

ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

STEMIN S.p.A.

CERTIFICATE NUMBER

222

ASI STANDARD

PERFORMANCE
STANDARD
(V3 2022)

CERTIFICATION LEVEL

FULL
CERTIFICATION

ASI ACCREDITED
AUDITING FIRM

BUREAU VERITAS
CERTIFICATION

DATE OF ISSUE

19 DECEMBER 2023

DATE OF EXPIRY

18 DECEMBER 2026

CERTIFIED SINCE

27 SEPTEMBER 2022

AUTHORISED BY

A handwritten signature in black ink, appearing to be 'J. H.', with a long horizontal line extending to the right.

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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.

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/RefiningCasthouses
ASI STANDARD	Performance Standard V3
AUDIT TYPE	<ul style="list-style-type: none">Initial Certification Audit (5 – 7 July 2022)Re-Certification and Scope Change Audit (23 – 25 October 2023)
AUDIT FIRM	Bureau Veritas Certification
AUDIT DATE	<ul style="list-style-type: none">5 – 7 July 2022 (Initial Certification Audit)23 – 25 October 2023 (Re-Certification and Scope Change Audit)
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">1 August 2022 (Initial Certification Audit)11 November 2023 (Re-Certification and Scope Change Audit)
AUDIT SCOPE	<p><u>Initial Certification Audit (5 – 7 July 2022)</u></p> <p>The audit scope includes the design and production of extrusion billets, slugs and discs, die casted, tilt casted, machined and assembled parts and heat transfer plates of aluminium and aluminium alloys.</p> <p>Supply chain activities included in the audit scope:</p> <ul style="list-style-type: none">Aluminium Re-melting/Refining <p>All applicable criteria in the ASI Performance Standard were included in the audit scope.</p> <p><u>Re-Certification and Scope Change Audit (23 – 25 October 2023)</u></p> <p>The audit scope includes the design and production of extrusion billets, slugs and discs, die casted, tilt casted, machined and assembled parts and heat transfer plates of aluminium and aluminium alloys.</p> <p>Supply chain activities included in the audit scope:</p> <ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthouses <p>All applicable criteria in the ASI Performance Standard were included in the audit scope.</p>

AUDIT OUTCOME

- Certification

AUDIT METHODOLOGY
DECLARATION

The Auditors confirm that:

- 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 company's defined Certification Scope.
- The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.

CERTIFICATION PERIOD

19 December 2023 – 18 December 2026

NEXT AUDIT TYPE

Surveillance Audit

NEXT AUDIT DATE

19 June 2025

CERTIFICATE NUMBER

222



If you have an inquiry or complaint about this Certification, go to the third-party EthicsPoint portal at: <https://aluminium-stewardship.ethicspoint.com/>

EthicsPoint is a comprehensive and confidential reporting tool that enables complaints to be securely raised, managed and responded to. This enables anonymity to be maintained where desired by complainants, or as relevant to whistleblowing situations.

Information is available in five languages – English, French, Chinese, German and Portuguese (Brazil). Translation services provided by EthicsPoint enable complaints and correspondence to be managed in multiple languages.

ENTITY OVERVIEW

The Entity was founded in 1999 and is part of the *FECS Industrial Group*, is an international company operating within the metallurgical sector and is considered a European leader in the recovery, treatment, and sales of metal scraps and the production of secondary aluminium alloys. The Entity is a main business of the Group is in the aluminium industry from scrap and wastes receiving from collectors and other industries to the production of aluminium ingots or aluminium goods (heath radiators). Its core business is the re-melting of aluminium from aluminium wastes. The Entity's facilities which are included in the Certification Scope are located in the area of Bergamo in northern Italy. It employs over 80 personnel across the three facilities.

MATURITY RATINGS

A rating of maturity (low, medium or high) determined by the Auditor that provides a general assessment in terms of systems, Residual Risk and performance assigned to a Sustainability Component.

Maturity ratings are not a direct assessment of conformance to the Standard.

	GOVERNANCE	ENVIRONMENT	SOCIAL	COMBINED RATING
SYSTEMS	Medium	High	High	HIGH
RISKS	High	High	High	HIGH
PERFORMANCE	Medium	High	High	HIGH
OVERALL		HIGH		

FINDINGS

CRITERION	RATING	COMMENT
1. BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity has developed and implemented a procedure to identify and update applicable legislation. External consultants are engaged to support the Entity in this process. Customary requirements are also included in any contract review activities.
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 ensure its independence from the corporate hierarchy. The body is placed in a main 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.
1.3a-e Code of Conduct	Conformance	The Entity's Code of Ethics has been directed by relevant laws, guidelines and regulations existing at national and international levels in terms of corporate social responsibility, corporate governance, Human Rights and the environment. The Code also references the principles of corporate ethics and rules of conduct aimed at preventing the commission, according to Italian law, of the offences provided for by Legislative Decree 231/2001. The Code of Ethics is available at: https://stemin.it/wp-content/uploads/2023/09/Codice-etico_EN-07.09.2023-Cda-31032023.pdf The Code of Ethics is reviewed at least every five years. All other related documents are reviewed on an annual basis during the management review and are updated if necessary.
2. POLICY AND MANAGEMENT		
2.1a-f Environmental, Social, and Governance Policy	Conformance	The Entity's Policy includes environmental and social matters and is signed by the Chief Executive Officer (CEO). The Policy is publicly available at: https://stemin.it/wp-content/uploads/2023/09/Politica_01.09.2023.pdf It is also presented throughout the Entity's premises.
2.2a-c Leadership	Conformance	A letter of appointment has been signed by the CEO and accepted by the nominated person, the contents of the letter include the implementation of the Aluminium Stewardship Initiative Management System and communication with internal and external interested parties. The letter of appointment includes a statement on the resources reserved for implementing the Management System
2.3a Environmental and Social Management Systems - Environmental	Conformance	The Entity holds a valid ISO14001 certification which includes all sites and activities included in the Certification Scope and is valid until November 2024. The certificates are available at: https://stemin.it/wp-content/uploads/2022/11/STEMIN-S.p.A._ISO-14001-2015_ACCREDIA_ITA_agg.pdf https://www.radiator2000.it/wp-content/uploads/2021/12/UNI-EN-ISO-14001-2015-22355_161221.pdf

CRITERION	RATING	COMMENT
2.3b Environmental and Social Management Systems – Social	Conformance	The Entity has implemented a Social Responsibility Management System that has integrated social responsibility requirements. This Social Responsibility Management System conforms to SA8000 however it is not certified.
2.4a-e Responsible Sourcing	Conformance	<p>The Entity has developed and implemented two main documents relating to responsible sourcing. The general Policy is publicly available at: https://stemin.it/wp-content/uploads/2023/09/Politica_01.09.2023.pdf</p> <p>The Social and Ethical Handbook and Balance Sheet (Manuale e bilancio Sociale ed Etico) describes the procedure for assessing suppliers and is publicly available at: https://stemin.it/wp-content/uploads/2023/10/ASI-Manuale-Gestione.pdf</p> <p>The Entity's suppliers are assessed following criteria linked to the country of origin, presence of Conflict-Affected and High-Risk Areas (CAHRAs), state of Human Rights, level of poverty and the presence of Management System certifications.</p> <p>All documents are reviewed on an annual basis during management review and are updated if necessary. The Social Manual includes a complete list of suppliers and was last updated in August 2023.</p>
2.5a-g Environmental and Social Impact Assessments	Not Applicable	<p>This Criterion is not applicable to the Entity, as no New Projects or Major Changes to existing Facilities have occurred since joining ASI.</p> <p>However, the Entity has developed and implemented a procedure for risk and Impact Assessment for environmental matters according to ISO 14001 certification requirements. Social impacts and risks are assessed according to the procedure included in the Social and Ethical Handbook and Balance Sheet (Manuale e bilancio Sociale ed Etico).</p> <p>The procedures include a provision for New Projects and Major Changes and both procedures take into account Historic Aluminium Operations. The latest risk assessments include a management plan for social and environmental impacts for all of the Entity.</p> <p>Further information is provided in the Entity's Sustainability Report at: https://stemin.it/wp-content/uploads/2023/11/Sustainability-report-2022-2023.pdf</p>
2.6a-h Human Rights Impact Assessment	Not Applicable	<p>This Criterion is not applicable to the Entity, as no New Projects or Major Changes to existing Facilities have occurred since joining ASI.</p> <p>However, the Entity's risk assessment procedures include provisions for New Projects and Major Changes, including Human Rights, and any measures implemented to prevent and mitigate risks that are gender sensitive. The assessment was performed but no Indigenous Peoples are present in this Entity's Area of Influence.</p> <p>For further information, see Annex 3: https://stemin.it/wp-content/uploads/2023/10/ASI-Manuale-Gestione.pdf</p>
2.7a-f Emergency Response Plan	Conformance	<p>Emergency Response Plans have been documented for each of the Entity's Facilities and all have been reviewed and revised over the past three years. All documents are reviewed on an annual basis during management review and, if necessary are updated.</p> <p>The last drill exercise relating to these response plans for fire, Leakage and emergency first aid was undertaken in September 2023</p> <p>The Emergency Response Plans are publicly available on request at: https://stemin.it/contatti/</p>

CRITERION	RATING	COMMENT
2.8a-d Suspended Operations	Conformance	The Entity has prepared a Resilience and Business Continuity Plan which includes environmental, social, and overall governance impacts. The document is reviewed on an annual basis during management review and, if necessary is updated.
2.9a-b Mergers and Acquisitions	Conformance	The Entity has established procedures for Mergers and Acquisitions and actions to be taken after such an event, including the sharing of information with affected populations. The last risk assessment which includes a management plan for environmental issues was undertaken in June 2023. All documents were updated less than five years ago and are reviewed on an annual basis during management review and, if necessary are updated.
2.10a-b 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.

3. TRANSPARENCY

3.1a-b Sustainability Reporting	Conformance	The governance approach and environmental, social and economic impacts are included in the Entity's Sustainability Report which is publicly available at: https://stem.in.it/wp-content/uploads/2023/11/Sustainability-report-2022-2023.pdf
3.2 Non-compliance and Liabilities	Conformance	Information on Material fines, judgments, penalties and non-monetary sanctions for failure to comply with Applicable Law are available in the Sustainability Report at: https://stem.in.it/wp-content/uploads/2023/11/Sustainability-report-2022-2023.pdf At the time of the audit, there were no fines, sentences or penalties relating to non-Compliance with the Applicable Law. There are no disputes of any kind and nature. Should these situations arise in the future, the Entity will make the information public through the Sustainability Report.
3.3a-c Payments to Governments	Conformance	The only payments to government are those mandated on a legal basis. Further Information is included in the financial statement communicated, as per local law to the local Chamber of Commerce. If applicable, political contributions will be stated in the Entity's Sustainability Report at: https://stem.in.it/wp-content/uploads/2023/11/Sustainability-report-2022-2023.pdf
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	The Entity's Complaints Resolution Mechanism is considered accessible, equitable, transparent, Rights-compatible and is based on engagement and dialogue. It is adequate to address Affected Populations and Organisations' complaints and is used as a source of continuous learning. The mechanism is publicly available at: https://stem.in.it/wp-content/uploads/2022/05/stem.in-segnalazioni.pdf

4. MATERIAL STEWARDSHIP

CRITERION	RATING	COMMENT
4.1a Environmental Life Cycle Assessment	Conformance	<p>A Life Cycle Assessment (LCA) analysis document has been prepared by the Entity in accordance with ISO 14040, ISO 14044 and ISO 14067. The analysis involved the production cycles of STEMIN 41 and RADIATORI 2000 and considers the transformation of Aluminium scrap from two sources, Post-Consumer Scrap that originates after the use of Aluminium products and Pre-Consumer Scrap coming directly from industry as waste from the processing of Aluminium products. Underlining assumptions were derived from publicly available data at: https://simapro.com/</p> <p>The LCA was last updated in June 2023 and considers 18 main alloys produced. The LCA addresses environmental indicators such as acidification, eutrophication, global warming, photochemical oxidation, and water shortage. The functional unit is defined as the production of 1 ton of molten Aluminium (considering the average product) alloy ingot ready for delivery to the user.</p>
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	<p>Whilst the complete LCA is confidential, information on the single alloy is available on customer request. A statement has also been included in the Sustainability Report as well as information on underlying assumptions and global results: https://stemin.it/wp-content/uploads/2023/11/Sustainability-report-2022-2023.pdf</p>
4.2 Product Design	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.3a-b Aluminium Process Scrap	Conformance	<p>All production cycles are monitored by the Entity for each phase of the process with the recording of standard process rejects and extra rejects. Process waste is reduced to a minimum and fully respects the parameters defined by ASI and local law. The Entity applies internal procedures for the recovery of secondary raw materials and waste in compliance with the provisions of its environmental Management System conforming to ISO 14001.</p> <p>All production scrap is collected for families of compatible alloys in order to facilitate their reuse in the foundry. Internal waste is 100% recycled.</p>
4.4a-c Collection and Recycling of Products at End of Life - Material Conversion and other Manufacturing	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.4d Collection and Recycling of Products at End of Life	Conformance	<p>The Entity has developed and implemented a recycling strategy which is reviewed on an annual basis as part of the management review. A public statement on the recycling strategy is publicly available in Sustainability Report at: https://stemin.it/wp-content/uploads/2023/11/Sustainability-report-2022-2023.pdf</p> <p>The Entity's target is to have 100% of waste recycled directly where possible. Further information is available at: https://www.bg.camcom.it/mercato/ambiente/mud</p>

5. GREENHOUSE GAS EMISSIONS

CRITERION	RATING	COMMENT
5.1a-b Disclosure of GHG Emissions and Energy Use	Conformance	The Entity's Greenhouse Gases (GHG) emissions and energy usage are controlled and monitored according to its environmental Management System and environmental authorisations. A statement is included in the Sustainability Report publicly available at: https://stemin.it/wp-content/uploads/2023/11/Sustainability-report-2022-2023.pdf The GHG calculations have been provided by an expert consultant.
5.2a Aluminium Smelter GHG Emissions Intensity - Started production after 2020	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.2b Aluminium Smelter GHG Emissions Intensity - In production up to and including 2020	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.3a-e GHG Emissions Reduction Plans	Conformance	The Entity has developed a GHG Reduction Plan for all significant impacts. The Emissions Reduction Pathway developed as part of this Plan is consistent with a 1.5°C warming scenario and is annually reviewed in management review with annual targets. All Scope 1 to Scope 3 emissions are included in the annual Sustainability Report and the approach used conforms to ISO 14064-1 and the plan will be verified by an independent certification body in early 2024. The latest version of the GHG Emissions Reduction programs is available at: https://stemin.it/wp-content/uploads/2023/11/Sustainability-report-2022-2023.pdf The document lists the Entity's objectives such as obtaining certification against ISO 14064 and ISO 14067 standards and reducing GHG emissions by 2% in the next three years. The next iteration of the Sustainability Report will provide evidence of the progress against the objectives stated.
5.4 GHG Emissions Management	Conformance	The management of GHG emissions is included in the Entity's Environmental Management System. The certifications are available at: https://stemin.it/wp-content/uploads/2022/11/STEMIN-S.p.A._ISO-14001-2015_ACCREDIA_ITA_agg.pdf https://www.radiatori2000.it/wp-content/uploads/2021/12/UNI-EN-ISO-14001-2015-22355_161221.pdf
6. EMISSIONS, EFFLUENTS AND WASTE		
6.1a-f Emissions to Air	Conformance	Emissions to Air are quantified and communicated to public administration on an annual basis. A plan to reduce the impacts to Emissions to Air is implemented within the ISO 14001 Management System and reviewed annually in management review.
6.2a-g Discharges to Water	Conformance	Discharges to Water are quantified and communicated to public administration on an annual basis. A plan to reduce the impacts of Emissions to Air is implemented within the ISO 14001 Management System and reviewed annually in management review.

CRITERION	RATING	COMMENT
6.3a-g Assessment and Management of Spills and Leakages	Conformance	Spills and Leakages are considered by the Entity as environmental emergencies and non-conformities against the Environmental Management System. Plans and procedures to manage Spills and Leakages are included in existing environmental procedures. Public disclosure of environmental incidents are included in the Sustainability Report when they occur.
6.4a-b Public Disclosure of Spills and Leakages	Conformance	There were no Spills and Leakages reported by the Entity in the last two years. A public statement is available in the Sustainability Report when Spills or Leakages occur.
5a-c Waste Management and Reporting	Conformance	All waste quantities produced by the Entity are communicated annually to public administration. In this communication, the type of waste, quantity and disposal/recycling method are reported, in a statement known as a Unique Declaration Form (Modulo Unico di Dichiarazione) These statements are publicly available on request from the local Chamber of Commerce at: https://www.bg.camcom.it/mercato/ambiente/mud
6.6a-g Bauxite Residue	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7a-f Spent Pot Lining (SPL)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8a-d Dross	Conformance	Where possible, Dross is recycled internally and there is no release to the environment. Some Dross however is still considered waste and any quantities produced by the Entity are communicated annually to public administration via the Unique Declaration Form (Modulo Unico di Dichiarazione). These statements are publicly available on request from the local Chamber of Commerce at: https://www.bg.camcom.it/mercato/ambiente/mud
7. WATER STEWARDSHIP		
7.1a-b Water Assessment and Disclosure	Conformance	The Entity has completed an environmental review that includes the mapping of water sources and water usage. This Entity has mapped its water sources and water usage including an environmental analysis in compliance with ISO 14001 certification. Their plants have environmental authorisations according to the Legislative Decree 152/06 with quotas for water withdrawal.
7.2a-e Water Management	Not Applicable	This Criterion is not applicable, as the Entity has conducted an environmental review which determined that the Material water-related risks are low. However, a plan to reduce the impacts linked to emissions in water is implemented within the Environmental Management System and is reviewed annually in management review. A statement on the water management plan is included in the Sustainability Report.
8. BIODIVERSITY AND ECOSYSTEM SERVICES		

CRITERION	RATING	COMMENT
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	An assessment of environmental aspects and impacts, including biodiversity and Ecosystem Services has been completed and is updated annually. No adverse impacts or risks to biodiversity and Ecosystem Services were identified.
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Not Applicable	This Criterion is not applicable, as the Entity has identified no adverse impacts or risks to biodiversity and Ecosystem Services.
8.2a-g Biodiversity Management	Not Applicable	This Criterion is not applicable, as the Entity has identified no adverse impacts or risks to biodiversity and Ecosystem Services in the annual assessment.
8.3a-c Management of Priority Ecosystem Services	Not Applicable	This Criterion is not applicable, as the Entity has identified no adverse impacts or risks to biodiversity and Ecosystem Services in the annual assessment. A Biodiversity Action Plan is not required.
8.4 Alien Species	Conformance	An assessment of environmental aspects and impacts, including Alien Species has been completed and is updated annually. No impacts on biodiversity, including an Alien Species introduction have been identified.
8.5a-b Commitment to "No Go" in World Heritage Properties	Conformance	There are no impacts to World Heritage Properties identified in the Entity's biodiversity risk assessment. Statements on World Heritage Properties are included in the Handbook and Social and Ethical Report (Manuale e Bilancio sociale ed etico) publicly available at: https://stemin.it/wp-content/uploads/2023/10/ASI-Manuale-Gestione.pdf
8.6a-d Protected Areas	Conformance	There are no impacts to Protected Areas discovered in the Entity's biodiversity risk assessment.
8.6e Protected Areas - Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.7a-i Mine Rehabilitation	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9. HUMAN RIGHTS		
9.1a-d Human Rights Due Diligence	Conformance	Statements on Human Rights are included in the Handbook and Social and Ethical Report (Manuale e Bilancio Sociale ed Etico) available at: https://stemin.it/wp-content/uploads/2023/10/ASI-Manuale-Gestione.pdf and in the Entity's Integrated Policy: https://stemin.it/wp-content/uploads/2023/09/Politica_01.09.2023.pdf Both documents were updated less than five years ago and are reviewed annually as part of management review. A Due Diligence exercise was completed in 2023 and is planned to be reviewed at least annually or in case of changes in the business model or at the discovery of control gaps. The mapping of interested parties, includes the Affected Populations and Organisations. No adverse impacts on Human Rights were identified.

CRITERION	RATING	COMMENT
9.2a-e Gender Equity and Women's Empowerment	Conformance	<p>A program for gender equity is included in the 'Social and Ethical Handbook and Report' (Manuale e Bilancio Sociale ed Etico) available at: https://stemin.it/wp-content/uploads/2023/10/ASI-Manuale-Gestione.pdf</p> <p>The document describes the process to address the barriers to women's empowerment, the process and its results are reviewed annually in the management review or cases of changes in the business model or at the discovery of control gaps.</p> <p>Data on women's empowerment are available in the same document</p>
9.3a-I Indigenous Peoples	Not Applicable	This Criterion does not apply to the Entity as Indigenous Peoples or their lands, territories and resources are not present in the Entity's Area of Influence.
9.4a Free, Prior, and Informed Consent (FPIC)-- New Projects or Major Changes	Not Applicable	This Criterion does not apply to the Entity as Indigenous Peoples or their lands, territories and resources are not present in the Entity's Area of Influence.
9.4b Free, Prior, and Informed Consent (FPIC)-- Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9.4c Free, Prior, and Informed Consent (FPIC)-- Demonstrate support	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.
9.5a Cultural and Sacred Heritage-- Identification	Conformance	The Entity has conducted a risk assessment to identify known or potential cultural and sacred heritage locations which will be updated on an annual basis. There are no sacred or cultural heritage sites in the Area of Influence of the Entity.
9.5b Cultural and Sacred Heritage - Impacts	Not Applicable	This Criterion is not applicable, as there are no sacred or cultural heritage sites in the Area of Influence of the Entity. However, the Entity has conducted a risk assessment to identify known or potential cultural and sacred heritage locations and will be updated on an annual basis.
9.6a-i Displacement	Not Applicable	<p>This Criterion is not applicable, as there have been no New Projects and Major Changes that would require displacement or resettlement.</p> <p>The Social and Ethical Handbook and Report (Manuale e Bilancio Sociale ed Etico) provides information on potential impacts to Affected Populations and Organisations and is available at: https://stemin.it/wp-content/uploads/2023/10/ASI-Manuale-Gestione.pdf</p>
9.7a-h Affected Populations and Organisations	Conformance	<p>The Social and Ethical Handbook and Report (Manuale e Bilancio Sociale ed Etico) provides information on potential impacts to Affected Populations and Organisations and is available at: https://stemin.it/wp-content/uploads/2023/10/ASI-Manuale-Gestione.pdf</p> <p>The document is reviewed annually in the management review or case of changes in the business model or at the discovery of control gaps.</p>

CRITERION	RATING	COMMENT
9.8a Conflict-Affected and High-Risk Areas - Strong management systems	Conformance	The Entity has developed and implemented a Supply Chain Policy which is available at: https://stemin.it/wp-content/uploads/2023/10/ASI-Manuale-Gestione.pdf . Pre-existing Due Diligence processes and Management Systems are used with respect to CAHRA assessment activities.
9.8b Conflict-Affected and High-Risk Areas - Identify and assess risks	Conformance	The risk assessment results from supply chain and supplier Due Diligence assessments are included in the Social and Ethical Handbook and Report ('Manuale e Bilancio Sociale ed Etico). No significant risks were identified, as the Entity's key suppliers are currently located within Europe.
9.8c Conflict-Affected and High-Risk Areas - Strategy to respond to risks	Conformance	The risk assessment results are included in the Social and Ethical Handbook and Report ('Manuale e Bilancio Sociale ed Etico). No significant risks have been identified, however, if they were identified in future revisions, a specific strategic plan would be developed by senior management.
9.8d Conflict-Affected and High-Risk Areas - Audit of due diligence	Conformance	The Social and Ethical Handbook and Report ('Manuale e Bilancio Sociale ed Etico) includes a general report on Due Diligence results. Currently, there is no involvement in CAHRA. The ASI Performance Standard Audit also covers this requirement.
9.8e Conflict-Affected and High-Risk Areas - Report annually	Conformance	The Social and Ethical Handbook and Report ('Manuale e Bilancio Sociale ed Etico') includes a general report on Due Diligence results.
9.9 Security practice	Conformance	Private security services used by the Entity hold a valid license awarded by public administration for the firm to undertake their services. The license includes a Human Rights commitment. Public security services must comply with local law which implies respecting Human Rights.
10. LABOUR RIGHTS		
10.1a-c Freedom of Association and Right to Collective Bargaining	Conformance	The Social and Ethical Handbook and Report ('Manuale e Bilancio Sociale ed Etico) includes a statement on Collective Bargaining and Freedom of Association. Very few Workers at the Entity are Union members, and interviewed Workers stated that they do not feel the need to have Union presence within the Entity. Despite this, the contact details for the four main Trade Unions present in Italy are available at the Entity's premises. All Workers in Italy are covered by a Collective Bargaining Agreement (CBA) agreed at a National level among Trade Unions and industry representatives. This CBA provides a statement on the freedom of Trade Union activity. During interviews and factory tours, no evidence of CBA non-conformances was found.
10.1d Freedom of Association and Right to Collective Bargaining - Alternative means in context of Applicable Law	Not Applicable	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 association are required.
10.2a-c Child Labour	Conformance	The Social and Ethical Handbook and Report ('Manuale e Bilancio Sociale ed Etico) includes a statement on Child Labour. At hiring, every

CRITERION	RATING	COMMENT
		Worker must present an ID card with a date of birth and a copy is retained in the personal file of the worker. In Italy, Workers under 15 years old is illegal and, due to the nature of work, it is very unlikely that a child can be hired by the Entity. No young Workers between 15 and 18 are present at the Entity.
10.3a-c Forced Labour	Minor Non-Conformance	<p>The Due Diligence performed on the supply chain and the adoption of a code of Ethics reduce the level of risk related to modern slavery practices. During the Audit, there was no evidence of engagement in Human Trafficking or smuggling, and only copies of documents are retained as confirmed during both interviews and site tour.</p> <p>The Entity provides several statements on its commitment towards Human Rights, including the right not to be exploited as a slave and this can be found in publicly available documents.</p> <p>Social and Ethical Handbook and Report (Manuale e Bilancio Sociale ed Etico), Chapter 5: https://stemin.it/wp-content/uploads/2023/10/ASI-Manuale-Gestione.pdf</p> <p>Integrated Policy, Section ethics requirements: https://stemin.it/wp-content/uploads/2023/09/Politica_01.09.2023.pdf</p> <p>Sustainability report, Chapter 8: https://stemin.it/wp-content/uploads/2023/11/Sustainability-report-2022-2023.pdf</p> <p>However, despite the number of statements and internal assessment processes in place, the Entity currently does not have a stand-alone publicly available declaration against Modern Slavery.</p>
10.4a-c Non-Discrimination	Conformance	There was no evidence of Discrimination found, during both interviews and factory tour. An analysis of payroll and job descriptions also did not give any evidence of Discrimination. The Social and Ethical Handbook and Report (Manuale e Bilancio Sociale ed Etico) includes a statement on Discrimination.
10.5 Communication and engagement	Conformance	During interviews, Workers stated that they have access to management for discussing issues related to working conditions. In addition, as is typical in Italy, an annual meeting among management and Worker's representatives is held on health and safety matters.
10.6a-g Violence and Harassment	Conformance	<p>The Entity provides several statements on its commitment towards Human Rights that include protection against Violence and Harassment. The Social and Ethical Handbook and Report (Manuale e Bilancio Sociale ed Etico) and the Entity's Integrated Policy reference protection against Violence and Harassment.</p> <p>In Italy, local law requires a specific risk assessment on Violence and Harassment to be included in health and safety risk assessment, following the ILO Convention C190.</p> <p>As per local laws, these documents are reviewed annually and training on this topic and other Health and Safety topics is provided at hiring and updated at least every five years.</p>
10.7a-d Remuneration	Conformance	The national CBA rules all the main aspects of work including remuneration and minimum wages, working hours and extra allowances for Overtime, weekly rest and annual leave. As per local law DLgs 104/2022 information on the contents of the CBA must be made available in work contracts and copies of the CBA shall be available for Workers at company premises.

CRITERION	RATING	COMMENT
		The CBA Mechanics Industry – industrial is in use at the Entity. Pay rates were updated last in June 2023.
10.8a-c Working Time	Conformance	The national CBA rules all the main aspects of work including remuneration and minimum wages, working hours and extra allowances for Overtime, weekly rest and annual leave. As per local law Dlgs 104/2022 information on the contents of the CBA must be made available in work contracts and copies of the CBA shall be available for Workers at company premises.
10.9a-b Informing Workers of Rights	Conformance	The national CBA rules all the main aspects of work including remuneration and minimum wages, working hours and extra allowances for Overtime, weekly rest and annual leave. As per local law Dlgs 104/2022 information on the contents of the CBA must be made available in work contracts and copies of the CBA shall be available for Workers at company premises.
11. OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Management System	Conformance	The Entity has developed and implemented an Occupational Health and Safety (OH&S) Management System which conforms to ISO 45001. As part of the Certification Audit a complete check of legal compliance is performed and no issues were discovered.
11.1b-e Occupational Health and Safety (OH&S) Management System – Reviews and disclosure	Minor Non-Conformance	<p>The Entity's OH&S Management system is reviewed at least annually, or at every significant change or indication. This review is performed in consultation with Workers' representatives. Public disclosure on OH&S performance is available in the Sustainability Report at: https://stemin.it/wp-content/uploads/2023/11/Sustainability-report-2022-2023.pdf</p> <p>However the Entity has not publicly disclosed lagging or leading indicators on health and safety performance, nor has it disclosed any comparative analyses with peer businesses.</p>
11.2 Employee engagement on Health and Safety	Minor Non-Conformance	<p>As required by Italian Law, there is a Workers' Safety Representative (Rappresentante dei Lavoratori per la Sicurezza) elected by Workers. The representative participates in an annual meeting with management on OH&S issues, and as part of ISO 45001 certification the regularity of elections and the content of the annual meetings were reviewed and no issues were identified. There is commentary included within the Entity's Sustainability Report that states there have been no injuries or medical treatment cases recorded.</p> <p>However there was no evidence of comparison of the Entity's Health and Safety performance against peer organisations.</p>

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DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	27 September 2022	Certification Audit - Certification
1	19 December 2023	Re-Certification and Scope Change Audit – Full Certification Scope Change to apply PS V3 and addition of 'Casthouses' Supply Chain Activity.
