

ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

Foma S.p.A

CERTIFICATE NUMBER
450

ASI STANDARD
**PERFORMANCE
STANDARD
(V3.1 2023)**

DATE OF ISSUE
13 MAY 2025

CERTIFICATION LEVEL
**PROVISIONAL
CERTIFICATION***

DATE OF EXPIRY
12 MAY 2026

ASI ACCREDITED
AUDITING FIRM
**BUREAU VERITAS
CERTIFICATION**

CERTIFIED SINCE
13 MAY 2025

AUTHORISED BY

CERTIFICATION SCOPE

Production of Aluminium die cast and machined components for the automotive industry at Foma's facilities, located in Pralboino, Italy.

Aluminium Stewardship Initiative Ltd
ACN 606 661 125, Australia
info@aluminium-stewardship.org

Validity of this Certificate is subject to continued conformance with the applicable ASI Standard and can be verified at:
www.aluminium-stewardship.org

* Provisional Certification is valid for the period of one year, during which the company can address the non-conformances assessed and subsequently seek full certification.

AUDIT REPORT PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Foma S.p.A
ENTITY NAME	Foma S.p.A
CERTIFICATION SCOPE	Production of Aluminium die cast and machined components for the automotive industry at Foma's facilities, located in Pralboino, Italy.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthousesMaterial Conversion
ASI STANDARD	Performance Standard V3.1
AUDIT TYPE	<ul style="list-style-type: none">Initial Certification Audit
AUDIT FIRM	Bureau Veritas Certification
AUDIT DATE	<ul style="list-style-type: none">27 – 30 January 2025
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">20 February 2025
AUDIT SCOPE	<p>The Audit Scope included the production of Aluminium die cast and machined components for the automotive industry at Foma's facilities, located in Pralboino, Italy.</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthousesMaterial Conversion <p>All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.</p>
AUDIT OUTCOME	<ul style="list-style-type: none">Provisional Certification
AUDIT METHODOLOGY DECLARATION	<p>The Auditors confirm that:</p> <ul style="list-style-type: none"><input checked="" type="checkbox"/> The information provided by the Entity is true and accurate to the best knowledge of the Auditor(s) preparing this report.<input checked="" type="checkbox"/> The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous.<input checked="" type="checkbox"/> 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.<input checked="" type="checkbox"/> The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.

CERTIFICATION PERIOD	13 May 2025 – 12 May 2026
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NEXT AUDIT TYPE	Surveillance Audit
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NEXT AUDIT DATE	12 November 2025
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CERTIFICATE NUMBER	450
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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

Foma (the 'Entity') is a leading Aluminium die casting foundry located in Pralboino, Northern Italy, with a long-standing history of excellence in the automotive industry. The Entity was founded in 1956 by Angelo Montini in Lumezzane as a moulding construction site. In 1971, the Entity expanded its operations and moved to Pralboino, where it established itself as a die casting foundry, specialising in producing high-quality Aluminium components. The Lumezzane plant continues to focus on mould design and construction for the Pralboino site.

The Entity employs approximately 500 people and produces a wide range of Aluminium die-cast components that are essential for the automotive industry, including parts for structural, safety, and performance applications for its customers, both within Italy and internationally. The Entity's production capabilities span the entire Aluminium Casting process, from mould design and die casting to mechanical machining and final assembly. This integrated approach allows the Entity to maintain full control over the whole processes of its products.

The Entity's plant areas include a waste storage area, raw and finished products warehouse, spare parts warehouse, mechanical and electrical maintenance workshop, mould maintenance workshop, a laboratory and management/administration offices.

The Entity is located in the southern area of Brescia and is located within Valle Padana, in the region of Lombardy, with the Mella River located approximately one kilometre from the site. The closest sensitive receptors include a residential area located one kilometre from the site and a school approximately 1.5 kilometres away. There is a Protected Area (Parco del Mella), in the general region, however it is located well away from the Entity's Area of Influence. No sites of cultural significance, or other elements of Biodiversity are in the vicinity of the Entity.

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	Medium	Medium	MEDIUM
RISKS	Medium	Medium	High	MEDIUM
PERFORMANCE	High	Medium	Medium	MEDIUM
OVERALL	MEDIUM			

FINDINGS

CRITERION	RATING	COMMENT
1. BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity has developed and implemented a Management System that complies with Legislative Decree 231/01. The Entity has established a Supervisory Board, which periodically verifies the compliance of the Entity with current and relevant regulations. The Entity's Certifications are available at: https://www.foma.it/en/operations
1.2 Anti-Corruption	Conformance	The Entity has developed and implemented a Code of Ethics which has been endorsed by the Entity's Board of Directors. The Code outlines the Entity's expectations relating to anti-Bribery and anti-Corruption and mandates all Workers and contractors adhere to the Code. This Code is made available on bulletin boards and on the Entity's website at: https://www.foma.it/en/company
1.3a-e Code of Conduct	Minor Non-Conformance	<p>The Entity's Code of Conduct is an internal document contained within the Code of Ethics, and it includes all principles relevant to environmental, social and governance performance. All Workers are informed and trained during recruitment and updated in case of any changes.</p> <p>Whilst the Entity specifies a review of the Code of Conduct at least every five years, there is no evidence that the review has taken place within the required timeframe. In addition, the Code of Conduct is not publicly disclosed.</p>
2. POLICY AND MANAGEMENT		
2.1a-f Environmental, Social, and Governance Policy	Conformance	The Entity has issued Policies that address environmental, social and governance practices (including environmental, Health and Safety, Supplier Code of Conduct and Human Rights Policy). These Policies are periodically reviewed and are published on the Entity's website at: https://www.foma.it/en/company
2.2a-c Leadership	Conformance	The Entity's Policies are endorsed by the Chief Executive Officer (CEO) and are implemented by the respective System Managers. The responsibilities of each Manager/Director are provided in job/position description documents. Implementation is verified during periodical management reviews.
2.3a Environmental and Social Management Systems – Environmental	Conformance	<p>The Entity has a certified Environmental Management System to ISO 14001. The Management System incorporates a manual, documented procedures, training and working instructions and addresses all the Entity's processes of both sites.</p> <p>A periodic check of the effectiveness of the System is undertaken through internal audits and a senior management review.</p>
2.3b Environmental and Social Management Systems – Social	Conformance	<p>The Entity has a social element incorporated into its certified Management Systems (Health and Safety (H&S) – ISO45001 and Environment – ISO14001) Management System (ISO 14001 and ISO 45001). A periodic check of the effectiveness of the System is undertaken through internal audits and a senior management review.</p> <p>All relevant Policies are available at: https://www.foma.it/en/company</p>

CRITERION	RATING	COMMENT
2.4a-e Responsible Sourcing	Minor Non-Conformance	<p>The Entity's integrated Policy addresses suppliers and subcontractors, as does the Code of Ethics. All purchase orders include the reference to the Modello Organizzativo secondo la 231/01 and the Code of Ethics. Subcontractors such as maintenance suppliers and construction companies are managed and assessed in accordance with an internal procedure (Procurement and works contract management/Gestione appalti e contratti d'opera).</p> <p>Whilst the Entity has a Supplier quality manual linked to the Code of Ethics which incorporates criteria for conduct in supplier relations and duties of suppliers, however there is no clear evidence that the Entity's Responsible Sourcing management framework is applied for all suppliers due to gaps identified in some purchase orders.</p>
2.5a-g Environmental and Social Impact Assessments	Not Applicable	This Criterion is not applicable to the Entity, as it does not have New Projects or Major Changes to existing Facilities.
2.6a-h Human Rights Impact Assessment	Not Applicable	This Criterion is not applicable to the Entity, as it does not have New Projects or Major Changes to existing Facilities.
2.7a-f Emergency Response Plan	Conformance	<p>The Entity has developed and implemented an Emergency Response Plan which is annually reviewed. Evacuation tests are regularly conducted, and the Entity has prepared the evacuation plan in accordance with Legislative Decree 81/08.</p> <p>The Entity shares the Emergency Response Plan with all contractors and subcontractors, and is available upon request via the website at: https://www.foma.it/en/company</p>
2.8a-d Suspended Operations	Conformance	The Entity has developed a Contingency Plan which is annually reviewed. Should any procedures or actions be required relating to Suspended Operations, the Entity's Board of Directors will enact them based on internal procedures and to ensure consistency with the Entity's Industrial Plan.
2.9a-b Mergers and Acquisitions	Conformance	The Entity has developed a Contingency Plan which is annually reviewed. Should any procedures or actions be required relating to Mergers and Acquisitions, the Entity's Board of Directors will enact them based on internal procedures and to ensure consistency with the Entity's Industrial Plan.
2.10a-b Closure, Decommissioning and Divestment	Conformance	The Entity has developed a Contingency Plan which is annually reviewed. Should any procedures or actions be required relating to Closure, Decommissioning and Divestment, the Entity's Board of Directors will enact them based on internal procedures and to ensure consistency with the Entity's Industrial Plan.
3. TRANSPARENCY		
3.1a-b Sustainability Reporting	Conformance	<p>The Entity has publicly disclosed its second Sustainability Report for 2022-2023. The Report is available at: https://www.foma.it/en/company</p> <p>The Entity also periodically posts on its LinkedIn social page on its commitment regarding ESG topics, refer to:</p>

CRITERION	RATING	COMMENT
		https://www.linkedin.com/company/foma-s.p.a The next iteration of the Entity's Sustainability Report for 2024-2025 will be available in early 2026.
3.2 Non-compliance and Liabilities	Conformance	No significant fines, prosecutions, penalties and sanctions have been raised in the last two years. If there are any significant fines, prosecutions, penalties and sanctions, these will be disclosed in the financial summary of the Sustainability Report: https://www.foma.it/en/company
3.3a-c Payments to Governments	Conformance	All payments made to the Government and Public Administration are paid legally (i.e. taxation). Relevant data are presented in the Sustainability Report: https://www.foma.it/en/company
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	The Entity's 'whistleblowing' and complaints procedure is outlined at: https://foma.segnalazioni.net Workers can also contact the Human Resources Department directly. For complaints relating to Health and Safety (H&S) and environmental compliance, any concerned party can communicate via certified email.
4. MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment	Conformance	Since 2020, the Entity has been calculating and disclosing its Company Carbon Footprint (CCF) in collaboration with an external expert agency. The Product Life Cycle Assessment (LCA) is based on this CCF.
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	Since 2020, the Entity has been calculating and disclosing its Company Carbon Footprint (CCF) in collaboration with an external expert agency. The Product LCA is based on this CCF. The LCA/CCF is available upon request, however no requests have been received to date.
4.2 Product Design	Conformance	Whilst the Entity aims to be involved in the product design process, automotive castings (end products) are requested directly by the customer therefore input in this process from the Entity is very limited.
4.3a-b Aluminium Process Scrap	Conformance	The Entity recovers 100% of Aluminium Scrap from its internal processes. The Scrap resulting from the die casting process is stored in a dedicated area and fully recovered in the smelting processes, while, the decaying Scrap from mechanical processing is also fully recovered but managed through sale to a plant authorised for recovery and treatment.
4.4a-c Collection and Recycling of Products at End of Life - Material Conversion and other Manufacturing	Conformance	The goal of the Entity is to recover all Aluminium Scrap. The customer designs components to be 100% recycled. This process is under the responsibility of and is executed by the customer.
4.4d Collection and Recycling of Products at End of Life	Conformance	The Entity's main goal is to collect and recover all Aluminium material where relevant. The customer designs components to be 100% recyclable, however the ability for the Entity to influence the collection

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		and recycling of Aluminium rests with the Entity's customers, whom are aware of these obligations.
5. GREENHOUSE GAS EMISSIONS		
5.1a-b Disclosure of GHG Emissions and Energy Use	Minor Non-Conformance	<p>The Entity publicly discloses its Scope 1, 2 and 3 Greenhouse Gases (GHG) emissions in the Sustainability Report and Company Carbon Footprint (CCF). However, the Entity does not provide any independent verification for these data. Third-party verification will be available for the year 2026.</p> <p>The 2022-2023 Sustainability Report is available (pages 23 and 24) at: https://www.foma.it/en/company</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 GHG Emissions Reduction Plans	Major Non-Conformance	<p>Whilst the Entity has commenced a series of initiatives with respect to the on-site reduction of GHG emissions, these initiatives/actions are currently not structured in a formal Emissions Reduction Plan. It is expected that the Entity's senior management will endorse a final GHG reduction plan by the end of 2025. The Entity's GHG Reduction Plan is also not currently disclosed.</p> <p>Additionally, the ASI Pathways Calculation Tool has not been used by the Entity to develop emissions reduction curves that align with a 1.5c emissions reduction pathway. Whilst the Entity has developed Intermediate Targets for 2030 and 2039, it has not developed appropriate five-year targets out to 2050, and a baseline year has also not been established.</p>
5.3b-e GHG Emissions Reduction Plans	Major Non-Conformance	The ASI Pathways Calculation Tool has not been used by the Entity to develop emissions reduction curves that align with a 1.5c emissions reduction pathway. Whilst the Entity has developed Intermediate Targets for 2030 and 2039, it has not developed appropriate five-year targets out to 2050, and a baseline year has also not been established. As a result, there is also a lack of public disclosure with respect to the Entity's plan.
5.4 GHG Emissions Management	Minor Non-Conformance	Whilst the Entity has commenced a series of initiatives with respect to the on-site reduction of GHG emissions, these initiatives/actions are currently not structured in a formal Emissions Reduction Plan. It is proposed that full disclosure of the Entity's GHG Emissions Management programme will be made available in the 2024-2025 Sustainability Report.
6. EMISSIONS, EFFLUENTS AND WASTE		
6.1a-f Emissions to Air	Conformance	The Entity holds an environmental authorisation conforming to Italian Law Dlg. 152/2006, AIA (Autorizzazione Integrata Ambientale):

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		<p>Environmental Integrated Authorization)), that requires the Entity to communicate to public administration its air emissions on an annual basis.</p> <p>The frequency of control is annual and is monitored during the annual environmental management review. Emissions to Air are reported in the Sustainability Report (pages 23-24), which is available at: https://www.foma.it/en/company</p>
6.2a-g Discharges to Water	Minor Non-Conformance	<p>The Entity holds an environmental authorisation conforming to Italian Law Dlgs. 152/2006, AIA (Autorizzazione Integrata Ambientale: Environmental Integrated Authorization)), that requires the Entity to communicate to public administration its Discharges to Water on an annual basis.</p> <p>The frequency of control is annual and is monitored during the annual environmental management review. Whilst discharges to Water are discussed in the Sustainability Report (pages 23-24), which is available at: https://www.foma.it/en/company, there are no water data provided.</p>
6.3a-g Assessment and Management of Spills and Leakages	Conformance	<p>The Entity has completed a risk assessment which includes Spills and Leakages. In addition to this risk assessment, each Worker is trained to report situations that may affect both Health and Safety and environmental issues to their supervisors. The Entity undertakes periodic drills/trials for Spills and Leakages.</p> <p>Spills are reported internally using a form called 'Stato di Insicurezza' (Unsafe Situation) - Spills and leaks are considered an unsafe situation to be reported, there is no evidence of Spills or Leakages outside the Entity's premises. The Entity's external communication plan requires that any Spill related information be made available to interested parties upon request, and any major Spills and Leakages must be reported to public administration as a requirement of the Environmental Authorisation.</p> <p>Emergency drills relating to Spills and Leakages are performed on an annual basis.</p>
6.4a-b Public Disclosure of Spills and Leakages	Conformance	<p>No Material Spills or leakages have occurred on-site to date. Material Spills and Leakages will be publicly disclosed via the Sustainability Report and root causes and remediation actions taken on an annual basis according to the Management System. Each Worker is trained to report situations that may affect both health and safety and environmental issues to supervisors.</p>
6.5a-c Waste Management and Reporting	Minor Non-Conformance	<p>The Entity reports Waste volumes to the public authorities via the 'Modello Unico di Dichiarazione (MUD)' process. The MUD includes all quantities of waste produced (both hazardous and non-hazardous) with evidence of their final destination, as defined by Italian legislation. Whilst the Entity has established targets to reduce both the hazardous status of waste stream as well as the quantities of waste in absolute terms, there is no public disclosure of waste data.</p>
6.6a-g Bauxite Residue	Not Applicable	<p>This Criterion is not applicable to the Entity's Certification Scope.</p>
6.7a-f Spent Pot Lining (SPL)	Not Applicable	<p>This Criterion is not applicable to the Entity's Certification Scope.</p>

CRITERION	RATING	COMMENT
6.8a-d Dross	Conformance	All Dross produced by the Entity is disposed of as waste and recovered by an authorised disposal Facility. The areas in which Dross is temporarily stored are completely enclosed and in good condition. Annual quantities of Dross produced are reported in the annual Modello Unico di Dichiarazione (MUD).
7. WATER STEWARDSHIP		
7.1a-b Water Assessment and Disclosure	Conformance	<p>The Entity has conducted a water assessment and outlines the water quantities used and management processes (Sections 6.2 and 6.3) in place: https://www.foma.it/en/company</p> <p>All water consumption withdrawn by the Entity is monitored and on an annual basis, the Entity reports the quantities broken down by quantity and origin to the Agency for Environmental Protection (ARPA). No wastewater is generated on-site, other than basic kitchen and sanitary wastewater.</p> <p>The Entity manages water consumption in accordance with the requirements of the national legislation D.Lgs. 152/2006 and the Integrated Environmental Authorisation.</p>
7.2a-e Water Management	Conformance	<p>All water consumption withdrawn by the Entity is monitored and on an annual basis, the Entity reports the quantities broken down by quantity and origin to the Agency for Environmental Protection (ARPA). No wastewater is generated on-site, other than basic kitchen and sanitary wastewater.</p> <p>The Entity manages water consumption in accordance with the requirements of the national legislation D.Lgs. 152/2006 and the Integrated Environmental Authorisation.</p>
8. BIODIVERSITY AND ECOSYSTEM SERVICES		
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	<p>The Entity has conducted a risk assessment regarding the Materiality of its impacts to Biodiversity. The result determined that the Biodiversity impacts are not considered Material. The analysis of the animal and plant species present in the Area of Influence has not led to the identification of critical situations, or in any case of attention such as to have to intervene on the environmental matrices that affect the Entity production.</p> <p>Section 1.4.4.1 in the Sustainability Report provides an overview of the Biodiversity status of the Entity's premises and Area of Influence: https://www.foma.it/en/company</p>
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Not Applicable	This Criterion is not applicable to the Entity, as no significant Biodiversity features were identified in the Biodiversity risk assessment and potential impacts are assessed and documented as low.
8.2a-g Biodiversity Management	Not Applicable	This Criterion is not applicable to the Entity, as no significant Biodiversity features were identified in the Biodiversity risk assessment and potential impacts are assessed and documented as low.
8.3a-c Management of Priority Ecosystem Services	Not Applicable	This Criterion is not applicable to the Entity, as no Priority Ecosystem Services have been identified.

CRITERION	RATING	COMMENT
8.4 Alien Species	Conformance	The potential for impacts relating to Alien Species has been assessed as low risk as the Entity considers itself in compliance with Italian phytosanitary regulations. Additionally, the Entity does not have any suppliers of materials outside of Europe. The Entity plans over time to reduce the use of wooden pallets or select pallets according to International Standards for Phytosanitary Measures (ISPM) No. 15.
8.5a-b Commitment to “No Go” in World Heritage Properties	Conformance	The Entity does not conduct operation and development of activities within or adjacent to the boundaries of Natural Sites included in the UNESCO World Heritage List.
8.6a-d Protected Areas	Conformance	Using regional maps, the Entity has identified the Protected Areas near its Facility and this exercise confirmed that the Entity is not near any boundaries of any defined Protected Areas. A brief summary is included in the company profile (Section 1.4.4.1) in the Sustainability Report: https://www.foma.it/en/company
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 has developed and implemented a Human Resources Policy which prescribes the respect for Human Rights and to observe all the Applicable Laws and Principles on Business and Human Rights in ways appropriate to its size and circumstances.</p> <p>The Entity's 'Corporate Human Rights Policy' is available at: https://www.foma.it/en/company</p> <p>The Policy is distributed to all employees by the 'ZConnect' application (PC and mobile).</p> <p>The Entity conducted a Human Rights risk assessment in 2020/2021, which was then updated in 2022/2023. There have been no complaints or concerns raised relating to any adverse Human Rights impacts. A review of Human Rights risks has been undertaken in conjunction with other complaints and grievances received via the internal software QualyWare.</p>
9.2a-e Gender Equity and Women's Empowerment	Minor Non-Conformance	<p>Discrimination against women is illegal in Italy and additionally Decree 151/2001 protects maternity and all laws related to women's rights within the workplace. This is formalised through the commitments included in the Entity's Human Rights Policy https://www.foma.it/en/company</p> <p>The Entity however has not disclosed information as to the effectiveness of the measures taken to promote gender equity on an annual basis.</p>
9.3a-i Indigenous Peoples	Not Applicable	This Criterion is not applicable to the Entity, as the site is located in Lombardy in northern Italy, province of Brescia where there are no Indigenous Peoples or their lands, territories and resources.

CRITERION	RATING	COMMENT
9.4a Free, Prior, and Informed Consent (FPIC) – New Projects or Major Changes	Not Applicable	This Criterion is not applicable to the Entity, as the site is located in Lombardy in northern Italy, province of Brescia where there are no Indigenous Peoples or their lands, territories and resources.
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 the site is located in Lombardy in northern Italy, province of Brescia where there are no Indigenous Peoples or their lands, territories and resources.
9.5a Cultural and Sacred Heritage – Identification	Not Applicable	This Criterion is not applicable to the Entity, as the Entity's Due Diligence process did not identify any sacred or cultural heritage sites and values within its Area of Influence. Indigenous Peoples or their lands, territories and resources are not directly affected by the Entity's operations.
9.5b Cultural and Sacred Heritage – Impacts	Not Applicable	This Criterion is not applicable to the Entity, as no sacred or cultural heritage sites and values within the Entity's Area of Influence are present. Indigenous peoples or their lands, territories and resources are not directly affected by the Entity's operations.
9.6a-i Displacement	Not Applicable	This Criterion is not applicable to the Entity, as confirmed by interviews, the Entity did not require the resettlement or cause the displacement. The Entity's senior management confirmed that this is also not planned for New Projects or Major Changes.
9.7a-h Affected Populations and Organisations	Conformance	The Entity's Human Rights risk assessment determined that for the Populations and Organisations there are no significant impacts in terms of Human Rights. The Entity is active in the Local Community through several initiatives including the local soccer team, the local volleyball team, the local middle school and local donations for health preventive initiatives. The Entity also cooperates and collaborates with a certain number of high schools by organising specific events related to the die casting field and in general to the working world. Further information is available in the Sustainability Report: https://www.foma.it/en/company
9.8a Conflict-Affected and High-Risk Areas – Strong management systems	Conformance	Although not operating in conflict areas, the Entity has implemented a 'conflict minerals' Policy as it is sensitive to the humanitarian objective of ending the violent conflict in the areas indicated. The Policy also includes supplier (raw material and components) information on the origin of raw materials used to manufacture components. The Entity's suppliers must complete the latest version of the CMR Template and upload this on its supplier portal.
9.8b Conflict-Affected and High-Risk Areas – Identify and assess risks	Conformance	Although not operating in conflict areas, the Entity has implemented a 'conflict minerals' Policy as it is sensitive to the humanitarian objective of ending the violent conflict in the areas indicated. The Policy also includes supplier (raw material and components) information on the origin of raw materials used to manufacture components. The Entity's suppliers must complete the latest version of the CMR Template and upload this on its supplier portal.

CRITERION	RATING	COMMENT
		As the Entity is currently only sourcing secondary Aluminium, the overall risk level has been classified as low.
9.8c Conflict-Affected and High-Risk Areas – Strategy to respond to risks	Conformance	<p>The Entity requires its suppliers to be in conformance to its Supplier Guidelines by completing and uploading the latest version of the CMRT on its supplier website which are then verified.</p> <p>All suppliers are considered in conformance, and no non-compliances have been identified. There is a process in place to manage instances of non-compliance as they arise and are then escalated to management. As the Entity is currently only sourcing secondary Aluminium, the overall risk level has been classified as low.</p>
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 provides supplier Due Diligence/assessment data to interested Stakeholders upon request: https://www.foma.it/en/contact Supply Chain Due Diligence activities are included in the Sustainability Report: https://www.foma.it/en/company
9.9 Security practice	Conformance	The Entity has a contract with a security company for the concierge service (night hours only) and the overall control of the plant area against theft. The requirements of Italian law for the protection of Human Rights are referenced in the contract.
10. LABOUR RIGHTS		
10.1a-c Freedom of Association and Right to Collective Bargaining	Conformance	<p>The Entity adheres to the National Contract of the category of the 'metal Worker' which specifies the right of the Worker to join Labour Unions and Collective Bargaining. Refer to: https://www.federmeccanica.it/relazioni-industriali/contratto-collettivo-nazionale-di-lavoro-ccnl.html</p> <p>Beyond the National contract, the Entity also has in place a further internal negotiation ("contratto di 2° livello") between Union representatives and the Entity.</p> <p>The Entity respects the rights of Workers to unite freely, seek representation and join the Works Councils without interference. Italian labour law applies to all the Entity's employees. Refer to: https://www.federmeccanica.it/relazioni-industriali/contratto-collettivo-nazionale-di-lavoro-ccnl.html</p> <p>In Italy, all Workers are covered by a Collective Bargaining Agreement (CBA) agreed at the national level among Trade Unions and industry representatives, the CBA recognises the freedom of Trade Union activity.</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, as the Entity does not operate in a country (Italy) that restricts the right to Freedom of Association and Collective Bargaining.
10.2a-c Child Labour	Conformance	The Entity applies Italian law of underage work (16 years old), however the Entity does not employ people younger than 18 years old. Restriction of Child Labour is also clearly written and defined in the

CRITERION	RATING	COMMENT
		<p>Entity's Human Resources Policy. The Entity also keeps records and copies of the proof of identification of its Workers.</p> <p>The Entity's Human Resources Policy is available at: https://www.foma.it/en/company</p>
10.3a-c Forced Labour	Conformance	<p>Italian law states that Forced Labour is illegal, to which the Entity subscribes. The Entity's Human Resources Policy also states that Forced Labour is illegal. The Entity's Modern Slavery Statement is available at: https://www.foma.it/en/company</p>
10.4a-c Non-Discrimination	Conformance	<p>The Entity's commitment to non-Discrimination is declared in its Code of Ethics. Since 2017, the Entity has implemented a 'whistleblowing' procedure, which was updated in 2023. Refer to: https://foma.segnalazioni.net</p> <p>To date, the Entity has not had any cases of Discrimination. The Entity employment processes are applied equally to both women and men. Both genders are given equal opportunities to use their abilities and propensities and have the chance to advance in their working careers. Further information is available at: https://www.foma.it/en/company</p>
10.5 Communication and engagement	Conformance	<p>Upon employment at the Entity, a new Worker receives a copy of the National Contract which includes information and procedures regarding working conditions and resolution of workplace and compensation issues, without threat of reprisal, intimidation or Violence and Harassment. Refer to: https://www.foma.it/en/company</p> <p>In the Human Resources Policy, the Entity makes reference to a workplace free of Violence and Harassment.</p>
10.6a-g Violence and Harassment	Conformance	<p>In the Entity's Human Resources Policy, the Entity makes reference to a workplace free of Violence and Harassment. Refer to: https://www.foma.it/en/company</p> <p>Throughout each year, initiatives are organised to promote outreach and awareness on issues related to Violence, Violence against women, racism and gender equality. There has been no case or evidence reported of corporal punishment, mental or physical coercion, harassment, and gender-based Violence including sexual harassment, or verbal abuse.</p>
10.7a-c Remuneration	Conformance	<p>Terms and conditions of employment and other information including payment terms, Overtime and holidays and leaves are provided to each Worker as part of the National contract requirements. The National Collective Labour Contract applies to all Workers at the Entity. Refer to: https://www.federmeccanica.it/relazioni-industriali/contratto-collettivo-nazionale-di-lavoro-ccnl.html</p> <p>On time wage payments are made on the 11th day of each month. Workers interviewed during the Audit stated they understood the contents of payroll and that payments were always made on time.</p>
10.8a-c Working Time	Conformance	<p>Terms and conditions of employment and other information including Working Time, Overtime and holidays and leaves are provided to each Worker as part of the National contract requirements. The National Collective Labor Contract applies to all Workers at the Entity. Refer to:</p>

CRITERION	RATING	COMMENT
		<p>https://www.federmeccanica.it/relazioni-industriali/contratto-collettivo-nazionale-di-lavoro-ccnl.html</p> <p>All information on Working Time (including Overtime working hours), public holidays and paid annual leave are indicated in the National contract (a copy of which is given to every Worker) and also in the recruitment letter. In some special cases, the Entity will discuss and agree to special internal contracts (i.e. contract level 2) with the union representatives.</p>
10.9a-b Informing Workers of Rights	Conformance	<p>All Workers are informed about their rights through the National Contract. All new Workers receive a copy of the National Contract, with related explanations provided during induction/onboarding.</p> <p>Each Worker must sign a copy of a Decreto Trasparenza where Workers are informed of their primary working conditions.</p>
11. OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Management System	Minor Non-Conformance	<p>The Entity has been certified to ISO45001 for its Occupational Health and Safety (OH&S) Management System since 2016. The Entity's OH&S Policy highlights its commitment to maintain the highest standards of Health and Safety for employees. The OH&S Management System is audited annually for compliance. The OH&S Policy is available at: https://www.foma.it/en/company</p> <p>In conformance with the D.Lgs. 81/08, the Entity has appointed all the necessary safety personnel (e.g. competent physician prevention and protection service manager, emergency teams and Worker safety representatives), however the Entity does not provide evidence as to whether an annual senior management review of both the OH&S Policy and Management System has been undertaken.</p>
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Conformance	<p>An Occupational Health and Safety (OH&S) risk assessment has been undertaken and updated regularly, with relevant procedures implemented. The OH&S Management System is audited annually for compliance to ISO45001.</p> <p>Information on the effectiveness of the OH&S Management System and Health and Safety performance are disclosed in the Sustainability Report (page 46) (https://www.foma.it/en/company) and through requests via: https://www.foma.it/en/contact</p>
11.2 Employee engagement on Health and Safety	Conformance	<p>Every worker is trained so that anyone who encounters abnormal or hazardous health and safety or environmental situations reports it to the relevant supervisor or internal HSE department. This type of communication is essential to assess Workers' Health and Safety conditions, to better identify and address actual and potential risks, and to promote continuous improvement for Health and Safety issues in the workplace.</p> <p>The Entity's HSE Department meets monthly with Workers' safety representatives. The Health and Safety Policy has been distributed to all Workers via a dedicated internal application. the Entity's Process Managers with maintenance, safety and environment, and quality managers meet daily, to discuss risks and hazards.</p>

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DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	13 May 2025	Initial Certification Audit – Provisional Certification