

ASI CERTIFICATION
PERFORMANCE
STANDARD



PRESENTED TO

ASSAN
ALÜMİNYUM

CERTIFICATE
NUMBER

118

ASI
STANDARD

PERFORMANCE
STANDARD
(V2 2017)

CERTIFICATION
LEVEL

FULL
CERTIFICATION

ASI
ACCREDITED
AUDITOR

CETIZION
VERIFICA

DATE OF ISSUE

2 FEBRUARY 2022

DATE OF EXPIRY

1 FEBRUARY 2025

CERTIFIED SINCE

3 MARCH 2021

AUTHORISED BY

A handwritten signature in black ink, appearing to be 'J. H.', written over a white background.

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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

Tuzla and Dilovasi production facilities located in
Turkey.

SUMMARY AUDIT REPORT

PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Assan Alüminyum
ENTITY NAME	Assan Alüminyum
CERTIFICATION SCOPE	Tuzla and Dilovası production facilities located in Turkey.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Aluminium Re-melting/ RefiningCasthousesSemi-FabricationMaterial Conversion (Production and Transformation)
ASI STANDARD	<ul style="list-style-type: none">Performance Standard V2
AUDIT TYPE	<ul style="list-style-type: none">Initial Certification Audit (14–23 December 2020)Surveillance Audit (1–3 December 2021)Surveillance Audit (13-15 March 2023)
AUDIT FIRM	<ul style="list-style-type: none">CETIZION Verifica (Surveillance Audit)
AUDIT DATE	<ul style="list-style-type: none">14–23 December 2020 (Initial Certification Audit)1–3 December 2021 (Surveillance Audit)13-15 March 2023 (Surveillance Audit)
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">25 January 2021 (Initial Certification Audit)7 January 2022 (Surveillance Audit)5 April 2023 (Surveillance Audit)
AUDIT SCOPE	<p><u>Initial Certification Audit (14 – 23 December 2020)</u></p> <p>The audit scope included the Tuzla and Dilovasi production facilities located in Turkey.</p> <p>The supply chain activities included in the audit scope:</p> <ul style="list-style-type: none">Aluminium Re-melting/ RefiningCasthousesSemi-FabricationMaterial Conversion (Production and Transformation)

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

At the time of the Audit (December 2020), access to the site was not possible, due to COVID-19 related travel restrictions. The Audit has been undertaken as a 'desktop' exercise, in accordance with ASI Interim Policy regarding Audits, Audit-Related Travel and Coronavirus (v4), and included a remote review of relevant documentation.

Surveillance Audit (1 – 3 December 2021)

The audit scope included the Tuzla and Dilovasi production facilities located in Turkey.

The supply chain activities included in the audit scope:

- Aluminium Re-melting/ Refining
- Casthouses
- Semi-Fabrication
- Material Conversion (Production and Transformation)

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

Surveillance Audit (13 – 15 March 2023)

The audit scope included the Tuzla and Dilovasi production facilities located in Turkey.

The supply chain activities included in the audit scope:

- Aluminium Re-melting/ Refining
- Casthouses
- Semi-Fabrication
- Material Conversion (Production and Transformation)

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

AUDIT
OUTCOME

Certification

AUDIT
METHODOLOGY
DECLARATION

The Auditors confirm that:

- The information provided by the Entity is true and accurate to the best knowledge of the Auditor(s) preparing this report.
- The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous.
- The Audit Scope and audit methodology are sufficient to establish confidence that the findings are indicative of the performance of the Entity's defined Certification Scope.
- The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.

CERTIFICATION
PERIOD

2 February 2022 – 1 February 2025

NEXT AUDIT
TYPE

Re-Certification Audit

NEXT AUDIT
DUE DATE

1 February 2025

CERTIFICATE
NUMBER

118

SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The group 'Kibar Holding' conducted risk-based process audits including legal compliance, approximately once yearly in all group companies including Assan Alüminyum. The progress report is provided in the first quarter of each calendar year and reported to the Kibar Holding board of directors as well as the General manager of each company. There is an ongoing legal compliance monitoring and tracking system in place and determined to be satisfactory.
1.2 Anti-Corruption	Conformance	The Entity has a Code of Conduct for employees and service providers. There is an oversight function via an Ethical Committee at the group level (Kibar Holding). There is a central database to record incidents or notifications made via email, the hotline or in person. There are no complaints related to Corruption or other related unethical behaviour.
1.3 Code of Conduct	Conformance	The Entity has a bilingual (English and Turkish) Code of Conduct: https://www.kibar.com/en/holding/codes-of-conduct The Code of Conduct applies to all employees including subcontractors.
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	The Entity has implemented and maintains policies consistent with the environmental, social and governance (ESG) practices included in the ASI Performance Standard. The policies are subject to periodic employee training.
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	In accordance with the ASI Performance Standard and the Entity's Environmental and Health and Safety Management System, adequate resources for the effective implementation of ESG policies are provided, and policies are regularly reviewed. Both facilities hold a current ISO 14001:2015 and ISO 45001:2018 certification.
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	The policies are communicated internally and externally as appropriate (company website and intranet). The Supplier Code of Conduct is communicated to Suppliers: https://www.assanaluminyum.com/en/about-us/our-company-policies

CRITERION	RATING	COMMENT
2.2 Leadership	Conformance	There is a demonstrable commitment by General Manager, as the nominated person responsible for both Facilities, to implement the ASI Performance Standard.
2.3a Environmental and Social Management Systems (environmental)	Conformance	The Entity has maintained third party certification for its Environmental Management System (ISO 14001:2015) since 2006, with the latest audit conducted in June 2022.
2.3b Environmental and Social Management Systems (social)	Conformance	The Entity has documented and implemented Social Management System requirements with policies, procedures, implementation records, monitoring records and management review provisions. Periodic management reviews are undertaken, and important items are tracked for completion.
2.4 Responsible Sourcing	Conformance	<p>The Entity has implemented responsible sourcing practices, and has an established Procurement Code of Conduct:</p> <p>https://www.kibarsatinalma.com/en/tedarikci-yonetim-sistemi</p> <p>The company is working to re-structure its supplier due-diligence framework at the Kibar Holding level which will also get implemented at the Entity.</p>
2.5 Impact Assessments	Conformance	<p>The Entity conducts impact assessments arising from investment projects such as capacity expansion and efficiency improvements. Impact assessments cover the potential impact on employee health and safety, communities, and the environment, considering the economic analysis, SWOT analysis and risk analysis. The Entity demonstrates good practice by developing annual investment plans at both facilities. The Entity has developed a green financing framework for access to finance to meet its expansion needs through comprehensive impact assessment, also verified as 'Second Party Opinion (SPO)'.</p> <p>https://www.assanaluminyum.com/en/~media/files/surdurulebilirlik/2023/03/yesil-finans-cercevesi-2023.pdf</p>
2.6 Emergency Response Plan	Conformance	<p>The Entity has an Emergency Response Plan for both the Tuzla and Dilovasi facilities. Worker representatives are engaged in the development of site-specific Emergency Response Plans.</p> <p>The Entity has undertaken periodic emergency drills at both facilities as per the Emergency Response Plan and checked drills conducted since the last ASI audit.</p>

CRITERION	RATING	COMMENT
2.7 Mergers and Acquisitions	Conformance	The Entity did not undergo nor planned a merger or acquisition since joining ASI. However, a Due Diligence process is defined to manage mergers and acquisitions should it become relevant.
2.8 Closure, Decommissioning and Divestment	Conformance	The Entity did not undergo nor planned a closure, decommissioning or divestment since joining ASI. However, a planning process has been defined to manage a closure, decommissioning or divestment should it become relevant.
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	<p>The Entity has published its Sustainability Report for the year 2021 as per GRI guidelines: https://www.assanaluminyum.com/en/~media/files/surdurulebilirlik/2023/03/assan-aluminyum-surdurulebilirlik-raporu-en.pdf</p> <p>The Entity is preparing a Sustainability Report as per GRI reporting guidelines for 2022 which is currently under development and is expected to be published for external Stakeholders by the end of June 2023.</p>
3.2 Non-compliance and liabilities	Conformance	<p>There is no case of non-compliance with statutory norms and liabilities. There are no significant fines, judgments, penalties, and non-monetary sanctions for any violation of Applicable Law. The Entity has disclosed information about significant fines, judgments, penalties and non-monetary sanctions are included in the Sustainability Report, page 69: https://www.assanaluminyum.com/en/~media/files/surdurulebilirlik/2023/03/assan-aluminyum-surdurulebilirlik-raporu-en.pdf</p>
3.3a Payments to governments (legal and contractual)	Conformance	<p>The Entity has developed and implemented policies, systems, procedures, and processes that conform to Anti-Corruption requirements related to payments to governments and the facilitation of payments. The accounting period is from January to December. For 2022, audited financial results are in progress and are expected to complete by mid-April 2023. There is a tax department at Kibar holding level and the Entity works with external tax consultants. The required taxes like the Value Added Tax (VAT), withholding tax, corporate tax, custom duty etc are paid on time and claim tax incentives from the government as per applicable tax policies. All the team members are Certified Public Accountants (CPA) approved by the Turkish Government. There are no payments made to political parties and non-business activities.</p>

CRITERION	RATING	COMMENT
3.3b Payments to governments (disclosure - bauxite mining)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
3.4 Stakeholder complaints, grievances and requests for information	Conformance	The Entity has a Complaints Resolution Mechanism in place for handling Stakeholder complaints. Stakeholders are able to lodge complaints via the online communication form available at: https://www.assanaluminyum.com/en/contact/contact-form There have been no Stakeholder complaints or requests for information since the last ASI Audit.
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	The Entity has undertaken a Life Cycle Assessment (LCA) of its major product lines including sheet, foil, and coated sheet, in accordance with ISO 14040, ISO 14044 and ISO 14025.
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	The Entity has undertaken a cradle-to-gate LCA of its major product lines. The inventory for the LCA is based on production figures from both the Tuzla and Dilovası manufacturing plants.
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	The Entity has made public the Sustainability Report (page 22) and commits itself to communicate the results of the LCA via an EN 15084 consistent Environmental Product Declaration (EPD). https://www.assanaluminyum.com/en/~media/files/surdurulebilirlik/2023/03/assan-aluminyum-surdurulebilirlik-raporu-en.pdf
4.2 Product design	Conformance	The Entity's design and development process for products includes consideration to enhance sustainability, including the life cycle impacts of the end product. Product design for continuous casting experimented with magnesium levels with the end product resulting in a reduction of magnesium content. There is a high focus on developing new alloying elements with higher content of scrap (Post-Consumer Scrap) for new applications as well as a focus on process improvements from an environment and product safety perspective.
4.3a Aluminium Process Scrap (targets)	Conformance	The Entity has established targets (Key Performance Indicators) to minimise Aluminium Process Scrap generation through quality improvement and oversight and targets 100% of scrap for collection to be recycled or reused.

CRITERION	RATING	COMMENT
4.3b Aluminium Process Scrap (alloy separation)	Conformance	100% Aluminium Process Scrap is collected for recycling and segregated in a designated area with a colour coding system used to separate aluminium alloys and grades.
4.4a Collection and recycling of products at end-of-life (strategy)	Conformance	The Entity has developed and implemented a recycling strategy. The input material (internal scrap, external scrap, and Dross from the melting furnace) is processed in a rotary furnace. 100% of process scrap is recycled.
4.4b Collection and recycling of products at end-of-life (engagement)	Conformance	The Entity closely co-operates with collection and recycling systems to support accurate measurement and efforts to increase recycling rates for their products.
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		
5.1 Disclosure of GHG emissions and energy use	Conformance	<p>The Entity discloses its Scope 1 and Scope 2 Greenhouse Gases (GHG) emissions for both the Tuzla and Dilovasi facilities in the Sustainability Report, page 77:</p> <p>https://www.assanaluminyum.com/en/~media/files/surdurulebilirlik/2023/03/assan-aluminyum-surdurulebilirlik-raporu-en.pdf</p> <p>The Entity has calculated its Scope 1 and 2 GHG emissions for 2022. The disclosure is scheduled through the sustainability reporting process, which is expected by the end of June 2023.</p>
5.2 GHG emissions reductions	Conformance	<p>The Entity has developed a GHG Emissions Reduction Plan to target a reduction in energy intensity by 5% (from 2017 – 2019 average) by 2025. This target is disclosed in the Sustainability Report, page 61:</p> <p>https://www.assanaluminyum.com/en/~media/files/surdurulebilirlik/2023/03/assan-aluminyum-surdurulebilirlik-raporu-en.pdf</p> <p>The projects included in the annual investment plans are linked to energy efficiency, energy use and process modernisation and will contribute towards the 2025 reduction target. Current project progress contributing to GHG reductions is satisfactory.</p>
5.3a Aluminium Smelting (management system)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.3b Aluminium Smelting (up to and including 2020)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.3c Aluminium Smelting (after 2020)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
PRINCIPLE 6 EMISSIONS, EFFLUENTS AND WASTE		
6.1 Emissions to Air	Conformance	The Entity conducts testing and reports Emissions to Air in accordance with government requirements, emissions were within prescribed legal limits. There is annual planning for various emissions testing, checked for the year 2022 (completed) and year 2023 (plan and in progress).
6.2 Discharges to Water	Conformance	Water balance diagrams for both plants indicating intake, usage and discharge have been developed. Water discharge is tested by local authorities monthly. In Tuzla, the rainwater is discharged to the external rainwater channel of the municipality while domestic and industrial wastewater is treated and discharged to the municipality wastewater channel. The test reports by an approved agency are checked generally two times a year. For Dilovasi, the wastewater is discharged to industrial authority and parameters are checked periodically and found within permissible limits.
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	The Entity periodically identifies and evaluates major risk areas of operations where Spills and Leakage may contaminate air, water or soil.
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	The Entity has established management and external communication plans, compliance controls and a monitoring program to prevent and detect Spills and Leakage. A physical assessment of the management of Spills and Leakages was undertaken during the onsite audit. There were no spillages found. Spill kits are provided, and containment provisions are made including the waste storage area.
6.4a Reporting of Spills (immediate disclosure)	Conformance	The Entity has developed a procedure and a management response plan to deal with significant Spills immediately upon occurrence.
6.4b Reporting of Spills (regular reporting)	Conformance	The Entity reports periodically the status of significant spills/leakage in its sustainability and other Government reporting. There were no significant spills during 2020 and 2021 as disclosed in the Sustainability Report, pages 62-65: https://www.assanaluminyum.com/en/~media/files/surdurulebilirlik/2023/03/assan-aluminyum-surdurulebilirlik-raporu-en.pdf
6.5a Waste management and reporting (strategy)	Conformance	The Entity has developed a waste management strategy in accordance with the Waste Mitigation Hierarchy at both facilities.

CRITERION	RATING	COMMENT
6.5b Waste management and reporting (disclosure)	Conformance	<p>During the plant visit waste segregation and container labelling it was found to be satisfactory. For 2022, waste performance data (declaration) submitted to the government indicating information like generation quantity, waste types, disposal quantity, disposal method, recovery etc were checked. The Entity enters the quantity of waste (Hazardous and Non-Hazardous) generated and disposal method in the assigned Government portal as well as maintaining internal monitoring (excel sheet) practices.</p> <p>The Entity discloses the quantity of Hazardous and Non-Hazardous Waste generated and its disposal method in the Sustainability Report, page 78: https://www.assanaluminyum.com/en/~media/files/surdurulebilirlik/2023/03/assan-aluminyum-surdurulebilirlik-raporu-en.pdf</p>
6.6a Bauxite Residue (storage construction)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6b Bauxite Residue (integrity checks and controls)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6c Bauxite Residue (water discharge)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6d Bauxite Residue (marine and aquatic environments)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6e Bauxite Residue (state of the art technologies)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6f Bauxite Residue (remediation)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7a Spent Pot Lining (SPL) (storage and management)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7b Spent Pot Lining (SPL) (recovery and recycling)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7c Spent Pot Lining (SPL) (Untreated SPL)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7d Spent Pot Lining (SPL) (review of alternatives)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7e Spent Pot Lining (SPL) (marine and aquatic environments)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
6.8a Dross (recovery)	Conformance	The Entity maximises the recovery of aluminium by treatment of Dross and Dross residues. Dross from the melting furnace is used as input material in the Rotary furnace for recovery of aluminium and the remaining Dross residue is sent to an externally approved agency with none disposed to landfill.
6.8b Dross (recycling)	Conformance	The records relating to Dross are up to date and in conformance with the ASI Performance Standard. Dross generated at Tuzla is transported to Dilovasi for aluminium recovery.
6.8c Dross (review of alternatives)	Conformance	The records relating to Dross are up to date and in conformance with the ASI Performance Standard. Dross is not sent to landfill.
PRINCIPLE 7 WATER STEWARDSHIP		
7.1a Water assessment (mapping)	Conformance	<p>The Entity has developed water mapping for both the Tuzla and Dilovasi plants, identifying water withdrawal by source, use and disposal.</p> <p>The water balance (assessment) was revised in 2022. There has been no change in water intake and outlet stream. In February 2023, the Entity commissioned a new wastewater recycling facility and treated water is used in the cooling tower thus reducing freshwater demand.</p> <p>Total water consumption reduced in 2022 from the previous year, although production quantity and the number of employees increased due to water efficiency and water-saving projects.</p> <p>Rainwater is discharged to the external municipality drain and the Entity has a plan to collect and reuse it in suitable locations.</p> <p>As per the water risk assessment, it is in medium to high-risk areas per the World Resources Institute: https://www.wri.org/applications/aqueduct/water-risk-atlas</p>
7.1b Water assessment (risk assessment)	Conformance	<p>The Entity has assessed water-related risks in its Area of Influence from business, legal and environmental perspectives as part of the Environmental Management System.</p> <p>There is no change in water intake and outlet stream.</p> <p>As per the water risk assessment, it is in medium to high-risk areas per the World Resources Institute: https://www.wri.org/applications/aqueduct/water-risk-atlas</p>
7.2a Water management (management plans)	Conformance	The Entity has developed water management plans for the Tuzla and Dilovasi plants.

CRITERION	RATING	COMMENT
7.2b Water management (monitoring)	Conformance	There is a daily and weekly inspection of water-related activities. The discharge points and internal wastewater treatment facility were checked during the plant visit. The metering/flow station was checked and found in working condition. The records relating to water management are up to date and in conformance with the ASI Standard. The water-related performance has been disclosed in Sustainability Report, pages 62-65: https://www.assanaluminyum.com/en/~media/files/surdurulebilirlik/2023/03/assan-aluminyum-surdurulebilirlik-raporu-en.pdf
7.3 Disclosure of water usage and risks	Conformance	The Entity's water performance data are reported in Sustainability Report as well as annual disclosure to the Government authority. https://www.assanaluminyum.com/en/~media/files/surdurulebilirlik/2023/03/assan-aluminyum-surdurulebilirlik-raporu-en.pdf
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	The Entity has systematically assessed the risks and materiality of the impacts on biodiversity from the land use and activities in the Entity's Area of Influence. A documented biodiversity assessment report is available. The Entity has undertaken a re-assessment of biodiversity during 2022-23 through an external agency.
8.2a Biodiversity management (biodiversity action plans)	Conformance	Based on the biodiversity assessment, it has been determined that the Entity does not need to implement a Biodiversity Action Plan. There will be periodic reviews of the assessment.
8.2b Biodiversity management (consultation and mitigation hierarchy)	Conformance	The Entity used external agency expertise to hold a Stakeholder consultative process related to the biodiversity assessment.
8.2c Biodiversity management (reporting)	Conformance	The Entity has disclosed its impact and mitigation measures in the Sustainability Report, page 59: https://www.assanaluminyum.com/~media/files/surdurulebilirlik/2021/12/28/assan-aluminyum-2020-sustainability-report.pdf?la=en
8.3 Alien Species	Conformance	The Entity has processes in place, such as the purchase of heat-treated pallets, to prevent the introduction of Alien Species.

CRITERION	RATING	COMMENT
8.4a Commitment to “No Go” in World Heritage properties (exploration and new mines)	Not Applicable	This Criterion is not applicable to the Entity’s Certification Scope.
8.4b Commitment to “No Go” in World Heritage properties (existing mines)	Not Applicable	This Criterion is not applicable to the Entity’s Certification Scope.
8.5a Mine rehabilitation (best available techniques)	Not Applicable	This Criterion is not applicable to the Entity’s Certification Scope.
8.5b Mine rehabilitation (financial provisions)	Not Applicable	This Criterion is not applicable to the Entity’s Certification Scope.
PRINCIPLE 9 HUMAN RIGHTS		
9.1a Human Rights Due Diligence (policy)	Conformance	The Entity has established a Human Resources Policy which includes a commitment to respect Human Rights and undertake Due Diligence: https://www.assanaluminyum.com/en/~media/files/politikalarimiz/2020/12/08/human-resources-policy.pdf
9.1b Human Rights Due Diligence (process)	Conformance	The Entity has reviewed its Human Rights due-diligence process. There are no significant changes since the last ASI Audit. The past challenges of foreign Migrant Workers and refugees from neighbouring countries due to geo-political reasons who do not hold work permits or are undocumented entries, do not present a risk for the Entity due to the high level of skills required for work on site.
9.1c Human Rights Due Diligence (remediation)	Conformance	The Entity has identified and implemented remediation measures for potential Human Rights risks. The risk register has been updated to cover security services and logistics. A Communication on Progress is submitted by the holding company to the United Nations Global Compact confirming Human Rights policies and outcomes as well as alignment with UN SDGs. Human Rights risks, in particular those relating to logistical activities are part of enterprise risk management with required mitigation measures identified.
9.2 Women’s Rights	Conformance	The policies covering Women’s Rights are established in accordance with Turkish law and ILO Conventions. The Entity is currently working on a project to further promote ownership and employee engagement with a special focus on women employees. https://www.kibar.com/en/career/about-biz-at-kibar

CRITERION	RATING	COMMENT
		There is an ongoing 'We Are Equal' project with a target to hire women employees in the production area, currently assessing physical needs like toilets, changing rooms, and nursing rooms and are expected to complete female hiring by the end of 2023.
9.3 Indigenous Peoples	Not Applicable	This Criterion is not applicable as there is no presence of Indigenous Peoples or their lands, territories and resources in the Entity's business activities or plant area.
9.4 Free, Prior, and Informed Consent (FPIC)	Not Applicable	This Criterion is not applicable as there is no presence of Indigenous Peoples or their lands, territories and resources in the Entity's business activities or plant area.
9.5 Cultural and sacred heritage	Not Applicable	This Criterion is not applicable as the Entity's business activities and plant area are not located in Indigenous Peoples' sacred or cultural heritage sites.
9.6a Resettlements (avoid or minimise)	Not Applicable	This Criterion is not applicable as there are no Indigenous Peoples involved and thereby no physical and/or economic displacement during the Entity's establishment or its business activities.
9.6b Resettlements (where unavoidable)	Not Applicable	This Criterion is not applicable as there are no Indigenous Peoples involved and thereby no resettlements during the Entity's establishment or its business activities.
9.7a Local Communities (rights and interests)	Conformance	The Entity has identified and engages with Local Communities and respects their legal rights. Records relating to Local Communities are up to date. The interview with the community representative shared the positive contribution of the Entity in overall community development through employment generation, support of health and education and economic growth of the area.
9.7b Local Communities (impacts)	Conformance	The Entity identifies the impact of its business activities, such as emissions, on Local Communities as part of the corporate risk assessment processes. Local Communities' representatives are engaged to understand and address any issues or concerns. Records relating to Local Communities are up to date. More information is available in the Sustainability Report, 57: https://www.assanaluminyum.com/en/~media/files/surdurulebilirlik/2023/03/assan-aluminyum-surdurulebilirlik-raporu-en.pdf

CRITERION	RATING	COMMENT
9.7c Local Communities (livelihoods)	Conformance	<p>Local Community projects are undertaken by the Entity (e.g., sponsoring theatre groups to promote education and sustainability in the communities of Tuzla and Dilovasi). There have been no complaints received from Local Communities over the past two years.</p> <p>There are other programs that support and benefit the community, including:</p> <ol style="list-style-type: none"> 1. Supporting arts students 2. Planting drive with a university 3. Offsetting the use of wooden pallets with reforestation projects 4. Volunteer projects <p>More information is available on the Entity's website: https://www.assanaluminyum.com/en/sustainability/corporate-social-responsibility/art-in-the-factory-project</p>
9.8 Conflict-Affected and High-Risk Areas	Conformance	<p>The Entity is not located in Conflict-Affected and High-Risk Areas (CAHRAs) and has implemented policies and procedures for responsible sourcing in CAHRAs.</p> <p>https://www.kibarsatinalma.com/en/tedarikci-yonetim-sistemi</p>
9.9 Security practice	Conformance	<p>The Entity has undertaken a Human Rights risk assessment and Due Diligence processes to cover security practices. Written contracts with security agencies are in accordance with local laws and training for security personnel is provided. Records relating to security practices are up to date. It was further confirmed through an interview with security guards, and an on-site plant visit.</p>
PRINCIPLE 10 LABOUR RIGHTS		
10.1a Freedom of Association and Right to Collective Bargaining (freedom of association)	Conformance	<p>The Entity has included the Freedom of Association and Right to Collective Bargaining in its Human Resources Policy: https://www.assanaluminyum.com/en/~media/files/politikalarimiz/2020/12/08/human-resources-policy.pdf</p> <p>In February 2020, the Entity received a 'Great Place to Work' certification, the first within the Kibar Holding group and the first in the metal sector in Turkey. Records relating to Freedom of Association and Collective Bargaining are up to date and in conformance with the ASI Performance Standard.</p>
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Conformance	<p>The Entity respects the right of Collective Bargaining and has committed to its Human Resources Policy: https://www.assanaluminyum.com/en/~media/files/politikalarimiz/2020/12/08/human-resources-policy.pdf</p>

CRITERION	RATING	COMMENT
		<p>The Workers' representative elections are conducted democratically. The Entity implements the Collective Bargaining Agreement agreed upon between the sectoral trade unions and the association of sectoral companies (MESS).</p> <p>Records relating to Freedom of Association and Collective Bargaining are up to date and in conformance with the ASI Performance Standard.</p>
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Not Applicable	This Criterion is not applicable as Turkish Law does not restrict the right to Freedom of Association and Collective Bargaining.
10.2a Child Labour (minimum age)	Conformance	<p>The Entity outlines in its Human Resources Policy the minimum age of 18 years for Workers and subcontractors.</p> <p>https://www.assanaluminyum.com/en/~media/files/politikalarimiz/2020/12/08/human-resources-policy.pdf</p> <p>There was no Child Labour identified during plant visits as well via a review of hiring documentation</p> <p>The pre-employment medical examination is undertaken at no cost by an in-house medical centre to ascertain age and other health parameters.</p>
10.2b Child Labour (hazardous)	Conformance	<p>The Entity does not support nor involve any child or young Workers below 18 years of age in any hazardous process.</p> <p>Records relating to Child Labour are up to date.</p> <p>Workers interviewed confirm there are no child Workers.</p>
10.2c Child Labour (worst forms)	Conformance	<p>The Entity does not engage in or support Worst Forms of Child Labour:</p> <p>https://www.assanaluminyum.com/en/~media/files/politikalarimiz/2020/12/08/human-resources-policy.pdf</p> <p>Records relating to Child Labour are up to date.</p> <p>Workers interviewed confirm there are no child Workers.</p>
10.3a Forced Labour (human trafficking)	Conformance	<p>The Entity does not engage in nor support the use of Forced Labour as defined in ILO Conventions C29, along with Protocol P29 (2014) to this Convention, and C105. The Human Resources Policy outlines this commitment and also applies to subcontractors:</p> <p>https://www.assanaluminyum.com/en/~media/files/politikalarimiz/2020/12/08/human-resources-policy.pdf</p> <p>Records relating to forced labour are up to date.</p> <p>These aspects were checked during Workers' interviews and found conforming.</p>

CRITERION	RATING	COMMENT
10.3b Forced Labour (deposits, fees, advances)	Conformance	The Entity does not engage in nor support the use of Forced Labour as defined in ILO Conventions C29, along with Protocol P29 (2014) to this Convention, and C105. Records relating to Forced Labour are up to date. There is no recruitment fee and collected original documents as found during Workers' interviews and randomly selected employees' personnel files.
10.3c Forced Labour (migrant workers)	Conformance	The Entity does not engage or use Migrant Workers and does not require any deposit or security payments. Records relating to Forced Labour are up to date and in conformance with the ASI Performance Standard. Workers interviewed confirm there is no Forced Labour.
10.3d Forced Labour (debt bondage)	Conformance	The Entity does not hold Workers in Debt Bondage or force them to work in order to pay off debt as verified during a review of employees' files, interviews and discussions with management. Records relating to Forced Labour are up to date and in conformance with the ASI Performance Standard. Workers interviewed confirm there is no Forced Labour.
10.3e Forced Labour (freedom of movement)	Conformance	The Entity allows Workers free movement within the plant area. Records relating to Forced Labour are up to date and in conformance with the ASI Performance Standard. Workers interviewed confirm there is no Forced Labour.
10.3f Forced Labour (retention of identity papers, permits, certificates)	Conformance	The Entity does not collect and retain original copies of Workers' identity papers, educational certificates, work permits or training certificates. Records relating to Forced Labour are up to date and in conformance with the ASI Performance Standard. Workers interviewed confirm there is no Forced Labour.
10.3g Forced Labour (freedom to terminate employment)	Conformance	The Entity gives Workers the freedom to terminate their employment at any time without penalty, given advance notice as per employment contract conditions mutually agreed. Records relating to Forced Labour are up to date and in conformance with the ASI Performance Standard. Workers interviewed confirm there is no Forced Labour.
10.4 Non-Discrimination	Conformance	The Entity documents its policy on Non-Discrimination as part of the Human Resources Policy, providing equal opportunities and not engaging in Discrimination in hiring, salary, promotion, training and advancement opportunities or termination of any Worker on the basis of gender,

CRITERION	RATING	COMMENT
		<p>race, national or social origin, religion, disability, political affiliation, sexual orientation, marital status, family responsibilities, age, or any other condition that could give rise to Discrimination, in line with ILO Conventions C100 and C111:</p> <p>https://www.assanaluminyum.com/en/~media/files/politikalarimiz/2020/12/08/human-resources-policy.pdf</p> <p>Records relating to Non-Discrimination are up to date and in conformance with the ASI Performance Standard.</p>
10.5 Communication and engagement	Conformance	<p>The Entity's procedure for internal communication is described in detail in the Communication Policy. The Entity conducts surveys among the employees and directly engages with Workers and their representatives via monthly meetings. The employee survey was conducted in the year 2022 and the results were analysed.</p>
10.6 Disciplinary practices	Conformance	<p>The Entity has established a disciplinary procedure, and disciplinary practices are reflected under the employment policy and in line with local laws. There are some verbal and written warning letters issued to employees, generally for violation of safety rules. There are no practices of wage deduction for disciplinary reasons. There is a 'disciplinary council' comprising Management Representatives as well as Workers' representatives.</p>
10.7a Remuneration (living wage)	Conformance	<p>The Entity has established a Remuneration and Wages Policy and wages are paid above the living wage, as calculated by the Entity.</p> <p>The Entity pays above the minimum wage as well as the estimated living wage. This was checked during a review of payroll records, and Workers' interviews. The employee survey has been conducted for living wage calculation collecting information on family size, cost of groceries, energy and clothing.</p>
10.7b Remuneration (method of payment)	Conformance	<p>Records relating to remuneration are up to date and in conformance with the ASI Performance Standard. Remuneration is paid via bank transfer.</p>
10.8 Working Time	Conformance	<p>Working Time records are recorded by the Entity through magnetic card readers, with working hours in compliance with local laws. Overtime performance is tracked monthly and displayed on the KPI board. There is an analysis at the department level, verified for 2022. The total working hours including Overtime are within national and ILO limits (i.e., 60 hrs/week).</p>

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PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	The Entity has developed and implemented an Occupational Health and Safety Policy (OH&S): https://www.assanaluminyum.com/en/~media/files/politikalarimiz/2022/01/05/isg-cevre-politikamiz-en.pdf
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	The Entity has developed and implemented an OH&S Policy covering Workers including subcontractors and Visitors. https://www.assanaluminyum.com/en/~media/files/politikalarimiz/2022/01/05/isg-cevre-politikamiz-en.pdf Visitors, upon arrival, are shown a brief safety video and provided with personal protective equipment.
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Conformance	The Entity has developed and implemented an OH&S Policy which respects applicable national OH&S laws and includes a target of zero accidents. https://www.assanaluminyum.com/en/~media/files/politikalarimiz/2022/01/05/isg-cevre-politikamiz-en.pdf
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	The Entity has developed and implemented an OH&S Policy confirming Workers' rights to understand the hazards and safe practices for their work, and the authority to refuse or stop unsafe work. https://www.assanaluminyum.com/en/~media/files/politikalarimiz/2022/01/05/isg-cevre-politikamiz-en.pdf
11.2 OH&S Management System	Conformance	The Entity holds a valid ISO45001 certificate (valid to 13 October 2025). The periodic surveillance audit conducted in 2022 with no non-conformities. https://www.assanaluminyum.com/en/~media/files/certificate/2022/12/02/iso-45001-isgys-belgesi-ingilizce.pdf The Entity's safety team also participate in a joint workshop organised by the European Aluminium Association and re-visit its safety culture and safety focus areas which are lifting and transport equipment, material handling and molten metal. Some of the developments are the use of artificial intelligence (AI) on coil handling near the rolling mill area, which was checked during the plant visit. The OH&S risk assessments are periodically reviewed and updated. The risk assessment is also reviewed whenever there is any near miss or reportable accident.
11.3 Employee engagement on health and safety	Conformance	The Entity has developed a procedure for employee communication, including engagement in health and safety. Various types of OH&S training are identified and provided. The legally required training is 16 hrs/per

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		employee/year for high-risk workplaces. The amount of training is provided both internally as well as externally (first aid, fire safety and forklift). 2022 statistics indicate training hours per employee per year above 16 hours which is above the pre-pandemic level. There is a printed safety booklet on life safety, forklift, and crane safety with a QR code issued to each new employee.
11.4 OH&S performance	Conformance	<p>The Entity evaluates its OH&S performance regularly and several key performance indicators are maintained. The Entity has several tools for evaluating performance and continuously improves its OH&S Management System e.g., lagging indicators, accident statistics, and lost time incidents (LTI).</p> <p>The OH&S performance indicators like LTI show improvement trends in the year 2022, it is also benchmarked with European aluminium OH&S performance. There was no case that was fatal or resulted in permanent disability.</p> <p>The OHS performance data and trends are displayed in the work area, as found in the plant visit. The OH&S performance is reviewed on a weekly basis with the management team and other responsible employees.</p>

Document Control and Version History

Revision	Date	Notes
0	3 March 2021	Initial Certification Audit – Provisional Certification
1	2 February 2022	Surveillance Audit – Certification
2	2 May 2023	Surveillance Audit; Change of Audit Firm to Cetizion Verifica