PURPOSE AND COMMITMENT

AS METAL COM is one of the main companies in Romania whose core activities are the elaboration of secondary aluminium alloys and the valorisation of ferrous and non-ferrous metal waste.
AS METAL COM is committed to respecting human rights and believes that all people should be treated with dignity and respect, in line with its values.
AS METAL COM seeks to create a positive social impact by mitigating human rights risks and by promoting respect for human rights throughout its operations and activities.

1. GUIDING PRINCIPLES

AS METAL COM's commitment to respect human rights is guided by 7 principles derived from the Human Rights, Labour and Anti-Corruption principles of the United Nations Global Compact:

1.1. AS METAL COM supports and respects the protection of internationally recognised human rights.
1.2. AS METAL COM ensures that it is not complicit in human rights abuses.
1.3. AS METAL COM upholds freedom of association and the effective recognition of the right to collective bargaining.
1.4. AS METAL COM eliminates all forms of forced or compulsory labour.
1.5. AS METAL COM prohibits child labour and protects young workers in accordance with applicable laws.
1.6. AS METAL COM eliminates discrimination in respect of employment and occupation.
1.7. AS METAL COM works against corruption in all its forms, including extortion and bribery, recognising that corruption undermines the protection of human rights.

2. SCOPE

This Human Rights Policy applies to all AS METAL COM employees, regardless of position or seniority, as well as to management and directors.
Where relevant, the principles outlined in this policy also apply to contractors, suppliers and other business partners acting on behalf of or in the interest of the company.

3. GOVERNANCE AND RESPONSIBILITIES

AS METAL COM management is responsible for the implementation, application and oversight of this Human Rights Policy.
Managers at all levels are responsible for ensuring that human rights principles are respected in daily operations and employment practices.
All employees are expected to comply with this policy and to report, in good faith, any suspected or actual human rights concerns.

4. IMPLEMENTATION AND PREVENTION

Respect for human rights is integrated into AS METAL COM's internal procedures, employment practices and management systems.
Employees are informed about human rights principles through internal communication and applicable internal policies, including the Code of Conduct and Ethics, the Anti-Harassment Policy, the Modern Slavery and Human Trafficking Policy and the Whistleblowing Policy.

5. REPORTING OF CONCERNS

Any concerns or suspected violations related to human rights may be reported through line management or via the company's whistleblowing channels.
AS METAL COM ensures confidentiality and protection against retaliation for individuals who report concerns in good faith.

6. MONITORING AND RESULTS

Compliance with this Human Rights Policy is monitored through internal controls, management oversight and reporting mechanisms.
During the period 2023–2025, no confirmed human rights violations were identified within the company. Any human rights violations will be addressed in accordance with applicable internal procedures and policies.

7. POLICY APPROVAL

This Human Rights Policy is approved by AS METAL COM management and is effective as of the date of approval.

GENERAL MANAGER

CONSTANTIN APOSTOL