

ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

METRA S.P.A. – FOALL S.R.L.

CERTIFICATE
NUMBER

205

ASI
STANDARD

PERFORMANCE
STANDARD
(V2 2017)

CERTIFICATION
LEVEL

FULL
CERTIFICATION

ASI ACCREDITED
AUDITOR

BUREAU
VERITAS
CERTIFICATION

DATE OF ISSUE

1 JUNE 2022

DATE OF EXPIRY

31 MAY 2025

CERTIFIED SINCE

1 JUNE 2022

AUTHORISED BY

A stylized black ink signature of the authorised person.

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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

Re-melting of primary and secondary Aluminum and
manufacture of Aluminum alloy extruded sections in
Rodengo Saiano, Italy.

SUMMARY AUDIT REPORT

PERFORMANCE

STANDARD

OVERVIEW

MEMBER NAME	Metra Holding S.p.A.
ENTITY NAME	Metra S.p.A. - Foall S.r.l.
CERTIFICATION SCOPE	Re-melting of primary and secondary Aluminum and manufacture of Aluminum alloy extruded sections in Rodengo Saiano, Italy.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthousesSemi-FabricationMaterial Conversion (Production and Transformation)
ASI STANDARD	<ul style="list-style-type: none">Performance Standard V2
AUDIT TYPE	<ul style="list-style-type: none">Initial Certification Audit (20 – 21 April 2022)Surveillance Audit (27 – 28 November 2023)
AUDIT FIRM	Bureau Veritas Certification
AUDIT DATE	<ul style="list-style-type: none">20 – 21 April 2022 (Initial Certification Audit)27 – 28 November 2023 (Surveillance Audit)
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">9 May 2022 (Initial Certification Audit)28 December 2023 (Surveillance Audit)
AUDIT SCOPE	<p><u>Initial Certification Audit (20 – 21 April 2022)</u></p> <p>The audit scope included the re-melting of primary and secondary Aluminum (Foall S.r.l.) and manufacture of Aluminum alloy extruded sections (Metra S.p.A.) in Rodengo Saiano, Italy.</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthousesSemi-FabricationMaterial Conversion (Production and Transformation)

All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.

Surveillance Audit (27 – 28 November 2023)

The audit scope included the re-melting of primary and secondary Aluminum (Foall S.r.l) and manufacture of Aluminum alloy extruded sections (Metra S.p.A.) in Rodengo Saiano, Italy.

Supply chain activities included in the Audit Scope:

- Aluminium Re-melting/Refining
- Casthouses
- Semi-Fabrication
- Material Conversion (Production and Transformation)

All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.

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

CERTIFICATION
PERIOD

1 June 2022 – 31 May 2025

NEXT AUDIT
TYPE

Re-Certification Audit

NEXT AUDIT
DUE DATE

31 May 2025

CERTIFICATE
NUMBER

205

SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity operates a management system, based on local law which ensures Compliance with Applicable Law. The Entity has implemented a procedure to review and update the legal requirements related to environment, health and safety, work-related law and financial matters. Internal audits have been performed by a specialised consultant for health and safety and environmental matters. External consultants have provided updates on legal requirements.
1.2 Anti-Corruption	Conformance	The Entity operates a management system, based on local law which ensures Compliance with Applicable Law and includes anti-Corruption. The Entity's Code of Ethics is publicly available: https://www.metra.eu/pdf/Metra_CodiceEtico-en.pdf There is no evidence of sanctions related to Bribery and Corruption.
1.3 Code of Conduct	Conformance	The Entity operates a management system, based on local law which ensures compliance with Applicable Law. The Entity has implemented a Code of Conduct and prepared a Sustainability Report, both available at: https://www.metra.eu/pdf/Metra_CodiceEtico-en.pdf https://www.metra.eu/pdf/rendicontazione-non-finanziaria-asi-gruppo-metra-2022.pdf Training on the Code of Conduct is provided to all Workers and information is available for all interested parties.
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	The Entity has an integrated Policy consistent with the environmental, social and governance practices of the ASI Performance Standard: https://www.metra.eu/pdf/politica-integrata-rev-03-del-01-07-2021.pdf
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	The Entity has an integrated Policy consistent with the environmental, social and governance practices of the ASI Performance Standard and signed by the Chief Executive Officer (CEO): https://www.metra.eu/pdf/politica-integrata-rev-03-del-01-07-2021.pdf
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	The Entity has an integrated Policy that is provided directly to suppliers and is publicly available at:

CRITERION	RATING	COMMENT
		https://www.metra.eu/pdf/politica-integrata-rev-03-del-01-07-2021.pdf
2.2 Leadership	Conformance	The Entity has appointed the senior manager as a Management Representative to ensure conformance with the ASI Performance Standard.
2.3a Environmental and Social Management Systems (environmental)	Conformance	<p>The Entity is operated by two legal entities, Metra S.p.A. (producing extruded profiles) and Foall S.r.l. (re-melter producing billets and ingots) and has implemented Environmental Management Systems (EMS). Metra has an EMS certified in accordance with ISO 14001: https://www.metra.eu/gruppo/qualita-certificata.html#2</p> <p>Foall operates an EMS (not certified to date), conducts environmental analysis and undergoes internal audits.</p>
2.3b Environmental and Social Management Systems (social)	Conformance	<p>The Entity has implemented a Social Management System consistent with, but not certified to SA 8000. The Entity's integrated Policy includes social responsibility: https://www.metra.eu/wp-content/uploads/2023/09/politica-integrata-rev-04-del-16-01-2023.pdf</p> <p>A Social Responsibility Manual has been implemented and management reviews are undertaken. Sustainability Reporting includes information on the performance of the Social Management System.</p>
2.4 Responsible Sourcing	Conformance	<p>The Entity has implemented procedures for the qualification of suppliers for management systems certified against ISO 9001, ISO 14001; ISO 45001 and ASI.</p> <p>The Entity has undertaken a supplier risk assessment. Suppliers are informed of the integrated Policy and Code of Ethics and are required to complete Supplier Evaluation Forms.</p> <p>The Entity has a Conflict Minerals Reporting questionnaire which is sent to the main customers of Metra and the risk assessment identified that there are no minerals from Conflict-Affected and High-Risk Areas (CAHRAs) used.</p>
2.5 Impact Assessments	Conformance	The Entity has implemented procedures that address environmental, social, cultural, gender topics and Human Rights Impact Assessments. There are no Major Changes planned for the next years.
2.6 Emergency Response Plan	Conformance	The Entity has Emergency Response Plans in accordance with established Environmental Management Systems.

CRITERION	RATING	COMMENT
2.7 Mergers and Acquisitions	Conformance	The Entity has developed a procedure that addresses environmental, social, cultural, gender issues and overall Human Rights Impact Assessments associated with Major Changes, which covers mergers and acquisitions.
2.8 Closure, Decommissioning and Divestment	Conformance	The Entity has developed a procedure that addresses environmental, social, cultural, gender issues and overall Human Rights Impact Assessments associated with Major Changes, which covers closure, decommissioning and divestment.
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	<p>The Entity has produced a publicly available Sustainability Report and discloses its environmental, social and health and safety impacts: https://www.metra.eu/pdf/rendicontazione-non-finanziaria-asi-gruppo-metra-2022.pdf https://www.metra.eu/en/sustainability</p> <p>The economic impacts and accountability statement, as required by Italian law, have been communicated to the local Chamber of Commerce and is publicly available on request: https://bs.camcom.it</p>
3.2 Non-compliance and liabilities	Conformance	<p>The Entity has produced a publicly available Sustainability Report and discloses its environmental, social and health and safety impacts: https://www.metra.eu/en/sustainability https://www.metra.eu/pdf/rendicontazione-non-finanziaria-asi-gruppo-metra-2022.pdf</p> <p>The Report discloses information on non-compliances and liabilities, please refer to paragraph 5.2. There have been no fines or sanctions over the previous two years.</p>
3.3a Payments to governments (legal and contractual)	Conformance	Italian law forbids payments to the public administration outside a legal or contractual basis. The Entity has a Management System to ensure Compliance with local law. There is no evidence of a violation on this matter.
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	<p>The Metra operation (producing extruded profiles) is certified against ISO 14001: https://www.metra.eu/gruppo/qualita-certificata.html#2</p> <p>The Entity's complaints mechanism is described in the Code of Ethics, please refer to Chapter 10: https://www.metra.eu/pdf/Metra_CodiceEtico.pdf</p> <p>A complaints form is publicly available at: https://www.metra.eu/pdf/mod-segnalazione-reclami.pdf</p>

CRITERION	RATING	COMMENT
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	The Entity's Life Cycle Assessment (LCA) for the five main products is publicly available on request and can be downloaded at: https://www.epditaly.it/ricerca-epd/?wpv_view_count=100003484&wpv-tipologia-epd=0&wpv_post_search=Metra&wpv_filter_submit=Cerca
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	The Entity's Life Cycle Assessment (LCA) for the five main products is publicly available on request and can be downloaded at: https://www.epditaly.it/ricerca-epd/?wpv_view_count=100003484&wpv-tipologia-epd=0&wpv_post_search=Metra&wpv_filter_submit=Cerca
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	The Entity's Life Cycle Assessment (LCA) for the five main products is publicly available on request and can be downloaded at: https://www.epditaly.it/ricerca-epd/?wpv_view_count=100003484&wpv-tipologia-epd=0&wpv_post_search=Metra&wpv_filter_submit=Cerca
4.2 Product design	Conformance	The Entity is not engaged in the design and development of products as the work is exclusively based on the customer's design, however, objectives on environmental impacts of the product coincide with environmental objectives of the company in reducing energy consumption and use of raw materials.
4.3a Aluminium Process Scrap (targets)	Conformance	The Entity generates a low level of Process Scrap and the data from customised software for production management indicates a downward trend. Scrap that is not recycled at the Entity are sent to waste treatment plants that recycle the filings and shavings.
4.3b Aluminium Process Scrap (alloy separation)	Conformance	The Entity separates its scrap materials including raw aluminium alloys and other materials to be added for the production of alloys as finished product.
4.4a Collection and recycling of products at end-of-life (strategy)	Conformance	The Entity complies with relevant environmental authorisations covering waste management and includes a recycling strategy. Recycling is close to 100% and the Entity's target is to maintain this performance. The Entity communicates its production of waste and its final destination to the public administration on an annual basis.

CRITERION	RATING	COMMENT
4.4b Collection and recycling of products at end-of-life (engagement)	Conformance	The Entity complies with relevant environmental authorisations covering waste management and includes a recycling strategy. Recycling is close to 100% and the Entity's target is to maintain this performance. The Entity communicates its production of waste and final destination of waste to the public administration on an annual basis to support accurate measurement and efforts to increase recycling rates.
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		
5.1 Disclosure of GHG emissions and energy use	Conformance	The Entity discloses its GHG emissions and energy use in the publicly available Sustainability Report: https://www.metra.eu/pdf/rendicontazione-non-finanziaria-asi-gruppo-metra-2022.pdf
5.2 GHG emissions reductions	Conformance	The Entity discloses its GHG emissions reduction target and the projects for implementation to achieve the target in the publicly available Sustainability Report: https://www.metra.eu/pdf/rendicontazione-non-finanziaria-asi-gruppo-metra-2022.pdf
5.3a Aluminium Smelting (management system)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.3b Aluminium Smelting (up to and including 2020)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.3c Aluminium Smelting (after 2020)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
PRINCIPLE 6 EMISSIONS, EFFLUENTS AND WASTE		
6.1 Emissions to Air	Conformance	The Entity complies with relevant environmental authorisations under local law and communicates the data required to the authorities. All findings are compliant with legal limits.
6.2 Discharges to Water	Conformance	The Entity complies with relevant environmental authorisations under local law and communicates the data required to the authorities. All reports are under legal limits.
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	The Entity has an Environmental Management System conforming to ISO 14001 and has undertaken a risk assessment which includes Spills and Leakages.
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	The environmental risk assessment indicates a very low risk of Spills and Leakage. The Entity has procedures to ensure Spills and Leakage are managed as an emergency response, a non-conformance is raised under the Environmental Management System. Any

CRITERION	RATING	COMMENT
		Spill incident is disclosed in the Sustainability Report: https://www.metra.eu/pdf/rendicontazione-non-finanziaria-asi-gruppo-metra-2022.pdf
6.4a Reporting of Spills (immediate disclosure)	Conformance	The environmental risk assessment indicates a very low risk of Spills and Leakage. The Entity has procedures to ensure Spills and Leakage are reported and as an emergency, a non-conformance is raised under the Environmental Management System. Any spill incident is disclosed in the Sustainability Report: https://www.metra.eu/pdf/rendicontazione-non-finanziaria-asi-gruppo-metra-2022.pdf
6.4b Reporting of Spills (regular reporting)	Conformance	The environmental risk assessment indicates a very low risk of Spills and Leakage. The Entity has procedures to ensure Spills and Leakage are reported and as an emergency, a non-conformance is raised under the Environmental Management System. Any spill incident is disclosed in the Sustainability Report: https://www.metra.eu/pdf/rendicontazione-non-finanziaria-asi-gruppo-metra-2022.pdf
6.5a Waste management and reporting (strategy)	Conformance	The Entity has developed and implemented procedures for dealing with waste and the Waste Mitigation Hierarchy is followed.
6.5b Waste management and reporting (disclosure)	Conformance	The Entity complies with relevant environmental authorisations under local law and communicates the amount of waste produced and its final destination to the public administration on an annual basis. The MUD declaration (Modello Unico di Dichiarazione: Unique Form of Declaration) for Foall is available on the local Chamber of Commerce website: https://www.bs.camcom.it
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.

CRITERION	RATING	COMMENT
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	Raw aluminium scrap produced in the Metra operations is re-melted in the Foall foundry, minimising the Entity's quantity of scrap. Dross is treated as waste under the European Waste Code and sent to a specialised processor for recovery.
6.8b Dross (recycling)	Conformance	Raw aluminium scrap produced in the Metra operations is re-melted in the Foall foundry, minimising the Entity's quantity of scrap. Dross is treated as waste under the European Waste Code and sent to a specialised processor for recovery.
6.8c Dross (review of alternatives)	Conformance	Raw aluminium scrap produced in the Metra operations is re-melted in the Foall foundry, minimising the Entity's quantity of scrap. Dross is treated as waste under the European Waste Code and sent to a specialised processor for recovery.
PRINCIPLE 7 WATER STEWARDSHIP		
7.1a Water assessment (mapping)	Conformance	Water for industrial use comes from authorised wells, while the local aqueduct supplies water for hygienic and sanitary use, the canteen and the fire prevention network.
7.1b Water assessment (risk assessment)	Conformance	Water-related risks are included in environmental risk assessment where no significant risk has been identified. The Entity's water consumption is lower than the permissible limits within its permits.
7.2a Water management (management plans)	Not Applicable	This Criterion is not applicable, as there are no significant water-related risks identified.
7.2b Water management (monitoring)	Not Applicable	This Criterion is not applicable, as there are no significant water-related risks identified.

CRITERION	RATING	COMMENT
7.3 Disclosure of water usage and risks	Conformance	The Entity's water usage data is disclosed in the Sustainability Report: https://www.metra.eu/pdf/rendicontazione-non-finanziaria-asi-gruppo-metra-2022.pdf
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	The Entity has conducted a biodiversity risk assessment as part of the general environmental risk assessment. There are no significant impacts on biodiversity identified.
8.2a Biodiversity management (biodiversity action plans)	Not Applicable	This Criterion is not applicable, as there are no significant impact on biodiversity identified.
8.2b Biodiversity management (consultation and mitigation hierarchy)	Not Applicable	This Criterion is not applicable, as there are no significant impact on biodiversity identified.
8.2c Biodiversity management (reporting)	Not Applicable	This Criterion is not applicable, as there are no significant impact on biodiversity identified.
8.3 Alien Species	Conformance	The Entity has conducted a biodiversity risk assessment as part of the general environmental risk assessment. There are no significant impacts on biodiversity identified. The introduction of Alien Species is a risk mitigated by internal processes including instructions for suppliers to treat wooden pallets according to international standards, such as the International Standard for Phytosanitary Measures (ISPM 15).
8.4a Commitment to "No Go" in World Heritage properties (exploration and new mines)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.4b Commitment to "No Go" in World Heritage properties (existing mines)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.5a Mine rehabilitation (best available techniques)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.5b Mine rehabilitation (financial provisions)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
PRINCIPLE 9 HUMAN RIGHTS		
9.1a Human Rights Due Diligence (policy)	Conformance	The Entity has an integrated Policy which includes a statement on Human Rights: https://www.metra.eu/wp-content/uploads/2023/09/politica-integrata-rev-04-del-16-01-2023.pdf

CRITERION	RATING	COMMENT
9.1b Human Rights Due Diligence (process)	Conformance	The Entity has undertaken an annual risk assessment which includes the supply chain. All suppliers are required to comply with the Entity's Code of Ethics, available at: https://www.metra.eu/pdf/Metra_CodiceEtico-en.pdf
9.1c Human Rights Due Diligence (remediation)	Conformance	The Entity has undertaken an annual risk assessment and there is no evidence of adverse Human Rights impacts in the supply chain or internal management.
9.2 Women's Rights	Conformance	The has undertaken an annual risk assessment which includes women's rights. The Entity has developed a procedure to address gender equality and Discrimination.
9.3 Indigenous Peoples	Not Applicable	The Criterion is not applicable as there are no Indigenous Peoples in the Entity's Area of Influence. A risk assessment was undertaken which includes the supply chain. All suppliers are required to comply with the Entity's Code of Ethics.
9.4 Free, Prior, and Informed Consent (FPIC)	Not Applicable	The Criterion is not applicable as there are no Indigenous Peoples in the Entity's Area of Influence. However, the Entity has developed a procedure that addresses environmental, social, cultural, gender issues and overall Human Rights impacts including Indigenous Peoples rights associated with Major Changes.
9.5 Cultural and sacred heritage	Conformance	The Entity has undertaken an annual risk assessment. There are no sacred or cultural heritage sites in the Entity's Area of Influence.
9.6a Resettlements (avoid or minimise)	Not Applicable	This Criterion is not applicable as there have been no Resettlements.
9.6b Resettlements (where unavoidable)	Not Applicable	This Criterion is not applicable as there have been no Resettlements.
9.7a Local Communities (rights and interests)	Conformance	The Entity has undertaken an annual risk assessment and has developed a procedure that addresses environmental, social, cultural, gender issues and overall Human Rights impacts associated with Major Changes. Local Communities are included as relevant interested parties as per ISO 14001 certification.
9.7b Local Communities (impacts)	Conformance	The Entity has undertaken an annual risk assessment and has developed a procedure that addresses environmental, social, cultural, gender issues and overall Human Rights impacts associated with Major Changes. Local Communities are included as relevant interested parties as per ISO 14001 certification.

CRITERION	RATING	COMMENT
9.7c Local Communities (livelihoods)	Conformance	The Entity has undertaken an annual risk assessment and has developed a procedure that addresses environmental, social, cultural, gender issues and overall Human Rights impacts associated with Major Changes. The Entity supports the development of the Local Community, for additional information please refer to the Sustainability Report: https://www.metra.eu/pdf/rendicontazione-non-finanziaria-asi-gruppo-metra-2022.pdf
9.8 Conflict-Affected and High-Risk Areas	Conformance	The Conflict Minerals Reporting Template questionnaire completed as part of the risk assessment for conflict minerals has resulted in no minerals from Conflict-Affected and High-Risk Areas being used.
9.9 Security practice	Conformance	The Entity does not engage private security providers. The only security provider is the police who are committed to respecting Human Rights as per local law.
PRINCIPLE 10 LABOUR RIGHTS		
10.1a Freedom of Association and Right to Collective Bargaining (freedom of association)	Conformance	The Entity respects the right to Freedom of Association which is addressed in their Integrated Policy and Code of Ethics: https://www.metra.eu/pdf/politica-integrata-rev-03-del-01-07-2021.pdf and: https://www.metra.eu/pdf/Metra_CodiceEtico.pdf Workers are free to contact Trade Unions and have elected Trade Union representatives.
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Conformance	The Entity operates a National Collective Bargaining Agreement (CBA) agreed by industry representatives and Trade Union representatives. In addition, there is a CBA at the Group level which includes production bonuses and shift details.
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Not Applicable	This Criterion is not applicable as in Italy there are no restrictions to Freedom of Association and Collective Bargaining and as such no alternative means of association are needed.
10.2a Child Labour (minimum age)	Conformance	The Entity has implemented procedures to address Child Labour and there is no evidence of its use or support. A supply chain Due Diligence was undertaken, and suppliers agreed to the Entity's Code of Ethics and Integrated Policy.
10.2b Child Labour (hazardous)	Conformance	The Entity has implemented procedures to address Child Labour and there is no evidence of its use or support. A supply chain Due Diligence was

CRITERION	RATING	COMMENT
		undertaken, and suppliers agreed to the Entity's Code of Ethics and Integrated Policy.
10.2c Child Labour (worst forms)	Conformance	The Entity has implemented procedures to address Child Labour and there is no evidence of its use or support. A supply chain Due Diligence was undertaken, and suppliers agreed to the Entity's Code of Ethics and Integrated Policy.
10.3a Forced Labour (human trafficking)	Conformance	The Entity has implemented procedures to address Forced Labour and there is no evidence of its use or support. A supply chain Due Diligence was undertaken, and suppliers agreed to the Entity's Code of Ethics and Integrated Policy.
10.3b Forced Labour (deposits, fees, advances)	Conformance	The Entity has implemented procedures to address Forced Labour and there is no evidence of its use or support. The Entity does not require fees from Workers.
10.3c Forced Labour (migrant workers)	Conformance	The Entity has implemented procedures to address Forced Labour and there is no evidence of its use or support. The Entity does not require fees from Workers.
10.3d Forced Labour (debt bondage)	Conformance	The Entity has implemented procedures to address Forced Labour and there is no evidence of its use or support. There is no evidence of debt bondage.
10.3e Forced Labour (freedom of movement)	Conformance	The Entity has implemented procedures to address Forced Labour and there is no evidence of its use or support. There are no restrictions to movement, unless for safety issues and Workers are free to leave their workplace at the end of working hours or in case of immediate danger.
10.3f Forced Labour (retention of identity papers, permits, certificates)	Conformance	The Entity has implemented procedures to address Forced Labour and there is no evidence of its use or support. There is no evidence of the retention of original documents.
10.3g Forced Labour (freedom to terminate employment)	Conformance	The Entity has implemented procedures to address Forced Labour and there is no evidence of its use or support. Workers can terminate their employment freely, in conformance to the rules of the CBA within the agreed notice period.
10.4 Non-Discrimination	Conformance	The Entity addresses Discrimination in its Code of Ethics and the Integrated Policy. There is no evidence of Discrimination. Promotion, advancement and salary are based on a Management By Objectives (MBO) system, the 'Metra

CRITERION	RATING	COMMENT
		Group annual incentive plan'. For Workers not involved in MBO, there is a process to review their salary/position based on formal communications among managers and supervisors.
10.5 Communication and engagement	Conformance	Workers' representatives have free access to the Human Resources Department. Meetings are held every three months and the safety meeting for managers and Worker's representatives are held once per year according to local law.
10.6 Disciplinary practices	Conformance	Disciplinary measures are outlined in the National CBA and the Entity's procedure on discipline is consistent with the CBA and local law.
10.7a Remuneration (living wage)	Conformance	Wage levels are defined by the National CBA. There is also a CBA at the company level where wages are above the minimum legal wage. The lowest wage at the Entity is higher than the poverty line as defined by the Italian National Institute of Statistics (Istituto nazionale di statistica).
10.7b Remuneration (method of payment)	Conformance	All Workers are provided with clearly readable pay slips. Wages are paid in accordance with the CBA on a monthly basis, on the 15th of each month by bank transfer.
10.8 Working Time	Conformance	Each Worker has an electronic badge to record the start and end of Working Time and these data are used to produce payslips. Leave entitlements and Overtime are defined by the CBA. The normal working time is 40 hours per week, Monday to Friday. Workers in production areas have different shift schemes as defined by the CBA at the company level. Overtime is regularly paid with extra allowances in accordance with the National CBA.
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	The Entity has an Integrated Policy, signed by the CEO and approved by the Board of Directors: https://www.metra.eu/pdf/politica-integrata-rev-03-del-01-07-2021.pdf
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	The Entity has an Integrated Policy, signed by the CEO and approved by the Board of Directors: https://www.metra.eu/pdf/politica-integrata-rev-03-del-01-07-2021.pdf The Policy is applicable to all Workers and Visitors and is available at the Entity's premises.

CRITERION	RATING	COMMENT
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Conformance	The Entity has an Integrated Policy, signed by the CEO and approved by the Board of Directors: https://www.metra.eu/pdf/politica-integrata-rev-03-del-01-07-2021.pdf The Policy includes a commitment to comply with Applicable Law.
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	The Entity has an Integrated Policy, signed by the CEO and approved by the Board of Directors: https://www.metra.eu/pdf/politica-integrata-rev-03-del-01-07-2021.pdf The Policy includes a statement, consistent also with local law, on the right of Workers to refuse and stop unsafe work and to be informed about risks and hazards.
11.2 OH&S Management System	Conformance	The Entity has a documented Management System including the key elements of risk assessment, training and management review. The latest management review addressed the performance indicators and improvement plan. The Entity also holds monthly meetings to monitor and update the improvement plan.
11.3 Employee engagement on health and safety	Conformance	Workers' representatives for health and safety are freely elected by Workers. In accordance with local law, Workers' representatives participate in annual meetings with management. Workers can also access the complaints mechanism via a reporting and complaint form: https://www.metra.eu/pdf/mod-segnalazione-reclami.pdf
11.4 OH&S performance	Minor Non-Conformance	The Entity evaluates its Occupational Health and Safety performance, and performance indicators are evaluated during the annual meeting. However, it was identified a risk assessment required under local law was incomplete.

Document Control and Version History

Revision	Date	Notes
0	1 June 2022	Initial Certification Audit – Full Certification
1	17 January 2024	Surveillance Audit