tolerance to the use of physical punishment or threats of Violence or other forms of physical, sexual, psychological or verbal abuse as a method of discipline or control - as confirmed via its internal procedures and publicly disclosed Policies and reports. Nemak recently published a revised and detailed Modern Slavery Statement, which is available at: https://www.nemak.com/media/3311/modern-slavery-statement-2024.pdf
10.4a-c Non-Discrimination	Conformance	The Entity is committed to a Discrimination-free working culture and work environment, as reaffirmed through statements in the Entity's

CRITERION	RATING	COMMENT
		Code of Conduct, Sustainability Report, other related corporate Policies and internal documentation. Regular training, awareness raising activities and dedicated top-management support are in place. Nemak has implemented a stand-alone Diversity and Inclusion (D&I) Policy since 2021 and was last updated in 2024: https://www.nemak.com/media/3300/global-diversity-inclusion-policy.pdf
10.5 Communication and engagement	Conformance	The Entity ensures open communication and direct engagement with Workers and their representatives regarding working conditions and the resolution of workplace and compensation issues, without the threat of reprisal, intimidation, or Harassment. This practice is also expressed and underlined by Nemak in several corporate documents including its Code of Conduct: https://www.nemak.com/media/3031/code-of-conduct-espa%C3%B1ol.pdf
10.6a-g Violence and Harassment	Conformance	In its Code of Conduct, Nemak has committed to support work environments that are free of hostility and physical or verbal Harassment, and it does not tolerate under any circumstance, Harassment of any kind (sexual, workplace, or physical, among others). The Entity has implemented the Nemak Violence and Harassment Policy, available at: https://www.nemak.com/documents/content/p_rNMZEfTo2YwXGIvoXeRAo97?download=false Mandatory employee training on the subject has been implemented. As confirmed by interviews and document review, the Entity neither engages in, nor tolerates, the use of corporal punishment, mental or physical coercion, Harassment, or gender-based Violence including sexual Harassment or verbal abuse of Workers.
10.7a-d Remuneration	Conformance	The Entity respects the rights of Workers to receive a living wage and ensures that wages paid for a normal working week meet at least the industry standard and above. Various bonuses and additional benefits including private health insurance are offered by default for all employees. In addition to meeting legal requirements regarding Working Time and payment terms, annual increase rates, extra promotional bonuses, and paid/unpaid leave conditions are also negotiated in Collective Bargaining Agreements. Average wages at the Entity are generally above the regional standard, and payments are undertaken in a timely manner.
10.8a-c Working Time	Conformance	The Entity complies with Applicable Law and local industry standards on working time, public holidays and paid annual leave. Working time and working conditions are also discussed during each Collective Bargaining Agreement period and are included in employment contracts.
10.9a-b Informing Workers of Rights	Conformance	Interviews with Workers and Human Resources management during the Audit, confirmed that all Workers are informed on Human and Labour Rights during the onboarding process and thereafter. All Workers receive documented training on the Code of Conduct and the Human Rights Policy.

CRITERION	RATING	COMMENT
11. OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Management System	Conformance	The Entity has implemented an Occupational Health & Safety (OHS) Management System, which is ISO 45001 certified. The Nemak Global OH&S Policy (https://www.nemak.com/media/2773/hse-policy.pdf) is supported by the Entity's local OH&S Policy, available at: https://www.nemak.com/media/2569/i%C5%9F-guevenli%C4%9Fi-sa%C4%9Fl%C4%B1l%C4%B1%C4%9F%C4%B1-politikas%C4%B1.pdf The OH&S Management System is subject to various external audits from clients and local authorities.
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Conformance	The Entity reviews its OH&S Management System annually at its senior management meeting, with the latest review in April 2024. Leading and lagging indicators such as Total Recordable Incident Rate (TRIR), Lost Time Case Rate (LTC) and Days Away, Restricted or Transferred (DART) metrics are monitored actively. Benchmarking according to both industry standards and other Nemak plants are conducted regularly. More information is available in the Turkey ASI Plant Report 2024, pages 13-14: https://www.nemak.com/media/3241/turkey-asi_plant-report-_2024.pdf
11.2 Employee engagement on Health and Safety	Conformance	The Entity has implemented a joint Health and Safety Committee, by which Workers can raise, discuss, and participate in the resolution of OH&S issues with management. Also, the meeting frequency (per month) is more frequent than the local legal minimum criteria (once per two months). Agendas and meeting minutes were readily on hand during the Audit and proof of implemented improvement measures demonstrated the effectiveness of this mechanism.

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DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	22 January 2025	Initial Certification Audit - Full Certification
1	24 September 2026	Surveillance Audit