
ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

SLIM ALUMINIUM S.p.A

CERTIFICATE
NUMBER

128

ASI
STANDARD

PERFORMANCE
STANDARD
(V2 2017)

CERTIFICATION
LEVEL

FULL
CERTIFICATION

ASI ACCREDITED
AUDITOR

BUREAU
VERITAS
CERTIFICATION

DATE OF ISSUE

11 MAY 2021

DATE OF EXPIRY

10 MAY 2024

CERTIFIED SINCE

11 MAY 2021

AUTHORISED BY

A stylized, handwritten signature in black ink.

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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

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

SUMMARY AUDIT REPORT

PERFORMANCE

STANDARD

OVERVIEW

MEMBER NAME	Slim Aluminium S.p.A.
ENTITY NAME	Slim Aluminium S.p.A.
CERTIFICATION SCOPE	Manufacture aluminium alloys rolled products by remelting, casting, hot and cold rolling and heat treatments (EA17).
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Semi-Fabrication
ASI STANDARD	<ul style="list-style-type: none">Performance Standard V2
AUDIT TYPE	<ul style="list-style-type: none">Initial Certification Audit (24 – 25 February 2021)Surveillance Audit (16 – 17 May 2022)
AUDIT FIRM	Bureau Veritas Certification
AUDIT DATE	<ul style="list-style-type: none">24 – 25 February 2021 (Initial Certification Audit)16 – 17 May 2022 (Surveillance Audit)
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">19 March 2021 (Initial Certification Audit)15 November 2022 (Surveillance Audit)
AUDIT SCOPE	<p><u>Initial Certification Audit (24 – 25 February 2021)</u></p> <p>The audit scope included all the facilities, functions and services of the Slim Aluminium S.p.A. di Cisterna di Latina plant.</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none">Semi-Fabrication <p>All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.</p> <p><u>Surveillance Audit (16 – 17 May 2022)</u></p> <p>The audit scope included all the facilities, functions and services of the Slim Aluminium S.p.A. di Cisterna di Latina plant.</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none">Semi-Fabrication

	All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.
AUDIT OUTCOME	<ul style="list-style-type: none"> • Certification
AUDIT METHODOLOGY DECLARATION	<p>The Auditors confirm that:</p> <ul style="list-style-type: none"> ✓ The information provided by the Entity is true and accurate to the best knowledge of the Auditor(s) preparing this report. ✓ 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.
CERTIFICATION PERIOD	11 May 2021 – 10 May 2024
NEXT AUDIT TYPE	Re-Certification Audit
NEXT AUDIT DUE DATE	10 May 2024
CERTIFICATE NUMBER	128

SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	A legislative list is kept updated by the IMS (Integrated Management System) Manager.
1.2 Anti-Corruption	Conformance	A Code of Conduct is contained in the Model Legislative Decree 231/01 - Organization and Control Model (Page 124 Code of Conduct - Annex II to the Organizational Model). The Code includes environmental protection, the disciplinary system (Annex III) and confidentiality. The system also includes the whistleblowing system.
1.3 Code of Conduct	Conformance	<p>A Code of Conduct is contained in the Model Legislative Decree 231/01 – Organization and Control Model (Page 124 Code of Conduct – Annex II to the Organizational Model). The Code includes environmental protection, the disciplinary system (Annex III) and confidentiality. The system also includes the whistleblowing system. The system provides for the acceptance of the Code of Ethics in the supplier pre-qualification phase.</p> <p>The Entity disseminates the Code of Conduct and delivers training on its contents. The Code is available at:</p> <p>https://www.slimalu.com/wp-content/uploads/2022/05/Slim-Aluminium-SpA-Codice-di-Comportamento-Politica-Anticorruzione-06.05.2022-Vers.-2.02.pdf</p>
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	The Entity has an Integrated Policy which contains environmental, social and governance references. The Policy also covers other aspects, including energy management (ISO 50001), food safety (ISO 22000) and structural aluminium products (EN 15088).
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	The Integrated Policy is periodically reviewed to verify its continued suitability and adequacy. The Policy clearly describes the Entity's commitment to the use and provision of resources to ensure continuous improvement and the Entity also invests in staff training and education. The Policy is signed by the Plant Manager and CEO.
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	<p>The Integrated Policy is available internally through the company intranet and to interested external parties through the publication on the website:</p> <p>https://www.slimalu.com/it/certifications/</p>

CRITERION	RATING	COMMENT
		or in Italian at: https://www.slimalu.com/wp-content/uploads/2021/02/Politica-Integrata-Ed3_Rev2_2021_02_ita.pdf and English: https://www.slimalu.com/wp-content/uploads/2021/02/Politica-Integrata-Ed3_Rev2_2021_02_eng.pdf
2.2 Leadership	Conformance	The Entity has appointed a manager tasked with supervising and ensuring 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 has an ISO 14001 certified Management System (certified by DNV).
2.3b Environmental and Social Management Systems (social)	Minor Non-Conformance	The Entity does not have a social responsibility management system certified by a certification body. The management system currently implemented by the Entity is not fully integrated with the social responsibility requirements.
2.4 Responsible Sourcing	Conformance	The Entity has developed a pre-qualification questionnaire and periodic monitoring of suppliers on environmental, energy and safety issues is envisaged. The Procurement Policy currently adopted by the Entity addresses the requirements relating to social responsibility.
2.5 Impact Assessments	Minor Non-Conformance	The Environmental Impact Assessment analyses the significance level of environmental impacts for each identified direct and indirect environmental aspect. However, the document requires revision to consider the risks and opportunities related to the social sphere.
2.6 Emergency Response Plan	Conformance	The Entity has established and documented a series of procedures to respond to emergency situations and dangerous behaviour. At least annually, the Entity organizes training tests to respond to emergency situations.
2.7 Mergers and Acquisitions	Conformance	No acquisitions have been made and no acquisitions are planned in the near future. The Entity has a process within the Legislative Decree 231/01 Model which provides for the preparation of plans to review environmental, social and governance issues.
2.8 Closure, Decommissioning and Divestment	Conformance	No decommissioning or divestments are foreseen. In any case, the Entity has a process within the

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		Legislative Decree 231/01 Model in place which, in the event of divestment and disposal of plants, a specific plan is created to review environmental, social and governance issues.
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	The Entity discloses its governance approach and its environmental, social and economic impacts through the Sustainability Report, available at: https://www.slimalu.com/it/sustainability-2/
3.2 Non-compliance and liabilities	Conformance	There are no fines, sentences or penalties relating to non-compliance with Applicable Regulations. There are no disputes of any kind and nature. This information is made public in the Sustainability Report on pages 62 – 64, available at: https://www.slimalu.com/wp-content/uploads/2022/04/Slim-Aluminium-Bilancio-di-Sostenibilita-2020.pdf
3.3a Payments to governments (legal and contractual)	Conformance	The Entity has a management system, compliant with the Legislative Decree 231/01 Model, which provides for both a Code of Ethics and internal anti-corruption controls undertaken by a Supervisory Body.
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	The Entity's reporting tool was developed through the Legislative Decree 231/01 Model. The tool gives Workers the opportunity 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 prepared a Life Cycle Assessment (LCA) report that has analysed three products: aluminium paper for food use, aluminium strips for cosmetic packaging, and discs for making kitchen pots. Gabi software is used for data processing. The study was developed by the Rina body.
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	The LCA study is not published on the website but is provided to interested parties upon request. An extract relating to carbon is reported in the Sustainability Report available at: https://www.slimalu.com/wp-content/uploads/2022/04/Slim-Aluminium-Bilancio-di-Sostenibilita-2020.pdf

CRITERION	RATING	COMMENT
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	The LCA study is not published on the website but is provided to interested parties upon request. An extract relating to carbon is reported in the Sustainability Report available at: https://www.slimalu.com/wp-content/uploads/2022/04/Slim-Aluminium-Bilancio-di-Sostenibilita-2020.pdf
4.2 Product design	Conformance	The environmental impact of the materials produced is reduced by maximizing the use of aluminium waste (pre and post-consumer) on the alloys produced.
4.3a Aluminium Process Scrap (targets)	Conformance	All production cycles are monitored for each phase of the process with the recording of standard process rejects and extra rejects through dedicated software. Measurements are used to minimize the waste of each cycle and standardise it. Where necessary, for example in cases where anomalies occur, specific improvement projects are initiated to reduce waste back within standard limits or even lower.
4.3b Aluminium Process Scrap (alloy separation)	Conformance	All production scraps are collected for families of compatible alloys in order to facilitate reuse. Internal waste is 100% recycled. Various tools are available for the collection of scraps: dedicated bins with separation by alloy and type, centralized pneumatic conveying systems, equipment for moulding chipboard or other types of thin waste in order to optimize the yield of remelting.
4.4a Collection and recycling of products at end-of-life (strategy)	Conformance	The Entity applies internal procedures for the recovery of secondary raw materials and waste. There is an interest (including an economic one) in using the largest quantities of recycled material or secondary raw materials available on the market. One of the sales strategies is "in tolling". In these cases, customers provide their own processing scraps or other aluminium scraps purchased on the market to cover the metal value of the products purchased from Slim Aluminium.
4.4b Collection and recycling of products at end-of-life (engagement)	Conformance	The Entity is part of several associations, including CIAL (Italian Consortium for Aluminium Packaging Recycling) which deals with the recovery of aluminium (post-consumer). At present, CIAL has not signed post-consumer recycling agreements in the geographical area of the Entity. The Entity can receive aluminium scraps/waste (including end-of-life), re-melting them as part of the raw material. Products containing a higher percentage of recycled material are also promoted.

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		The Entity purchases a share of pre/post-consumer material from metal collection centres.
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		
5.1 Disclosure of GHG emissions and energy use	Conformance	<p>The Entity has a certified Management System according to the UNI EN ISO 50001 standard. The Entity's main CO₂ emissions are derived from the consumption of methane, diesel for the generating sets and from the organic share of aluminium scrap. An audit is undertaken annually by a certification agency to verify the CO₂ values</p> <p>The Entity reports emissions data annually to public authorities as required by the EU Emissions Trading System (EU ETS). The Entity publicly discloses material GHG emissions and energy use by source on an annual basis through the Sustainability Report, on page 52, available at: https://www.slimalu.com/wp-content/uploads/2022/04/Slim-Aluminium-Sustainability-Report-2020.pdf</p>
5.2 GHG emissions reductions	Conformance	<p>All energy consumption that directly (natural gas) or indirectly (electricity) contributes to GHG emissions is monitored. Potential efficiency projects are analysed in order to obtain a continuous reduction in consumption. The objectives for the reduction of GHG emissions have been identified and activated. Pending the publication of the Sustainability Report, the Entity makes available on request the data for GHG emissions from energy consumption and reduction targets; interested parties are also informed.</p> <p>GHG emission reduction objectives have been defined for projects including the optimization of the compressed air network and the efficiency of the Bernotti 2 coil annealing furnaces; with other ongoing studies, such as extension of fusion line 2, to evaluate potential future improvements.</p>
5.3a Aluminium Smelting (management system)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.3b Aluminium Smelting (up to and including 2020)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.3c Aluminium Smelting (after 2020)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
PRINCIPLE 6 EMISSIONS, EFFLUENTS AND WASTE		
6.1 Emissions to Air	Conformance	The Entity has an Environmental Authorization (AIA or Integrated Environmental Authorization) which

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		provides for the management of emissions into the atmosphere, in compliance with Legislative Decree 152/2006. Following the authorization principles, the Entity annually communicates its Emissions to Air to the Public Administration. The Entity carries out internal audits on compliance with the AIA and checks on communication to the Public Administration as part of the ISO 14001 certification audit.
6.2 Discharges to Water	Conformance	The Entity is equipped with three water treatment and purification systems for industrial and civil use. The final wastewater discharge point is constantly monitored in order to prevent any type of external contamination. Purification devices are monitored daily, with all checks recorded weekly. Furthermore, in compliance with the Environmental Authorization (AIA or Integrated Environmental Authorization), the final discharge point is equipped with an automatic sampler.
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	The Environmental Analysis report was updated in March 2022 which included assessment of spills and leaks. This document analyses the environmental aspect in normal and emergency conditions and assesses the level of significance.
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	The Entity has prepared a series of internal control procedures and programs for the management of emergencies. Specific training tests on the management of environmental emergencies are scheduled every year. Firefighting systems tests are performed at least twice a year (including valve operation test, periodic control of fire-fighting devices and control of detection systems).
6.4a Reporting of Spills (immediate disclosure)	Conformance	<p>The Entity communicates the type and potential impact of any environmental spills and accidents through the Sustainability Report on page 61: https://www.slimalu.com/wp-content/uploads/2022/04/Slim-Aluminium-Bilancio-di-Sostenibilita-2020.pdf</p> <p>The Entity declares that there have been situations of accidents from spills of polluting material in the last 20 years.</p>
6.4b Reporting of Spills (regular reporting)	Conformance	<p>The Entity communicates the type and potential impact of any environmental spills and accidents through the Sustainability Report on page 61 https://www.slimalu.com/wp-content/uploads/2022/04/Slim-Aluminium-Bilancio-di-Sostenibilita-2020.pdf</p>

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		The Entity declares that there have been situations of accidents from spills of polluting material in the last 20 years.
6.5a Waste management and reporting (strategy)	Conformance	<p>Based on the principles of sustainability and circularity, the Entity has established a goal to maximize the recovery of waste by directing only a small (non-recoverable) part to disposal. The aluminium waste produced in all stages of the process is recovered internally as a secondary raw material of the melting furnaces. The overall percentage of waste sent for recovery in 2021 was 85.7%.</p> <p>The plant periodically carries out a characterization of its waste using the services of external laboratories. It also performed a characterization of the waste where requested by the suppliers of the disposal / recovery service.</p>
6.5b Waste management and reporting (disclosure)	Conformance	<p>The Entity monitors the quantities of Hazardous and Non-Hazardous Waste produced and determined how the waste was disposed of. The Entity communicates the quantity of Hazardous and Non-Hazardous Waste generated annually through the Sustainability Report on page 52:</p> <p>https://www.slimalu.com/wp-content/uploads/2022/04/Slim-Aluminium - Sustainability-Report-2020.pdf</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 (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.

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6.7c Spent Pot Lining (SPL) (Untreated SPL)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7d Spent Pot Lining (SPL) (review of alternatives)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7e Spent Pot Lining (SPL) (marine and aquatic environments)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8a Dross (recovery)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8b Dross (recycling)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8c Dross (review of alternatives)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

PRINCIPLE 7 WATER STEWARDSHIP

7.1a Water assessment (mapping)	Conformance	<p>The water system is divided into:</p> <ul style="list-style-type: none"> - Two wells for industrial use (well 1 and 2) - One well for civil use (well 3) - Two barrier wells (wells A and B) for the MISO project (operational safety); the water from wells A and B is also used for cooling after treatment (industrial use). <p>This description is reported in the environmental analysis document which was last updated in March 2022.</p>
7.1b Water assessment (risk assessment)	Not Applicable	There are no watersheds in the Entity's Area of Influence.
7.2a Water management (management plans)	Conformance	<p>The Entity has undertaken an environmental review that includes a mapping of water sources and water consumption and a risk assessment for water use. The main risk is exceeding the limits of the Environmental Authorization, including the water withdrawal quotas. Internal audits and operational control measures are in place to monitor water use.</p>
7.2b Water management (monitoring)	Conformance	<p>The monitoring of water consumption is undertaken monthly and recorded. The data recorded in the monitoring period, referring to the quantity of water supplied, demonstrates a strong trend due to the decrease in specific water consumption.</p>
7.3 Disclosure of water usage and risks	Conformance	<p>The Entity monitors water withdrawal and use, and analyses material risks related to water. The Entity publicly discloses water consumption and destination in the Sustainability Report on page 50:</p>

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		https://www.slimalu.com/wp-content/uploads/2022/04/Slim-Aluminium - Sustainability-Report-2020.pdf
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	The Entity has undertaken a biodiversity risk assessment and developed an action plan in based on the Environmental Permit (AIA) and legal obligations (Legislative Decree 152/2006). Foliar investigations to check for the presence of elements that could cause damage (e.g. presence of chlorinated solvents) have been undertaken. The plan included in the AIA considers the Biodiversity Mitigation Hierarchy, primarily taking into account the mitigation in relation to the remediation project in progress. No significant risk to biodiversity was found.
8.2a Biodiversity management (biodiversity action plans)	Conformance	Foliar investigations are currently underway and ongoing to check for the presence of elements that could cause damage (e.g. presence of chlorinated solvents). The Entity does not operate in protected areas and there are no key areas of biodiversity or threatened species that may be affected by the production activities. No significant risk to biodiversity was found.
8.2b Biodiversity management (consultation and mitigation hierarchy)	Conformance	No significant risk to biodiversity was found. However, the action plan considers the Biodiversity Mitigation Hierarchy.
8.2c Biodiversity management (reporting)	Conformance	The Entity does not operate in protected areas and there are no key areas of biodiversity or threatened species that may be affected by the Group's activities. No significant risk to biodiversity was found. The organization will communicate this aspect within the next sustainability report (2021), which is scheduled to be published in September 2022.
8.3 Alien Species	Conformance	Alien Species are monitored through periodic checks established as part of the monitoring plan required by ISO 14001. The assessment undertaken currently evaluates the probability of introduction of alien species that could have significant negative impacts on low biodiversity.
8.4a Commitment to “No Go” in World Heritage properties (exploration and new mines)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

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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’s commitment to respect Human Rights is expressed in the Integrated Policy, the Code of Ethics and the Sustainability Report.
9.1b Human Rights Due Diligence (process)	Conformance	The Entity’s commitment to respect Human Rights is expressed in the Integrated Policy, Code of Ethics and the Model Legislative Decree 231/01. A Human Rights Due Diligence process is regularly undertaken. Compliance with the mandatory legislation applicable to labour law was confirmed.
9.1c Human Rights Due Diligence (remediation)	Conformance	The Entity’s commitment to respect Human Rights is expressed in the Integrated Policy, Code of Ethics and Legislative Decree 231/01 Model. No remediation actions have been taken and to date, no adverse impacts have been identified through the continuous due diligence process.
9.2 Women’s Rights	Conformance	Gender equality is guaranteed by compliance with regulations and by the presence of women in senior and middle management positions. For this section, the percentage of women in production is typically low. The adoption of an Organizational Model pursuant to Legislative Decree 231/01 and a confidential reporting system represent a tool for communicating any crimes and violations to the Supervisory Body in charge. There were no cases of discrimination.
9.3 Indigenous Peoples	Not Applicable	The Entity does not operate on sites occupied by Indigenous Peoples.
9.4 Free, Prior, and Informed Consent (FPIC)	Not Applicable	The Entity does not operate on sites occupied by Indigenous Peoples.
9.5 Cultural and sacred heritage	Conformance	A risk assessment on biodiversity is addressed in the Environmental Permit (AIA or Environmental Integrated Authorization) with a chapter on artistic and historical heritage included in the Annex Report on Territorial, Urban and Environmental Constraints.

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9.6a Resettlements (avoid or minimise)	Conformance	There are no resettlements expected. In the event of transfers and re-establishments, assessment of related social risks will be undertaken, however, at the moment, there are none planned.
9.6b Resettlements (where unavoidable)	Conformance	There are no resettlements expected. In the event of transfers and re-establishments, assessment of related social risks will be undertaken, however, at the moment, there are none planned.
9.7a Local Communities (rights and interests)	Conformance	There are no concerns for local communities. The relationships are however regulated through the competent territorial bodies, Municipality, Province and ARPA (Regional Agency for the Protection of the Environment).
9.7b Local Communities (impacts)	Conformance	There are no resettlements expected. In the event of transfers and re-establishments, assessment of related social risks will be undertaken, however, at the moment, there are none planned.
9.7c Local Communities (livelihoods)	Conformance	There are no direct concerning issues for local communities. The relationships are regulated through the competent territorial bodies including the Municipality, Province and ARPA (Regional Agency for the Protection of the Environment).
9.8 Conflict-Affected and High-Risk Areas	Conformance	The Entity has developed a Supplier Risk Assessment which analyses the risks associated with the potential origin of the aluminium used. The Risk Readiness Assessment (RRA) is also referred to in the assessment of risks in the supply chains of raw materials.
9.9 Security practice	Conformance	An armed night surveillance service of the plant is provided, specifically appointed and authorized by law. The concierge service is carried out during the day by non-armed personnel belonging to an external company. Supervision and access control are carried out in compliance with the law. At the entrance to the plant, an identity document is requested from external staff, and in response to the current pandemic situation, body temperature checks are carried out at the entrance to the plants using a thermoscanner.
PRINCIPLE 10 LABOUR RIGHTS		
10.1a Freedom of Association and Right to Collective Bargaining (freedom of association)	Conformance	In Italy, all workers are covered by a Collective Labor Agreement (CCNL) agreed at national level between trade unions and sector representatives. During the audit, no obstacles were found to joining

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		<p>trade unions. The Entity respects the right of workers to associate freely. There are unitary trade union representatives whose delegates confirmed the collaboration and guarantee of association rights by all Workers. The Entity has adopted the National Collective Labor Agreement for the metalworking industry and the installation of plants and with unitary union representation.</p> <p>A three yearly procedure is in place for the renewal of the representations. Currently, there are no trade union disputes.</p>
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Conformance	<p>The right to Collective Bargaining is guaranteed to all Workers through their representatives. The feedback from the interviews with the workers was positive; no situations emerged in which the right to freedom of association and collective bargaining is impeded. The Entity informs workers of the freedom to join any organization of their choice and ensures that the choices made do not lead to negative consequences such as victimisation, harassment, intimidation or retaliation by the Entity. A monthly meeting is scheduled with the unions to communicate results.</p>
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Conformance	<p>The right to Collective Bargaining is guaranteed to all Workers through their representatives. The feedback from the interviews with the workers was positive; no situations emerged in which the right to freedom of association and collective bargaining is impeded. The Entity informs workers of the freedom to join any organization of their choice and ensures that the choices made do not lead to negative consequences such as victimisation, harassment, intimidation or retaliation by the Entity. A monthly meeting is scheduled with the unions to communicate results.</p>
10.2a Child Labour (minimum age)	Conformance	<p>The recruitment procedure and the checking of identity documents guarantees the absence of Child Labour. The Entity does not use or support the use of Child Labour. Proof of commitment is available in the Social Responsibility Policy document. At the time of the audit, no minors were hired by the Entity.</p>
10.2b Child Labour (hazardous)	Conformance	<p>The recruitment procedure and the checking of identity documents guarantees the absence of Child Labour. The Entity does not use or support the use of Child Labour. Proof of commitment is available in the Social Responsibility Policy document. At the time of the audit, no minors were hired by the Entity.</p>

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10.2c Child Labour (worst forms)	Conformance	The recruitment procedure and the checking of identity documents guarantees the absence of Child Labour. The Entity does not use or support the use of Child Labour. Proof of commitment is available in the Social Responsibility Policy document. At the time of the audit, no minors were hired by the Entity.
10.3a Forced Labour (human trafficking)	Conformance	<p>All Workers are hired directly or through administration agencies authorized by the Ministry of Labor through the regulatory devices. No intermediaries of any kind are used. The National Collective Bargaining Agreement (CCNL) is applied by the metalworking collective.</p> <p>No loan situation. Ancient PTFs in compliance with the law. Overtime (working hours) is always authorized by the managers and registered with magnetic badges. Extraordinary maximum level as per collective agreement. Overtime is always optional. Two administrative agencies are used - Adecco and Manpower (both SA8000 certified) and security is guaranteed by Metro Italia Day with a Metronotte.</p>
10.3b Forced Labour (deposits, fees, advances)	Conformance	No deposits, hiring fees or equipment payments are required of Workers. All Workers are hired directly or through administrative agencies authorized by the Ministry of Labor through regulatory measures. No intermediaries of any kind are used. Overtime (working hours) is always authorized by the managers and registered with magnetic badges. Extraordinary maximum level as per collective agreement. Overtime is always optional. Two administrative agencies are used - Adecco and Manpower (both SA8000 certified) and security is guaranteed by Metro Italia Day with a Metronotte.
10.3c Forced Labour (migrant workers)	Conformance	No deposits of any kind are required from Workers, whether they are EU citizens or migrants. There is no worker loan facility at the Entity. Overtime (working hours) is always authorized by the managers and registered with magnetic badges, and the maximum level allowed is as per collective agreement. Overtime is always optional. When necessary, two staff leasing agencies Adecco and Manpower (both SA8000 certified) are used.
10.3d Forced Labour (debt bondage)	Conformance	<p>No loan facility is present at the Entity. Overtime work is always voluntary and always authorized by the process managers and recorded via magnetic badges. The maximum level allowed is in line with the provisions of the collective agreement.</p> <p>No advances or loans are granted, other than those</p>

CRITERION	RATING	COMMENT
		envisaged by current legislation. For example, the CCNL defines the possibility of requesting up to 70% of one's severance pay in advance for well-identified reasons (any health costs for therapies or extraordinary interventions recognized by the competent public structures; purchase of the first home for oneself or for the children, all must be documented with a notarial deed).
10.3e Forced Labour (freedom of movement)	Conformance	The Entity respects the right of freedom of movement during the working day and breaks are guaranteed. Workers are free from forms of pressure, they are not forced to accept work or keep it, they are free to bargain and to put an end to the employment relationship in accordance with Italian regulations. Declares refusal of forced labour.
10.3f Forced Labour (retention of identity papers, permits, certificates)	Conformance	The Entity does not keep original copies of the documents. Only non-original copies of Workers' documents (identity card, driving license and/or passport) are retained.
10.3g Forced Labour (freedom to terminate employment)	Conformance	Workers can freely withdraw from the employment relationship at any time by communicating their resignation to Human Resources. Depending on the role and number of years of employment, a notice period is required, as prescribed by the national collective agreement.
10.4 Non-Discrimination	Conformance	The Entity confirms its commitment to refrain from supporting discriminatory practices. There is no interference with staff rights to follow religious and cultural principles or practices, or to satisfy needs related to race, sex, sexual orientation, trade union or political affiliation, etc. social responsibility. The policy adopted by the Entity guarantees equal opportunities and non-discrimination in the hiring, remuneration, promotion, training, promotion or dismissal opportunities of any Worker based on sex, race, national or social origin, religion or any other condition that may give rise to discrimination.
10.5 Communication and engagement	Conformance	Communications occur at the Entity via regular meetings with staff and management, meetings with Workers' safety representatives, periodic meetings on health and safety between the Employer, the Occupational Doctor, the Head of the Prevention and Protection Service, the Head of Workers' Safety and union member meetings.

CRITERION	RATING	COMMENT
10.6 Disciplinary practices	Conformance	<p>The disciplinary procedures are in accordance with the CCNL and are regularly communicated to the Workers through the company bulletin board. The Entity complies with the CCNL and Law 300.</p> <p>Disciplinary practices are managed in accordance with the provisions of current legislation. In the last year there have been 21 disciplinary measures and one dismissal managed according to the CCNL. There are no reports of violation.</p>
10.7a Remuneration (living wage)	Conformance	<p>The remuneration levels are applied in compliance with the sector National Collective Bargaining Agreement (CCNL). The levels most applied are Levels 4 and 5. The levels are being redetermined as required by the renewal agreement of the CCNL. According to national statistics, the living wage is 758.68 euros per month. The lowest level present is Level 3 for direct workers and Level 2 for administration.</p>
10.7b Remuneration (method of payment)	Conformance	<p>The Entity regularly pays salaries every month by bank transfer, with printouts of the transfer attached to the envelopes. Payrolls and bank transfers were sampled. The payslips comply with the standard forms approved by the public administration, the interviewed Workers declared that they understood the contents of the payslips and that payments were always punctual.</p>
10.8 Working Time	Conformance	<p>The Entity complies with Applicable Law and industry standards regarding working hours (including overtime). The recording of working hours is by means of magnetic badges. Overtime is always voluntary. INAZ is used for payroll management and working time recording system. The payslips are managed internally and the records of attendance, absence, leave and illness are included on payslips. With the exception of support activities, the facility operates on three shifts and the facility is open seven days a week. Timetable changes due to the application of the Covid protocol are communicated one week in advance.</p>
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	<p>The Entity is ISO 45001 certified. The Integrated Policy (and integrated with ASI requirements), signed by the General Manager and CEO, includes commitment to implement economic-financial management methods, personnel and supplier management in order to guarantee ethical</p>

CRITERION	RATING	COMMENT
		correctness, protection of the territory and respect for human and social rights. The OH&S Policy was approved by senior management, and resources are provided for its implementation.
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	As required by ISO 45001, the Integrated Policy and the OH&S Management System in full is applied to all Workers present whether they are direct, indirect or subcontracted Workers.
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Conformance	As required by ISO 45001, the Integrated Policy contains a commitment to comply with all mandatory standards.
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	As required by ISO 45001, the Integrated Policy includes a commitment to ensure that Workers understand safe practices and the right to leave the workplace in case of unsafe practices. In particular, any Worker who leaves their workplace in the presence of a serious and immediate danger that cannot be avoided will not face subsequent consequences.
11.2 OH&S Management System	Conformance	The Entity has an OH&S Management System that is ISO 45001 certified.
11.3 Employee engagement on health and safety	Conformance	The Health and Safety Committee corresponds to the SPP (Prevention and Protection Service), of which the RLS (Workers' Representative for Security) is a member.
11.4 OH&S performance	Conformance	The Entity annually evaluates the indicators defined within the Management System for process control; continuous improvement is guaranteed by the objectives defined at the annual Management Review. A key performance requirement includes the updating specific risk assessments relating to radon, fire, chemical, work-related stress, biological risk; improving training and awareness for the use of work equipment (such as overhead cranes, fire-fighting systems and forklifts), the continuation of the post 96 machine health and safety 'Essential Requirements' improvement campaign and the remediation plan for trolley transit routes.

Document Control and Version History

Revision	Date	Notes
0	11 May 2021	Initial Certification Audit (Full Certification)
1	17 December 2022	Surveillance Audit