
ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

STEMIN S.p.A.

CERTIFICATE
NUMBER

222

ASI
STANDARD

PERFORMANCE
STANDARD
(V2 2017)

CERTIFICATION
LEVEL

FULL
CERTIFICATION

ASI ACCREDITED
AUDITOR

BUREAU
VERITAS
CERTIFICATION

DATE OF ISSUE

27 SEPTEMBER 2022

DATE OF EXPIRY

26 SEPTEMBER 2025

CERTIFIED SINCE

27 SEPTEMBER 2022

AUTHORISED BY

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

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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

Manufacturing of aluminium ingots at the (41)
STEMIN S.p.A., (K4) STEMIN S.p.A. and
RADIATORI 2000 S.p.A. facilities in Italy.

SUMMARY AUDIT REPORT

PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	STEMIN S.p.A.
ENTITY NAME	STEMIN S.p.A.
CERTIFICATION SCOPE	Manufacturing of aluminium ingots at the (41) STEMIN S.p.A., (K4) STEMIN S.p.A. and RADIATORI 2000 S.p.A. facilities in Italy.
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">Certification Audit
AUDIT FIRM	Bureau Veritas Certification
AUDIT DATE	<ul style="list-style-type: none">5 – 7 July 2022
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">1 August 2022
AUDIT SCOPE	<p>The Audit Scope covers STEMIN S.p.A., (K4) STEMIN S.p.A. and RADIATORI 2000 S.p.A. facilities in Italy for the production and trade of Aluminium alloys in ingots enhancing metal scrap through the purchase, storage, processing and melting phases.</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.<input checked="" type="checkbox"/> The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous.

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- 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 27 September 2022 – 26 September 2025

NEXT AUDIT TYPE Surveillance Audit

NEXT AUDIT DATE 27 March 2024

CERTIFICATION NUMBER 222

SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity has implemented a procedure that outlines the frequency and method for periodic assessment of compliance with legislative requirements. Records on compliance with legislative requirements are maintained. The Integrated Management System (IMS) Manager maintains a list of legislative requirements.
1.2 Anti-Corruption	Conformance	The Entity has established a Management System, conforming to Italian law Decree 231/01 that requires both a Code of Ethics and Anti-Corruption internal audits conducted by a supervisory body (Organismo di Vigilanza: Vigilating Body). The supervisory body is established for each company in the STEMIN Group, consisting of several members to ensuring its independence from the corporate hierarchy. The body is placed in a top position in direct relationship with the Board of Directors, to which it reports any violations. The duties, powers and responsibilities of the body are regulatory defined.
1.3 Code of Conduct	Conformance	The Entity has implemented a Code of Ethics for the STEMIN Group (https://stemin.it/wp-content/uploads/2022/05/STEMIN_CodiceEtico-diCondotta.pdf) and RADIATORI 2000 (https://www.radiatori2000.it/wp-content/uploads/2017/02/Codice-Etico-Radiatori-2000.pdf).
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	The Entity has implemented an integrated Policy with references to quality, safety, energy, environmental, social and governance.
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	The Entity has implemented an integrated Policy that is periodically reviewed to ensure it remains suitable and adequate. It is signed by the President and describes the Entity's commitment to the provision of resources to ensure continuous improvement. The Entity undertakes to invest in staff training and education.
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	The Entity makes the Policy document available to external interested parties via publication on the website for STEMIN Group and RADIATORI 2000: https://stemin.it/wp-content/uploads/2022/05/Untitled_08042022_160518.pdf https://www.radiatori2000.it/wp-content/uploads/2022/06/Politica-sistema-gestione_Rev8.pdf

CRITERION	RATING	COMMENT
2.2 Leadership	Conformance	The Entity has appointed a manager tasked with supervising and ensuring the correct implementation of all Management Systems and with direct responsibility for the integrated requirements.
2.3a Environmental and Social Management Systems (environmental)	Conformance	The Entity holds valid ISO 14001 certifications for both the STEMIN Group and Radiatori 2000.
2.3b Environmental and Social Management Systems (social)	Conformance	The Entity has implemented a Social Responsibility Management System that has integrated social responsibility requirements.
2.4 Responsible Sourcing	Minor Non-Conformance	The Entity has prepared a pre-qualification questionnaire and periodically monitors suppliers on environmental, energy and safety issues. However, it was identified the Procurement Policy adopted by the Entity requires further enrichment of the requirements relating to social responsibility. Within its Certification Scope, not all suppliers of Aluminium Waste and Scrap are taken into consideration, but only those that directly supply STEMIN 41.
2.5 Impact Assessments	Conformance	The Entity has implemented an Environment Management System which is ISO 14001 certified which includes Impact Assessments.
2.6 Emergency Response Plan	Conformance	The Entity has implemented a Safety and Environmental Management System and developed environmental and safety emergency plans in compliance with applicable legislation (Legislative Decree 81/2008 for occupational, health and safety at work and 152/06 for environmental protection). The Entity holds valid ISO 14001 and ISO 45001 certificates.
2.7 Mergers and Acquisitions	Conformance	The Entity has established a process in accordance with Legislative Decree 231/01 which mandates a Due Diligence process for Human Rights violations and impacts on the environment. The established Due Diligence process is for or in the event and for the preparation of acquisitions. No acquisitions have occurred or are currently proposed.
2.8 Closure, Decommissioning and Divestment	Conformance	The Entity has established a process in the event of any divestment or disposal of plants. A plan was developed within the Environmental Management System to manage environmental issues. No decommissions or divestments are currently proposed.

CRITERION	RATING	COMMENT
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	The Entity has published its Sustainability Report 2021 which is publicly available at: https://stemin.it/wp-content/uploads/2022/07/Rendicontazione-non-finanziaria_stemin-2021_approved_compressed.pdf (Italian only)
3.2 Non-compliance and liabilities	Conformance	The Entity has not received any fines, sentences, or penalties for non-compliances with the Applicable Law. There have been no disputes of any kind and nature should these situations arise in the future, the STEMIN Group has planned to make information public through the Sustainability Report.
3.3a Payments to governments	Conformance	The Entity has established a Management System compliant with Legislative Decree 231/01 Model that requires both the Code of Ethics and internal controls on Anti-Corruption to be conducted by a Supervisory Body (Ovid or Organismo di Vigilanza).
3.3b Payments to governments	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
3.4 Stakeholder complaints, grievances and requests for information	Conformance	The Entity has developed a whistleblowing tool in accordance with Legislative Decree 231/01. The tool allows Workers to make reports and complaints through a dedicated email address. Complaints and reports from external Stakeholders are analysed and managed.
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	The Entity has developed a Life Cycle Assessment (LCA) study report that analyses the production cycle of the average Product.
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	The LCA study is not published on the Entity's website but provided to interested parties upon request.
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	The LCA study is not published on the Entity's website but provided to interested parties 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	The Entity monitors all production cycles for each phase of the process and records standard process rejects and extra rejects using dedicated software. Measurements are used to minimise Waste in each production cycle and are standardised by reducing process Waste to a minimum.

CRITERION	RATING	COMMENT
4.3b Aluminium Process Scrap (alloy separation)	Conformance	The Entity has implemented internal procedures for the recovery of secondary raw materials and Waste as part of its Environmental Management system. The Entity has an interest (including economic) to use the largest quantities available on the market of recycled material or secondary raw materials.
4.4a Collection and recycling of products at end-of-life (strategy)	Conformance	The Entity has implemented internal procedures for the recovery of secondary raw materials and Waste as part of its Environmental Management System. The Entity has an interest (including economic) to use the largest quantities available on the market of recycled material or secondary raw materials.
4.4b Collection and recycling of products at end-of-life (engagement)	Conformance	The Entity 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).
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		
5.1 Disclosure of GHG emissions and energy use	Conformance	The Entity has undertaken a Greenhouse Gas (GHG) analysis. Atmospheric CO ₂ emissions are generated from methane consumption, diesel consumption for generator sets, and organic share of Aluminium Scrap. More information is available in the Sustainability Report 2021 (non-financial reporting): https://stemin.it/wp-content/uploads/2022/07/Rendicontazione-non-finanziaria_stemin-2021_approved_compressed.pdf
5.2 GHG emissions reductions	Minor Non-Conformance	The Entity monitors all energy consumption that contributes directly (natural gas) or indirectly (electricity) to GHG emissions. Based on these monitoring activities, potential efficiency projects are analysed to obtain a continuous reduction in consumption. However, it was identified the objective of reducing CO ₂ emissions per unit according to a timeframe is currently not clear.
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	The Entity has an Integrated Environmental Authorisation (AIA or Integrated Environmental Authorisation)

CRITERION	RATING	COMMENT
		which includes the management of emissions into the atmosphere, compliant with Legislative Decree 152/2006. The Entity annually communicates its atmospheric emissions to the Public Administration and undertakes internal audits to ensure compliance with conditions of the Permit.
6.2 Discharges to Water	Conformance	The Entity has implemented an Environmental Management System, its plants are equipped with water cycle treatment and purification systems. The final discharge point of the wastewater is monitored to prevent any external contamination.
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	The Entity has conducted an assessment as part of its environmental analysis and has implemented provisions for the management of Spills.
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	The Entity has developed a series of internal control procedures and programs for the management of emergencies. Each year, specific training tests are planned for the management of environmental emergencies.
6.4a Reporting of Spills (immediate disclosure)	Conformance	The Entity's environmental authorisation (AIA) (Environmental Integrated Authorization) under the Legislative Decree 152/2006, requires them to communicate to the public administration of any Spills and Leakage.
6.4b Reporting of Spills (regular reporting)	Conformance	The Entity has implemented a plan to communicate the type and potential impact of eventual Spills, and environmental accidents through its Sustainability Report. There are currently no incidents of environmental accidents.
6.5a Waste management and reporting (strategy)	Conformance	Based on the principles of sustainability and circularity, the Entity has aimed to maximise the recovery of Waste by sending a small part (non-recoverable) for disposal. The Aluminium Waste produced at all stages of the process is recovered internally as a secondary raw material from the melting furnaces.
6.5b Waste management and reporting (disclosure)	Conformance	The Entity is required to communicate the quantity of Hazardous and Non-Hazardous Waste generated in compliance with Legislative Decree 152/06. The Entity annually prepares a report called MUD (Unique Form of Declaration) and submits it to the public administration.
6.6a Bauxite Residue (storage construction)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
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	The Entity has implemented a Management System to manage its Dross recovery and treatment. Salt Slags are recovered and disposed of in compliance with Legislative Decree 152/06 and with ISO 14001 certification.
6.8b Dross (recycling)	Conformance	The Entity has implemented a Management System to manage its Dross recovery and treatment. Salt Slags are recovered and disposed of in compliance with Legislative Decree 152/06 and with ISO 14001 certification.
6.8c Dross (review of alternatives)	Conformance	The Entity has implemented a Management System to manage its Dross recovery and treatment. Salt Slags are recovered and disposed of in compliance with Legislative Decree 152/06 and with ISO 14001 certification.
PRINCIPLE 7 WATER STEWARDSHIP		
7.1a Water assessment (mapping)	Conformance	The Entity has conducted an environmental review that includes the mapping of water sources and water usage.
7.1b Water assessment (risk assessment)	Conformance	This Entity has mapped its water sources and water usage that included an environmental analysis in

CRITERION	RATING	COMMENT
		compliance with ISO 14001 certification. Its plants have environmental authorisations according to the Legislative Decree 152/06 with quotas for water withdrawal.
7.2a Water management (management plans)	Conformance	The Entity has conducted an environmental review that includes mapping of water sources and water usage. Its environmental analysis consists of a water use risk assessment which identified a potential risk of exceeding its environmental authorisation limits and water withdrawal quotas. Internal audits and operational control measures are in place to monitor water use.
7.2b Water management (monitoring)	Conformance	The Entity monitors and records its water consumption monthly and monitors water resources (m ³ / tonne of Aluminium produced). The data recorded in the monitoring period demonstrated a notable decrease in the specific consumption of water.
7.3 Disclosure of water usage and risks	Conformance	The Entity monitors its water consumption in compliance with the provisions of Legislative Decree 152/06.
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	This Entity has implemented an Environmental Management System and has conducted a biodiversity risk assessment as part of its overall environmental risk assessment. There are no identified Significant Risks affecting biodiversity.
8.2a Biodiversity management (biodiversity action plans)	Conformance	This Entity has conducted a biodiversity risk assessment as part of its overall environmental risk assessment. There are no identified Significant Risks affecting biodiversity and therefore no specific action plans are required.
8.2b Biodiversity management (consultation and mitigation hierarchy)	Conformance	This Entity has conducted a biodiversity risk assessment as part of its overall environmental risk assessment. There are no identified Significant Risks affecting biodiversity and therefore no specific action plans are required.
8.2c Biodiversity management (reporting)	Conformance	This Entity has conducted a biodiversity risk assessment as part of its overall environmental risk assessment. There are no identified Significant Risks affecting biodiversity and therefore no specific action plans are required.
8.3 Alien Species	Conformance	This Entity has conducted a biodiversity risk assessment as part of its overall environmental risk assessment. There are no identified Significant Risks affecting biodiversity. Alien species are constantly monitored through periodic checks established within the monitoring plan and it was identified likelihood of introducing alien species that could have adverse or significant negative impacts on biodiversity are low.

CRITERION	RATING	COMMENT
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 has implemented an integrated Policy, Code of Ethics and Legislative Decree 231/01 Model with an expressed commitment to respect Human Rights. The Entity has implemented a Human Rights Due Diligence process and follows applicable mandatory regulations in terms of labour law.
9.1b Human Rights Due Diligence (process)	Conformance	The Entity has implemented an integrated Policy, a Human Rights Due Diligence process, a Code of Ethics and Legislative Decree 231/01 Model with an expressed commitment to respect Human Rights.
9.1c Human Rights Due Diligence (remediation)	Conformance	The Entity has demonstrated no adverse Human Rights impacts in both within its supply chain and internal management. The Entity’s commitment to respect for Human Rights is expressed in the integrated Policy, Code of Ethics and Legislative Decree 231/01 Model.
9.2 Women’s Rights	Conformance	The Entity has implemented a risk assessment that includes specific rights of women and a procedure that deals with gender equality and discrimination.
9.3 Indigenous Peoples	Not Applicable	This Criterion does not apply as Indigenous Peoples or their lands, territories and resources are not present in the Entity’s Area of Influence.
9.4 Free, Prior, and Informed Consent (FPIC)	Not Applicable	This Criterion does not apply as Indigenous Peoples or their lands, territories and resources are not present in the Entity’s Area of Influence.
9.5 Cultural and sacred heritage	Conformance	The Entity has conducted a risk assessment and identified there are no sacred or cultural heritage sites in its Area of Influence as the Facilities are in industrial areas. The latest risk assessment was undertaken in March 2022 and is updated annually.

CRITERION	RATING	COMMENT
9.6a Resettlements (avoid or minimise)	Conformance	The Entity has identified that no resettlements are expected. In the event of transfers and re-establishments, an assessment of related social risks will be undertaken, however, none are planned.
9.6b Resettlements (where unavoidable)	Conformance	The Entity has identified there are no resettlements expected. In the event of transfers and re-establishments, an assessment of related social risks will be undertaken, however, none are planned.
9.7a Local Communities (rights and interests)	Conformance	The Entity has implemented a procedure that addresses the environmental, social, cultural, gender and overall Human Rights impact of change. A risk assessment included Local Communities and concluded there are no issues. These relationships are regulated through the competent territorial bodies, Municipality, Province, and ARPA (Regional Agency for the Protection of the Environment).
9.7b Local Communities (impacts)	Conformance	The Entity has conducted a risk assessment and Due Diligence on Local Communities and concluded there are no issues or impacts regarding Local Communities. A communication channel is available for the Local Communities to engage with the Entity.
9.7c Local Communities (livelihoods)	Conformance	The Entity has established a procedure that addresses the environmental, social, cultural, gender and overall Human Rights impact of change. The Entity supports the development of the Local Community. More information is available within the Sustainability Report 2021, pages 35 - 39: https://stemin.it/wp-content/uploads/2022/07/Rendicontazione-non-finanziaria_stemin-spa_2021.pdf
9.8 Conflict-Affected and High-Risk Areas	Conformance	The Entity has undertaken a supplier risk assessment which analyses the risks associated with the origin of the Aluminium, whether it is to be used, and if the company is from a Conflict-Affected and High-Risk Areas (CAHRAs).
9.9 Security practice	Conformance	The Entity does not engage with private security providers, the only security provider is the police.
PRINCIPLE 10 LABOUR RIGHTS		
10.1a Freedom of Association and Right to Collective Bargaining (freedom of association)	Conformance	The Entity has demonstrated respect for Trade Unions and Workers to contact Trade Unions. The Entity has a statement on Trade Unions included in its Code of Ethics: https://stemin.it/wp-content/uploads/2022/05/STEMIN_CodiceEtico-diCondotta.pdf (Italian only)

CRITERION	RATING	COMMENT
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Conformance	The Entity operates under a National Collective Bargaining Agreement (CBA) agreed upon by industry representatives and Trade Unions representatives. The CBA is valid from January 2021 until its renewed.
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Conformance	The Entity operates in a country (Italy) where Applicable Law does not restrict the right to Freedom of Association and Collective Bargaining. No alternative means of associations are required.
10.2a Child Labour (minimum age)	Conformance	The Entity has demonstrated there is no evidence of Child Labour. The Entity has established a manual and procedure to conduct supply chain Due Diligence and requires suppliers to subscribe to its Code of Ethics and Policy.
10.2b Child Labour (hazardous)	Conformance	The Entity has demonstrated there is no evidence of Child Labour. The Entity has established a manual and procedure to conduct supply chain Due Diligence and requires suppliers to subscribe to its Code of Ethics and Policy.
10.2c Child Labour (worst forms)	Conformance	The Entity has demonstrated there is no evidence of Child Labour. The Entity has established a manual and procedure to conduct supply chain Due Diligence and requires suppliers to subscribe to its Code of Ethics and Policy.
10.3a Forced Labour (human trafficking)	Conformance	The Entity has demonstrated there is no evidence of Forced Labour. The Entity has established a manual and procedure to conduct supply chain Due Diligence and requires suppliers to subscribe to its Code of Ethics and Policy.
10.3b Forced Labour (deposits, fees, advances)	Conformance	The Entity has demonstrated there is no evidence of Forced Labour and does not require Workers to pay fees.
10.3c Forced Labour (migrant workers)	Conformance	The Entity has demonstrated there is no evidence of Forced Labour and does not request Workers to lodge deposits or any security payment. This was verified through interviews and document review.
10.3d Forced Labour (debt bondage)	Conformance	The Entity has demonstrated there is no evidence of Forced Labour and does not hold Workers in Debt Bondage. This was verified through interviews and document review.
10.3e Forced Labour (freedom of movement)	Conformance	The Entity has demonstrated there is no evidence of Forced Labour and does not restrict the movement of Workers unless for safety issues. Workers are free to leave the workplace at the end of working hours or in case of immediate danger.

CRITERION	RATING	COMMENT
10.3f Forced Labour (retention of identity papers, permits, certificates)	Conformance	The Entity has demonstrated there is no evidence of Forced Labour and does not retain original documents.
10.3g Forced Labour (freedom to terminate employment)	Conformance	The Entity has demonstrated there is no evidence of Forced Labour. Workers can terminate their employment freely according to the Collective Bargaining Agreement with a pre-notice.
10.4 Non-Discrimination	Conformance	The Entity has demonstrated there is no evidence of Discrimination including in hiring and career development. Discrimination is covered within its Code of Ethics and Management System Policy. https://stemin.it/wp-content/uploads/2022/05/STEMIN_CodiceEtico-diCondotta.pdf (Italian only) https://stemin.it/wp-content/uploads/2022/05/Untitled_08042022_160518.pdf (Italian only)
10.5 Communication and engagement	Conformance	The Entity has established communication channels that are accessible to all Workers. Disciplinary measures are governed by the National Collective Bargaining Agreement (CBA).
10.6 Disciplinary practices	Conformance	The Entity's disciplinary measures are governed by the National Collective Bargaining Agreement (CBA).
10.7a Remuneration (living wage)	Conformance	Wages at the Entity are governed by the National Collective Bargaining Agreement (CBA). The calculation of the basic wage was updated for 2022 and the minimum wage at the Entity is higher than the calculated rate.
10.7b Remuneration (method of payment)	Conformance	The Entity provides all Workers with clearly legible pay slips. Wages are paid as per the Collective Bargaining Agreement (CBA) monthly and typically on the 15th of each month via bank transfer.
10.8 Working Time	Minor Non-Conformance	The Entity complies with Applicable Law and industry standards regarding working hours. Working hours are recorded and Overtime is voluntary. However, it was identified there were some cases of Workers exceeding the Overtime limit and one Worker not using the entitled compensatory rest.
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	The Entity has demonstrated it adheres to the mandatory health and safety regulations according to the Legislative Decree 81/08 for health and safety at work. The Entity holds a valid ISO 45001 certification.

CRITERION	RATING	COMMENT
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	The Entity has demonstrated it adheres to the mandatory health and safety regulations according to the Legislative Decree 81/08 for health and safety at work. OH&S is included in the integrated Policy. The Policy is available at: https://stemin.it/wp-content/uploads/2022/05/Untitled_08042022_160518.pdf The Entity holds a valid ISO 45001 certification.
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Conformance	The Entity has demonstrated it adheres to the mandatory health and safety regulations according to the Legislative Decree 81/08 for health and safety at work. The Entity holds a valid ISO 45001 certification.
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	Workers understand the hazards and safe practices for their work and their authority to refuse or stop unsafe work is stated within Italian law on Occupational Health and Safety (OH&S) Decree 81/08 and within the integrated Policy. The Entity holds a valid ISO 45001 certification.
11.2 OH&S Management System	Conformance	The integrated Policy includes a commitment to guarantee ethical correctness, protection of the territory and respect for human and social rights. The Entity holds a valid ISO 45001 certification.
11.3 Employee engagement on health and safety	Conformance	The Entity has implemented a procedure for monitoring OH&S performance as part of its integrated Management System.
11.4 OH&S performance	Conformance	The Entity conducts an OH&S performance meeting on an annual basis with senior management, Worker's representatives, and a medical specialist. The Entity maintains minutes of these meetings which including indicators on the frequency and severity of injuries and near misses. Results of the medical survey are also discussed.

Document Control and Version History

Revision	Date	Notes
0	27 September 2022	Initial Certification Audit - Full Certification