
ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

SLIM ALUMINIUM S.p.A

CERTIFICATE
NUMBER

128

ASI
STANDARD

PERFORMANCE
STANDARD
(V2 2017)

CERTIFICATION
LEVEL

FULL
CERTIFICATION

ASI ACCREDITED
AUDITOR

BUREAU
VERITAS
CERTIFICATION

DATE OF ISSUE

11 MAY 2021

DATE OF EXPIRY

10 MAY 2024

CERTIFIED SINCE

11 MAY 2021

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*

CERTIFICATION SCOPE

Manufacture aluminium alloys rolled products by remelting, casting, hot and cold rolling and heat treatments (EA17).

SUMMARY AUDIT REPORT

PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Slim Aluminium S.p.A.
ENTITY NAME	Slim Aluminium S.p.A.
CERTIFICATION SCOPE	Manufacture aluminium alloys rolled products by remelting, casting, hot and cold rolling and heat treatments (EA17).
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">• Semi-Fabrication
ASI STANDARD	<ul style="list-style-type: none">• Performance Standard V2
AUDIT TYPE	<ul style="list-style-type: none">• Certification Audit
AUDIT FIRM	Bureau Veritas Certification
AUDIT DATE	<ul style="list-style-type: none">• 24 – 25 February 2021
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">• 19 March 2021
AUDIT SCOPE	<p>The audit scope included all the facilities, functions and services of the Slim Aluminium S.p.A. di Cisterna di Latina plant.</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none">• Semi-Fabrication <p>All relevant 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	<p>The Auditors confirm that:</p> <ul style="list-style-type: none"><input checked="" type="checkbox"/> The information provided by the Entity is true and accurate to the best knowledge of the Auditor(s) preparing this report.<input checked="" type="checkbox"/> The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous.<input checked="" type="checkbox"/> 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 11 May 2021 – 10 May 2024

NEXT AUDIT TYPE Surveillance Audit

NEXT AUDIT DUE DATE 10 November 2022

CERTIFICATE NUMBER 128

SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	A legislative list is kept updated by the IMS (Integrated Management System) Manager.
1.2 Anti-Corruption	Conformance	A Code of Conduct is contained in the Legislative Decree 231/01 Model - Organization and Control Model (Page 124 Code of Conduct - Annex II to the Organizational Model). The Code includes environmental protection, the disciplinary system (Annex III) and confidentiality. The system also includes the whistleblowing system.
1.3 Code of Conduct	Conformance	A Code of Conduct is contained in the Legislative Decree 231/01 Model - Organization and Control Model (Page 124 Code of Conduct - Annex II to the Organizational Model). The Code includes environmental protection, the disciplinary system (Annex III) and confidentiality. The system also includes the whistleblowing system. The system provides for the acceptance of the Code of Conduct in the supplier pre-qualification phase.
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	The Entity has an Integrated Policy which contains environmental, social and governance references. The Policy also covers other aspects including energy management (ISO 50001), food safety (ISO 22000) and aluminium structural products (EN 15088).
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	The Integrated Policy is periodically reviewed to verify its constant suitability and adequacy. The Policy clearly describes the Entity's commitment to the use and provision of resources to ensure continuous improvement and. the Entity also undertakes to invest in staff training and education. The Policy is signed by the Plant Manager and CEO.
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	The Integrated Policy is available internally through the company intranet and to external interested parties through publication on the website: https://www.slimalu.com/it/certificazioni/ or with a direct link (in Italian): https://www.slimalu.com/wp-content/uploads/2021/02/Politica-Integrata-Ed3_Rev2_2021_02_ita.pdf
2.2 Leadership	Conformance	The Entity has appointed a manager tasked with supervising and ensuring correct implementation of all

CRITERION	RATING	COMMENT
		management systems and with direct responsibility for the integrated requirements.
2.3a Environmental and Social Management Systems (environmental)	Conformance	The Entity has an ISO 14001 certified Management System (certified by DNV GL).
2.3b Environmental and Social Management Systems (social)	Minor Non-Conformance	The Entity does not have a certified social management system. The Management System currently implemented by the Entity requires greater integration with the requirements of social responsibility.
2.4 Responsible Sourcing	Minor Non-Conformance	The Entity has prepared a pre-qualification questionnaire and there is periodic monitoring of suppliers on environmental, energy and safety issues. However, the Procurement Policy currently adopted by the Entity requires further enrichment on the requirements relating to social responsibility.
2.5 Impact Assessments	Minor Non-Conformance	The Environmental Impact Assessment analyses the significance level of environmental impacts for each identified direct and indirect environmental aspect. However, the document requires revision to consider the risks and opportunities related to the social sphere.
2.6 Emergency Response Plan	Conformance	The Entity has established and documented a series of procedures to respond to emergency situations and dangerous behaviour. At least once a year the Entity organizes training tests to respond to emergency situations.
2.7 Mergers and Acquisitions	Conformance	No acquisitions have been made and no acquisitions are planned in the near future. The Entity has a process within the Legislative Decree 231/01 Model which provides for the preparation of plans to review environmental, social and governance issues.
2.8 Closure, Decommissioning and Divestment	Conformance	No decommissioning or divestments are foreseen. In any case, the Entity has a process within the Legislative Decree 231/01 Model in place which, in the event of divestment and disposal of plants, a specific plan is created to review environmental, social and governance issues.
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Minor Non-Conformance	The Entity's Sustainability Report, as at time of audit, is in draft. Approval of the document and its publication is expected at the same time as the approval of the budget scheduled for June 2021.

CRITERION	RATING	COMMENT
3.2 Non-compliance and liabilities	Conformance	There are no fines, sentences or penalties relating to non-compliance with applicable law. There are no disputes of any kind and nature. Should these situations arise in the future, the Entity will publish details in the Sustainability Report (under the section 'relationship with stakeholders'). Once approved, the document will be published and made available at: https://www.slimalu.com/it/slim-cisterna-2/
3.3a Payments to governments (legal and contractual)	Conformance	The Entity has a management system, compliant with Legislative Decree 231/01 Model which requires both a Code of Ethics and internal controls on anti-corruption carried out by a Supervisory Body (OdV or Organismo di Vigilanza).
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	Minor Non-Conformance	The Entity's whistleblowing tool was developed through Legislative Decree 231/01 Model. The tool gives the possibility for workers to make reports and complaints through a dedicated email address. However, the awareness amongst workers on the use of this mechanism needs to be improved. Complaints and reports from external stakeholders are analysed and managed even if a specific tool is not currently envisaged.
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	The Entity has an LCA study report which analysed 3 representative products, including circles (cookware) alloy 400-D, cosmetics (deep-drown) for 5657-D and 5005-L alloys; and household foil 8006-L. Gabi software is used for data processing. The study was developed by the Rina body.
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	The LCA study is not published on the website but is provided to interested parties upon request.
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	The developed LCA study is not published on the website but is provided to interested parties upon request.
4.2 Product design	Conformance	The impact on the environment of the materials produced is lessened by maximizing the use of aluminium scraps (pre/post-consumer) on the alloys produced.
4.3a Aluminium Process Scrap (targets)	Conformance	All production cycles are monitored for each phase of the process with the recording of standard process rejects and extra rejects using dedicated software.

CRITERION	RATING	COMMENT
		Measurements are used to minimize waste of each cycle and standardize it. Where necessary, for example in cases where anomalies occur, specific improvement projects are launched to bring the waste back to within the standard limits or even lower.
4.3b Aluminium Process Scrap (alloy separation)	Conformance	All production scraps are collected for families of compatible alloys in order to facilitate reuse. Internal waste is 100% recycled. Various tools are available for the collection of scraps: dedicated bins with separation by alloy and type, centralized pneumatic conveying systems, equipment for molding chipboard or other types of thin waste in order to optimize the yield of remelting.
4.4a Collection and recycling of products at end-of-life (strategy)	Conformance	The Entity applies internal procedures for the recovery of secondary raw materials and waste. There is an interest (including economic) to use the largest quantities available on the market of recycled material or secondary raw materials. One of the sales strategies is "in tolling". In these cases, customers provide their own processing scraps or other aluminium scraps purchased on the market to cover the metal value of the products purchased from Slim Aluminium.
4.4b Collection and recycling of products at end-of-life (engagement)	Conformance	Slim Aluminium is part of several associations - in Italy the most important for the aluminium sector is CIAL which deals with the recovery of aluminium (post-consumer). At present, CIAL has not signed post-consumer recycling agreements in the geographical area of the Entity. The Entity can receive aluminium scraps/waste (including end-of-life), re-melting them as part of the raw material. Products containing a higher percentage of recycled material are also promoted. Slim Aluminium buys a share of pre/post-consumer material from metal collection centres.

PRINCIPLE 5 GREENHOUSE GAS EMISSIONS

5.1 Disclosure of GHG emissions and energy use	Minor Non-Conformance	The Entity has a certified Management System in accordance with UNI EN ISO 50001. The amount of CO ₂ in the atmosphere derives from the consumption of methane, consumption of diesel for generating sets and organic share of aluminium scrap. An audit is carried out annually by a certification body to verify CO ₂ values emitted for the site using methane bills and diesel consumption. In the year 2019, 28.539 tons of CO ₂ were emitted.
--	-----------------------	--

CRITERION	RATING	COMMENT
		<p>The Entity reports emissions data annually to public authorities as required by the EU Emissions Trading System (EU ETS).</p> <p>Pending the publication of the Sustainability Report, the Entity makes available the data relating to GHG emissions from energy consumption and reduction targets upon request; stakeholders are informed of this possibility.</p>
5.2 GHG emissions reductions	Minor Non-Conformance	<p>All energy consumptions that directly (natural gas) or indirectly (electricity) contribute to GHG emissions are monitored. On the basis of this monitoring, potential efficiency projects are analysed in order to obtain a continuous reduction in consumption. Targets to reduce GHG emissions have been identified and activated. Pending the publication of the Sustainability Report, the Entity makes available the data relating to GHG emissions from energy consumption and reduction targets upon request; stakeholders are informed of this possibility. GHG emission reduction targets have been established for projects such as the optimization of the compressed air network, and the efficiency of Bernotti 2 coil annealing furnaces; with other studies also underway, such as the expansion of melting line 2, to evaluate potential future improvement.</p>
5.3a Aluminium Smelting (management system)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.3b Aluminium Smelting (up to and including 2020)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.3c Aluminium Smelting (after 2020)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
PRINCIPLE 6 EMISSIONS, EFFLUENTS AND WASTE		
6.1 Emissions to Air	Conformance	<p>The plant has an Environmental Authorisation (AIA or Integrated Environmental Permit) which includes management of emissions into the atmosphere, compliant with Legislative Decree 152/2006. Following the authorization principles, the Entity communicates its emissions into the atmosphere to the Public Administration annually.</p> <p>The Entity undertakes internal audits of compliance with the Permit and checks on the communication to the Public Administration is part of the ISO 14001 certification audit.</p>
6.2 Discharges to Water	Conformance	The plant is equipped with three water cycle treatment and purification systems for industrial and civil use.

CRITERION	RATING	COMMENT
		<p>The final discharge point of the wastewater is constantly monitored in order to prevent any kind of external contamination. Purification devices are monitored daily, with all checks recorded on a weekly basis.</p> <p>Additionally, in compliance with the Environmental Authorisation (AIA or Integrated Environmental Permit), the final discharge point is equipped with an automatic sampler with chiller which makes wastewater samples from the previous 12 hours available to the authorities.</p>
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	<p>An assessment of spills and leakage was made within the Environmental Analysis (updated March 2019). The document analyses the environmental aspect in normal and emergency conditions and assesses the level of significance.</p>
6.3b Assessment and Management of Spills and Leakage (management)	Minor Non-Conformance	<p>The Entity has prepared a series of internal control procedures and programs for emergency management. Specific training tests on the management of environmental emergencies are planned every year. However, an emergency training test was not carried out during 2020.</p>
6.4a Reporting of Spills (immediate disclosure)	Conformance	<p>There have been no spillage accidents and spills of polluting material over the last 20 years. The Entity has planned to communicate these types of events through the Sustainability Report. The communication of environmental disasters is also envisaged by the internal procedure relating to the management of environmental emergencies.</p>
6.4b Reporting of Spills (regular reporting)	Conformance	<p>There have been no spillage accidents and spills of polluting material over the last 20 years. The Entity has planned to communicate these types of events through the Sustainability Report. The communication of environmental disasters is also envisaged by the internal procedure relating to the management of environmental emergencies.</p>
6.5a Waste management and reporting (strategy)	Conformance	<p>Based on the principles of sustainability and circularity, the Entity aims to maximize the recovery of waste by directing only a small part of it (non-recoverable) to disposal. The aluminium waste produced in all stages of the process is recovered internally as a secondary raw material of the melting furnaces. The overall percentage of waste sent for recovery operations in 2020 is 87%.</p> <p>The plant periodically carries out a characterization of its waste using the services of external laboratories.</p>

CRITERION	RATING	COMMENT
		It also performed the characterization of the waste whenever requested by the suppliers of the disposal/recovery service.
6.5b Waste management and reporting (disclosure)	Minor Non-Conformance	The Entity monitored the quantities of hazardous and non-hazardous waste generated and determined the methods of waste disposal. Pending the publication of the Sustainability Report, the Entity makes available this information upon request; stakeholders are informed of this possibility.
6.6a Bauxite Residue (storage construction)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6b Bauxite Residue (integrity checks and controls)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6c Bauxite Residue (water discharge)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6d Bauxite Residue (marine and aquatic environments)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6e Bauxite Residue (state of the art technologies)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6f Bauxite Residue (remediation)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7a Spent Pot Lining (SPL) (storage and management)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7b Spent Pot Lining (SPL) (recovery and recycling)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7c Spent Pot Lining (SPL) (Untreated SPL)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7d Spent Pot Lining (SPL) (review of alternatives)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7e Spent Pot Lining (SPL) (marine and aquatic environments)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8a Dross (recovery)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8b Dross (recycling)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8c Dross (review of alternatives)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
PRINCIPLE 7 WATER STEWARDSHIP		
7.1a Water assessment (mapping)	Conformance	The water system is divided into: - 2 wells for industrial use (well 1 and 2) - 1 well for drinking use (well 3) - 2 barrier wells (wells A and B) for MISO project (operational safety). water from wells A and B for is also used for cooling after treatment (industrial use). This description is reported in the Environmental Analysis document (updated March 2019).
7.1b Water assessment (risk assessment)	Not Applicable	There are no watersheds in the Entity's Area of Influence.
7.2a Water management (management plans)	Conformance	The Entity is ISO 14001:2015 certified. The environmental review required by this Standard includes a mapping of water sources and water usage. The latest analysis is dated November 2019. The Environmental Analysis also includes a risk assessment for the use of water. The main risk is exceeding the Environmental Authorization limits, including water withdrawal quotas. Internal audits and operational control measures are in place to monitor water use.
7.2b Water management (monitoring)	Conformance	The monitoring of water consumption is undertaken monthly and recorded in a dedicated file. Verified specific monitoring of water resources (m ³ /ton of aluminium produced). The data recorded in the monitoring period, referring to the quantity of water supplied, shows a fairly strong trend due to a decrease in specific water consumption.
7.3 Disclosure of water usage and risks	Minor Non-Conformance	The Entity monitored the withdrawal and use of water and analysed the material risks related to water. However, this type of information is not currently disclosed publicly. Pending the publication of the Sustainability Report later in the year, the Entity makes available this information upon request; stakeholders are informed of this possibility.
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	The Entity has identified a plan of action in relation to biodiversity in documents for release under the Environmental Permit (AIA or Environmental Integrated Authorization), and is a requirement under Italian law, Decree 152/2006. Criticalities have been identified which were kept under control by means of foliar investigations for the constant verification of the presence of elements that could cause damage (e.g. presence of chlorinated solvents). The plan included in

CRITERION	RATING	COMMENT
		the AIA is correctly structured and takes into account the mitigation hierarchy, first of all taking into consideration the mitigation in relation to the remediation project in progress.
8.2a Biodiversity management (biodiversity action plans)	Conformance	A risk assessment on biodiversity is addressed in the Environmental Permit (AIA or Environmental Integrated Authorization) and is a requirement under Italian law, Decree 152/2006. At present, foliar investigations for the constant verification of the presence of elements that could cause damage (e.g. presence of chlorinated solvents) are undertaken.
8.2b Biodiversity management (consultation and mitigation hierarchy)	Conformance	A risk assessment on biodiversity is addressed in the Environmental Permit (AIA or Environmental Integrated Authorization) and is a requirement under Italian law, Decree 152/2006. At present, foliar investigations for the constant verification of the presence of elements that could cause damage (e.g. presence of chlorinated solvents) are undertaken.
8.2c Biodiversity management (reporting)	Conformance	A risk assessment on biodiversity is addressed in the Environmental Permit (AIA or Environmental Integrated Authorization) and is a requirement under Italian law, Decree 152/2006. The risk was assessed as not present. At present, foliar investigations for the constant verification of the presence of elements that could cause damage (e.g. presence of chlorinated solvents) are undertaken.
8.3 Alien Species	Conformance	Alien species are constantly monitored through periodic checks established within the monitoring plan required by ISO 14001. The assessment performed in terms of risk management currently evaluates the probability of introducing alien species that could have significant negative impacts to be low on biodiversity.
8.4a Commitment to “No Go” in World Heritage properties (exploration and new mines)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.4b Commitment to “No Go” in World Heritage properties (existing mines)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.5a Mine rehabilitation (best available techniques)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
8.5b Mine rehabilitation (financial provisions)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
PRINCIPLE 9 HUMAN RIGHTS		
9.1a Human Rights Due Diligence (policy)	Conformance	The organization's commitment to respect human rights is expressed in the Integrated Policy, Code of Ethics and Legislative Decree 231/01 Model.
9.1b Human Rights Due Diligence (process)	Conformance	The organization's commitment to respect human rights is expressed in the Integrated Policy, Code of Ethics and Legislative Decree 231/01 Model. A human rights due diligence process is consistently carried out. Compliance with applicable mandatory regulations in terms of labour law has been verified.
9.1c Human Rights Due Diligence (remediation)	Conformance	The organization's commitment to respect human rights is expressed in the Integrated Policy, Code of Ethics and Legislative Decree 231/01 Model. No remediation actions have been taken and to date, no adverse impacts have been identified through the continuous due diligence process.
9.2 Women's Rights	Conformance	Gender equality is guaranteed by regulatory compliance and by the presence of women in top management and middle management positions (General Manager, middle managers and higher levels of clerical). For the reference sector, the percentage of women in production is small. The adoption of an Organizational Model pursuant to Legislative Decree 231/01 and a confidential reporting system represent provides a tool for communicating any offenses and violations to the Supervisory Body in charge. There were no cases of discrimination in 2019.
9.3 Indigenous Peoples	Not Applicable	The Entity does not operate on sites occupied by Indigenous Peoples.
9.4 Free, Prior, and Informed Consent (FPIC)	Not Applicable	The Entity does not operate on sites occupied by Indigenous Peoples.
9.5 Cultural and sacred heritage	Conformance	A risk assessment on biodiversity is addressed in the Environmental Permit (AIA or Environmental Integrated Authorization) with a chapter on artistic and historical heritage included in the Annex Report on Territorial, Urban and Environmental Constraints.
9.6a Resettlements (avoid or minimise)	Conformance	There are no resettlements expected. In the event of transfers and re-establishments, assessment of related social risks will be undertaken, however, at the moment, there are none planned.

CRITERION	RATING	COMMENT
9.6b Resettlements (where unavoidable)	Conformance	There are no resettlements expected. In the event of transfers and re-establishments, assessment of related social risks will be undertaken, however, at the moment, there are none planned.
9.7a Local Communities (rights and interests)	Conformance	There are no concerns for local communities. The relationships are however regulated through the competent territorial bodies, Municipality, Province, ARPA (Regional Agency for the Protection of the Environment), etc.
9.7b Local Communities (impacts)	Conformance	There are no concerns for local communities. The relationships are however regulated through the competent territorial bodies, Municipality, Province, ARPA (Regional Agency for the Protection of the Environment), etc.
9.7c Local Communities (livelihoods)	Conformance	There are no concerns for local communities. The relationships are however regulated through the competent territorial bodies, Municipality, Province, ARPA (Regional Agency for the Protection of the Environment), etc.
9.8 Conflict-Affected and High-Risk Areas	Conformance	The requirement is met through the Supplier Risk Assessment which analyses the risks associated with the potential origin of aluminium used, whether it is also used, as in the case of the company not coming from conflict risk areas. The Risk Readiness Assessment (RRA) - Risk Assessment in Raw Materials Supply Chains has been recalled.
9.9 Security practice	Conformance	An armed night surveillance service of the plant is provided, specifically appointed and authorized by law. The concierge service is carried out during the day by non-armed personnel belonging to an external company. Supervision and access control are carried out in compliance with the law. At the entrance to the plant, an identity document is requested from external staff, and in response to the current pandemic situation, body temperature checks are carried out at the entrance to the plants using a thermoscanner.

PRINCIPLE 10 LABOUR RIGHTS

10.1a Freedom of Association and Right to Collective Bargaining (freedom of association)	Conformance	The Entity respects the right of workers to associate freely. There are unitary trade union representatives (CGIL, SISL, UIL), whose delegates have confirmed collaboration and guarantee of the rights to association by all workers. The following was found: - No obstacles found to training or membership of trade unions.
--	-------------	--

CRITERION	RATING	COMMENT
		<ul style="list-style-type: none"> - Adopted the National Collective Bargaining Agreement for the metalworking industry and installation of plants, signed by the USW plus II level contracts in 2015 which concerns premium increases law e.g. in case of shift. - There is a RSU - unitary trade union representation (6 components). - There is a three-year procedure for the renewal of representations. Represent the trade unions CGIL, CISL, UIL, UGL. - Monthly meeting planned with the unions to communicate results, in terms of production (DEPTTA and production paid x month). - Security and investments are the main themes. Trade union disputes not present.
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Conformance	<p>The right to collective bargaining is guaranteed to all workers through their own representatives. The following was found:</p> <ul style="list-style-type: none"> - No obstacles found to training or membership of trade unions. - Adopted the National Collective Labour Agreement for the metalworking industry and installation of plants, signed by the USW plus II level contracts in 2015 which concerns premium increases law e.g. in case of shift. - There is a RSU - unitary trade union representation (6 components). - There is a three-year procedure for the renewal of representations. Represent the trade unions CGIL, CISL, UIL, UGL. - Monthly meeting planned with the unions to communicate results, in terms of production (DEPTTA and production paid x month). - Security and investments are the main themes. Trade union disputes not present.
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Conformance	<p>The right to collective bargaining and freedom of association is established in Italy by law. The following was found:</p> <ul style="list-style-type: none"> - No obstacles found to training or membership of trade unions. - Adopted the National Collective Labour Agreement for the metalworking industry and installation of plants, signed by the USW plus II level contracts in 2015 which concerns premium increases law e.g. in case of shift. - There is a RSU - unitary trade union representation (6 components).

CRITERION	RATING	COMMENT
		<ul style="list-style-type: none"> - There is a three-year procedure for the renewal of representations. Represent the trade unions CGIL, CISL, UIL, UGL. - Monthly meeting planned with the unions to communicate results, in terms of production (DEPTTA and production paid x month). - Security and investments are the main themes. Trade union disputes not present.
10.2a Child Labour (minimum age)	Conformance	<p>The hiring procedure and the control of identity documents guarantees the absence of child labour. The Entity does not use or support the use of child labour. Evidence of the commitment is available in the Social Responsibility Policy document.</p> <p>At the date of the audit, no minor workers were hired by the Entity.</p>
10.2b Child Labour (hazardous)	Conformance	<p>The hiring procedure and the control of identity documents guarantees the absence of child labour. The Entity does not use or support the use of child labour. Evidence of the commitment is available in the Social Responsibility Policy document.</p> <p>At the date of the audit, no minor workers were hired by the Entity.</p>
10.2c Child Labour (worst forms)	Conformance	<p>The hiring procedure and the control of identity documents guarantees the absence of child labour. The Entity does not use or support the use of child labour. Evidence of the commitment is available in the Social Responsibility Policy document.</p> <p>At the date of the audit, no minor workers were hired by the Entity.</p>
10.3a Forced Labour (human trafficking)	Conformance	<p>All workers are hired directly or through administration agencies authorized by the Ministry of Labour through the regulatory devices. No intermediaries of any kind are used. The following was found:</p> <ul style="list-style-type: none"> - The National Collective Bargaining Agreement (CCNL) is applied by the metalworking collective. No loan situation. Ancient PTFs in compliance with the law. - Extraordinary (working hours) always authorized by the managers and registered through magnetic badges. Extraordinary maximum level as per collective agreement. Overtime is always optional. - Two administration agencies are used, Adecco and Manpower (both SA8000 certified). - Security is provided by Metro Italia Giorno in daytime and at night with armed guard by Metronotte.

CRITERION	RATING	COMMENT
10.3b Forced Labour (deposits, fees, advances)	Conformance	<p>No deposit, hiring commissions, equipment payments, etc. are requested of the workers. All workers are hired directly or through administration agencies authorized by the Ministry of Labour through the regulatory devices. No intermediaries of any kind are used. The following was found:</p> <ul style="list-style-type: none"> - The National Collective Bargaining Agreement (CCNL) is applied by the metalworking collective. <p>No loan situation. Ancient PTFs in compliance with the law.</p> <ul style="list-style-type: none"> - Extraordinary (working hours) always authorized by the managers and registered through magnetic badges. Extraordinary maximum level as per collective agreement. Overtime is always optional. - Two administration agencies are used, Adecco and Manpower (both SA8000 certified). - Security is provided by Metro Italia Giorno in daytime and at night with armed guard by Metronotte.
10.3c Forced Labour (migrant workers)	Conformance	<p>No deposits of any kind are required from the workers, be they EU citizens or migrants. The following was found:</p> <ul style="list-style-type: none"> - The National Collective Bargaining Agreement (CCNL) is applied by the metalworking collective. <p>No loan situation. Ancient PTFs in compliance with the law.</p> <ul style="list-style-type: none"> - Extraordinary (working hours) always authorized by the managers and registered through magnetic badges. Extraordinary maximum level as per collective agreement. Overtime is always optional. - Two administration agencies are used, Adecco and Manpower (both SA8000 certified). - Security is provided by Metro Italia Giorno in daytime and at night with armed guard by Metronotte.
10.3d Forced Labour (debt bondage)	Conformance	<p>Workers are free to leave their jobs at any time. No advance payments or loans are given, other than those provided for by the regulations in force. The following was found:</p> <ul style="list-style-type: none"> - The National Collective Bargaining Agreement (CCNL) is applied by the metalworking collective. <p>No loan situation. Ancient PTFs in compliance with the law.</p> <ul style="list-style-type: none"> - Extraordinary (working hours) always authorized by the managers and registered through magnetic badges. Extraordinary maximum level as per collective agreement. Overtime is always optional. - Two administration agencies are used, Adecco and Manpower (both SA8000 certified). - Security is provided by Metro Italia Giorno in daytime and at night with armed guard by Metronotte.

CRITERION	RATING	COMMENT
10.3e Forced Labour (freedom of movement)	Conformance	<p>Workers can leave their jobs freely at any time. The following was found:</p> <ul style="list-style-type: none"> - The National Collective Bargaining Agreement (CCNL) is applied by the metalworking collective. No loan situation. Ancient PTFs in compliance with the law. - Extraordinary (working hours) always authorized by the managers and registered through magnetic badges. Extraordinary maximum level as per collective agreement. Overtime is always optional. - Two administration agencies are used, Adecco and Manpower (both SA8000 certified). - Security is provided by Metro Italia Giorno in daytime and at night with armed guard by Metronotte.
10.3f Forced Labour (retention of identity papers, permits, certificates)	Conformance	<p>Only copies, not originals, of the workers' documents (identity card, residence permit, driving license, passport) are available. The following was found:</p> <ul style="list-style-type: none"> - The National Collective Bargaining Agreement (CCNL) is applied by the metalworking collective. No loan situation. Ancient PTFs in compliance with the law. - Extraordinary (working hours) always authorized by the managers and registered through magnetic badges. Extraordinary maximum level as per collective agreement. Overtime is always optional. - Two administration agencies are used, Adecco and Manpower (both SA8000 certified). - Security is provided by Metro Italia Giorno in daytime and at night with armed guard by Metronotte.
10.3g Forced Labour (freedom to terminate employment)	Conformance	<p>Workers can freely terminate their employment relationship at any time by communicating their resignation to Human Resources. The following was found:</p> <ul style="list-style-type: none"> - The National Collective Bargaining Agreement (CCNL) is applied by the metalworking collective. No loan situation. Ancient PTFs in compliance with the law. - Extraordinary (working hours) always authorized by the managers and registered through magnetic badges. Extraordinary maximum level as per collective agreement. Overtime is always optional. - Two administration agencies are used, Adecco and Manpower (both SA8000 certified). - Security is provided by Metro Italia Giorno in daytime and at night with armed guard by Metronotte.
10.4 Non-Discrimination	Conformance	<p>Gender equality is guaranteed through the Entity's Code of Ethics and the staff selection and hiring procedure. The policy adopted by the Entity</p>

CRITERION	RATING	COMMENT
		guarantees equal opportunities and non-discrimination in the hiring, remuneration, promotion, training, opportunities for advancement or dismissal of any Worker on the basis of sex, race, national or social origin, religion or any other condition that may give rise to of discrimination.
10.5 Communication and engagement	Conformance	<p>Communications are given by:</p> <ul style="list-style-type: none"> - Regular meetings with staff and management. - Meetings with workers' safety representatives. - Periodic meeting on health and safety between Employer, Occupational Doctor, Head of the prevention and protection service, Head of Workers for Safety (in Italy it is mandatory according to Article 35 of Decree 81/2008). - Union meetings of workers registered with the union.
10.6 Disciplinary practices	Conformance	<p>The Entity complies with the National Collective Bargaining Agreement (CCNL) and Law 300. Disciplinary practices are managed in accordance with the provisions of current legislation. In the last year, there were 26 measures, and one dismissal was managed in accordance with the CCNL.</p>
10.7a Remuneration (living wage)	Conformance	<p>The remuneration levels are applied in compliance with the National Collective Bargaining Agreement (CCNL) for the sector. The most applied levels are Level 4 and 5. The levels are being recalculated as established by the renewal agreement of the CCNL (signed on February 2021 to take effect May for the regulatory part and June for remuneration part). According to national statistics, the living wage is €758.68 per month. The lowest level present is Level 3 for direct workers and Level 2 for administration. Payrolls and bank transfers were sampled. The payslips comply with the standard forms approved by the public administration and employees interviewed stated they understood the contents of payslips and that payments were always on time.</p>
10.7b Remuneration (method of payment)	Conformance	<p>The remuneration levels are applied in compliance with the national collective agreement for the sector. Payrolls and bank transfers were sampled. The payslips comply with the standard forms approved by the public administration, the people interviewed said they understood the contents of the payslips and that payments were always on time.</p>
10.8 Working Time	Conformance	<p>The Entity complies with applicable law and industry standards regarding working hours (including</p>

CRITERION	RATING	COMMENT
		<p>overtime). Recording of working hours is via magnetic badges. Overtime is always voluntary.</p> <p>Payslips contain records of attendance, absence, leave, illness, etc. A sample of 20 payslips across each department over the month of January 2021 was taken. The Entity uses INAZ as a payroll management system and working time recording. Payrolls are managed internally.</p> <p>With the exception of support activities, the plant operates on three shifts (currently staggered as per COVID-19 protocol (6.00 - 14.00; 14.00 - 22.00; 22.00 - 06.00). The plant is open 7 days a week for many production departments - e.g. foundry. The timetable changes, due to application of the COVID-19 protocol, are communicated one week in advance.</p>
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	<p>The Entity is ISO 45001 certified. The Integrated Policy (and integrated with ASI requirements), signed by the General Manager and CEO, includes commitment to implement economic-financial management methods, personnel and supplier management in order to guarantee ethical correctness, protection of the territory and respect for human and social rights.</p> <p>The OH&S Policy was approved by top management, and resources are provided for its implementation.</p>
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	<p>The Entity is ISO 45001 certified. The Integrated Policy (and integrated with ASI requirements), signed by the General Manager and CEO, includes commitment to implement economic-financial management methods, personnel and supplier management in order to guarantee ethical correctness, protection of the territory and respect for human and social rights.</p> <p>As required by ISO 45001, the Policy and the OH&S Management System in full is applied to all workers present whether they are direct, indirect or subcontracted workers.</p>
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Conformance	<p>The Entity is ISO 45001 certified. The Integrated Policy (and integrated with ASI requirements), signed by the General Manager and CEO, includes commitment to implement economic-financial management methods, personnel and supplier management in order to guarantee ethical correctness, protection of the territory and respect for human and social rights.</p>

CRITERION	RATING	COMMENT
		As required by ISO 45001, the Policy contains a commitment to comply with all mandatory standards.
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	<p>The Entity is ISO 45001 certified. The Integrated Policy (and integrated with ASI requirements), signed by the General Manager and CEO, includes commitment to implement economic-financial management methods, personnel and supplier management in order to guarantee ethical correctness, protection of the territory and respect for human and social rights.</p> <p>The Policy includes a commitment to ensure workers understand safe practices and the right to leave the workplace in cases of unsafe practices. In particular, any worker who leaves the workplace in the presence of serious and immediate danger that cannot be avoided will not face subsequent implications.</p>
11.2 OH&S Management System	Conformance	<p>The Entity is ISO 45001 certified. The Integrated Policy (and integrated with ASI requirements), signed by the General Manager and CEO, includes commitment to implement economic-financial management methods, personnel and supplier management in order to guarantee ethical correctness, protection of the territory and respect for human and social rights.</p> <p>The Entity also commits to performance of excellence in the areas of energy efficiency, ethics and human rights.</p>
11.3 Employee engagement on health and safety	Conformance	<p>The Entity is ISO 45001 certified. The Integrated Policy (and integrated with ASI requirements), signed by the General Manager and CEO, includes commitment to implement economic-financial management methods, personnel and supplier management in order to guarantee ethical correctness, protection of the territory and respect for human and social rights.</p> <p>The Health and Safety Committee corresponds to the SPP (Prevention and Protection Service), of which the RLS is a member (Workers' Representative for Security).</p>
11.4 OH&S performance	Conformance	<p>Six accidents were recorded in 2020, with the most serious for a total of 60 days and another 55 days. One incident related to a temporary worker. KPI's consider the IG (0.34) and IF (8.11) indicators. No non-conformances were detected in the last ISO 45001 audit, which also identified eight observations</p>

CRITERION	RATING	COMMENT
		and one opportunity for improvement in addition to those not closed in the 2019 report.

Document Control and Version History

Revision	Date	Notes
0	11 May 2021	Initial Certification Audit (Full Certification)