
ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

RAFFMETAL S.p.A.

CERTIFICATE
NUMBER

89

ASI
STANDARD

PERFORMANCE
STANDARD
(V2 2017)

CERTIFICATION
LEVEL

CERTIFICATION

ASI ACCREDITED
AUDITOR

BUREAU
VERITAS
CERTIFICATION

DATE OF ISSUE

10 AUGUST 2020

DATE OF EXPIRY

9 AUGUST 2023

CERTIFIED SINCE

10 AUGUST 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*

CERTIFICATION SCOPE

Production and trade of standardized and industrial aluminium alloys in ingot form, continuous bar castings and in the liquid state through the phases of purchasing, storage, sorting and processing of scrap metal, both within ferrous and non-ferrous materials.

SUMMARY AUDIT REPORT PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Raffmetal and Fondital
ENTITY NAME	Raffmetal S.p.A.
CERTIFICATION SCOPE	Production and trade of standardized and industrial aluminium alloys in ingot form, continuous bar castings and in the liquid state through the phases of purchasing, storage, sorting and processing of scrap metal, both within ferrous and non-ferrous materials.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Aluminium Re-melting/Refining
ASI STANDARD	<ul style="list-style-type: none">Performance Standard V2
AUDIT TYPE	<ul style="list-style-type: none">First Certification Audit
AUDIT FIRM	Bureau Veritas Certification
AUDIT DATE	<ul style="list-style-type: none">8 . 10 July 2020
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">25 July 2020
AUDIT SCOPE	<p>The audit scope covered the Production and trade of standardized and industrial aluminium alloys in ingot form, continuous bar castings and in the liquid state through the phases of purchasing, storage, sorting and processing of scrap metal, both within ferrous and non-ferrous materials at Casto, via Malpaga 82 and Odolo, via Brescia 60.</p> <p>Supply chain activities included in the audit scope:</p> <ul style="list-style-type: none">Aluminium Re-melting/Refining <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.

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- 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 10 August 2020 - 9 August 2023

NEXT AUDIT TYPE Re-certification Audit

NEXT AUDIT DUE DATE 9 August 2023

CERTIFICATE NUMBER 89

SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	<p>The Company is certified against ISO 14001 and BS OHSAS 18001. Conforming to these Standards, there is a complete list of applicable environmental laws, and legal compliance and undertaking internal audits.</p> <p>In addition to certifications there is a Management System, conforming to Italian law decree 231/01 that requires internal audits on legal compliance to be undertaken by a supervising body called OdV (Organismo di Vigilanza: Vigilating Body).</p>
1.2 Anti-Corruption	Conformance	<p>The Entity has a Management System, conforming to Italian law decree 231/01 that requires both a code of ethics and internal audits on anti-corruption to be undertaken by a supervising body called OdV (Organismo di Vigilanza: Vigilating Body). Code of ethics is available at this link:</p> <p>http://www.raffmetal.com/web_eng/codice-etico.asp</p>
1.3 Code of Conduct	Conformance	<p>The Entity has a Management System, conforming to Italian law decree 231/01 that requires both a code of ethics and internal audits on anti-corruption to be undertaken by a supervising body called OdV (Organismo di Vigilanza: Vigilating Body).</p>
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	<p>A policy has been documented and been endorsed by top management.</p> <p>Policy is available at this link:</p> <p>http://www.raffmetal.com/web_eng/politica-aziendale.asp</p>
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	<p>A policy has been documented and been endorsed by top management.</p> <p>Policy is available at this link:</p> <p>http://www.raffmetal.com/web_eng/politica-aziendale.asp</p>
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	<p>The policy is available on the public website, is communicated to workers during the induction process and available both on the intranet and at the company premises.</p> <p>Procedure for internal distribution of the</p>

CRITERION	RATING	COMMENT
		document is PGI 04.01 rev 14 dated June 2015. Link to public website is the following: http://www.raffmetal.com/web_eng/politica-aziendale.asp
2.2 Leadership	Conformance	The Management Systems Manager is the senior manager appointed for compliance to the ASI standard. The appointment is included in the position description (dated 6 March 2020).
2.3a Environmental and Social Management Systems (environmental)	Minor Non-Conformance	The Entity is ISO 14001 and ISO 50001 certified. Certificates are available at this link: http://www.raffmetal.com/web_eng/sostenibilita-ambientale.asp During a site walkover at the Odolo facility, it was noted that operational controls were deficient in mitigating fugitive emissions from welding activities.
2.3b Environmental and Social Management Systems (social)	Conformance	The ethical code and organizational model are consistent with the requirements of a Social Management System. It includes statements and policies on recruiting, Human Resources (HR) management and health and safety. The HR Department has its own procedures to continuously deliver conformity to the National CBA (Collective Bargaining Agreement) for work-related matters like wages and working hours. The CBA in Italian is called CCNL: Contratto Collettivo Nazionale di Lavoro, Collective National Work Agreement) The ethical code is available at this link: http://www.raffmetal.com/web_eng/codice-etico.asp The CBA is available to workers and on several websites, including: https://www.fiom-cgil.it/net/index.php/industria-privata-e-installazione-impianti/ccnl-federmeccanica
2.4 Responsible Sourcing	Conformance	The integrated policy addresses suppliers and sub-contractors, as does the ethical code. The Purchasing Department Manager was interviewed and working conditions of subcontractors were audited. All purchase orders reference the ethical code and decree 231. Subcontractors such as maintenance suppliers and construction companies . are kept under control following procedure PGI 07.33.02.

CRITERION	RATING	COMMENT
2.5 Impact Assessments	Conformance	The Entity has a procedure titled "Context analysis, interested parties identification and risk assessment". A risk assessment undertaken using this procedure dated November 2019, addresses environmental and quality matters. Ethics has its own risk assessment dated 2018 a draft of the new release that will be dated in 2020 was shown.
2.6 Emergency Response Plan	Conformance	The Entity has both a certified Environmental and Health and Energy Management System. Environmental certificates (ISO 50001 and ISO 14001) are available at this link: http://www.raffmetal.com/web_eng/sostenibilita-ambientale.asp
2.7 Mergers and Acquisitions	Conformance	Top management stated that if a merger or acquisition is planned, advisors will be hired in accordance with Procedure 05_Raffmetal_Ps All5_"Purchase of goods, services advices and consultancies" dated 28 March 2019.
2.8 Closure, Decommissioning and Divestment	Conformance	Top management stated that if closure, decommissioning or any divestment is planned, advisors will be hired in accordance with Procedure 05_Raffmetal_Ps All5_"Purchase of goods, services advices and consultancies" dated 28 March 2019.
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	The Entity has a Sustainability Report, independently assured to the GRI Standards, by Det Norske Veritas (DNV). The Report was released on a biannual basis for the years 2013/2014, 2015/2016 and 2017/2018. A Sustainability Report for 2019 is being prepared with future reports released on an annual basis. The Sustainability report is available on request at this link: http://www.raffmetal.com/web_eng/contatti.asp In accordance with Italian Civil Code, statutory financial statements are available on request at Chamber of Commerce.
3.2 Non-compliance and liabilities	Conformance	Information is available on request. Top management stated that no significant fines, prosecutions, penalties and sanctions were raised in last two years. Some minor traffic-related fines have been received over this time.

CRITERION	RATING	COMMENT
3.3a Payments to governments (legal and contractual)	Conformance	The Entity has a Management System, conforming to Italian law decree 231/01 that requires both a code of ethics and internal audits on anti-corruption undertaken by a supervising body called OdV (Organismo di Vigilanza: Vigilating Body) The Code of ethics is available at this link: http://www.raffmetal.com/web_eng/codice-etico.asp . Top management stated that all payments made to government and public administration are paid legally (i.e. taxation).
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	A grievance mechanism is publicly available and also describes the Code of Ethics (paragraph 11). A form "contact us" is publicly available at this link: http://www.raffmetal.com/web_eng/contatti.asp However it is not clear what kind of information is required nor what kind of grievances can be raised.
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	Raffmetal performed a complete and thorough Life Cycle Assessment (LCA). The LCA document is available to stakeholders upon request.
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	Raffmetal performed a complete and thorough Life Cycle Assessment (LCA). The LCA document is available to stakeholders upon request.
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	Raffmetal performed a complete and thorough Life Cycle Assessment (LCA). The LCA document is available to stakeholders upon request.
4.2 Product design	Not Applicable	This criterion is not applicable to the Entity's Certification Scope.
4.3a Aluminium Process Scrap (targets)	Conformance	Raffmetal has developed and implemented procedures for the total recovery of aluminium waste.
4.3b Aluminium Process Scrap (alloy separation)	Conformance	Raffmetal has developed and implemented procedures for the total recovery of aluminium waste.

CRITERION	RATING	COMMENT
4.4a Collection and recycling of products at end-of-life (strategy)	Conformance	Raffmetal promotes policies for the efficient implementation of recycling systems. It promotes the culture of recycling at every level of the Entity.
4.4b Collection and recycling of products at end-of-life (engagement)	Conformance	Raffmetal promotes policies for the efficient implementation of recycling systems. It promotes the culture of recycling at every level of the Entity.
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		
5.1 Disclosure of GHG emissions and energy use	Conformance	The Sustainability Report is developed in accordance with the GRI Standards. The Report is available on request at this link: http://www.raffmetal.com/web_eng/contatti.asp
5.2 GHG emissions reductions	Conformance	The Sustainability Report is developed in accordance with the GRI Standards. The Report includes objectives and reduction targets. The Report is available on request at this link: http://www.raffmetal.com/web_eng/contatti.asp
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	Each of the two facilities has its own environmental authorization conforming to Italian Law Dlgs. 152/2006, AIA (Autorizzazione Integrata Ambientale: Environmental Integrated Authorization). The Entity must communicate to public administration its air emissions on annual basis. Other audits (e.g. ISO14001) determined air emissions conformed to local law and AIA (Autorizzazione Integrata Ambientale: Environmental Integrated Authorization). Air emissions data is included in the Sustainability report, which is available on request at this link: http://www.raffmetal.com/web_eng/contatti.asp
6.2 Discharges to Water	Conformance	Each of the two facilities has its own environmental authorization conforming to

CRITERION	RATING	COMMENT
		<p>Italian Law Dlgs. 152/2006, AIA (Autorizzazione Integrata Ambientale: Environmental Integrated Authorization). The Entity must communicate to public administration its water emissions on annual basis.</p> <p>Other audits (e.g. ISO14001) determined air emissions conformed to local law and AIA (Autorizzazione Integrata Ambientale: Environmental Integrated Authorization). Water data is included in the Sustainability report, which is available on request at this link: http://www.raffmetal.com/web_eng/contatti.asp</p>
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	<p>The Entity has a Management System conforming to ISO 14001 - a risk assessment including spills and leakages has been performed, which was last updated in December 2019. In addition to risk assessment, each worker is trained to report situations that may affect both health and safety and environmental issues to supervisors - spills and leaks are considered unsafe situations to be reported. There was no evidence of spills or leakages outside company premises.</p>
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	<p>Every worker is trained to report situations that may affect both health and safety and environmental issues to supervisors. Spills and leaks are considered unsafe situations to be reported.</p> <p>There is no evidence of spills or leakages outside company premises.</p> <p>The Entity's external communication plan requires information to be made available on request to all interested parties at this link: http://www.raffmetal.com/web_eng/contatti.asp</p> <p>Major spills and leakages must be reported to public administration as a rule of the environmental authorization.</p>
6.4a Reporting of Spills (immediate disclosure)	Conformance	<p>Each of the two facilities has its own environmental authorization conforming to Italian Law Dlgs. 152/2006, AIA (Autorizzazione Integrata Ambientale: Environmental Integrated Authorization). The Entity must communicate to public administration any spills and leaks.</p> <p>Air emissions conform to local law and AIA (Autorizzazione Integrata Ambientale: Environmental Integrated Authorization).</p> <p>A spill or a leakage is also considered a nonconformity under ISO 14001 and is recorded</p>

CRITERION	RATING	COMMENT
		<p>as an emergency according to procedure PGI 08.03.</p> <p>Spill information (if any) is included in the Sustainability report, which is available on request at this link: http://www.raffmetal.com/web_eng/contatti.asp</p>
6.4b Reporting of Spills (regular reporting)	Conformance	<p>Each of the two facilities has its own environmental authorization conforming to Italian Law Dlgs. 152/2006, AIA (Autorizzazione Integrata Ambientale: Environmental Integrated Authorization). The Entity must communicate to public administration any spills and leaks. Air emissions conform to local law and AIA (Autorizzazione Integrata Ambientale: Environmental Integrated Authorization). A spill or a leakage is also considered a nonconformity under ISO 14001 and is recorded as an emergency according to procedure PGI 08.03.</p> <p>Spill information (if any) is included in the Sustainability report, which is available on request at this link: http://www.raffmetal.com/web_eng/contatti.asp</p>
6.5a Waste management and reporting (strategy)	Conformance	<p>Wastes have been identified as an environmental aspect for the Entity. Objectives to reduce scrap and waste have been established for the Production Department. The reporting of wastes produced and their final destination is mandatory under Italian law Decree 152/2006. A report called MUD (Modello Unico di Dichiarazione: Unique Form of Declaration) must be sent to public administration every year. A MUD for each facility has been sent to public administration (receipt dated 12 June 2020). Sustainability report is available on request and contains information on waste production. http://www.raffmetal.com/web_eng/contatti.asp</p>
6.5b Waste management and reporting (disclosure)	Conformance	<p>Wastes have been identified as an environmental aspect for the Entity. Objectives to reduce scrap and waste have been established for the Production Department. The reporting of wastes produced and their final destination is mandatory under Italian law Decree 152/2006. A report called MUD (Modello Unico di Dichiarazione: Unique Form of Declaration) must be sent to public administration every year. A MUD for each</p>

CRITERION	RATING	COMMENT
		<p>facility has been sent to public administration (receipt dated 12 June 2020). Sustainability report is available on request and contains information on waste production.</p> <p>http://www.raffmetal.com/web_eng/contatti.asp</p>
6.6a Bauxite Residue (storage construction)	Not Applicable	This criterion is not applicable to the Entity's Certification Scope.
6.6b Bauxite Residue (integrity checks and controls)	Not Applicable	This criterion is not applicable to the Entity's Certification Scope.
6.6c Bauxite Residue (water discharge)	Not Applicable	This criterion is not applicable to the Entity's Certification Scope.
6.6d Bauxite Residue (marine and aquatic environments)	Not Applicable	This criterion is not applicable to the Entity's Certification Scope.
6.6e Bauxite Residue (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	<p>100% of dross is recovered and a detailed description of process can be found in technical attachment to AIA (Autorizzazione Integrata Ambientale: Environmental Integrated Authorization) delivered to the Casto facility. Aluminium and salt are recovered in the internal production process while aluminium oxides are sent to other companies and are utilized in production of concrete and bricks.</p> <p>AIA Casto n° 6307 released by province of Brescia dated 2 December 2016 expires in 2021, renewal required.</p> <p>The sustainability report contains details on</p>

CRITERION	RATING	COMMENT
		<p>quantity of dross recovered internally. Sustainability report is publicly available on request to this link: http://www.raffmetal.com/web_eng/contatti.asp</p>
6.8b Dross (recycling)	Conformance	<p>100% of dross is recovered and a detailed description of process can be found in technical attachment to AIA (Autorizzazione Integrata Ambientale: Environmental Integrated Authorization) delivered to the Casto facility. Aluminium and salt are recovered in the internal production process while aluminium oxides are sent to other companies and are utilized in production of concrete and bricks. AIA Casto n° 6307 released by province of Brescia dated 2 December 2016 expires in 2021, renewal required. The sustainability report contains details on quantity of dross recovered internally. Sustainability report is publicly available on request to this link: http://www.raffmetal.com/web_eng/contatti.asp</p>
6.8c Dross (review of alternatives)	Conformance	<p>100% of dross is recovered and a detailed description of process can be found in technical attachment to AIA (Autorizzazione Integrata Ambientale: Environmental Integrated Authorization) delivered to the Casto facility. Aluminium and salt are recovered in the internal production process while aluminium oxides are sent to other companies and are utilized in production of concrete and bricks. AIA Casto n° 6307 released by province of Brescia dated 2 December 2016 expires in 2021, renewal required. The sustainability report contains details on quantity of dross recovered internally. Sustainability report is publicly available on request to this link: http://www.raffmetal.com/web_eng/contatti.asp</p>
PRINCIPLE 7 WATER STEWARDSHIP		
7.1a Water assessment (mapping)	Conformance	<p>Company is certified against ISO 14001:2015 and an environmental analysis is required by this standard which includes a mapping of water sources and water usage. Last analysis was dated December 2019. There is also a procedure PGA 05.03 rev2 dated Aug. 2013 %Water Management+ Both facilities have their own environmental authorization conforming to</p>

CRITERION	RATING	COMMENT
		<p>Italian law Dlgs. 152/2006 - this authorization includes quotas of water withdrawal; the name of authorization is AIA (Autorizzazione Integrata Ambientale: Environmental Integrated Authorization)</p> <p>AIA Casto n° 6307 released by province of Brescia dated 2 December 2016 expires in 2021, renewal required.</p> <p>AIA Odolo n°650 renewed by province of Brescia dated 4 March 2019 expires in 2031.</p>
7.1b Water assessment (risk assessment)	Conformance	<p>Company is certified against ISO 14001:2015 and an environmental analysis is required by this standard which includes a mapping of water sources and water usage. Last analysis was dated December 2019. There is also a procedure PGA 05.03 rev2 dated Aug. 2013 %Water Management+. Both facilities have their own environmental authorization conforming to Italian law Dlgs. 152/2006 - this authorization includes quotas of water withdrawal; the name of authorization is AIA (Autorizzazione Integrata Ambientale: Environmental Integrated Authorization)</p> <p>AIA Casto n° 6307 released by province of Brescia dated 2 December 2016 expires in 2021, renewal required.</p> <p>AIA Odolo n°650 renewed by province of Brescia dated 4 March 2019 expires in 2031.</p>
7.2a Water management (management plans)	Conformance	<p>Company is certified against ISO 14001:2015 and an environmental analysis is required by this standard which includes a mapping of water sources and water usage. Last analysis was dated December 2019. There is also a procedure PGA 05.03 rev2 dated Aug. 2013 %Water Management+. Both facilities have their own environmental authorization conforming to Italian law Dlgs. 152/2006 - this authorization includes quotas of water withdrawal; the name of authorization is AIA (Autorizzazione Integrata Ambientale: Environmental Integrated Authorization)</p> <p>AIA Casto n° 6307 released by province of Brescia dated 2 December 2016 expires in 2021, renewal required.</p> <p>AIA Odolo n°650 renewed by province of Brescia dated 4 March 2019 expires in 2031.</p>
7.2b Water management (monitoring)	Conformance	<p>Company is certified against ISO 14001:2015 and an environmental analysis is required by</p>

CRITERION	RATING	COMMENT
		<p>this standard which includes a mapping of water sources and water usage. Last analysis was dated December 2019. There is also a procedure PGA 05.03 rev2 dated Aug. 2013 %Water Management+. Both facilities have their own environmental authorization conforming to Italian law Dlgs. 152/2006 - this authorization includes quotas of water withdrawal; the name of authorization is AIA (Autorizzazione Integrata Ambientale: Environmental Integrated Authorization)</p> <p>AIA Casto n° 6307 released by province of Brescia dated 2 December 2016 expires in 2021, renewal required.</p> <p>AIA Odolo n°650 renewed by province of Brescia dated 4 March 2019 expires in 2031.</p>
7.3 Disclosure of water usage and risks	Conformance	<p>Company is certified against ISO 14001:2015 and an environmental analysis is required by this standard which includes a mapping of water sources and water usage. Last analysis was dated December 2019. There is also a procedure PGA 05.03 rev2 dated Aug. 2013 %Water Management+. Both facilities have their own environmental authorization conforming to Italian law Dlgs. 152/2006 - this authorization includes quotas of water withdrawal; the name of authorization is AIA (Autorizzazione Integrata Ambientale: Environmental Integrated Authorization)</p> <p>AIA Casto n° 6307 released by province of Brescia dated 2 December 2016 expires in 2021, renewal required.</p> <p>AIA Odolo n°650 renewed by province of Brescia dated 4 March 2019 expires in 2031.</p>
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	<p>A risk assessment on biodiversity was undertaken as part of the general environmental risk assessment (dated December 2019) and undertaken for ISO 14001 certification. No significant risk affecting biodiversity was identified.</p>
8.2a Biodiversity management (biodiversity action plans)	Conformance	<p>A risk assessment on biodiversity was undertaken as part of the general environmental risk assessment (dated December 2019) and undertaken for ISO 14001 certification. No significant risk affecting biodiversity was identified.</p>

CRITERION	RATING	COMMENT
8.2b Biodiversity management (consultation and mitigation hierarchy)	Conformance	A risk assessment on biodiversity was undertaken as part of the general environmental risk assessment (dated December 2019) and undertaken for ISO 14001 certification. No significant risk affecting biodiversity was identified.
8.2c Biodiversity management (reporting)	Conformance	A risk assessment on biodiversity was undertaken as part of the general environmental risk assessment (dated December 2019) and undertaken for ISO 14001 certification. No significant risk affecting biodiversity was identified.
8.3 Alien Species	Conformance	A risk assessment on biodiversity was undertaken as part of the general environmental risk assessment (dated December 2019) and undertaken for ISO 14001 certification. No significant risk affecting biodiversity was identified. Introduction of alien species is a risk mitigated by internal processes including instructions for suppliers to treat wooden pallets according to international standards, such as ISPM.
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 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	The Entity's Policy including a commitment towards human rights is available at this link: http://www.raffmetal.com/web_eng/politica-aziendale.asp
9.1b Human Rights Due Diligence (process)	Conformance	Human rights due diligence has been undertaken in the 2018 document titled "RAFFMETAL- Mappatura Rischi 231_settembre 2018.xlsx" (dated September 2018).

CRITERION	RATING	COMMENT
9.1c Human Rights Due Diligence (remediation)	Conformance	There was no evidence of adverse human rights impact identified in either documentation or through direct questioning of both management and workers. Workers also did not state that they had any knowledge about human rights adverse impacts in Raffmetal.
9.2 Women's Rights	Conformance	In Italy, discrimination against women is illegal and there is a law, decree 151/2001, to protect maternity and all laws related to work state about women rights. The Entity's integrated policy requires legal compliance. Female workers interviewed stated that are comfortable with their job, colleagues and company
9.3 Indigenous Peoples	Conformance	In the Entity's area of influence - Lombardy Prealps in northern Italy, province of Brescia there are no Indigenous People as defined by Article 1 of ILO Convention 169.
9.4 Free, Prior, and Informed Consent (FPIC)	Conformance	In the Entity's area of influence - Lombardy Prealps in northern Italy, province of Brescia there are no Indigenous People as defined by Article 1 of ILO Convention 169. Top management stated that there are no projects with impact on Indigenous Peoples.
9.5 Cultural and sacred heritage	Conformance	There is no "Cultural and Sacred heritage" in the area of influence of the Entity as the facilities are located in industrial areas.
9.6a Resettlements (avoid or minimise)	Conformance	The Entity does not have resettlement projects currently. A procedure to minimise negative impacts of changes has been developed (PGI 01.01).
9.6b Resettlements (where unavoidable)	Conformance	The Entity does not have resettlement projects currently. A procedure to minimise negative impacts of changes has been developed (PGI 01.01).
9.7a Local Communities (rights and interests)	Conformance	The due diligence did not identify issues regarding local communities. A communication channel available to all interested parties is available at this link: http://www.raffmetal.com/web_eng/contatti.asp
9.7b Local Communities (impacts)	Conformance	The due diligence did not identify issues regarding local communities. A communication channel available to all interested parties is

CRITERION	RATING	COMMENT
		available at this link: http://www.raffmetal.com/web_eng/contatti.asp
9.7c Local Communities (livelihoods)	Conformance	The due diligence did not identify issues regarding local communities. A communication channel available to all interested parties is available at this link: http://www.raffmetal.com/web_eng/contatti.asp
9.8 Conflict-Affected and High-Risk Areas	Conformance	The due diligence did not identify issues regarding local communities. A communication channel available to all interested parties is available at this link: http://www.raffmetal.com/web_eng/contatti.asp
9.9 Security practice	Conformance	The provision of security services is governed by contracts with authorized security companies. This process includes a check of legality, in accordance with the Entity's human rights policy.
PRINCIPLE 10 LABOUR RIGHTS		
10.1a Freedom of Association and Right to Collective Bargaining (freedom of association)	Conformance	The company does not have an internal trade union representative, but single workers are enrolled in local trade unions. Top management allows trade union involvement, however interviewed workers stated that they prefer to discuss work related issues directly with their supervisors. No evidence of poor behaviour against trade unions was identified. In Italy, all workers are covered by a Collective Bargaining Agreement (CBA) agreed at national level among trade unions and industry representatives. The CBA allows for freedom of trade union activity. No evidence of activity contrary to the CBA was identified.
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Conformance	In Italy, all workers are covered by a Collective Bargaining Agreement (CBA) agreed at national level among trade unions and industry representatives. The CBA allows for freedom of trade union activity. No evidence of activity contrary to the CBA was identified.
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Conformance	In Italy, applicable law does not restrict the right to freedom of association and collective bargaining.

CRITERION	RATING	COMMENT
10.2a Child Labour (minimum age)	Conformance	At hiring every worker has to provide an ID card with date of birth. A copy is retained in the personal file of the worker. In Italy, work under 15 years is illegal and, due to the nature of work it is very unlikely that a child would be hired.
10.2b Child Labour (hazardous)	Conformance	At hiring every worker has to provide an ID card with date of birth. A copy is retained in the personal file of the worker. In Italy, work under 15 years is illegal and, due to the nature of work it is very unlikely that a child would be hired.
10.2c Child Labour (worst forms)	Conformance	At hiring every worker has to provide an ID card with date of birth. A copy is retained in the personal file of the worker. In Italy, work under 15 years is illegal and, due to the nature of work it is very unlikely that a child would be hired.
10.3a Forced Labour (human trafficking)	Conformance	The Entity's policy and Code of Ethics specifies the legal protection of human rights. A sample of migrant workers were interviewed as well as a sample of personal files of workers was checked. No evidence of forced labour was identified.
10.3b Forced Labour (deposits, fees, advances)	Conformance	The Entity's policy and Code of Ethics specifies the legal protection of human rights. A sample of migrant workers were interviewed as well as a sample of personal files of workers was checked. No evidence of fees and deposits was identified.
10.3c Forced Labour (migrant workers)	Conformance	The Entity's policy and Code of Ethics specifies the legal protection of human rights. A sample of migrant workers were interviewed as well as a sample of personal files of workers was checked. No evidence of forced labour was identified.
10.3d Forced Labour (debt bondage)	Conformance	The Entity's policy and Code of Ethics specifies the legal protection of human rights. A sample of migrant workers were interviewed as well as a sample of personal files of workers was checked. No evidence of debt bondage was identified.
10.3e Forced Labour (freedom of movement)	Conformance	The Entity has a Code of Conduct that strictly prohibits forced labour. For suppliers, the due diligence process assesses the risks relating to forced labour.

CRITERION	RATING	COMMENT
		At the plant, workers are free to leave their working places.
10.3f Forced Labour (retention of identity papers, permits, certificates)	Conformance	The Entity in both its policy and Code of Ethics addresses human rights and legal requirements. A sample of migrant workers were interviewed as well as a check of a sample of personal files of workers. No evidence of retention of original documents was found.
10.3g Forced Labour (freedom to terminate employment)	Conformance	Workers are free to leave the company provided advanced notice is given (ranging from 8 to 90 days depending on the job and seniority), which is in compliance with Italian law on collective bargaining.
10.4 Non-Discrimination	Conformance	The Entity's Code of Ethics requires equal opportunity for all workers. Procedure "04_Raffmetal_Ps All4_Selezione assunzione e gestione del personale" dated 28 March 2019 sets conditions for the hiring and selection of personnel. Current procedures are consistent with the Code of Ethics. No evidence of discrimination was found during the audit.
10.5 Communication and engagement	Minor Non-Conformance	Workers stated that they have access to supervisors and managers, or they can contact an appropriate trade union. No grievances were raised in the last two years. A grievance mechanism is referenced in the Code of Ethics (paragraph 11). Training on this matter was delivered to management records dated 11 June 2020 were shown. All persons in company are informed at hiring, however there was no evidence that this awareness training had been delivered.
10.6 Disciplinary practices	Conformance	Disciplinary practices are ruled by Collective Bargaining Agreement and by local legislation (Law 300/1970). No evidence of corporal punishment, mental or physical coercion, harassment, and gender-based violence including sexual harassment, or verbal abuse was found.
10.7a Remuneration (living wage)	Conformance	According to national statistics the living wage is 758.68" per month in 2019. The minimum wage paid by the Entity are about 1,100" per month.

CRITERION	RATING	COMMENT
		A sample of Payrolls and bank transfers were reviewed during the audit.
10.7b Remuneration (method of payment)	Conformance	Payrolls conform to standard forms approved by public administration. Persons interviewed stated they understand the contents of payroll and that payments were always on time.
10.8 Working Time	Conformance	The Collective Bargaining Agreement (CBA) and local law Decree 66/2003 provide minimum requirements for working hours, overtime, overtime payment rates and reports monthly to managers and supervisor on working hours, overtime and leave. No evidence of discrepancies between CBA and data shown.
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	An OH&S Policy is available and regularly reviewed. Management review is undertaken on annual basis for the whole company . last undertaken on 2 February 2020. The Policy is publicly available at this link: http://www.raffmetal.com/web_eng/politica-aziendale.asp
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	An OH&S Policy is available and regularly reviewed. Management review is undertaken on annual basis for the whole company . last undertaken on 2 February 2020. The Policy is publicly available at this link: http://www.raffmetal.com/web_eng/politica-aziendale.asp Procedure PGI 04.01 facilitates for the communication and the updating of the Policy.
11.1c Occupational Health and Safety (OH&S) Policy (Applicable Law and standards)	Conformance	A commitment to comply with Applicable Law on Workers health and safety is included in the OH&S policy. Italy subscribes to ILO conventions and therefore compliance with Italian law equates to compliance with ILO conventions.
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	The right for workers to understand the hazards and safe practices for their work, and their authority to refuse or stop unsafe work are required under Italian law (Occupational Health and Safety Decree 81/08) and in the Entity's policy there is a commitment to comply with law.

CRITERION	RATING	COMMENT
11.2 OH&S Management System	Minor Non-Conformance	The Entity has a Management system conforming to BS OHSAS 18001:2007. Some minor failures of operational control were found during the site walkovers . this included one expired filter among emergency PPE and the presence of a small ladder without "CE" labelling.
11.3 Employee engagement on health and safety	Conformance	Every worker is trained to report situations that may affect both health and safety and environmental issues. It was noted during site interviews that workers were aware of this requirement.
11.4 OH&S performance	Conformance	A procedure for the monitoring of health and safety performance is included in general monitoring procedure PGI 08.08 rev 12 November 2013. As per local law decree 81/2008, it is mandated that an annual meeting to review health and safety performance with top management, workers representatives and a competent medical professional. A review of meeting minutes dated March 2020 confirmed that indicators on frequency and severity of injuries, near misses and results of medical surveys were discussed.

Document Control and Version History

Revision	Date	Notes
0	10 August 2020	Issued (Initial certification audit)