
ASI CERTIFICATION
PERFORMANCE
STANDARD



PRESENTED TO

ALUPHOENIX SRL

CERTIFICATE
NUMBER

292

ASI
STANDARD

PERFORMANCE
STANDARD
(V2 2017)

CERTIFICATION
LEVEL

FULL
CERTIFICATION

ASI ACCREDITED
AUDITOR

BUREAU
VERITAS
CERTIFICATION

DATE OF ISSUE

14 JUNE 2023

DATE OF EXPIRY

13 JUNE 2026

CERTIFIED SINCE

14 JUNE 2023

AUTHORISED BY

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

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*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

The melting and amalgamation of high-grade aluminium into alloys. The refining and recovery of aluminium-based scrap, at the Aluphoenix facility located in Riese Pio X, Italy.

SUMMARY AUDIT REPORT

PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Aluphoenix Srl
ENTITY NAME	Aluphoenix facility of Riese Pio X, Italy
CERTIFICATION SCOPE	The melting and amalgamation of high-grade aluminium into alloys. The refining and recovery of aluminium-based scrap, at the Aluphoenix facility located in Riese Pio X, Italy.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthouses
ASI STANDARD	<ul style="list-style-type: none">Performance Standard V2
AUDIT TYPE	<ul style="list-style-type: none">Initial Certification Audit
AUDIT FIRM	Bureau Veritas Certification
AUDIT DATE	<ul style="list-style-type: none">25 – 27 May 2023
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">30 May 2023
AUDIT SCOPE	<p>The audit scope includes the melting and amalgamation of high-grade aluminium into alloys. The refining and recovery of aluminium-based scrap, at the Aluphoenix facility located in Riese Pio X, Italy.</p> <p>Supply chain activities included in the audit scope:</p> <ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthouses <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 14 June 2023 – 13 June 2026

NEXT AUDIT TYPE Re-Certification Audit

NEXT AUDIT DUE DATE 13 June 2026

CERTIFICATE NUMBER 292

SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	<p>The Entity holds ISO 14001 certification and has implemented a Management System conforming to Italian law decree 231/01 grant information on legal matters.</p> <p>A procedure for legal compliance has been developed and internal audits for legal compliance are undertaken.</p>
1.2 Anti-Corruption	Conformance	<p>The Entity holds ISO 14001 certification and has implemented a Management System conforming to Italian law decree 231/01 that requires both a code of ethics and internal audits on anti-corruption carried out by a supervising body called OdV (Organismo di Vigilanza: Vigilating Body). The Entity's Code of Ethics is available at:</p> <p>http://www.aluphoenix.com/wp-content/uploads/2023/05/TABO03_03_00-Codice-Etico.pdf</p>
1.3 Code of Conduct	Conformance	<p>The Entity holds ISO 14001 certification and has implemented a Management System conforming to Italian law decree 231/01 that requires both a code of ethics and internal audits on anti-corruption carried out by a supervising body called OdV (Organismo di Vigilanza: Vigilating Body). The Entity's Code of Ethics is available at:</p> <p>http://www.aluphoenix.com/wp-content/uploads/2023/05/TABO03_03_00-Codice-Etico.pdf</p>
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	<p>An ESG Policy has been developed and has received endorsement by senior management. The Policy is available at:</p> <p>http://www.aluphoenix.com/wp-content/uploads/2023/05/QEP_05_00_Politica-per-la-Qualita-per-l'Ambiente-ASI.pdf</p>
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	<p>An ESG Policy has been developed and has received endorsement by senior management. The Policy is available at:</p> <p>http://www.aluphoenix.com/wp-content/uploads/2023/05/QEP_05_00_Politica-per-la-Qualita-per-l'Ambiente-ASI.pdf</p>
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	<p>An ESG Policy has been developed and has received endorsement by senior management, and</p>

CRITERION	RATING	COMMENT
		communicated to all employees and contractors. The Policy is available at: http://www.aluphoenix.com/wp-content/uploads/2023/05/QEP_05_00_Politica-per-la-Qualita-per-lAmbiente-ASI.pdf
2.2 Leadership	Conformance	The Entity has nominated a Management Representative (Senior Manager – Management System Assurance) who has overall responsibility and authority for the requirements of the ASI program.
2.3a Environmental and Social Management Systems (environmental)	Conformance	The Entity is certified to ISO 14001. The certificate is available at: http://www.aluphoenix.com/wp-content/uploads/2021/09/cert_iso_14001_2015_it_en.pdf
2.3b Environmental and Social Management Systems (social)	Conformance	The Entity's Ethical Code and Organizational Model are consistent with the requirements of a social Management System: there are statements and policies about recruiting, human resources and health and safety. The Ethical Code is available at: http://www.aluphoenix.com/wp-content/uploads/2023/05/TABO03_03_00-Codice-Etico.pdf
2.4 Responsible Sourcing	Conformance	A procedure has been developed for the management of suppliers and responsible sourcing. All suppliers are required to fill in a questionnaire with information on their work and ethical practices.
2.5 Impact Assessments	Conformance	The Entity has a document titled Context Analysis and Interested Parties' that describes all interested parties and the impact on their interests. This document includes a gender analysis aspect.
2.6 Emergency Response Plan	Conformance	The Entity's Emergency Response Plan is included and managed under the certified Environmental Management System.
2.7 Mergers and Acquisitions	Conformance	The Entity has developed a procedure which will be adhered to if a merger or acquisition were to occur in future.
2.8 Closure, Decommissioning and Divestment	Conformance	The Entity has developed a procedure which will be adhered to if closure, decommissioning or divestment were to occur in future. In addition, both the CBA (Collective Bargaining Agreement) and Environmental Permit specify requirements to minimise impacts on interested parties.

CRITERION	RATING	COMMENT
3.1 Sustainability Reporting	Conformance	The Entity has a Sustainability Report available at: http://www.aluphoenix.com/wp-content/uploads/2023/05/Corporate-sustainability-report_2022_IT-1.pdf
3.2 Non-compliance and liabilities	Conformance	Information on non-compliance and liabilities is available on request. Senior management confirmed that no significant fines have been received.
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 carried out by a supervising body called OdV (Organismo di Vigilanza: Vigilating Body) Senior management confirmed that all payments made to government and public administration are made on a legal basis, including 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	Conformance	A grievance mechanism is publicly available and is explained in the Ethical Code. The form is publicly available at: http://www.aluphoenix.com/wp-content/uploads/2023/05/Modulo-segnalazioni.pdf
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	A Life Cycle Perspective Evaluation was developed taking into account the impacts of major Products and process according to ISO 14001. In addition there is a Life Cycle Assessment (LCA) developed according to ISO 14040 and ISO 14044 for four specific Products.
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	A Life Cycle Perspective Evaluation was developed taking into account the impacts of major Products and process according to ISO 14001. In addition there is an LCA developed according to ISO 14040 and ISO 14044 for four specific Products.
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	LCAs are available to customers upon request. Assumptions including system boundaries are defined in the LCA reports.
4.2 Product design	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.3a Aluminium Process Scrap (targets)	Conformance	As per its ISO 14001 Management System, the Entity manages scrap and recycles it into its production process. Data on scrap are monitored and are available

CRITERION	RATING	COMMENT
		on a daily basis with details relating to each department and product.
4.3b Aluminium Process Scrap (alloy separation)	Conformance	Scrap and waste are separated as per relevant operational control procedures.
4.4a Collection and recycling of products at end-of-life (strategy)	Conformance	The Entity holds an Environmental permit: AIA (Autorizzazione Integrata Ambientale: Environmental Integrated Authorization) conforming to Italian law Dlgs. 152/2006. This authorisation includes waste management and in accordance with the authorisation principles, the Entity must communicate to the public administration its production of wastes and the final destination of wastes annually.
4.4b Collection and recycling of products at end-of-life (engagement)	Conformance	The Entity holds an Environmental permit: AIA (Autorizzazione Integrata Ambientale: Environmental Integrated Authorization) conforming to Italian law Dlgs. 152/2006. This authorisation includes waste management and in accordance with the authorisation principles, the Entity must communicate to the public administration its production of wastes and the final destination of wastes annually.
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		
5.1 Disclosure of GHG emissions and energy use	Conformance	There is a specific document on Greenhouse Gases (GHG) disclosure produced by an external consultant, which is available on request. Public disclosure of GHG emissions and reduction activities is available in the Sustainability Report at: http://www.aluphoenix.com/wp-content/uploads/2023/05/Corporate-sustainability-report_2022_IT-1.pdf
5.2 GHG emissions reductions	Conformance	There is a specific document on GHG disclosure produced by an external consultant, which is available on request. Public disclosure of GHG emissions and reduction activities is available in the Sustainability Report at: http://www.aluphoenix.com/wp-content/uploads/2023/05/Corporate-sustainability-report_2022_IT-1.pdf
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.

CRITERION	RATING	COMMENT
PRINCIPLE 6 EMISSIONS, EFFLUENTS AND WASTE		
6.1 Emissions to Air	Conformance	In accordance with the principles of the Entity's environmental authorisation, the Entity must communicate its air emissions on an annual basis to the public administration. Both the certification and internal audits and assessments determined that air emissions were conforming to local law and the AIA (Autorizzazione Integrata Ambientale: Environmental Integrated Authorization).
6.2 Discharges to Water	Conformance	In accordance with the principles of the Entity's environmental authorisation, the Entity must communicate its water discharges on an annual basis to the public administration. Both the certification and internal audits and assessments determined discharges to water conforming to local law and the AIA (Autorizzazione Integrata Ambientale: Environmental Integrated Authorization).
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	The Entity's Management System includes a risk assessment, which has included the assessment of Spills and Leakages.
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	Internal audits are undertaken by the Entity. There is no evidence of Spills or Leakages outside company premises. An external communication plan requires that information is available on request to all interested parties; and major spills and leakages must be reported to the public administration as a requirement of the environmental authorisation.
6.4a Reporting of Spills (immediate disclosure)	Conformance	Under the Entity's Management System, a Spill or Leakage is considered a nonconformity and is recorded. No evidence of spills or leakages were noted.
6.4b Reporting of Spills (regular reporting)	Conformance	Information on Material Spills (if they occur) is available upon request. No spills and leakages have occurred over the past three years.
6.5a Waste management and reporting (strategy)	Conformance	Wastes are an environmental aspect of the Entity and objectives to reduce scrap and Waste have been developed. In addition, a specific accountability of wastes produced and their final destination is mandatory for Italian law Decree 152/2006. A report called MUD (Modello Unico di Dichiarazione: Unique Form of Declaration) is sent to the public administration annually.

CRITERION	RATING	COMMENT
6.5b Waste management and reporting (disclosure)	Conformance	Wastes are an environmental aspect of the Entity and objectives to reduce scrap and Waste have been developed. In addition a specific accountability of wastes produced and their final destination is mandatory for Italian law Decree 152/2006. A report called MUD (Modello Unico di Dichiarazione: Unique Form of Declaration) is sent to the public administration annually.
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)	Conformance	The Entity controls Dross and recycles it into its production process. Data on Dross are monitored and are available on a daily basis with details based on department and product.
6.8b Dross (recycling)	Conformance	The Entity controls Dross and recycles it into its production process. Data on Dross are monitored and are available on a daily basis with details based on department and product.

CRITERION	RATING	COMMENT
6.8c Dross (review of alternatives)	Conformance	All Dross that cannot be recycled into the process is sent to waste treatment plants that have the technology to effectively recycle Dross.
PRINCIPLE 7 WATER STEWARDSHIP		
7.1a Water assessment (mapping)	Conformance	The Entity has undertaken a mapping of water sources and water usage, as required under its environmental authorisation and includes includes quotas for water withdrawal.
7.1b Water assessment (risk assessment)	Conformance	The Entity has undertaken a risk analysis for water-related risks as required under its environmental authorisation.
7.2a Water management (management plans)	Conformance	The Entity has undertaken a risk analysis for water-related risks, as required under its environmental authorisation and includes a water management plan with measurement of withdrawal and discharges.
7.2b Water management (monitoring)	Conformance	The Entity has undertaken mapping and monitoring of water sources and water usage, as required under its environmental authorisation and includes quotas for water withdrawal.
7.3 Disclosure of water usage and risks	Conformance	The Entity undertakes regular reporting on water usage in its management review. Data are included in the Sustainability Report, which is publicly available at: http://www.aluphoenix.com/wp-content/uploads/2023/05/Corporate-sustainability-report_2022_IT-1.pdf
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	A risk assessment on Biodiversity has been undertaken by the Entity as part of its general environmental risk assessment. It is documented in a specific document named VInCA (Valutazione Incidenza Ambientale: Evaluation of Environmental Impact). No significant risk affecting biodiversity was found.
8.2a Biodiversity management (biodiversity action plans)	Conformance	A risk assessment on Biodiversity has been undertaken by the Entity as part of its general environmental risk assessment. It is documented in a specific document named VInCA (Valutazione Incidenza Ambientale: Evaluation of Environmental Impact). No significant risk affecting biodiversity was found.
8.2b Biodiversity management (consultation and mitigation hierarchy)	Conformance	A risk assessment on Biodiversity has been undertaken by the Entity as part of its general environmental risk assessment. It is documented in a specific document named VInCA (Valutazione Incidenza Ambientale:

CRITERION	RATING	COMMENT
		Evaluation of Environmental Impact). No significant risk affecting biodiversity was found.
8.2c Biodiversity management (reporting)	Not Applicable	As the Biodiversity risk has been determined as low, the Entity is not required to publicly report biodiversity-related performance information.
8.3 Alien Species	Conformance	A risk assessment on Biodiversity has been undertaken by the Entity as part of its general environmental risk assessment, which included Alien Species. The introduction of Alien Species is a risk mitigated by internal processes such as 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 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.
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 has developed a Human Rights Policy that includes a commitment towards Human Rights, and is available at: http://www.aluphoenix.com/wp-content/uploads/2023/05/QEP_05_00_Politica-per-la-Qualita-per-lAmbiente-ASI.pdf
9.1b Human Rights Due Diligence (process)	Conformance	A Human Rights Due Diligence process has been undertaken by the Entity, as part of its Ethics Risk Assessment.
9.1c Human Rights Due Diligence (remediation)	Conformance	The Entity has established and implemented a Human Rights compliance system. There has been no evidence of adverse human rights impacts in either documentation or via management and worker interviews.
9.2 Women’s Rights	Conformance	In the Entity’s country (Italy), Discrimination against women is illegal and decree 151/2001 has been implemented to protect maternity and all laws related to work state women’s rights. The Entity’s Integrated

CRITERION	RATING	COMMENT
		Policy states requirements on being lawful. No evidence of non-conformance by workers or management was found. Female workers interviewed stated they are satisfied with their working conditions.
9.3 Indigenous Peoples	Not Applicable	This Criterion is not applicable as there are no Indigenous Peoples in or around the Entity's Area of Influence.
9.4 Free, Prior, and Informed Consent (FPIC)	Not Applicable	This Criterion is not applicable as there are no Indigenous Peoples in or around the Entity's Area of Influence.
9.5 Cultural and sacred heritage	Not Applicable	This Criterion is not applicable as there are no Indigenous Peoples in or around the Entity's Area of Influence.
9.6a Resettlements (avoid or minimise)	Not Applicable	This Criterion is not applicable as no resettlements are being considered or have taken place since joining ASI, or are expected to occur during the Certification Period.
9.6b Resettlements (where unavoidable)	Not Applicable	This Criterion is not applicable as no resettlements are being considered or have taken place since joining ASI, or are expected to occur during the Certification Period.
9.7a Local Communities (rights and interests)	Conformance	The Entity's Due Diligence process did not identify issues or impacts relating to Local Communities. A communication channel is available to all interested parties at: http://www.aluphoenix.com/wp-content/uploads/2023/05/Modulo-segnalazioni.pdf
9.7b Local Communities (impacts)	Conformance	The Entity's Due Diligence process did not identify issues or impacts relating to Local Communities. A communication channel is available to all interested parties at: http://www.aluphoenix.com/wp-content/uploads/2023/05/Modulo-segnalazioni.pdf
9.7c Local Communities (livelihoods)	Conformance	The Entity's Due Diligence process did not identify issues or impacts relating to Local Communities. A communication channel is available to all interested parties at: http://www.aluphoenix.com/wp-content/uploads/2023/05/Modulo-segnalazioni.pdf
9.8 Conflict-Affected and High-Risk Areas	Conformance	There are no direct activities from the Entity in, or from Conflict-Affected and High-Risk Areas (CAHRAs) and the Entity does not contribute to armed conflict or Human Rights abuses. Supplier selection, evaluation and audit procedures did not identify any contribution by the Entity to activities in CAHRAs.

CRITERION	RATING	COMMENT
9.9 Security practice	Conformance	Security services are determined by contracts with authorised security companies, and authorisation released by the public administration includes a check of legality that coincides with a human right policy. No evidence of violation of Human Rights was found.
PRINCIPLE 10 LABOUR RIGHTS		
10.1a Freedom of Association and Right to Collective Bargaining (freedom of association)	Conformance	In Italy, all Workers are covered by a Collective Bargaining Agreement (CBA) agreed at a National level among trade unions and industry representatives, The CBA states about freedom of trade unions activity.
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Conformance	Presently, there are no Workers at the Entity that are union members. Interviewed Workers stated that they did not have need for union representation at the Entity. Regardless, contact information for the four main trade unions in Italy are available at the Entity's premises.
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Not Applicable	This Criterion is not applicable as there is no restriction to Freedom of Association and Collective Bargaining in Italy.
10.2a Child Labour (minimum age)	Conformance	During the hiring process, every Worker must provide an identity card with date of birth and a copy is retained in the personal file of the Worker. In Italy, Workers under the age of 15 years is illegal, and due to the nature of work, it is very unlikely that a child can be hired at the Entity.
10.2b Child Labour (hazardous)	Conformance	During the hiring process, every Worker must provide an identity card with date of birth and a copy is retained in the personal file of the Worker. In Italy, Workers under the age of 15 years is illegal, and due to the nature of work, it is very unlikely that a child can be hired at the Entity.
10.2c Child Labour (worst forms)	Conformance	During the hiring process, every Worker must provide an identity card with date of birth and a copy is retained in the personal file of the Worker. In Italy, Workers under the age of 15 years is illegal, and due to the nature of work, it is very unlikely that a child can be hired at the Entity.
10.3a Forced Labour (human trafficking)	Conformance	The Entity's Code of Ethics represents and acknowledges Human Rights and legality. A sample of Migrant Workers were interviewed and a sample of Workers' personnel files was checked, and no evidence of Forced Labour was found.
10.3b Forced Labour (deposits, fees, advances)	Conformance	The Entity has implemented corporate procedures and rules against taking deposits or any other payments. A

CRITERION	RATING	COMMENT
		sample of Migrant Workers were interviewed and a sample of Workers' personnel files was checked, and no evidence of fees and deposits was found.
10.3c Forced Labour (migrant workers)	Conformance	The Entity neither engages in nor supports the use of Forced Labour in any kind or form, according to local country laws. A sample of Migrant Workers were interviewed and a sample of Workers' personnel files was checked, and no evidence of debt bondage was found.
10.3d Forced Labour (debt bondage)	Conformance	The Entity neither engages in nor supports the use of Forced Labour in any kind or form, according to local country laws. A sample of Migrant Workers were interviewed and a sample of Workers' personnel files was checked, and no evidence of debt bondage was found.
10.3e Forced Labour (freedom of movement)	Conformance	The Entity neither engages in nor supports the use of Forced Labour in any kind or form, according to local country laws. A sample of Migrant Workers were interviewed and a sample of Workers' personnel files was checked, and no evidence of unreasonable restrictions was found. There is no on-site housing.
10.3f Forced Labour (retention of identity papers, permits, certificates)	Conformance	The Entity neither engages in nor supports the use of Forced Labour in any kind or form, according to local country laws. A sample of Migrant Workers were interviewed and a sample of Workers' personnel files was checked, and no evidence of retention of documents was found, only copies.
10.3g Forced Labour (freedom to terminate employment)	Conformance	Workers are free to leave the Entity with an advanced notice (i.e. between 8 and 90 days depending on position and seniority. This is in compliance with local law and the Collective Bargaining Agreement.
10.4 Non-Discrimination	Conformance	The Entity's Code of Ethics prescribes equal opportunities for all Workers. The Collective Bargaining Agreement and procedure establishes rules for the hiring and selection of personnel. The procedure is consistent with Code of Ethics. No evidence of Discrimination was found.
10.5 Communication and engagement	Conformance	Workers are engaged, and during interviews they stated that they have access to supervisors and managers. No grievances were raised in the last two years. A grievance mechanism linked to the Code of Ethics is available.

CRITERION	RATING	COMMENT
10.6 Disciplinary practices	Conformance	Disciplinary practices are ruled by the Collective Bargaining Agreement and by local laws. There was no evidence of corporal punishment, mental or physical coercion, harassment, and gender-based violence including sexual harassment, or verbal abuse found at the Entity.
10.7a Remuneration (living wage)	Conformance	The Entity's remuneration payments to Workers are above the minimum legal wage, which is over the national living wage. Payroll details and bank transfers were sampled and were in conformance.
10.7b Remuneration (method of payment)	Conformance	Payrolls are conforming to standard forms approved by the public administration, and interviewed Workers stated they understand the contents of payroll and that payments were always made on time.
10.8 Working Time	Conformance	The Collective Bargaining Agreement and local laws determine working hours, Overtime, overtime payment rates and annual leave entitlements. Overtime is regularly reported in payrolls and no evidence of exceedance above the upper limits was identified.
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	An Occupational Health and Safety (OH&S) Policy is available and regularly reviewed. The Policy is publicly available at: http://www.aluphoenix.com/wp-content/uploads/2023/05/QEP_05_00_Politica-per-la-Qualita-per-l'Ambiente-ASI.pdf
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	An Occupational Health and Safety (OH&S) Policy is available and regularly reviewed. The Policy is publicly available at: http://www.aluphoenix.com/wp-content/uploads/2023/05/QEP_05_00_Politica-per-la-Qualita-per-l'Ambiente-ASI.pdf
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Conformance	A commitment to comply with Applicable Laws on Workers' health and safety is included in the OH&S Policy.
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 included in Italian law. The Entity's OH&S Policy specifies Italian law must be adhered.
11.2 OH&S Management System	Conformance	The Entity has an Occupational Health and Safety Management System with a complete risk assessment, and an annual management review.

CRITERION	RATING	COMMENT
		Operational controls are considered sound and no non-conformities were identified.
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. There is a RLS (Rappresentante dei Lavoratori per la Sicurezza) Workers' Representative for health and safety on site, whom was elected by Workers and can be freely accessed.
11.4 OH&S performance	Conformance	An annual meeting of senior management, Workers' representatives and a competent doctor is held. Health and safety performance indicators on the frequency and severity of injuries and improvements are reviewed and discussed.

Document Control and Version History

Revision	Date	Notes
0	14 June 2023	Initial Certification Audit – Full Certification