

ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

Laminazione Sottile Group

CERTIFICATE NUMBER
124

ASI STANDARD
PERFORMANCE
STANDARD
(V3 2022)

CERTIFICATION LEVEL
FULL
CERTIFICATION

ASI ACCREDITED
AUDITING FIRM
BUREAU VERITAS
CERTIFICATION

DATE OF ISSUE
29 MARCH 2024

DATE OF EXPIRY
28 MARCH 2027

CERTIFIED SINCE
29 MARCH 2021

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 semi-finished
Aluminium coils and sheets at
Laminazione Sottile Plant (Italy), coil
coating at Italcot Plant (Italy) and
coating/printing at IPS Industrial
Packaging Solution Plant (Italy).

AUDIT REPORT PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Laminazione Sottile S.p.A.
ENTITY NAME	Laminazione Sottile Group
CERTIFICATION SCOPE	Manufacturing of semi-finished aluminium coils and sheets at Laminazione Sottile Plant (Italy), coil coating at Italcoat Plant (Italy) and coating/printing at IPS Industrial Packaging Solution Plant (Italy).
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">• Semi-Fabrication• Material Conversion
ASI STANDARD	<ul style="list-style-type: none">• Performance Standard V3
AUDIT TYPE	<ul style="list-style-type: none">• Initial Certification Audit (21 – 29 January 2021)• Surveillance Audit (2 – 5 May 2022)• Re-Certification and Scope Change Audit (18 January – 26 February 2024)
AUDIT FIRM	Bureau Veritas Certification
AUDIT DATE	<ul style="list-style-type: none">• 21 – 29 January 2021 (Initial Certification Audit)• 2 – 5 May 2022 (Surveillance Audit)• 18 January – 26 February 2024 (Re-Certification Audit and Scope Change)
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">• 27 February 2021 (Initial Certification Audit)• 30 June 2022 (Surveillance Audit)• 1 May 2024 (Re-Certification Audit and Scope Change t)
AUDIT SCOPE	<p><u>Initial Certification Audit (21 – 29 January 2021)</u></p> <p>The Audit Scope included the activities at the Laminazione Sottile, Italcoat and IPS Industrial Packaging Solution plants in Italy.</p> <p>Supply chain activities included in the audit scope:</p> <ul style="list-style-type: none">• Semi-Fabrication• Material Conversion (Production and Transformation) <p>All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.</p> <p><u>Surveillance Audit (2 – 5 May 2022)</u></p> <p>The Audit Scope included the activities at the Laminazione Sottile, Italcoat and IPS Industrial Packaging Solution plants in Italy.</p> <p>Supply chain activities included in the audit scope:</p> <ul style="list-style-type: none">• Semi-Fabrication• Material Conversion (Production and Transformation) <p>All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.</p>

Re-Certification Audit and Scope Change (18 January – 26 February 2024)

The Audit Scope included the activities at the Laminazione Sottile, Italcot and IPS Industrial Packaging Solution plants in Italy.

Supply chain activities included in the audit scope:

- Semi-Fabrication
- Material Conversion

All applicable 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

29 March 2024 – 28 March 2027

NEXT AUDIT TYPE

Surveillance Audit

NEXT AUDIT DATE

29 March 2025

CERTIFICATE NUMBER

369



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 Laminazione Sottile Group, specialises in the transformation of Aluminium and is made up of ten companies, including Laminazione Sottile, Italtcoat, Contital and IPS Industrial Packaging Solution in Italy, and the i2r group of facilities located in the United Kingdom, South Korea and the United States; PLLANA GmbH in Germany; and Contital Turkey located in Turkey. The Group's companies, integrated into the supply chain, produce Aluminium coils in different shapes, alloys and surface treatments, including painting and printing, as well as the production of Aluminium trays for the food and beverage industry.

The activities of the three companies included in the Certification Scope (the 'Entity') include the design, manufacturing and surface treatment of rolled products in Aluminium and its alloys (at Laminazione Sottile S.p.A); the design and production of strips and sheets in painted Aluminium with coil coating technology (at Italtcoat S.r.l. Design); and Production of flexible packaging made of Aluminium lacquered and/or printed and/or laminated with plastic film for pharmaceutical, food and cosmetics applications.

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	High	High	High	HIGH
RISKS	Medium	Medium	Medium	MEDIUM
PERFORMANCE	Low	Medium	Medium	MEDIUM
OVERALL	MEDIUM			

CRITICAL INCIDENT – MARCH 2024

On 12 March 2024, a critical incident occurred at the Laminazione Sottile company's plant, which resulted in the fatality of a Worker. This incident occurred after the conclusion of this ASI Surveillance and Scope Change Audit (18 January – 26 February 2024), which identified no Material issues or findings relating to the management of Occupational Health and Safety at the site. The Entity has consistently demonstrated consistent performance with their OH&S systems, and no non-conformities relating to the relevant Criteria of the ASI Performance Standard have been identified in both this, and prior ASI Performance Standard Audits.

The Lead Auditor notified ASI of this incident as soon as it became publicly known, and a teleconference was held between the ASI Secretariat and both the Lead Auditor and representatives of the Accredited Auditing Firm immediately following to discuss and provide additional context.

The Audit Report makes no specific assessment, assumption or commentary on this incident, nor any system, processes or behaviours that may have contributed, or be considered as a possible cause. As of the release date of this Audit Report (21 June 2024), Local and Federal agencies in Italy are continuing in their investigation. In response to this incident, the Lead Auditor has bought forward the next Surveillance Audit by six months, to March 2025.

FINDINGS

CRITERION	RATING	COMMENT
1. BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity has planned, established, implemented and maintained adequate processes for assessing Compliance with legal and other requirements. A procedure has been implemented which provides for the frequency and method for periodic assessment of Compliance with legislative requirements. Records on Compliance with legislative requirements are maintained.
1.2 Anti-Corruption	Conformance	The Entity has established a Management System with a Code of Ethics and internal anti-Corruption processes compliant with Legislative Decree 231/01 (corporate responsibility for crimes perpetuated in the interest or to the advantage of a legal entity) supervised by Organismo di Vigilanza (OdV).
1.3a-e Code of Conduct	Conformance	The Entity via the Laminazione Sottile Group has implemented a Code of Ethics: https://www.laminazionesottile.com/wp-content/uploads/2023/09/Codice-Etico-2023.pdf The Ethics Code expresses the principles, values and rules of conduct inherent in the actions of the companies within the Laminazione Sottile Group.
2. POLICY AND MANAGEMENT		
2.1a-f Environmental, Social, and Governance Policy	Conformance	The Social Responsibility Policy is documented, endorsed by Senior Management and shared with all Workers: https://www.laminazionesottile.com/wp-content/uploads/2023/12/LS_Responsabilita-Sociale-2023.pdf The Entity has a Policy that commits to environment, health and safety, and social responsibility. Management guarantees periodic reviews and consistency with strategic objectives, including environmental and safety aspects. The Policy ensures Compliance with regulations and aims for safe working conditions and environmental protection.
2.2a-c Leadership	Conformance	All functions of the Entity work towards the implementation of the system, and the senior management ensures Conformance with the ASI Performance Standard through an inter-functional team. This team is adequately trained and knowledgeable about the ASI Standards.
2.3a Environmental and Social Management Systems - Environmental	Conformance	The Entity has adopted Environmental Management Systems certified by accredited assessment bodies and compliant with UNI EN ISO 14001 to guarantee the continuous improvement of its environmental performance. Current certification information is available at: Laminazione Sottile S.p.A.: https://www.laminazionesottile.com/wp-content/uploads/2023/04/LS-ISO-14001-2015-IT_scad.2026.pdf Italcoat S.r.l. and IPS Industrial Packaging Solution S.r.l.: https://www.italcoat.com/it/sostenibilita/certificazioni

CRITERION	RATING	COMMENT
2.3b Environmental and Social Management Systems – Social	Conformance	<p>Laminazione Sottile S.p.A. has implemented SA8000 certified Social Management System: https://www.laminazionecottile.com/it/sostenibilit%C3%A0/certificazion</p> <p>The IPS Industrial Packaging Solution S.r.l. and Italcot S.r.l. sites do not currently have a certified Social Responsibility Management System. However, both sites have implemented the Entity's Ethical Code, and the organisational model is consistent with the requirements of a Social Management System with statements and Policies on recruiting, human resources management and Health and Safety. The Human Resources department has procedures to continuously deliver conformity to the national Collective Bargaining Agreement for work-related matters, including wages and working hours.</p> <p>Code of Ethics: https://www.italcoat.com/wp-content/uploads/2023/09/Codice-Etico-2023.pdf</p>
2.4a-e Responsible Sourcing	Conformance	<p>The Entity has implemented a Procedure that describes how the Laminazione Sottile Group manages the procurement and assignment of outsourced activities. The Procedure describes the checks to be undertaken on products and services, including environment and sustainability aspects.</p> <p>The Entity's Social Responsibility Policy is available at: https://www.laminazionecottile.com/wp-content/uploads/2024/03/LS_Responsabilita-Sociale-2024.pdf</p>
2.5a-g Environmental and Social Impact Assessments	Not Applicable	<p>This Criterion is not applicable to the Entity, as there have not been any current, or recently completed New Projects or Major Changes. However, the Entity has documented Impact Assessments, taking into consideration normal operating conditions, start-up and shutdown phases and emergencies, and past, present and planned activities. Specific procedures are in place for assessing direct and indirect environmental aspects.</p>
2.6a-h Human Rights Impact Assessment	Not Applicable	<p>This Criterion is not applicable to the Entity, as there have not been any current, or recently completed New Projects or Major Changes. However, the Entity has a documented risk assessment that includes Human Rights to identify and prioritise areas. The Social Performance Team is responsible for assessing the risks covered by this assessment, and Management approves the document and any remedial actions in the improvement plan.</p>
2.7a-f Emergency Response Plan	Conformance	<p>The Entity has prepared site-specific procedures to predict and manage emergencies with an impact on both environmental and safety systems.</p> <p>The procedures cover the implementation actions to prevent or mitigate the impacts deriving from possible emergencies, respond to emergencies and plan actions for periodic tests. Additionally, the Entity periodically checks the effectiveness of planned actions in response to potential emergencies. The emergency plans are communicated to Visitors and suppliers who enter the sites, and are also available to anyone who requests them.</p>
2.8a-d Suspended Operations	Conformance	<p>The Entity's Business continuity plan is currently in the draft stage. The plan focuses on the Entity's ability to continue operating in the event of any disruption or disaster. The plan includes procedures to manage crises and minimise the impact on Business operations. Environmental</p>

CRITERION	RATING	COMMENT
		and safety emergencies that may occur are managed through specific plans, periodically reviewed and updated. Practical training tests for emergencies are regularly organised.
2.9a-b Mergers and Acquisitions	Conformance	There has been no recent closure, decommissioning or divestment activity. In the event of new Mergers, Acquisitions or decommissioning activities, environmental, social and governance issues will be addressed. The Entity has implemented the Group Environmental, Social and Governance Due Diligence Policy covering governance, environmental and social parameters in the event of new Mergers or Acquisitions activity.
2.10a-b Closure, Decommissioning and Divestment	Conformance	There are no Mergers or Acquisitions, closures, decommissioning or divestment. The Entity has implemented the Group Environmental, Social and Governance Due Diligence Policy addressing governance, environmental and social parameters in the event of any closure, decommissioning or divestment.
3. TRANSPARENCY		
3.1a-b Sustainability Reporting	Conformance	<p>Through the Laminazione Sottile Group, the Entity annually communicates its performance and approach to governance, environmental and social issues. The Sustainability Report with data on environmental, social and safety impacts is available at: https://www.laminazionecottile.com/it/sostenibilita/rapporto-di-sostenibilita</p> <p>The Sustainability Report is published in May each year and currently the report for 2023 is publicly available.</p>
3.2 Non-compliance and Liabilities	Conformance	<p>The Entity's Sustainability Report discloses there are no disputes or sanctions for non-Compliance with environmental legislation: https://www.laminazionecottile.com/it/sostenibilita/rapporto-di-sostenibilita</p> <p>There have been no reported cases of Corruption or anti-competitive behaviour, and there have been no violations of laws or regulations in the social or economic areas.</p>
3.3a-c Payments to Governments	Conformance	<p>The Entity has established a Management System as well as a Code of Ethics and internal anti-Corruption processes compliant with Legislative Decree 231/01 (corporate responsibility for crimes perpetrated in the interest or to the advantage of a legal entity) supervised by Organismo di Vigilanza (OdV). The Entity declares the absence of payments made to Government parties, which is addressed in the Code of Ethics, pages 7-8: https://www.laminazionecottile.com/wp-content/uploads/2023/09/Codice-Etico-2023.pdf</p> <p>The Entity's senior management confirmed that all payments made to the Government and public administration are on a legal basis, which includes taxes. The organisational models adopted by the Entity include a set of principles and rules of conduct, operating procedures and disciplinary sanctions aimed at preventing the commission of crimes and guaranteeing ethical behaviour from those who work on behalf of the Entity.</p>

CRITERION	RATING	COMMENT
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	<p>The Entity has established effective tools for receiving and investigating complaints and suggestions for improvement from Stakeholders. These tools include letterboxes, dedicated email addresses and periodic meetings between Workers and their representatives. External Stakeholders can report or submit requests or complaints through the tools indicated on the websites for all sites.</p> <p>IPS Industrial Packaging Solution S.r.l.: https://www.ipstech.it/whistleblowing</p> <p>Italcoat S.r.l.: https://www.italcoat.com/whistleblowing-policy</p> <p>Laminazione Sottile S.p.A.: https://www.laminacionesottile.com/it/whistleblowing</p>
4. MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment	Conformance	A Life Cycle Perspective Evaluation was developed that considers the life cycle impacts of major products and processes. The Entity has conducted two Life Cycle Assessment (LCA) studies in accordance with ISO 14040:2006 and ISO 14044:2006/Amd 1:2017 on the final products manufactured by the Contital S.r.l. (part of the same Group).
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	The Entity has conducted two LCA studies on the final products manufactured by the Contital S.r.l. (part of the same Group). These studies are shared with specific and selected customers.
4.2 Product Design	Conformance	Research and development activities are centralised at the Group level and are responsible for promoting product innovation and seeking solutions to meet customer needs. Currently, industrial-scale experimentation is underway with two pilot customers for capsules and boxes, such as using a higher percentage of waste and decreasing the number of alloys.
4.3a-b Aluminium Process Scrap	Conformance	Based on its ISO 14001 certified Management System, the Entity has developed an improvement plan with environmental objectives, management review processes and measurable targets. The Scrap derived from various treatments are recovered via an internal recycling mechanism or returned to the foundry. The minimisation of waste is achieved through the recycling of Scrap. Any Scrap returned from manufacturing processes is divided by the type of internal alloy then stored in a dedicated storage area and entirely recovered in the smelting processes. Data are monitored and available every month with details for department, product and plant.
4.4a-c Collection and Recycling of Products at End of Life - Material Conversion and other Manufacturing	Conformance	<p>The Entity has industrial processes in place for the recovery of Aluminium Scrap deriving from industrial processing. Semi-finished products are supplied to customers who transform them into finished products. The resulting processing Scrap are returned to the factory to be remelted and re-transformed into laminates, implementing principles of a Circular Economy. The Entity is also engaged in a project that will foresee the recycling of post-consumer materials in future.</p> <p>The Entity's recycling strategy is available in the Sustainability Report 2022, chapter 6: https://www.laminacionesottile.com/it/sostenibilita/rapporto-di-sostenibilita</p>

CRITERION	RATING	COMMENT
4.4d Collection and Recycling of Products at End of Life	Conformance	At present, the Entity does not have a process for recycling post-consumer Aluminium (urban waste). However, a collaboration with the Italian consortium responsible for the collection of Aluminium waste (Consorzio Nazionale Imballaggi Alluminio (CIAL)) is being planned for the near future. Additionally, the Aluminium sold by Laminazione Sottile S.p.A. or Italcot S.r.l. to industrial customers is, in some cases, re-collected and transformed into new raw material. This occurs with larger customers currently, however there are plans to further improve this process in the near future.
5. GREENHOUSE GAS EMISSIONS		
5.1a-b Disclosure of GHG Emissions and Energy Use	Conformance	<p>The Entity is actively reducing Greenhouse Gases (GHG) emissions and applying the Emission Trading System (ETS) regulation. Laminazione Sottile S.p.A. GHG data is disclosed in the Environmental Declaration in chapter 10.6: https://www.laminazionecottile.com/wp-content/uploads/2024/01/DA-2023-Laminazione-Sottile.pdf</p> <p>IPS Industrial Packaging Solution S.r.l. and Italcot S.r.l. emissions for each site are not independently disclosed because they are not included in the ETS, which requires the Entity to obtain an equal number of permits to emit CO₂ to the quantity of emissions. However, the GHG emissions for all three sites are sent to the National Authority and are validated by an accredited body.</p> <p>The GHG emissions for the whole group including IPS Industrial Packaging Solution S.r.l. and Italcot S.r.l. emissions are included in the Sustainability Report, paragraph 6.6: https://issuu.com/laminazionecottilegroup/docs/lsg_sustainability_report_2022?fr=xPf8INTU</p>
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	<p>The Entity has a Greenhouse Gas Emissions Reduction Monitoring Plan. This reduction initiative is implemented across all three sites, and specific actions are envisaged to achieve these objectives. Over the years, the Group companies have achieved important results, as shown by the monitoring data of emissions into the atmosphere in terms of pollutant concentrations, which remain well below authorised legal limits. This has been achieved due to the Entity's adoption of advanced technologies aimed at continuous improvement and maintaining the efficiency of the systems with advanced maintenance programs.</p> <p>In order to achieve energy reductions (and indirect CO₂ emissions), the Entity has installed air-water heat exchangers in the foundry area to recover hot air exiting the chimneys and use it to heat the boiler water. This reduces the consumption of methane and therefore CO₂ emitted. The project allows significant energy savings which translates</p>

CRITERION	RATING	COMMENT
		<p>into a saving of methane gas. In 2022, 600,000 m³ of methane and 2.300.000 kWh of electric energy were saved.</p> <p>In 2021, a photovoltaic system was installed on the roofs of Laminazione Sottile S.p.A. warehouses, consumption is reported on an internal dashboard starting from November 2021. 6,313,000 kWh was produced in 2022 from photovoltaics (entirely consumed inside in thin lamination operations). More information is available in the Sustainability Report: https://www.laminazione.com/wp-content/uploads/2024/01/DA-2023-Laminazione-Sottile.pdf</p>
5.4 GHG Emissions Management	Conformance	Whilst the Entity does not have a certified ISO14064 or ISO50001 Management System, a series of procedures and operating instructions have been implemented for the management of the operational controls necessary to obtain performance in accordance with the Greenhouse Gas Emissions Reduction Plan and objectives.
6. EMISSIONS, EFFLUENTS AND WASTE		
6.1a-f Emissions to Air	Conformance	<p>Each of the Entity's three sites have an environmental authorisation called AIA (Integrated Environmental Authorisation) in Compliance with Italian law, Decree 152/2006 (Code on the Environment regarding all matters concerning environmental protection). This authorisation includes waste management, emissions, discharges, and water supply.</p> <p>Following the authorisation principles, each site must annually disclose atmospheric emissions to the public administration. The communication of emissions to Stakeholders for the three plants is available in the Sustainability Report, chapter 14, pages 104-105: https://www.laminazione.com/it/sostenibilita/rapporto-di-sostenibilita</p>
6.2a-g Discharges to Water	Conformance	<p>Each of the Entity's three sites have an environmental authorisation called AIA (Integrated Environmental Authorization) in accordance with Italian law, Decree 152/2006. This permit includes waste management, emissions, discharges, and water supply.</p> <p>Communication to Stakeholders relating to the monitored water discharge indicators is made available through the environmental declarations required by Eco-Management and Audit Scheme (EMAS) certification and are validated by certification bodies.</p> <p>The declarations are available at:</p> <p>https://www.laminazione.com/wp-content/uploads/2024/01/DA-2023-Laminazione-Sottile.pdf (paragraph 10.7)</p> <p>www.italcoat.com/wp-content/uploads/2024/01/DA-Italcoat-2023.pdf (paragraph 10.4)</p> <p>www.italcoat.com/wp-content/uploads/2024/01/DA-IPS-2023.pdf (paragraph 11.1)</p>
6.3a-g Assessment and Management of Spills and Leakages	Conformance	The Entity has established a Management System certified to ISO 14001. They have conducted a risk assessment to identify potential Spills and Leakages. Additionally, the Entity provides training on environmental emergency management at least once a year. They have also documented specific procedures for managing accidental Spills.

CRITERION	RATING	COMMENT
		<p>The risk assessments of possible Spills are available through environmental declarations:</p> <p>https://www.laminazionesottile.com/wp-content/uploads/2024/01/DA-2023-Laminazione-Sottile.pdf (paragraph 3.1 and paragraph 10)</p> <p>www.italcoat.com/wp-content/uploads/2024/01/DA-Italcoat-2023.pdf (paragraph 3.2 and paragraph 10)</p> <p>www.italcoat.com/wp-content/uploads/2024/01/DA-IPS-2023.pdf (paragraph 4.1 and paragraph 10)</p>
6.4a-b Public Disclosure of Spills and Leakages	Conformance	<p>There is no evidence of Spills or Leakage outside the Entity premises in 2002/2023. Any environmental accidents or Spills are communicated to the Stakeholders through the Sustainability Report and environmental declarations available on the Entity's websites (www.laminazionesottile.com and www.italcoat.com/it).</p> <p>The Entity has implemented the Laminazione Sottile Group procedures that require any situation involving the loss or Spills of dangerous substances to be promptly communicated to the competent bodies (Regional Environmental Protection Agency (Agenzia Regionale per la Protezione Ambientale), The Italian Institute for Environmental Protection and Research, ISPRA (Istituto Superiore per la Protezione e la Ricerca Ambientale) Municipalities and Province).</p>
6.5a-c Waste Management and Reporting	Conformance	<p>Waste management is governed by internal procedures compliant with ISO14001:2015. These procedures regulate the operational and legal management of waste generated by the Entity. The Entity annually declares the quantities of hazardous and non-hazardous produced according to Legislative Decree 152/2006, where the annual declaration (MUD) is mandatory.</p> <p>The management of waste is undertaken by third parties, who are authorised for the transport and final disposal or recovery. The Entity records the internal movements of the waste produced.</p> <p>Information on waste production is published annually in the Sustainability Report, pages 104-105: https://www.laminazionesottile.com/it/sostenibilita/rapporto-di-sostenibilita</p> <p>Public information on the quantity of Hazardous and non-Hazardous Waste produced for each site:</p> <p>Laminazione Sottile SPA, paragraph 10.8: www.laminazionesottile.com/it/sostenibilita/salute-sicurezza-ambiente</p> <p>Italcoat SRL, paragraph 10.5: www.italcoat.com/wp-content/uploads/2024/01/DA-Italcoat-2023.pdf</p> <p>IPS SRL (paragraph 11.12): www.italcoat.com/wp-content/uploads/2024/01/DA-IPS-2023.pdf</p>
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	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
7. WATER STEWARDSHIP		
7.1a-b Water Assessment and Disclosure	Conformance	<p>The Entity's risk analysis includes a mapping of water sources and water consumption. Each site has its own wells which guarantee all technological water needs of the plants with regular extraction authorisation. Each site has its environmental authorisation (AIA), in accordance with Legislative Decree 152/2006 which requires annual reporting of water withdrawals. Data on water use by source and type is available in the Sustainability Report, chapter 6: https://www.laminazione sottile.com/it/sostenibilita/rapporto-di-sostenibilita</p> <p>In addition, internal audits and operational controls are implemented to monitor water use. The water supply is categorised according to its use: drinkable, civil (non-potable water for human use) or use in the production process (non-potable water). Potable (potable) water is supplied by the municipal aqueduct and consumption is monitored by a sealed meter.</p> <p>There are no Watersheds located in the Entity's Area of Influence.</p>
7.2a-e Water Management	Not Applicable	<p>This Criterion is not applicable to the Entity, as no Material water-related risks were identified in the risk assessment. However, the Entity has implemented water resource management plans for each of the three sites aimed at reducing consumption over the years. The use of water resources is mainly linked to cooling operations necessary for various production activities. All of the Group's companies use underground water taken from their wells regularly authorised by provincial decrees.</p>
8. BIODIVERSITY AND ECOSYSTEM SERVICES		
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	<p>A risk assessment and impact on Biodiversity are included in the Entity's environmental analysis documents, risk analysis, assessment of environmental aspects and impact on the territory. The results demonstrate that there is no significant risk to Biodiversity and Ecosystem Services and that the risk is low. The Entity does not operate in Protected Areas, and there are no key Biodiversity areas or threatened species that are impacted by the Entity's activities.</p>
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Not Applicable	<p>This Criterion is not applicable to the Entity, as the risk to and impacts on Biodiversity and Ecosystem Services were determined to be low and no significant risk to Biodiversity and Ecosystem Services was identified. This aspect was also noted in the environmental analysis documents, risk analysis, and assessment of environmental aspects and impacts.</p>
8.2a-g Biodiversity Management	Not Applicable	<p>This Criterion is not applicable to the Entity, as the risk to and impacts on Biodiversity and Ecosystem Services were determined to be low and no significant risk to Biodiversity was identified.</p>
8.3a-c Management of Priority Ecosystem Services	Conformance	<p>This Criterion is not applicable to the Entity, as no Priority Ecosystem Services have been identified. This aspect was also noted in the environmental analysis documents, risk analysis, and assessment of environmental aspects and impacts.</p>

CRITERION	RATING	COMMENT
8.4 Alien Species	Conformance	The introduction of exotic species is a risk that is mitigated by the Entity through internal processes such as requiring suppliers to treat wooden pallets according to international standards, such as International Standards For Phytosanitary Measures (ISPM).
8.5a-b Commitment to “No Go” in World Heritage Properties	Conformance	The Entity has confirmed that their operational sites are not located near World Heritage sites or sites of natural interest. They have demonstrated there are no New Projects or Major Changes that impact World Heritage assets.
8.6a-d Protected Areas	Conformance	The Entity has conducted a risk assessment and the impact on Biodiversity is covered in the environmental analysis documents, risk analysis, assessment of environmental aspects and impacts on the territory. The results show a low to no risk to Biodiversity, as no Protected Areas have been identified in the area affected by the Entity's activities.
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	<p>The Entity's commitment to respecting Human Rights is expressed in the Social Responsibility Policy and Code of Ethics documents.</p> <p>Social Responsibility Policy (applicable to the Group): https://www.laminazioneosottile.com/wp-content/uploads/2023/12/LS_Responsabilita-Sociale-2023.pdf</p> <p>Code of Ethics: https://www.laminazioneosottile.com/wp-content/uploads/2023/09/Codice-Etico-2023.pdf</p> <p>The Code of Ethics covers corporate social responsibility, governance, Human Rights and the environment. Due Diligence is addressed through an internal process of analysing the actual and potential impacts on Human Rights and the preparation of the Group Policy on Due Diligence for the respect of Human Rights.</p> <p>The Policy outlines the Due Diligence process as a tool for implementing the Group's commitments to ensure respect for Human Rights. The process involves identifying areas of activity that may pose a risk of Human Rights violations, surveying existing measures in those areas to mitigate the risk, evaluating whether those measures are sufficient to effectively uphold Human Rights commitments, identifying areas where risk reduction is necessary based on adequacy assessments, providing input for improvement plans in high-risk areas, and ensuring follow-up on improvement actions with periodic repetition of the Due Diligence process.</p> <p>Interviews and documents reviewed during the Audit confirmed that there have been no Human Rights violations.</p>
9.2a-e Gender Equity and Women's Empowerment	Conformance	The Entity prohibits Discrimination based on differences in gender, age, state of health, nationality or ethnic group, and political or religious opinions. The Entity has adopted an Organisational Model according to Legislative Decree 231/2001 and implemented a confidential and anonymous reporting system, a tool for

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		<p>communicating any offences and violations to the Supervisory Body. There were no cases of Discrimination reported in 2022 and 2023.</p> <p>Over recent years, the Entity has actively increased the presence of female staff in historically male areas. This has included not only clerical roles but also in the technical ones. In 2021, a project was launched for the inclusion of female staff with the necessary qualifications. An important indicator is the availability of parental leave, reducing the risk of female staff leaving their jobs after the birth of a child. Both the return-to-work rate after parental leave and the job retention rate one year after returning to work showed that almost all employees who took advantage of this have returned to work and are still working at the Entity. As a result, the number of female Workers in the Group has increased over recent years. More information on Equal Gender Opportunities is available in the Sustainable Report, chapter 7.2: https://www.laminazioneottile.com/it/sostenibilita/rapporto-di-sostenibilita</p>
9.3a-i Indigenous Peoples	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples present where the Entity operates.
9.4a Free, Prior, and Informed Consent (FPIC) - New Projects or Major Changes	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples present where the Entity operates. However, an evaluation of Indigenous Peoples' consent will be carried out in the case of new establishments or substantial changes.
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 is not applicable to the Entity, as there are no Indigenous Peoples present where the Entity operates.
9.5a Cultural and Sacred Heritage - Identification	Not Applicable	This Criterion is not applicable, as there are no sites of cultural value and/or sacred heritage within the Entity's Area of Influence.
9.5b Cultural and Sacred Heritage - Impacts	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples present where the Entity operates. However, an evaluation of Indigenous Peoples' consent will be undertaken in the case of new establishments or substantial changes.
9.6a-i Displacement	Not Applicable	This Criterion is not applicable to the Entity, as there are no New Projects and Major Changes that require resettlement. A social risk assessment would be carried out in the event of resettlement.
9.7a-h Affected Populations and Organisations	Conformance	<p>Risk assessment did not identify problems affecting Local Communities, however, various communication channels are available to all interested parties: https://www.laminazioneottile.com/wp-content/uploads/2023/12/LS_Responsabilita-Sociale-2023.pdf</p> <p>The Entity is committed to contributing to the development of the Local Community through social activities of various kinds. Initiatives, projects, cultural events and associations focused on scientific</p>

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		research are constantly supported to strengthen civil conscience and fuel cultural renewal.
9.8a Conflict-Affected and High-Risk Areas - Strong Management Systems	Conformance	Laminazione Sottile S.p.A. has implemented an SA8000 Management System certified by an independent third party. The Management System includes policies and procedures that analyse the risk of Human Rights violations not only within its own organisation but throughout the entire supply chain. These procedures are extended and adopted by all Group companies including a Social Responsibility Policy and an integrated Quality, Safety and Environment (QSE) Policy which establish the Entity's commitment to ensuring Due Diligence on its Aluminum supply chain in accordance with the OECD Guide to the Due Diligence of Minerals from Conflict-Affected and High-Risk Areas (OECD Guide). These Policies are published on the website of each site.
9.8b Conflict-Affected and High-Risk Areas - Identify and assess risks	Conformance	The Entity has adopted an SA8000 Management System approach that analyses the risk of Human Rights violations throughout the supply chain. All suppliers are required to comply with the Group's Code of Ethics.
9.8c Conflict-Affected and High-Risk Areas - Strategy to respond to risks	Conformance	The Entity's supply chain risk assessment demonstrated no significant identifiers. However, according to an internal procedure, if there are any risks identified in future Due Diligence reviews, senior Management will develop a strategic plan.
9.8d Conflict-Affected and High-Risk Areas - Audit of due diligence	Conformance	This ASI Performance Standard Audit satisfies the requirements of this Criterion.
9.8e Conflict-Affected and High-Risk Areas - Report annually	Conformance	The Entity annually reports on its supply chain management and commitment to implementing a sustainable procurement process in the Sustainability Report, chapter 9: https://issuu.com/laminazionegroup/docs/lsg_raiuto_sostenibilit_2022?fr=xPf8INTU
9.9 Security practice	Conformance	An after-hours surveillance service is present at all sites within the Entity. The night guard service provides a custody and surveillance activity provided by a security company, aimed at protecting or safeguarding the integrity of the real estate, people or other Material assets from possible threats such as theft or wilful damage. Unarmed (or passive) surveillance, used video surveillance, night concierge or patrols to discourage possible criminals. The guards, although properly equipped, do not possess any type of weapon. During the daytime, the concierge service is carried out by internal staff. Surveillance and access control are carried out in Compliance with the law. All Visitors are asked for an identity document before authorising access to the establishment.
10. LABOUR RIGHTS		
10.1a-c Freedom of Association and Right to Collective Bargaining	Conformance	All Workers in Italy are covered by a Collective Labour Agreement (CCNL) agreed at the national level between Trade Unions and sector representatives. The Entity informs Workers of the freedom to join any organisation of their choice and guarantees that their choices do not

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		<p>lead to negative consequences such as Harassment, intimidation or retaliation. Currently, the group unionisation rate is approximately 20%.</p> <p>Feedback received during the worker interviews undertaken as part of the Audit was positive and confirmed that no situations have emerged in which the right to Freedom of Association and Collective Bargaining is impeded. Union representatives have been elected for Workers, and anyone who freely chooses to join a Union or similar associations. The Entity provides for meetings between Workers and Union representatives, offering suitable spaces for these meetings, and Trade Union representatives regularly meet with senior management.</p>
10.1d Freedom of Association and Right to Collective Bargaining - Alternative means in context of Applicable Law	Not Applicable	This Criterion is not applicable to the Entity, as Applicable Law in Italy does not limit the right to Freedom Of Association and Collective Bargaining. During interviews with Workers, no reports of undue pressure or obstacles towards Union activities emerged. All Trade Union representatives were freely elected by the Workers.
10.2a Child Labour	Conformance	The Entity does not use or support the use of Child Labour. The commitment not to hire or employ children (including children under the age of 18) in work activities is included in the Entity's Social Responsibility Policy and Code of Ethics.
10.3a-c Forced Labour	Minor Non-Conformance	<p>The Entity has declared its commitment to not support, or use Forced Labor directly or through personnel supply agencies. Its actions to address Modern Slavery are included in the Code of Ethics: https://www.laminazioneottile.com/wp-content/uploads/2023/09/Code-of-Ethics-2023.pdf</p> <p>Interviews with employees demonstrated the Entity respects the right to freedom of movement during the working day and guaranteed breaks. No limitations were found, and Workers can leave the workplace in an emergency. The staff is free from forms of pressure, they are not forced to accept work, they are free to collectively bargain and terminate the employment relationship in accordance with Italian regulations.</p> <p>Even though the Code of Ethics includes references to Modern Slavery, it does not provide sufficient information on how the Entity directly address Modern Slavery with a Modern Slavery Statement.</p>
10.4a-c Non-Discrimination	Conformance	<p>The Entity's Code of Ethics establishes equal opportunities for all Workers. The Collective Bargaining Agreement regulates the production bonus for all Workers. The Social Responsibility Policy guarantees equal opportunities and non-Discrimination in the recruitment, Remuneration, promotion, training, opportunities for advancement or dismissal of any worker based on sex, race, national or social origin, religion or any other condition that may give rise to Discrimination.</p> <p>The Entity has implemented an annual Performance Management System to evaluate performance based on the assignment of area and the personal objectives of any professional development plan. There was no evidence of Discrimination found during the Audit.</p>
10.5 Communication and engagement	Conformance	The Entity has implemented various methods of communication and involvement between management and Workers, this includes periodic meetings between managers and employees, training

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		<p>courses, and communication of principles via noticeboards and monitors present within the various production sites.</p> <p>All Workers and Stakeholders have the opportunity to make complaints anonymously, with the process outlined in the Social Responsibility Policy and Whistleblowing Policy.</p> <p>https://www.laminacionesottile.com/wp-content/uploads/2023/12/LS_Responsabilita-Sociale-2023.pdf</p> <p>https://www.italcoat.com/it/whistleblowing-segnalazioni</p> <p>https://www.laminacionesottile.com/it/whistleblowing</p>
10.6a-g Violence and Harassment	Conformance	<p>The Entity is against all forms of Harassment and Violence, and the commitment is communicated to all Stakeholders through the Code of Ethics, the Social Responsibility Policy and the Whistleblowing Policy. The work environment appears free from coercive or oppressive attitudes. All applicable disciplinary measures are defined and in Compliance with the Collective Labour Agreement (CCNL) and are accepted by Workers. These are regularly communicated to Workers via the company noticeboard. There are no disputes at the Entity regarding Violence and Harassment.</p> <p>Social Responsibility Policy (applicable to the Group): https://www.laminacionesottile.com/wp-content/uploads/2023/12/LS_Responsabilita-Sociale-2023.pdf</p> <p>Code of Ethics: https://www.laminacionesottile.com/wp-content/uploads/2023/09/Codice-Etico-2023.pdf</p>
10.7a-c Remuneration	Conformance	<p>Salary levels at the Entity are in accordance with the sector collective agreement. During the Audit, various documents relating to Remuneration were sampled (pay slips, employment contracts, and certificate of contributions Compliance (DURC)). The evidence reviewed during the audit demonstrated that the lowest-paid position at the company offers a salary that is significantly higher than the minimum subsistence level (living wage). Workers interviewed said they understood the contents of their payslips and received their wages on time.</p>
10.8a-c Working Time	Conformance	<p>The Entity complies with Applicable Law and industry standards regarding working hours (including Overtime). Working Time is recorded using magnetic badges and Overtime is voluntary. A sample of payslips examined during the audit demonstrated detailed attendance records, absences, leaves, illnesses, etc. In general, vacation days not taken by employees are constantly decreasing.</p>
10.9a-b Informing Workers of Rights	Conformance	<p>The Entity uses various strategies to inform employees about their rights. For example, they have established working groups aimed at improving individual production areas, processes, and technical-organisational systems. The Entity has also implemented communication campaigns such as workshops, focus groups, and interactive seminars to inform employees on various topics including Workers' rights, innovation projects, and organisational changes.</p> <p>In addition, the Entity utilises the company noticeboard and the intranet as tools to inform its employees. These platforms are accessible to all employees and are used to publish the code of ethics, updates, information from Trade Unions, and the collective agreement.</p>

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		The Entity is also certified according to the SA8000 standard. Furthermore, training on social responsibility has been provided to all employees within the Group.
11. OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Management System	Conformance	<p>The Entity has established an ISO 45001 certified, Health And Safety Management System certified by an accredited body. At the documentation level, the management system consists of a management manual operating procedure, registration forms, a register of legal requirements, and a schedule of legal requirements. The legal Compliance audit is conducted annually by an external consultant.</p> <p>Please refer to page 4 of this Report for context with respect to a critical Health and Safety incident that occurred at the Entity on March 12, 2024.</p>
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Conformance	<p>the Entity undergoes third-party audits on an annual basis to verify the state of development and Compliance of the Health and Safety Management System with the standard. Safety improvement objectives are established every six months, updated every six months and shared with social partners to provide evidence of continuous improvement. The Entity communicates annually regarding the maintenance of the Management System (including the results of third-party audits), monitoring objectives and indicators, trends in accidents and injuries, prevention initiatives and mitigation of impacts on health and safety at work. Refer to the Sustainability Report, chapter 8 for further information:</p> <p>https://www.laminazioneottile.com/it/sostenibilita/rapporto-di-sostenibilita</p>
11.2 Employee engagement on Health and Safety	Conformance	<p>The Entity has established a Health and Safety Committee to ensure the continuous improvement of Workers' Health and Safety. This includes periodic and formal risk assessments to identify and address real and potential risks to health and safety, as well as investigating the causes of accidents and their management. The committee comprises of managers, executives, and Workers' representatives. The HSE Department meetings are held regularly to discuss health, safety, and environmental matters.</p>

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DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	29 March 2021	Initial Certification Audit – Full Certification
1	3 August 2022	Surveillance Audit
2	21 June 2024	Re-Certification and Scope Change Audit – Full Certification
