

ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

Aluminium Company of Egypt (Egyptalum)

CERTIFICATE NUMBER

391

ASI STANDARD

PERFORMANCE
STANDARD
(V3 2022)

CERTIFICATION LEVEL

FULL
CERTIFICATION

ASI ACCREDITED
AUDITING FIRM

CETIZION VERIFICA

DATE OF ISSUE

18 OCTOBER 2024

DATE OF EXPIRY

17 OCTOBER 2027

CERTIFIED SINCE

18 OCTOBER 2024

AUTHORISED BY

A handwritten signature in black ink, appearing to be 'J. H.', with a long horizontal line extending to the right.

Aluminium Stewardship Initiative Ltd
ACN 606 661 125, Australia
info@aluminium-stewardship.org

*Validity of this Certificate is subject to
continued conformance with the
applicable ASI Standard and can be
verified at*

www.aluminium-stewardship.org

CERTIFICATION SCOPE

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

AUDIT REPORT PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Aluminium Company of Egypt (Egyptalum)
ENTITY NAME	Aluminium Company of Egypt (Egyptalum)
CERTIFICATION SCOPE	Manufacture and supply of Primary Aluminium products including ingots, wire rod, billets, T-bar, slabs, primary foundry alloys, flat rolled products and extrusions using casting, rolling, and extrusion processes at the Nag Hammadi site, Egypt. Including transportation of raw materials and finished products (Safaga port), carbon anode manufacturing, and industrial gases and compressed air production.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Aluminium SmeltingAluminium Re-melting/RefiningCasthousesSemi-FabricationMaterial Conversion
ASI STANDARD	Performance Standard V3
AUDIT TYPE	<ul style="list-style-type: none">Initial Certification Audit
AUDIT FIRM	CETIZION Verifica
AUDIT DATE	<ul style="list-style-type: none">28 May – 4 June 2024
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">27 August 2024
AUDIT SCOPE	<p>The Audit Scope includes the manufacture and supply of Primary Aluminium products including ingots, wire rod, billets, T-bar, slabs, primary foundry alloys, flat rolled products and extrusions using casting, rolling, and extrusion processes at the Nag Hammadi site, Egypt. Including the Alumina storage at the Safaga port in Safaga and related functions at the Head Office in Cairo.</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none">Aluminium SmeltingAluminium Re-melting/RefiningCasthousesSemi-FabricationMaterial Conversion <p>All applicable criteria in the ASI Performance Standard were included in the Audit Scope.</p>
AUDIT OUTCOME	<ul style="list-style-type: none">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

18 October 2024 – 17 October 2027

NEXT AUDIT TYPE

Surveillance Audit

NEXT AUDIT DATE

17 October 2025

CERTIFICATE NUMBER

391



If you have an inquiry or complaint about this Certification, go to the third-party EthicsPoint portal at: <https://aluminium-stewardship.ethicspoint.com/>

EthicsPoint is a comprehensive and confidential reporting tool that enables complaints to be securely raised, managed and responded to. This enables anonymity to be maintained where desired by complainants, or as relevant to whistleblowing situations.

Information is available in five languages – English, French, Chinese, German and Portuguese (Brazil). Translation services provided by EthicsPoint enable complaints and correspondence to be managed in multiple languages.

ENTITY OVERVIEW

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

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

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

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

MATURITY RATINGS

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

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

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

FINDINGS

CRITERION	RATING	COMMENT
1. BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	<p>The Entity is a State-owned enterprise and complies with public sector regulations and other Applicable Laws. The Entity maintains a subscription to an external agency for notifications on updates and changes in Applicable Law. Training is provided to responsible employees by both internal and external parties, including training delivered by the Ministry of Justice as a public sector company. The Entity has a monitoring plan and standard procedures to monitor its legal Compliance. There is no violation of the legal requirements (Kanoon).</p>
1.2 Anti-Corruption	Conformance	<p>The Entity has developed and implemented an anti-Corruption related Policy, procedure and risk assessment, which is publicly disclosed at: https://www.egyptalum.com.eg/Customers_Suppliers.aspx?Lid=13</p> <p>The Anti-Bribery and Anti-Corruption Policy has been aligned with Egyptian laws (such as <i>Penal Code No. 58/1937</i> under article 103 to 111 provisions which address bribery in both public and private sectors). Stakeholders have a right to complaint for practices violating the Entity's anti-Corruption Policies: https://www.egyptalum.com.eg/complaints.aspx?Lid=10</p> <p>The Corruption and Bribery risk assessment has been conducted and mitigation controls such as procurement processes and training of sales and marketing teams have been defined. The purchasing process is managed through a tender process to ensure both transparency and supplier evaluation.</p> <p>The Entity has an anti-Corruption committee and is working to align its Policy and procedures in accordance with international management standards such as ISO 37001. The Entity recognises the county score and rank in Transparency International's Corruption Perception Index (CPI): https://www.transparency.org/en/cpi/2023/index/egy</p>
1.3a-e Code of Conduct	Conformance	<p>The Entity has developed and implemented an Employee Code of Conduct for employees that defines the rules on employment and professional conduct: https://www.egyptalum.com.eg/SustainabilityFile.aspx?id=2</p> <p>Employees are required to re-affirm their understanding and conformance with the Code of Conduct on an annual basis. Employees can raise concerns on potential violation of or non-implementation of the Code of Conduct through various communication channels such as feedback or the whistleblower provision: https://www.egyptalum.com.eg/complaints.aspx?Lid=10</p>
2. POLICY AND MANAGEMENT		
2.1a-f Environmental, Social, and Governance Policy	Conformance	<p>The Entity has developed environmental, social and governance (ESG) Policies, which are on display in various working areas including the Safaga port, and awareness training on these Policies is provided to employees. The ESG Policy is available at: https://www.egyptalum.com.eg/SustainabilityFile.aspx?id=1</p>

CRITERION	RATING	COMMENT
2.2a-c Leadership	Conformance	The Entity's Chief Executive Officer has provided the required resources, approvals/commitment, and training to implement the ASI Performance Standard requirements.
2.3a Environmental and Social Management Systems - Environmental	Conformance	The Entity has implemented an Environmental Management System with accordingly developed Policies and procedures, and is third party certified. The Entity has an integrated Management System that comprises the ISO 9001, ISO 14001 and ISO 45001 standards.
2.3b Environmental and Social Management Systems - Social	Conformance	The Entity has implemented an integrated Management System that comprises the ISO 9001, ISO 14001 and ISO 45001 standards. The Entity's social Management System comprises Policies, work procedures, implementation records, reviews, public disclosures, and based on international guidance standards such as ISO 26000 and ISO 37001. The Entity's ESG Policies address both internal and external Stakeholders, such as Local Communities: https://www.egyptalum.com.eg/SustainabilityFile.aspx?id=1
2.4a-e Responsible Sourcing	Minor Non-Conformance	The Entity has developed and publicly disclosed its responsible sourcing Policy through the Supplier Code of Conduct: https://www.egyptalum.com.eg/SustainabilityFile.aspx?id=3 The Supplier Code of Conduct has been communicated to major suppliers of Alumina, consumables and others supplies. The Entity has established a procedure for supplier selection with selection criteria addressing quality, cost, delivery, service, reputation, sustainability and financial stability. The supplier selection procedure requires an audit of critical suppliers. However, there are deficiencies in how the Entity details how requirements of Supplier Code of Conduct are understood, implemented and verified on an on-going basis in accordance with the OECD Due Diligence requirements for Conflict-Affected and High-Risk Areas (CAHRA) and other related ASI requirements.
2.5a-g Environmental and Social Impact Assessments	Not Applicable	This Criterion is not applicable to the Entity, as there have been no New Projects or Major Changes to existing Facilities since joining ASI.
2.6a-h Human Rights Impact Assessment	Not Applicable	This Criterion is not applicable to the Entity, as there have been no New Projects or Major Changes to existing Facilities since joining ASI.
2.7a-f Emergency Response Plan	Conformance	The Entity has developed an Emergency Response Plan, which has been submitted to various government agencies including the Egyptian Environment Affairs Agency (EEAA) and General Administration of Civil Defence at the Ministry of Interior. It was developed by the Entity's Occupational Health and Safety (OH&S) and Environment Department in consultation with the Workers' council via consultation. The Emergency Response Plan details the available infrastructure to handle any emergency situation including fire water, fire extinguisher, ambulance (available 24 hours, 7 days a week), emergency team composition, and communication protocol. Emergency situations including natural gas and hazardous waste leakages have been considered. Drills are conducted and related information is recorded. Emergency numbers are displayed at various locations within the work premises.

CRITERION	RATING	COMMENT
		<p>The Ministry of Workforce and Immigration periodically visit the plant to monitor the Entity's emergency preparedness and implementation of corrective action, and that follow up visits by Government officials have been completed.</p> <p>The Emergency Response Plan (full version) is available upon request from the Entity and/or the approving authorities. Related disclosures are available in the Sustainability Report, page 64-65: https://www.egyptalum.com.eg/Files/Sustainability/Sustainability_Report_for_Egyptalum_2022-2023_-_REV01_(4)_Final_version.pdf</p>
2.8a-d Suspended Operations	Conformance	The Entity has developed a standard operating procedure, 'Resilience for sustainable, inclusive growth (ESG) risk assessment', which covers geo-political crises such as war that may lead to suspended operations. The other aspects addressed risks including trade and supply risk and financial risk. This is further covered in the organisational risk register.
2.9a-b Mergers and Acquisitions	Conformance	As a State-owned enterprise, the Entity is governed by <i>Capital Market Law No. 95 (1992)</i> and its executive regulations (<i>No. 139/1993</i>) and <i>Companies Law No. 159/1981</i> , and the Egyptian Financial Supervisory Authority (EFSA) is the responsible authority. The Entity has developed a standard operating procedure 'Resilience for sustainable, inclusive growth (ESG) risk assessment', which addresses the environmental, social and governance (ESG) aspects during mergers and acquisitions.
2.10a-b Closure, Decommissioning and Divestment	Conformance	As a State-owned enterprise, the Entity is governed by <i>Capital Market Law No. 95 (1992)</i> and its executive regulations (<i>No. 139/1993</i>) and <i>Companies Law No. 159/1981</i> , and the Egyptian Financial Supervisory Authority (EFSA) is the responsible authority. The Entity has developed a standard operating procedure 'Resilience for sustainable, inclusive growth (ESG) risk assessment', which addresses the environmental, social and governance (ESG) aspects during closure, decommissioning and divestment.
3. TRANSPARENCY		
3.1a-b Sustainability Reporting	Conformance	The Entity has developed and disclosed its first Sustainability Report for 2022-2023: https://www.egyptalum.com.eg/Files/Sustainability/Sustainability_Report_for_Egyptalum_2022-2023_-_REV01_(4)_Final_version.pdf
3.2 Non-compliance and Liabilities	Conformance	There were no Material fines, judgments, penalties and non-monetary sanctions for failure to comply with Applicable Law, as disclosed in the Sustainability Report, section 5-10: https://www.egyptalum.com.eg/Files/Sustainability/Sustainability_Report_for_Egyptalum_2022-2023_-_REV01_(4)_Final_version.pdf
3.3a-c Payments to Governments	Conformance	The Entity has disclosed information on payments to the government in the Sustainability Report, section 5-8: https://www.egyptalum.com.eg/Files/Sustainability/Sustainability_Report_for_Egyptalum_2022-2023_-_REV01_(4)_Final_version.pdf
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	The Entity has established, implemented and communicated on its Stakeholder Grievance Mechanism, which is disclosed in the Sustainability Report, section 5:

CRITERION	RATING	COMMENT
		<p>https://www.egyptalum.com.eg/Files/Sustainability/Sustainability_Report_for_Egyptalum_2022-2023_-_REV01_(4)_Final_version.pdf</p> <p>There have been no Stakeholder grievances received in the past reporting period.</p>
4. MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment	Conformance	The Entity has conducted a Life Cycle Assessment (LCA) of its major products including billet, ingot, slab, wire rod, and profiles, which follow the 'cradle-to-gate' methodology. The LCA was conducted according to the guidelines of ISO 14040:2006, ISO 14044:2006, ISO 14025:2006, ISO 14020:2006 and the requirements given in the General Program Instructions PCR 2022:08 Basic aluminium products and special alloys v1.0, by The International EPD® System and EN 15804:2012+A2:2019. The inventory for the LCA study is based on the January - December 2022 production figures from the Entity's manufacturing plant. This LCA was modelled with SimaPro LCA v9.4 software with Ecoinvent v3.8 database for secondary data. The LCA study aims to evaluate the environmental impacts for 1 kg of Aluminium billet, cradle-to-gate with options, modules (A1-A3) approach to be awarded Environmental Product Declarations (EPDs) certified by The International EPD System through third party verification.
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	The Entity has disclosed information on the LCA and Environment Product Declaration (EPD) in the Sustainability Report, page 47: https://www.egyptalum.com.eg/Files/Sustainability/Sustainability_Report_for_Egyptalum_2022-2023_-_REV01_(4)_Final_version.pdf
4.2 Product Design	Conformance	Then Entity produces various Primary Aluminium products such as billet, ingots, T-bar, as well as downstream products including wire rod, rolled products, and extrusion profiles. Sustainability attributes including recycled content and packaging have been considered during the product design phase. Details on the Entity's products is available at: https://www.egyptalum.com.eg/catalog.aspx?lid=9
4.3a-b Aluminium Process Scrap	Conformance	The Entity reduces its generation of Process Scrap through optimised processes and product design. The Process Scrap generated is 100% re-used in the Entity's Castehouse.
4.4a-c Collection and Recycling of Products at End of Life - Material Conversion and other Manufacturing	Conformance	The Entity is working to increase the use of recycled Scrap through collection and recycling of product at End of Life. The Entity's target is addressed in the strategy plan and RAR (RunARound) Scrap Management. The Entity has established recycling targets for using external Scrap, and targets are monitored regularly.
4.4d Collection and Recycling of Products at End of Life	Conformance	The Entity engages with local, regional or national collection and recycling systems (policy maker, disposal agency) to support accurate measurement and efforts to increase recycling rates in Egypt markets for their products and other products containing Aluminium.
5. GREENHOUSE GAS EMISSIONS		
5.1a-b Disclosure of GHG Emissions and Energy Use	Conformance	The Entity's Greenhouse Gas (GHG) emissions for the period January - December 2022 have been Third Party verified according to ISO 14064-

CRITERION	RATING	COMMENT
		3:2019. The related data, including Scopes 1, 2 and 3 GHG emissions, are disclosed in the Sustainability Report, pages 44-45: https://www.egyptalum.com.eg/Files/Sustainability/Sustainability_Report_for_Egyptalum_2022-2023_-_REV01_(4)_Final_version.pdf
5.2a Aluminium Smelter GHG Emissions Intensity - Started production after 2020	Not Applicable	This Criterion is not applicable to the Entity, as the smelter operations commenced in 1969.
5.2b Aluminium Smelter GHG Emissions Intensity - In production up to and including 2020	Conformance	<p>The Entity has calculated the GHG Emissions intensity (including Scopes 1, 2 and 3 Category 1-6) up to the Casthouse and has disclosed these data in the Sustainability Report, pages 44-46: https://www.egyptalum.com.eg/Files/Sustainability/Sustainability_Report_for_Egyptalum_2022-2023_-_REV01_(4)_Final_version.pdf</p> <p>The Entity's GHG Emissions intensity for 2022 was calculated as 13.182 t CO₂e/t of Primary Aluminium. These data will be used as the base year for future reporting. The 2023/24 GHG emissions intensity data is currently under evaluation and following Third Party verification will be publicly disclosed in Q1 2025. The Entity has demonstrated reduction in GHG emissions intensity primarily through energy efficiency initiatives and it is projected to achieve the target of below 13 t CO₂e/t by end 2025 following the agreement to construct a one gigawatt solar farm. The Entity's documentation of its GHG emissions data pre-2022 is lacking and processes have been established to ensure proper accounting and reporting.</p>
5.3a-e GHG Emissions Reduction Plans	Minor Non-Conformance	<p>The Entity has established a GHG Emissions Reduction Plan to ensure a GHG Emissions Reduction Pathway that is consistent with a 1.5°C warming scenario (as per the IAI 1.5 degrees scenario). The Entity's GHG Reduction Plan primarily involves the increase in solar energy use following the construction of a one gigawatt solar farm. The Entity's GHG Emissions Reduction Pathway (Decarbonization pathway) and GHG Emissions Reduction Plan are disclosed in the Sustainability Report, pages 46 and 48: https://www.egyptalum.com.eg/Files/Sustainability/Sustainability_Report_for_Egyptalum_2022-2023_-_REV01_(F3)_Final_version%20.pdf</p> <p>However, the Entity has not disclosed Intermediate Targets based on its GHG Emissions Reduction Plan.</p>
5.4 GHG Emissions Management	Conformance	The Entity has implemented a GHG Management system and practices in accordance with ISO 14064 and ISO 50001. This includes standard operating procedures, records management, responsibilities, operational controls, metering, monitoring/verification system (both internal as well as external verification by an independent Third Party).
6. EMISSIONS, EFFLUENTS AND WASTE		
6.1a-f Emissions to Air	Minor Non-Conformance	The Entity has a documented environmental, health and safety monitoring plan. The Entity has implemented a Continuous Emissions Monitoring System (CEMS) and internal periodic emissions monitoring is effective. There have been no violations or penalties associated with emissions as per the Entity's Environmental Permit.

CRITERION	RATING	COMMENT
		However, the Entity's stack emissions monitoring, which is undertaken by a licensed and approved Third Party as per legal requirements, was not complete at the time of Audit.
6.2a-g Discharges to Water	Conformance	The Entity has monitored its Discharges to Water (after treatment), and the parameters including pH, total suspended solids, chemical oxygen demand (COD), biological oxygen demand (BOD), and fluoride are within permissible limits. The domestic wastewater from the plant and colony is sent to the sewage treatment plant and used for irrigation purposes within the Entity's premises. The total water discharge between January-December 2023 is quantified and reported in the Sustainability Report, pages 49-50: https://www.egyptalum.com.eg/Files/Sustainability/Sustainability_Report_for_Egyptalum_2022-2023_-_REV01_(F3)_Final_version%20.pdf
6.3a-g Assessment and Management of Spills and Leakages	Conformance	The Entity has conducted an assessment on Spills and Leakages, following severity, probability, risk category (low/medium/high) and control measures have been defined.
6.4a-b Public Disclosure of Spills and Leakages	Conformance	The Entity has disclosed Spills and Leakages and related information in the Sustainability Report, page 56: https://www.egyptalum.com.eg/Files/Sustainability/Sustainability_Report_for_Egyptalum_2022-2023_-_REV01_(F3)_Final_version%20.pdf There has been no incidents of Spills or Leakage reported.
6.5a-c Waste Management and Reporting	Minor Non-Conformance	The Entity has established a Sustainability Committee (chaired by the Chairman and CEO) and has developed a Waste management and recycling strategy. The Entity has identified the related legal requirements on Waste management and reporting and submits annual waste data to the Egyptian Environment and Affairs Agency (EEAA) for public disclosure. Additionally, the EEAA and the Waste Management Regulatory Agency (WMRA) ensure the safe disposal and/or recycling of Hazardous Waste. Waste is stored in the Entity's Hazardous Waste storage area on a concrete surface to prevent soil contamination and Spent Pot Lining is covered with plastic sheet to avoid exposure. However, Dross is not fully covered as required in the EEAA Executive Regulation (No. 722/2022). Additionally, the Entity reports Hazardous Waste volumes in its Sustainability Report, however Non-Hazardous Waste types and volumes have not been reported.
6.6a-g Bauxite Residue	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7a-f Spent Pot Lining (SPL)	Conformance	The Entity's Spent Pot Lining (SPL) is addressed in its Waste management and recycling strategy. The SPL is disposed of via a licensed agency, approved by the Waste Management Regulatory Agency (WMRA) and is selected through a public tender process. During the inspection of the SPL storage area, it was identified that SPL waste is stored on a concrete surface to prevent any soil contamination and covered with plastic sheeting to avoid any exposure. The Entity has a current capital expenditure (CAPEX) project to transfer SPL waste to fully covered storage area.

CRITERION	RATING	COMMENT
6.8a-d Dross	Minor Non-Conformance	<p>The Entity's Dross is sold via public tender to an EEAA licensed company for the handling, transportation and reuse of Dross. The related disclosure is available in the Sustainability Report, page 56 -57: https://www.egyptalum.com.eg/Files/Sustainability/Sustainability_Report_for_Egyptalum_2022-2023_-_REV01_(F3)_Final_version%20.pdf</p> <p>However, records of Dross residues quantities disposed to landfill nor alternative options explored were available at the time of the Audit. Additionally, cold Dross, whilst stored on a concrete surface to prevent any soil contamination, is not fully covered in accordance with the EEAA Executive Regulation (No. 722/2022).</p>

7. WATER STEWARDSHIP

7.1a-b Water Assessment and Disclosure	Conformance	<p>The Entity has conducted a water risk assessment using the global Water Risk Atlas resource (https://www.wri.org/applications/aqueduct/water-risk-atlas), which classifies the overall water risk for the Entity as high. The risk assessment also addresses those potential risks on the impact to the water supply (business continuity), personnel health, reduced agriculture productivity, infrastructure and impact to public services. Further, detailed risk assessment was undertaken for the water treatment plant, and water-related risks and mitigation plans are available for the industrial and domestic usages.</p> <p>A water balance diagram has been developed to indicate various stages and quantities in the Entities water cycle. The Entity primarily sources water from the nearby Nile River, pre-treats the water and uses it for industrial applications including the cooling tower and domestic application within the plant area and the Workers colony. The Entity also extracts groundwater for irrigation purposes and has a valid approval from the relevant authority. Industrial water is a closed loop system and wastewater is not discharged to the environment.</p> <p>The Entity has disclosed its water- related performance in the Sustainability Report, pages 49-51: https://www.egyptalum.com.eg/Files/Sustainability/Sustainability_Report_for_Egyptalum_2022-2023_-_REV01_(F3)_Final_version%20.pdf</p>
--	-------------	---

7.2a-e Water Management	Conformance	<p>The Entity has established strategic water goals and water management plans for optimum utilisation and reduction of water use. Monitoring of the water treatment plant is undertaken with daily monitoring (residual chlorine and turbidity measurement), weekly monitoring (such as pH , total dissolved solids, and ammonia), monthly monitoring (comprehensive water quality analysis), quarterly monitoring (system audit) and annual maintenance (major equipment overhaul).</p> <p>Water meters are calibrated and water goals have been established (short term, mid-term and long term). The water management plan progress is periodically reviewed by the Sustainability Committee and is reported to senior management. The related disclosures are available in the Sustainability Report, page 50-51: https://www.egyptalum.com.eg/Files/Sustainability/Sustainability_Report_for_Egyptalum_2022-2023_-_REV01_(F3)_Final_version%20.pdf</p>
-------------------------	-------------	--

8. BIODIVERSITY AND ECOSYSTEM SERVICES

CRITERION	RATING	COMMENT
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Minor Non-Conformance	<p>The Entity has developed standard operating procedures to conduct Biodiversity risk assessments covering its operational sites and surrounding area. The Biodiversity assessment was conducted as part of the Environment Impact Assessment (EIA) undertaken by the Centre for Environmental Research and Studies, Cairo University in February 2018. Highlights of the assessment included 126 classes of wild plants in Nile Valley in Upper Egypt (Entity location, core and buffer area), 12 species of Mammals, more than 100 species of the birds and the area (Qena Governorate) is located in the main migratory path of various birds. The Biodiversity-related disclosures are available in the Sustainability Report, page 52-53: https://www.egyptalum.com.eg/Files/Sustainability/Sustainability__Report__for_Egyptalum_2022-2023_-_REV01_(F3)_Final_version%20.pdf</p> <p>However, the Entity's Biodiversity risk assessment does not cover the Safaga port location, which is under the Entity's operational control and within its Area of Influence. The Biodiversity survey for dominant habitat has not been conducted in accordance with US-EPA guidelines and Egyptian <i>Environment Law No. 09/2009 and No.4/1994</i> and its Executive Regulations, which required two reports in a year across two different seasons.</p>
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Not Applicable	The Criterion is not applicable to the Entity, as the Biodiversity assessment did not identify any Priority Ecosystem Services that are relevant to Affected Populations and Organisations.
8.2a-g Biodiversity Management	Conformance	<p>The Entity has developed a Land and Biodiversity Management Plan (BMP), which is aligned with the Egyptian <i>Environmental Law No. 4/1994</i> (that amended By Law 9/2008 and its Executive Regulations). The BMP addresses the agricultural landscape at the Egyptalum city, the landscape at Plant 3 and the 'Green Belt'. Management measures, such as vegetation protection, conservation and reuse of topsoil are included in the Plan.</p> <p>Progress against the BMP is periodically reviewed by the Sustainability Committee and reported to senior management. The related disclosures are available in the Sustainability Report, pages 52-53: https://www.egyptalum.com.eg/Files/Sustainability/Sustainability__Report__for_Egyptalum_2022-2023_-_REV01_(F3)_Final_version%20.pdf</p>
8.3a-c Management of Priority Ecosystem Services	Not Applicable	The Criterion is not applicable to the Entity, as no Priority Ecosystem Services were identified.
8.4 Alien Species	Conformance	The Entity has conducted a risk assessment for the potential introduction of Alien Species. Chemical treatment of wooden pallets is undertaken as a control measure, and a fumigation certificate is issued by the Ministry of Agriculture and Land Reclamation, Central Administration of Plant Quarantine (CAPQ), covering different types of timber and pallet size.
8.5a-b Commitment to "No Go" in World Heritage Properties	Conformance	<p>The Entity has developed a Heritage Sites Policy, as part of its Land and Biodiversity Management Plan, with a formal commitment to not explore or develop New Projects or make Major Changes in World Heritage Properties. The related disclosure is available in the Sustainability Report, page 54: https://www.egyptalum.com.eg/Files/Sustainability/Sustainability__Report__for_Egyptalum_2022-2023_-_REV01_(F3)_Final_version%20.pdf</p>

CRITERION	RATING	COMMENT
8.6a-d Protected Areas	Conformance	In Egypt, there are 13 designated Protected Areas (https://www.cbd.int/doc/world/eg/eg-nbsap-powpa-en.pdf) and the Entity is not located within or near a designated Protected Area. The Entity has developed a Heritage Sites Policy, as part of its Land and Biodiversity Management Plan. The related disclosure is available in the Sustainability Report, page 54: https://www.egyptalum.com.eg/Files/Sustainability/Sustainability__Report__for_Egyptalum_2022-2023_-_REV01_(F3)_Final_version%20.pdf
8.6e Protected Areas - Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.7a-i Mine Rehabilitation	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9. HUMAN RIGHTS		
9.1a-d Human Rights Due Diligence	Conformance	The Entity has developed ESG Policies that address Human Rights, which are available at: https://www.egyptalum.com.eg/SustainabilityFile.aspx?id=1 The Entity has conducted a risk assessment for Human Rights, which covered its supply chain and third party engagements, and addressed the identification of risks, risk ratings, and mitigation controls. The Entity complies with the <i>General Public Sector Law No. 203/1991</i> and its Executive Regulations related to Human Rights. The Entity's mitigation measures include, for example, regular dialogue with Trade Unions and community engagement.
9.2a-e Gender Equity and Women's Empowerment	Conformance	The Entity is an equal opportunity employer. There are currently 60 female employees, including one which is a representative of the Trade Union and women are part of the Entity's executive team. The Entity's Policies are gender neutral and provide employment opportunities for women. Some of these Policies and commitments are included in the Employee Code of Conduct: https://www.egyptalum.com.eg/SustainabilityFile.aspx?id=2 The Audit included visitation to the Entity's Corporate Social Responsibility (CSR) programs such as the special children's school and apparel training centres, the majority of the workforces are women.
9.3a-i Indigenous Peoples	Conformance	There are no Indigenous Peoples present at the Entity, as confirmed in the IWGIA online tool at: https://www.iwgia.org/en/countries.html . The Egyptian Copts (Coptics) are an ethno-religious (Christian) group and tribal communities are known as Nubian. Approximately 6% of employees have a Christian faith and the one Nubian employee retired approximately four years ago. There was no evidence of Discrimination at the Entity.
9.4a Free, Prior, and Informed Consent (FPIC) - New Projects or Major Changes	Not Applicable	This Criterion is not applicable to the Entity, as there are no New Projects or Major Changes to existing infrastructure.
9.4b Free, Prior, and Informed Consent (FPIC) - Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
9.4c Free, Prior, and Informed Consent (FPIC) - Demonstrate support	Not Applicable	This Criterion is not applicable to the Entity, as there are no New Projects or Major Changes to existing infrastructure.
9.5a Cultural and Sacred Heritage - Identification	Conformance	The Entity has made a formal commitment to cultural and heritage sites and values within the Land and Biodiversity Management Plan. There are no cultural or sacred heritage sites or values in or adjacent to the Entity.
9.5b Cultural and Sacred Heritage - Impacts	Not Applicable	This Criterion is not applicable to the Entity, as there is no impact on cultural and heritage sites and values.
9.6a-i Displacement	Not Applicable	This Criterion is not applicable to the Entity, as there are no New Projects or Major Changes planned, however the Entity has made a commitment to assess displacement impacts related to New Projects and expansion plans.
9.7a-h Affected Populations and Organisations	Conformance	The Entity is undertaking a variety of activities to support Local Communities and Affected Populations, including educational and health support services, open and free access to clubs with multiple purpose facilities (e.g. sports, wedding celebrations, and social gathering). During a visit to the AGYAL School for Special Needs, children from the Local Community with special care needs are provided with education and life skills. The Entity provides support with local infrastructure and other services including schools and a hospital. The Entity also provides free transportation to Naga Hammadi.
9.8a Conflict-Affected and High-Risk Areas - Strong management systems	Minor Non-Conformance	<p>The Entity has conducted screening of its operations and supply chain using a global map/list website, which identified that it is not within a Conflict-Affected or High-Risk Area (https://www.cahraslist.net/cahras).</p> <p>The Entity has commenced a process to assess the risks in its supply chain for Alumina suppliers and further traceability to Bauxite Mining, traders involved and transit routes, using the CAHRAs database. The Sustainability Committee, under the Risk Management Department, is responsible for the audit of the ERM Integrated Management System, which addresses the supply chain.</p> <p>However, the Entity's Due Diligence activities on the upstream Aluminium value chain is based on a 'status quo' situation and lacks detail on the long term Alumina and Bauxite suppliers' engagement approach to ensure effective implementation of the OECD Due Diligence requirements on an on-going basis. It has been identified as an important aspect due to possible disruption to inputs (such as changes in supplier/sub-supplier or transit routes due to geo-political situations e.g. Houthi rebels operating in the Red Sea).</p>
9.8b Conflict-Affected and High-Risk Areas - Identify and assess risks	Minor Non-Conformance	<p>The Entity has commenced a process to assess the risks in its supply chain for Alumina suppliers and further traceability to Bauxite Mining, traders involved and transit routes.</p> <p>However, the Entity has not completed its identification and assessment of the risks in its supply chain, including the identification of 'red flags', in accordance with the OECD Due Diligence requirements.</p>

CRITERION	RATING	COMMENT
9.8c Conflict-Affected and High-Risk Areas - Strategy to respond to risks	Minor Non-Conformance	<p>The Entity has commenced a process to assess the risks in its supply chain for Alumina suppliers and further traceability to Bauxite Mining, traders involved and transit routes.</p> <p>However, as the Entity has not completed its identification and assessment of the risks in its supply chain in accordance with the OECD Due Diligence requirements, it has not yet implemented a strategy in accordance with the OECD Due Diligence requirements.</p>
9.8d Conflict-Affected and High-Risk Areas - Audit of due diligence	Conformance	The Entity's Due Diligence practices were audited as part of this ASI Performance Standard Certification Audit, which fulfils the requirement.
9.8e Conflict-Affected and High-Risk Areas - Report annually	Minor Non-Conformance	Whilst the Entity has some limited information in its Sustainability Report related to its supply chain Due Diligence, it has not reported annually on supply chain Due Diligence performance (Step 5) in accordance with the OECD Due Diligence Guidance requirements.
9.9 Security practice	Conformance	The Entity's security guards are engaged as full time employees and have received Human Rights and other job specific training, both internally and externally are provided. The Human Rights risk assessment addresses security practices.
10. LABOUR RIGHTS		
10.1a-c Freedom of Association and Right to Collective Bargaining	Conformance	<p>The Entity has a functional Trade Union and the election process was supervised by the Ministry of Justice representatives present during the election process. The 13 employee representatives (from a pool of 130 applications) were elected by a majority vote. The election was conducted in May 2022 and is valid for four years. Monthly meetings are held between the Trade Union and the Entity's management.</p> <p>Interviews with Trade Union members conducted during the Audit confirmed that there was no sign of management interference. The Trade Union Office Bearer administers a Facebook page as a communications tool for employees.</p>
10.1d Freedom of Association and Right to Collective Bargaining - Alternative means in context of Applicable Law	Not Applicable	This Criterion is not applicable to the Entity, as Egyptian law does not restrict the rights of Freedom of Association and Collective Bargaining.
10.2a-c Child Labour	Conformance	<p>There was no Child Labour or personnel under the age of 18 years found during the Audit. The Workers' age is confirmed through the national identification records. Child Labour is addressed in the Entity's ESG Policies: https://www.egyptalum.com.eg/SustainabilityFile.aspx?id=1</p> <p>There are no instances of the Worst Forms of Child Labour that are likely to harm the health, safety or morals of any child under 18.</p>
10.3a-c Forced Labour	Conformance	<p>The Entity is not involved in Forced Labour and its commitment is included in the ESG Policies: https://www.egyptalum.com.eg/SustainabilityFile.aspx?id=1</p> <p>The interview with Workers and review of personnel/human resource records, confirmed there was no sign of Forced Labour. The Entity has</p>

CRITERION	RATING	COMMENT
		<p>implemented a Human Rights and Modern Slavery and Human Trafficking procedure, which provides a detailed commitment, risk assessment and reporting obligations.</p> <p>The Entity's Modern Slavery Statement, indicating the commitment and the actions to address modern slavery, is publicly disclosed at: https://www.egyptalum.com.eg/Files/Sustainability/egyptalum%20policy%20on%20slavery%20and%20human%20trafficking%20statement.pdf</p>
10.4a-c Non-Discrimination	Conformance	<p>The Entity has made a formal commitment to non-Discrimination in its hiring, promotions, incentive, career planning, and training processes. This has also been included in the ESG Policy, page 4 of 7: https://www.egyptalum.com.eg/SustainabilityFile.aspx?id=1</p> <p>As a State-owned enterprise, the Entity undertakes employee performance appraisals to determine equitable rates of pay across the workforce, including the roles undertaken by women. There is no pay parity due to a Workers' gender, which is also covered under government wage regulations.</p>
10.5 Communication and engagement	Conformance	<p>The Entity has implemented various channels of communication and engagement, including monthly communication meetings, quarterly labour management council meetings, notice boards, and social media and group messaging posts. The Entity has implemented its procedures for internal and external communication. There is also annual training planning, which has been undertaken, to engage with employees on skills improvements, and a training need assessment. Total training hours including safety training are recorded and reported in the Sustainability Report.</p>
10.6a-g Violence and Harassment	Conformance	<p>The Entity has Policy and practice to prevent any Violence and Harassment, as part of its ESG Policies: https://www.egyptalum.com.eg/SustainabilityFile.aspx?id=1</p> <p>There was no recorded incident of Violence or Harassment at the Entity.</p>
10.7a-d Remuneration	Conformance	<p>The Entity facilitates wage payments monthly via bank transfers on the 26th or 27th of each month. Overtime is paid at premium rate of 135% of the employees' daily salary for extra hours of work during daylight and 170% of the employees' daily salary for extra hours of work in the evening. Payslips are provided in advance detailing base wage, allowances, and statutory deductions towards social security. The employees living in the Entity provided accommodation facility are provided free electricity, water and housing, while employees living outside in their native village are paid an equivalent allowance.</p> <p>The legal minimum wage is EGP 6,000 per month and the Entity's wages are more than the legal minimum wage. The Entity also paid a bonus and some Workers also received a profit sharing bonus (last year 58 gross salary were paid as profit sharing).</p>
10.8a-c Working Time	Conformance	<p>The Entity is a 24 hour, seven days a week operation and shift rosters are prepared and communicated and provide a weekly rest day (Friday or as per shift roster), an 8 hour shift with a maximum 48 hours per week of normal working hours and 12 hours Overtime per week, total 60 hours/week. The Entity complies with the <i>General Public Sector Law No. 203/1991</i> and its Executive Regulations related to Working Time.</p>

CRITERION	RATING	COMMENT
		Leave is mandated by Egyptian Laws and is based on seniority/age. The working hours are recorded using biometric readers (plant and head office) or 'punch card' (at Safaga port).
10.9a-b Informing Workers of Rights	Conformance	The employees are informed about their rights through various method such as periodic training, Trade Union meetings, and visual displays. This was confirmed during the site visit and employee interviews.
11. OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Management System	Conformance	The Entity has developed and implemented an Occupational Health and Safety (OH&S) Management System, which is ISO 45001:2018 certified. During the plant visit, it was confirmed that the OH&S Management System requirements such as use of Personal Protective Equipment (PPE) and emergency preparedness have been implemented. Periodic safety inspections are also conducted. The firefighting plants cover the site and the Workers' accommodation facility. There have been occasions when the Entity's safety team was deployed to the government civil defence team to assist with community incidents such as fires.
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Minor Non-Conformance	<p>The Entity has developed key performance indicators, including lagging and leading indicators such as Total Recordable Incident Rate (TRIR), Lost Time Injury Frequency Rate (LTIFR), and safety training completion rate. An annual safety report is submitted to the Government authorities.</p> <p>However, the Entity has not formally conducted comparative analyses of performance with peer smelters and against sectoral leading practice.</p>
11.2 Employee engagement on Health and Safety	Conformance	<p>The Entity has engaged its employees on Health and Safety topics through training, and certifications such as first aid and fire safety. The Entity prepares an annual safety training calendar that covers various topics such as PPE, work permits, medical examinations, and lifting equipment. The related disclosures are available in the Sustainability Report, pages 64-67:</p> <p>https://www.egyptalum.com.eg/Files/Sustainability/Sustainability_Report_for_Egyptalum_2022-2023_-_REV01_(F3)_Final_version%20.pdf</p>

ASI LIMITATION OF LIABILITY DISCLAIMER

Organisations that make ASI-related claims are each responsible for their own compliance with Applicable Law, including laws and regulations related to labelling, advertisement, and consumer protection, and competition or antitrust laws, at all times. ASI does not accept liability for any violations of Applicable Law or any infringement of third-party rights (each a Breach) by other organisations, even where such Breach arises in relation to, or in reliance upon, any ASI Standard, document or other material, recommendation or directive issued by or on behalf of ASI. ASI gives no undertaking, representation or warranty that compliance with an ASI Standard, document or other material, recommendation or directive issued by or on behalf of ASI will result in compliance with any Applicable law, or will avoid any Breach from occurring.

DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	18 October 2024	Initial Certification Audit - Full Certification
