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ASI CERTIFICATION  
PERFORMANCE  
STANDARD



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PRESENTED TO

# ELVAL HELLENIC ALUMINIUM INDUSTRY

CERTIFICATE  
NUMBER

82

ASI  
STANDARD

PERFORMANCE  
STANDARD  
(V2 2017)

CERTIFICATION  
LEVEL

CERTIFICATION

ASI ACCREDITED  
AUDITOR

DNV GL

DATE OF ISSUE

21 JULY 2020

DATE OF EXPIRY

20 JULY 2023

CERTIFIED SINCE

21 JULY 2020

AUTHORISED BY

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

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](http://www.aluminium-stewardship.org)*

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CERTIFICATION SCOPE

Aluminium Rolling Division of Elvalhacor S.A. for  
the facility in Oinofyta, Greece, covering its Re-  
Melting & Casthouse facilities, Hot/Cold Rolling,  
Coil Coating and Finishing Lines.

# SUMMARY AUDIT REPORT

## PERFORMANCE STANDARD

### OVERVIEW

MEMBER NAME	ELVAL Hellenic Aluminium Industry
ENTITY NAME	ELVALHALCOR S.A. - Aluminium Rolling Division
CERTIFICATION SCOPE	Aluminium Rolling Division of Elvalhalcor S.A. for the facility in Oinofyta, Greece, covering its Re-Melting & Casthouse facilities, Hot/Cold Rolling, Coil Coating and Finishing Lines.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none"><li>Aluminium Re-melting/Refining</li><li>Casthouses</li><li>Semi-Fabrication</li></ul>
ASI STANDARD	<ul style="list-style-type: none"><li>Performance Standard V2</li></ul>
AUDIT TYPE	<ul style="list-style-type: none"><li>First Certification Audit</li></ul>
AUDIT FIRM	DNV GL
AUDIT DATE	<ul style="list-style-type: none"><li>7 - 8 April 2020 (initial desktop audit)</li><li>8 July 2020 (follow up on-site audit)</li></ul>
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none"><li>26 May 2020 (initial desktop audit)</li><li>13 July 2020 (follow up on-site audit)</li></ul>
AUDIT SCOPE	<p>The audit scope covered: Re-melting &amp; Casthouse (DCC + CC) operations, Hot Rolling, Cold Rolling, Coil Coating, Finishing Lines and Packaging.</p> <p>Supply chain activities included in the audit scope:</p> <ul style="list-style-type: none"><li>Aluminium Re-melting/Refining</li><li>Casthouses</li><li>Semi-Fabrication</li></ul> <p>All relevant criteria in the ASI Performance Standard were included in the audit scope.</p> <p>At the commencement of the audit, access to the site was not possible, due to COVID-19 related travel restrictions. The audit was initially undertaken as a desktop exercise in April 2020, in accordance with the ASI Interim Policy</p>

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regarding Audits, Audit-Related Travel and Coronavirus (v4), and included a remote review of relevant documentation. The audit was later completed on-site on 8 July 2020.

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AUDIT  
OUTCOME

- Certification
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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.
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CERTIFICATION  
PERIOD

21 July 2020 - 20 July 2023

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NEXT AUDIT  
TYPE

Re-certification Audit

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NEXT AUDIT  
DUE DATE

20 July 2023

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CERTIFICATE  
NUMBER

82

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## SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	Legal compliance is an objective in the Code of Conduct and Business Ethics of Elval as well as in the Environmental and Health & Safety Policies. Compliance is enforced by dedicated procedures included in the Entity's ISO 14001 and OHSAS 18001 Management Systems certification, while systems' proper implementation is ensured through the reporting hierarchy at all levels and personnel. Legislative conformance is supported by Group Viohalco's Legal Department.
1.2 Anti-Corruption	Conformance	Elval operates under a written Integrity and Transparency Policy against corruption and bribery. The company is implementing an Anti-Corruption Risk Assessment which is subject to internal audits, by Group auditors. Furthermore, external financial audit assess corruption risk and compliance to corruption legislation.
1.3 Code of Conduct	Conformance	Elval has implemented a Code of Conduct, which is communicated to all staff members and contractors and is available via its website: <a href="https://www.elval.com/arxeia/brochures/ElvalHalcor-Code-of-Conduct-Business-Ethics-EN-final-2017.pdf">https://www.elval.com/arxeia/brochures/ElvalHalcor-Code-of-Conduct-Business-Ethics-EN-final-2017.pdf</a>
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	Elval has implemented a Sustainability, Health and Safety Policy, an Environment and Energy Policy, the Code of Conduct and Business Ethics and an Integrity and Transparency Policy. All policies are available via the following links on its website: <a href="https://www.elval.com/en/sustainability-occupational-health-safety">https://www.elval.com/en/sustainability-occupational-health-safety</a> <a href="https://www.elval.com/arxeia/brochures/ENVIRONMENTAL-AND-ENERGY-POLICY-ELVALHALCOR.pdf">https://www.elval.com/arxeia/brochures/ENVIRONMENTAL-AND-ENERGY-POLICY-ELVALHALCOR.pdf</a> <a href="https://www.elval.com/arxeia/brochures/ElvalHalcor-Code-of-Conduct-Business-Ethics-EN-final-2017.pdf">https://www.elval.com/arxeia/brochures/ElvalHalcor-Code-of-Conduct-Business-Ethics-EN-final-2017.pdf</a> <a href="https://www.elval.com/arxeia/sustainability/ElvalHalcor-SUSTAINABILITY-POLICY-REVISED-EN-FINAL-2017.pdf">https://www.elval.com/arxeia/sustainability/ElvalHalcor-SUSTAINABILITY-POLICY-REVISED-EN-FINAL-2017.pdf</a>

CRITERION	RATING	COMMENT
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	All policies have been approved by senior management. Each Director is responsible for the day-to-day implementation of her/his department's objectives and for the reporting of potential gaps between their content and the actual business practices. An ESG Risk Assessment is in place assessing whether existing business activities are in-line with the relevant policies. No deviations were evident during the last evaluation (2019). The ESG Risk Assessment is due to be updated annually.
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	<p>Elval publishes all of its policies on its website as follows: Health and Safety - <a href="https://www.elval.com/en/sustainability-occupational-health-safety">https://www.elval.com/en/sustainability-occupational-health-safety</a></p> <p>Environment &amp; Energy - <a href="https://www.elval.com/arxeia/brochures/ENVIRONMENTAL-AND-ENERGY-POLICY-ELVALHALCOR.pdf">https://www.elval.com/arxeia/brochures/ENVIRONMENTAL-AND-ENERGY-POLICY-ELVALHALCOR.pdf</a></p> <p>Business Ethics - <a href="https://www.elval.com/arxeia/brochures/ElvalHalcor-Code-of-Conduct-Business-Ethics-EN-final-2017.pdf">https://www.elval.com/arxeia/brochures/ElvalHalcor-Code-of-Conduct-Business-Ethics-EN-final-2017.pdf</a></p> <p>Suppliers Code of Conduct - <a href="https://www.elval.com/arxeia/brochures/ElvalHalcor-Supplier-Code-of-Conduct-EN-13022020.pdf">https://www.elval.com/arxeia/brochures/ElvalHalcor-Supplier-Code-of-Conduct-EN-13022020.pdf</a> .</p> <p>It also conducts induction and other training courses and communicates policies on notice boards around the site for employees and contractors working on site.</p>
2.2 Leadership	Conformance	Elval has appointed its Environmental Compliance Manager as the person with overall responsibility for conformance with the ASI Performance Standard.
2.3a Environmental and Social Management Systems (environmental)	Conformance	<p>Elval has valid management systems certifications for Energy and Environment. Certificates can be accessed from the standards and certifications section of its website: <a href="https://www.elval.com/en/technology#technology-the-elval-way">https://www.elval.com/en/technology#technology-the-elval-way</a></p>
2.3b Environmental and Social Management Systems (social)	Conformance	Elval has implemented an integrated Management System (certified to ISO 14001, ISO 50001, ISO 9001 and IATF 16949) and a discrete Occupational Health & Safety Management System certified to OHSAS 18001. Social elements are managed across many

CRITERION	RATING	COMMENT
		<p>parts of these management systems. There are additional Human Resource system to manage labour, Business Ethics, Anti-Corruption Policy and system information and Suppliers Code of Conduct and procurement team manage social aspects of sourcing. Risks and performance are reviewed periodically.</p>
2.4 Responsible Sourcing	Conformance	<p>Elval has a Supplier Code of Conduct which is communicated to suppliers including through the website, <a href="https://www.elval.com/arxeia/brochures/ElvalHacor-Supplier-Code-of-Conduct-EN-13022020.pdf">https://www.elval.com/arxeia/brochures/ElvalHacor-Supplier-Code-of-Conduct-EN-13022020.pdf</a>. It evaluates and prioritises risks within its procurement categories following a dedicated procedure and focuses on the higher risks and critical suppliers which are sent a further evaluation questionnaire, which informs the company response.</p>
2.5 Impact Assessments	Conformance	<p>Elval has conducted Environmental, Biodiversity and Human Rights Impact Assessments for all existing and new projects. At the time of audit, a new hot rolling mill is under construction, within its current site boundaries. As part of securing permits for this process, it completed an impact assessment covering Environmental, Social and Human Rights impacts.</p>
2.6 Emergency Response Plan	Conformance	<p>Emergency response plans are requirements of ISO 14001 and OHSAS 18001, where valid certifications are held. The site has risk assessments and standard operating procedures to identify, manage and respond to emergency risks.</p>
2.7 Mergers and Acquisitions	Conformance	<p>Elval has a corporate Standard Operating Procedure that prescribes the process to be followed to evaluate environmental, social and governance risks relating to Mergers &amp; Acquisitions.</p>
2.8 Closure, Decommissioning and Divestment	Conformance	<p>Elval has a Standard Operating Procedure which prescribes the process to be followed to review risks relating to environmental social and governance issues upon the closure, decommissioning and de-investment of an existing facility.</p>

CRITERION	RATING	COMMENT
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	<p>ElvalHalcor issues a Sustainability report, publicly available through printed copies or via the web (<a href="https://www.elval.com/arxeia/sustainability/csr/pdf/ElvalHalcor-Sustainability-Report-Annual-Report-2018-English.pdf">https://www.elval.com/arxeia/sustainability/csr/pdf/ElvalHalcor-Sustainability-Report-Annual-Report-2018-English.pdf</a>), developed according to the Global Reporting Initiative Standards and verified against the AA1000 Assurance Standard by a 3<sup>rd</sup> party auditor, which provides confidence that Elval's material impacts are well understood and responded to.</p> <p>Elval annually submits data on Air Emissions, Waste Water Disposal and Water Use, to the Ministry of Environment, which are made publicly available on the ministry's web site (Air Emissions - <a href="http://www.ypeka.gr/LinkClick.aspx?fileticket=OZ1rgCnYsO8%3D&amp;tabid=965&amp;language=el-GR">http://www.ypeka.gr/LinkClick.aspx?fileticket=OZ1rgCnYsO8%3D&amp;tabid=965&amp;language=el-GR</a> Water Use - <a href="http://www.ypeka.gr/LinkClick.aspx?fileticket=7VMqe658hZQ%3D&amp;tabid=965&amp;language=el-GR">http://www.ypeka.gr/LinkClick.aspx?fileticket=7VMqe658hZQ%3D&amp;tabid=965&amp;language=el-GR</a> Waste Water - <a href="http://www.ypeka.gr/LinkClick.aspx?fileticket=eskjWvz%2FU5U%3D&amp;tabid=965&amp;language=el-GR">http://www.ypeka.gr/LinkClick.aspx?fileticket=eskjWvz%2FU5U%3D&amp;tabid=965&amp;language=el-GR</a> )</p>
3.2 Non-compliance and liabilities	Conformance	<p>Elval publishes information on significant fines, judgments, penalties and non-monetary sanctions for failure to comply with Applicable Law in its annual sustainability report, the most recent of which is available on the website at <a href="https://www.elvalhalcor.com/userfiles/225d38ab-9b23-4522-9e62-a6a900aac8b2/ElvalHalcor-Sustainability-Report-Annual-Report-2018-English_1.pdf">https://www.elvalhalcor.com/userfiles/225d38ab-9b23-4522-9e62-a6a900aac8b2/ElvalHalcor-Sustainability-Report-Annual-Report-2018-English_1.pdf</a>. It has not received any fines in 2018.</p>
3.3a Payments to governments (legal and contractual)	Conformance	<p>Elval has a policy to avoid bribery and corruption and publishes information that confirms it does not make payments other than legal taxes to governments in its annual sustainability report, the most recent of which is available on the website at: <a href="https://www.elvalhalcor.com/userfiles/225d38ab-9b23-4522-9e62-a6a900aac8b2/ElvalHalcor-Sustainability-Report-Annual-Report-2018-English_1.pdf">https://www.elvalhalcor.com/userfiles/225d38ab-9b23-4522-9e62-a6a900aac8b2/ElvalHalcor-Sustainability-Report-Annual-Report-2018-English_1.pdf</a>.</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 system in place to address complaints, grievances and requests for information, which is accessible to both internal and external stakeholders. This is defined in its Code of Conduct. There are complaint and suggestion boxes on site for where employees can submit anonymous complaints. All communication details and a contact form are available on Elval's web site for external complaints ( <a href="https://www.elval.com/en/contact">https://www.elval.com/en/contact</a> ).
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	Cradle to Gate Lifecycle Assessments according to ISO 14040/44 have been completed for the Can stock and the Foil stock product lines. These are available on request.
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	Cradle to Gate Lifecycle Assessments according to ISO 14040/44 have been completed for the Can stock and the Foil stock product lines. These are available on request.
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	Elval's Lifecycle Assessment of Canstock and Lifecycle Assessment of Foilstock are available to the public on request. ISO 14040 prescribes the contents of any public communication of an LCA and they are followed by Elval. Furthermore, Elval, being part of the European Aluminium, regularly takes part in sustainability surveys and annually submits data to be processed by the association in industry level studies, which are publicly available.
4.2 Product design	Conformance	Elval's Product Design and development procedure includes consideration of Life-Cycle impacts. The design and development process includes design for recyclability and re-use. Dismantling, disassembly and reuse/recycling relies on the downstream links of the aluminium value chain.
4.3a Aluminium Process Scrap (targets)	Conformance	Elval monitors all process scrap produced on site and segregates it for remelt. Excess scrap that cannot be remelted is sent for external reprocessing if required, recycling and returned back to site for use. The monitoring takes place under multiple perspectives, aiming to ensure efficient involvement both by management and



CRITERION	RATING	COMMENT
		personnel. An aluminium recycling culture has been established within the plant.
4.3b Aluminium Process Scrap (alloy separation)	Conformance	Elval monitors all process scrap produced on site and segregates it for remelt. Excess scrap that cannot be remelted is sent for external reprocessing if required, recycling and returned back to site for use. The monitoring takes place under multiple perspectives, aiming to ensure efficient involvement both by management and personnel. An aluminium recycling culture has been established within the plant.
4.4a Collection and recycling of products at end-of-life (strategy)	Conformance	<p>Elval has a clear approach in regards of all process concerning collection and recycling of products at End of Life. Elval has issued a recycling strategy for the years 2020-2025 that includes targets, time frames and supporting activities.</p> <p>The industry campaign "Every Can Counts" is in place and fully supported by the company. Monitoring takes place to ensure efficient involvement both by management and personnel.</p>
4.4b Collection and recycling of products at end-of-life (engagement)	Conformance	<p>Elval has a clear approach in regards of all process concerning collection and recycling of products at End of Life. Elval has issued a recycling strategy for the years 2020-2025 that includes targets, time frames and supporting activities. It engages through its CANAL initiative.</p> <p>The industry campaign "Every Can Counts" is in place and fully supported by the company. Monitoring takes place to ensure efficient involvement both by management and personnel.</p>
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		
5.1 Disclosure of GHG emissions and energy use	Conformance	Elval takes part in the European Union ETS System. An annual Greenhouse Gas (GHG) Emissions report, presenting the emissions per source is produced, verified by a 3rd party certified auditor and submitted to the local authorities in Greece. The GHG emissions assessment methodology is documented in the GHG Monitoring Plan that has been submitted and approved by the competent authorities. The GHG Environmental Permit provided issued by the authorities (Ministry of Environment and

CRITERION	RATING	COMMENT
		Energy) includes relevant terms and conditions, which are respected by the company. An Energy and GHG Emissions Reduction Plan (2019-2025) has been implemented and aims to increase GHG emissions reductions and energy savings. Public data on GHG emissions is available also in Elval's sustainability report: <a href="https://www.elval.com/arxeia/sustainability/csr_pdf/ELVAL-HALCOR-CSR--AR-OIK-GR-2019.pdf">https://www.elval.com/arxeia/sustainability/csr_pdf/ELVAL-HALCOR-CSR--AR-OIK-GR-2019.pdf</a>
5.2 GHG emissions reductions	Minor Non-Conformance	Elval takes part in the European Union ETS System. An annual Greenhouse Gas (GHG) Emissions report, presenting the emissions per source is produced, verified by a 3rd party certified auditor and submitted to the local authorities in Greece. The GHG emissions assessment methodology is documented in the GHG Monitoring Plan that has been submitted and approved by the competent authorities. Elval also reports its emissions data and information on its GHG management programme to the CDP. An Energy and GHG Emissions Reduction Plan (2019-2025) has been implemented which aims to increase GHG emissions reductions and energy savings and contains time-bound targets. Public information on GHG emissions is available in Elval's sustainability report: <a href="https://www.elval.com/arxeia/sustainability/csr_pdf/ELVAL-HALCOR-CSR--AR-OIK-GR-2019.pdf">https://www.elval.com/arxeia/sustainability/csr_pdf/ELVAL-HALCOR-CSR--AR-OIK-GR-2019.pdf</a> however no time-bound emission reduction target or summary of the plans to reduce emissions are available in the public domain.
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.
PRINCIPLE 6 EMISSIONS, EFFLUENTS AND WASTE		
6.1 Emissions to Air	Conformance	Elval is certified under ISO 14001:2015 Environmental Management System which is fully implemented. The company has developed an inventory of its point emissions sources, all emissions are monitored, analysed and reported under terms of Environmental Permit Conditions

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		and their impact is assessed in its Environmental Impact Assessment.
6.2 Discharges to Water	Conformance	Elval operates a Waste Water Treatment plant that includes two modern waste water treatment lines for different wastewater streams. The output of the plant is merged in a single discharge to a tank and then to the River which is located close to the border of the facility. All regulatory requirements are fully met.
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	Elval has conducted a risk assessment, has identified risks, and has plans and procedures in place for incident management and reporting. It has ISO 14001 certification in place which also covers spills and leaks management.
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	Elval has conducted a risk assessment, has identified risks, and has plans and procedures in place for incident management and reporting. It has an ISO 14001 certification in place which also covers spills and leaks management.
6.4a Reporting of Spills (immediate disclosure)	Conformance	In case of a leak that results in environmental pollution, Elval has a Standard Operation Procedure which prescribes the immediate steps that should be taken to communicate this to all affected (external) stakeholders, including the competent authorities, according to the environmental permit of the plant.
6.4b Reporting of Spills (regular reporting)	Conformance	The number of spills is disclosed under GRI index 306-3 Significant Spills (GRI Table, p. 6) in the Sustainability Report available on Elval's website at <a href="https://www.elval.com/en/sustainability-csr-reports">https://www.elval.com/en/sustainability-csr-reports</a> . In year 2018 (and in 2019, of which the sustainability report is yet to be published) there were no significant spills.
6.5a Waste management and reporting (strategy)	Conformance	Elval has implemented an Environmental Management System, certified to the ISO 14001 environmental management system standard, which covers waste management requirements. It has a documented waste management strategy that is respected and implemented by management and personnel.
6.5b Waste management and reporting (disclosure)	Conformance	Elval has implemented an Environmental Management System, certified to the ISO 14001 standard. Elval annually publishes, in its

CRITERION	RATING	COMMENT
		Sustainability Report, the quantity of hazardous and non-hazardous waste produced, as well as the associated waste treatment methods, according to the waste mitigation hierarchy (p.72, 87 <a href="https://www.elval.com/en/sustainability-csr-reports">https://www.elval.com/en/sustainability-csr-reports</a> )
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 (start 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.
6.8a Dross (recovery)	Conformance	Dross is produced in the form of Aluminium Skimmings from melting and holding ovens. The processing facilities are located abroad and Annex VII according to the Waste Shipment Regulation (1013/2006/EC) are being issued for every shipment. Elval is seeking to maximise recovery rates and tracks this rate.
6.8b Dross (recycling)	Conformance	Dross is sent offsite for reprocessing and all Aluminium that can be recovered through that process is shipped back to Elval in the form of

CRITERION	RATING	COMMENT
		Aluminium ingots which are recycled back into production.
6.8c Dross (review of alternatives)	Conformance	Elval collect and send all dross off-site for aluminium recovery, which is then returned to site to be recycled back into its production process. No dross is sent to landfill.
PRINCIPLE 7 WATER STEWARDSHIP		
7.1a Water assessment (mapping)	Conformance	A Water Mass Balance is being drawn on a monthly basis and maps the flow of water from the input to the outputs of the plant. Furthermore, a Water Inventory has been drawn as well as a process flow diagram, for all water input, processing, use and disposal (included in the Water Risk Assessment).
7.1b Water assessment (risk assessment)	Conformance	A Water Risk Assessment has been conducted, taking into consideration references from the WWF Filter and the Alliance for Water Stewardship's International Water Stewardship Standard.
7.2a Water management (management plans)	Conformance	Elval implements a certified ISO 14001 Environmental Management System. An Environmental Permit issued by the Ministry of Environment and Energy is in place, including terms and conditions relating to water management and use, monitored by the relevant competent authorities. Water-related risks are assessed as part of the Environmental Management System with and no material water risks identified.
7.2b Water management (monitoring)	Conformance	Elval implements a certified ISO 14001 Environmental Management System. An Environmental Permit issued by the Ministry of Environment and Energy is in place, including terms and conditions relating to water management and use, monitored by the relevant competent authorities. Water-related risks are assessed as part of the Environmental Management System with and no material water risks identified.
7.3 Disclosure of water usage and risks	Conformance	Elval submits data on water use to the Ministry of Environment and Energy. Data concerning the water use are publicly disclosed on the web site of the Ministry ( <a href="http://www.ypeka.gr/LinkClick.aspx?fileticket=VMqe658hZQ%3D&amp;tabid=965&amp;language=el-GR">http://www.ypeka.gr/LinkClick.aspx?fileticket=VMqe658hZQ%3D&amp;tabid=965&amp;language=el-GR</a> )

CRITERION	RATING	COMMENT
		The water intensity is also disclosed in the Sustainability Report (p. 68 <a href="https://www.elval.com/en/sustainability-csr-reports">https://www.elval.com/en/sustainability-csr-reports</a> )
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	A Biodiversity and Alien Species Impact Assessment has been conducted covering the operations of the plant as well as the impacts that are associated to the discharge point of the plants treated water disposal. The impacts included stem both from a bibliographical study as well as field observations by experts that were contracted by Elval for that purpose.
8.2a Biodiversity management (biodiversity action plans)	Conformance	A Biodiversity and Alien Species Impact Assessment has been conducted covering the operations of the plant as well as the impacts that are associated to the discharge point of the plants treated water disposal. The impacts included stem both from a bibliographical study as well as field observations by experts that were contracted by Elval for that purpose.
8.2b Biodiversity management (consultation and mitigation hierarchy)	Conformance	Elval commissioned a Biodiversity and Alien species assessment from a third party. This was in accordance with the mitigation hierarchy and was informed by community and expert consultation.
8.2c Biodiversity management (reporting)	Conformance	Biodiversity and Alien Species impact assessment was completed after the production of Elval's Sustainability Report 2018 and the draft for 2019 confirmed that the assessment and its outcomes will be included in the 2019 report.
8.3 Alien Species	Conformance	A Sustainability Impact Assessment has been conducted covering the operations of the plant as well as the impacts that are associated to the discharge point of the plants treated water disposal. An Alien Species Impact Assessment has been conducted for Elval (part of the Biodiversity and Alien Species Impact Assessment).
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.

CRITERION	RATING	COMMENT
8.4b Commitment to No Go+in World Heritage properties (existing operations)	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	Elval's commitment to protect Human Rights is evident primarily in its Code of Conduct & Business Ethics. Furthermore, a clear statement of support to the United Nations Global Compact's principles is included in the Sustainability Report. The company operates under the Greek legislation and European Union normative, respecting the constitutional Human Rights values.
9.1b Human Rights Due Diligence (process)	Conformance	Elval has conducted a Human Rights Due Diligence process aligned to the United Nations Guiding Principles on Business and Human Rights. Elval's commitment to protect Human Rights is evident primarily in its Code of Conduct & Business Ethics. Furthermore, a clear statement of support to the United Nations Global Compact's principles is included in the Sustainability Report. The company operates under Greek and European law in line with its corporate values.
9.1c Human Rights Due Diligence (remediation)	Conformance	Elval has conducted a Human Rights Due Diligence process aligned to the United Nations Guiding Principles on Business and Human Rights. Elval's commitment to protect Human Rights is evident primarily in its Code of Conduct & Business Ethics. Furthermore, a clear statement of support to the United Nations Global Compact's principles is included in the Sustainability Report. The company operates under the Greek European law, in line with its corporate values. The Human Rights Due Diligence process has identified no evidence that Elval has caused or contributed to adverse Human Rights impacts.
9.2 Women's Rights	Conformance	As a matter of policy, a clear statement is included in Elval's Code of Conduct and Business Ethics against discrimination and on

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		the protection of Women's Rights. No evidence of discrimination, unjustifiable under-representation, unequal pay, physical or sexual abuse, lack of opportunities or any other source of indirect impact has been identified.
9.3 Indigenous Peoples	Not Applicable	There are no indigenous people in Elval's Area of Influence.
9.4 Free, Prior, and Informed Consent (FPIC)	Not Applicable	There are no indigenous people in Elval's Area of Influence.
9.5 Cultural and sacred heritage	Not Applicable	There are no indigenous people, sacred or cultural heritage sites and values within Elval's Area of Influence.
9.6a Resettlements (avoid or minimise)	Not Applicable	The site is located in an area of industrial facilities. Where changes to site boundaries have happened, they have taken over other industrial facilities in the area. There is no resettlement need.
9.6b Resettlements (where unavoidable)	Not Applicable	The site is located in an area of industrial facilities. Where changes to site boundaries have happened, they have taken over other industrial facilities in the area. There is no resettlement need.
9.7a Local Communities (rights and interests)	Conformance	The Human Rights Due Diligence process did not identify any potential infringement of human rights. Elval has constructive and positive engagement with its local communities as evidenced by stakeholder interviews and feedback, as well as the sustainability report available from <a href="https://www.elval.com/en/sustainability-csr-reports">https://www.elval.com/en/sustainability-csr-reports</a> .
9.7b Local Communities (impacts)	Conformance	Elval has conducted an Environmental Impact Assessment and has evaluated the potential impacts to its surrounding communities that stem out of its activities through various studies (e.g. Environmental Risk Assessment, Biodiversity Impact Assessment, Water Risk Assessment, Environmental Noise measurements). No adverse impacts to the local communities have been identified. Elval has constructive and positive engagement with its local communities as evidenced by stakeholder interviews and feedback, as well as the sustainability report available from



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		<a href="https://www.elval.com/en/sustainability-csr-reports">https://www.elval.com/en/sustainability-csr-reports</a> .
9.7c Local Communities (livelihoods)	Conformance	<p>Elval has constructive and positive engagement with its local communities as evidenced by stakeholder interviews and feedback, as well as the sustainability report available from <a href="https://www.elval.com/en/sustainability-csr-reports">https://www.elval.com/en/sustainability-csr-reports</a>.</p> <p>There is a community program to support local communities, with donations of equipment and in kind support (supporting local medical centre, schools) rather than direct financial donations.</p>
9.8 Conflict-Affected and High-Risk Areas	Conformance	Elval is not located in an area of conflict or high risk. Any risks are associated with the supply chain which is covered by its Code of Conduct and supplier evaluation procedure.
9.9 Security practice	Conformance	Elval does not have any form of collaboration with private security forces. The company employs gatehouse personnel and night guardians that operate monitoring systems in accordance with its Code of Conduct & Business Ethics.
PRINCIPLE 10 LABOUR RIGHTS		
10.1a Freedom of Association and Right to Collective Bargaining (freedom of association)	Conformance	Elval fully respects the Right of Freedom of Association. A clear statement is included in the Code of Conduct and Business Ethics (Section 9), whereas a full support to the UN Global Compact has been formally declared in the Sustainability Report (p. 74).
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Conformance	<p>Elval fully respects the Right to Collective Bargaining. A clear statement is included in the Code of Conduct and Statement of Business Ethics.</p> <p>Its support for the principles of the UN Global Compact has been formally declared in the Sustainability Report (p. 74 <a href="https://www.elval.com/en/sustainability-csr-reports">https://www.elval.com/en/sustainability-csr-reports</a>)</p>
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Conformance	Worker representation is assured by alternative means (participation in open councils, on-the-job awareness sessions, suggestion boxes and procedures, etc.). Site tour confirmed good working conditions and employees interviewed expressed no concerns.

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10.2a Child Labour (minimum age)	Conformance	<p>Child Labour is prohibited by Greek and European law. Elval fulfils its legal conditions and has a clear policy against Child Labour included in the Code of Conduct &amp; Business Ethics (Section 9) as stated in the Sustainability Report (p. 74, support of the UN Global Compact, Principle 5)</p> <p><a href="https://www.elval.com/en/sustainability-csr-reports">https://www.elval.com/en/sustainability-csr-reports</a>. All workers in Elval are aged 18 or more which was consistent with observations during site tour and employee interviews.</p>
10.2b Child Labour (hazardous)	Conformance	<p>Child Labour is prohibited by Greek and European law. Elval fulfils its legal conditions and has a clear policy against Child Labour included in the Code of Conduct &amp; Business Ethics (Section 9) as stated in the Sustainability Report (p. 74, support of the UN Global Compact, Principle 5)</p> <p><a href="https://www.elval.com/en/sustainability-csr-reports">https://www.elval.com/en/sustainability-csr-reports</a>. All workers in Elval are aged 18 or more.</p>
10.2c Child Labour (worst forms)	Conformance	<p>Child Labour is prohibited by Greek and European law. Elval fulfils its legal conditions and has a clear policy against Child Labour included in the Code of Conduct &amp; Business Ethics (Section 9) as stated in the Sustainability Report (p. 74, support of the UN Global Compact, Principle 5)</p> <p><a href="https://www.elval.com/en/sustainability-csr-reports">https://www.elval.com/en/sustainability-csr-reports</a>. All workers in Elval are aged 18 or more.</p>
10.3a Forced Labour (human trafficking)	Conformance	<p>In accordance with the Greek and European Union law, Forced Labour is prohibited. Elval fulfils its legal requirements. Elval has conducted a Human Rights Due Diligence that includes an evaluation of Forced Labour Risks. Elval does not engage in Forced Labour, directly or indirectly nor does it tolerate forced labour in its supply chain. A clear policy against Forced Labour is included in the Code of Conduct &amp; Business Ethics, on the Sustainability Report (support of the UN Global Compact,) and in the Suppliers Code of Conduct. All contractors are inspected on a monthly basis against their legal obligations towards their employees (i.e. prompt payments, insurance, etc.) by submitting the appropriate evidence to the Gatehouse.</p>

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10.3b Forced Labour (deposits, fees, advances)	Conformance	Elval does not require any form of deposit, fee or advance from workers prior to their employment, nor does it tolerate any such actions on behalf of its supply chain. Specific and clear engagement is included in the Code of Conduct & Business Ethics, Sustainability Report, Suppliers Code of Conduct and Human Rights Due Diligence.
10.3c Forced Labour (migrant workers)	Conformance	Elval does not require migrant workers to lodge deposits or security payments at any time. All contractors are inspected on a monthly basis against their legal obligations towards their employees (i.e. prompt payments, insurance, etc.) by submitting the appropriate evidence. A clear policy against Forced Labour is included in the Code of Conduct & Business Ethics, on the Sustainability Report (support of the UN Global Compact,) and in the Suppliers Code of Conduct.
10.3d Forced Labour (debt bondage)	Conformance	Elval's Code of Conduct & Business Ethics prohibits holding workers in debt bondage or forcing them to pay off a loan as evidenced by its Sustainability Report, Suppliers Code of Conduct and Human Rights Due Diligence, and as aligned to Greek and European Union law.
10.3e Forced Labour (freedom of movement)	Conformance	Elval does not restrict the movement of any person on site, for any reason. Clear statements are included in the Code of Conduct & Business Ethics, Sustainability Report, Suppliers Code of Conduct and Human Rights Due Diligence.
10.3f Forced Labour (retention of identity papers, permits, certificates)	Conformance	A clear policy against Forced Labour is included in the Code of Conduct & Business Ethics, on the Sustainability Report (support of the UN Global Compact,) and in the Suppliers Code of Conduct. All contractors are inspected on a monthly basis against their legal obligations towards their employees (i.e. prompt payments, insurance, etc.) by submitting the appropriate evidence to the Gatehouse.
10.3g Forced Labour (freedom to terminate employment)	Conformance	The local (Greek) legislation and the European Union (EU) normative are fully respected. All employees are free to terminate their employment on their wish, according to applicable Law.

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10.4 Non-Discrimination	Conformance	Elval's Code of Conduct and Business Ethics, as well as its supplier Code of Conduct cover non-discrimination. Its Human Rights Due Diligence exercise did not highlight any material risks concerning discrimination.
10.5 Communication and engagement	Conformance	Communication and direct engagement of workers is assured via monthly EHS council, departmental meetings and on the job seminars. A dedicated procedure is in place enforcing the submissions of improvement proposals. Complaints can be raised via a dedicated procedure, without any threat of reprisal intimidation or harassment, whereas a suggestion box, operated solely by the General Manager, is used for the submissions of anonymous complaints of any form.
10.6 Disciplinary practices	Conformance	Elval's Code of Conduct, Employee Handbook and guidance clarify its disciplinary procedure and practices. This has been reviewed and confirmed by the local labour inspector and the company has appropriate grievance mechanisms in place.
10.7a Remuneration (living wage)	Conformance	Minimum wages are set according to the National Collective Agreement and Elval is fulfilling the legal requirements agreed by all social stakeholders. Furthermore, Elval provides to all of its employees additional benefits that improve their living standards, such as a private health insurance, food vouchers, bonuses, gifts to the families etc. This was confirmed through employee interviews as well as documentation review.
10.7b Remuneration (method of payment)	Conformance	All payments are made in full and without delays, according to domestic legislation, after the legal deductions for taxes, health insurance and pension schemes contributions. The payments are in alignment with National Collective Agreement. Employee interviews confirmed that all are comfortable with payments, fair wages and payroll process.
10.8 Working Time	Conformance	Elval complies with applicable law on working time (including overtime), public holidays and paid annual leave. Overtime is voluntary and is reimbursed according to national legislation. Confirmed by employee interviews. The Labour Inspectorate is the relevant state

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		authority responsible to control and inspect implementation of legal requirements.
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	Elval has implemented an OHSAS 18001 Management System, related to occupational Health & Safety (H&S). H&S Policy is respected and fulfilled both by Management and personnel. Elval has a plan to transition to certification to ISO 45001. Greek and European Union law is followed.
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	Elval has implemented an OHSAS 18001 Management System, related to occupational Health & Safety (H&S). Visitors are made aware of the H&S Policy and that they are obliged to respect it, which was confirmed during site visit.
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Conformance	Elval has implemented an OHSAS 18001 Management System, related to occupational Health & Safety (H&S) with a plan to transition to ISO 45001. This includes requirement to comply with Greek, European Union and international law.
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	Has implemented an OHSAS 18001 Management System, related to occupational Health & Safety (H&S). Its Policy and training enshrine the right of workers to stop work in hazardous or unsafe conditions, which has been confirmed through employee interview and site visit.
11.2 OH&S Management System	Conformance	Elval has implemented an OHSAS 18001 Management System, related to occupational Health & Safety (H&S) with a plan to transition to ISO 45001.
11.3 Employee engagement on health and safety	Conformance	Following Greek and European Union legal requirements, employees are made aware of and informed about Occupational Health & Safety. Furthermore, Elval is implementing the OHSAS 18001 occupational Health & Safety Management System, where specific procedures, reporting and documentation is included aiming to confirm employees awareness and training on OHS. This was confirmed through employee interviews and during site visit.

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11.4 OH&S performance	Conformance	Elval OHS performance is monitored, documented and reported to the Labour Inspectorate which is the relevant state authority according to the procedures, records and documents implemented by the certified OHSAS 18001 Health & Safety Management System.

**Document Control and Version History**

Revision	Date	Notes
0	21 July 2020	Issued (Initial certification audit)