

ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

SILVAL SpA

CERTIFICATE
NUMBER

477

ASI
STANDARD

PERFORMANCE
STANDARD
(V2 2017)

CERTIFICATION
LEVEL

PROVISIONAL
CERTIFICATION

ASI ACCREDITED
AUDITOR

BUREAU
VERITAS
CERTIFICATION

DATE OF ISSUE

27 FEBRUARY 2025

DATE OF EXPIRY

26 FEBRUARY 2026

CERTIFIED SINCE

10 AUGUST 2023

AUTHORISED BY

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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

Production of primary Aluminium alloys from
recycled content through the stages of melting and
continuous casting, in Vobarno, Italy.

SUMMARY AUDIT REPORT

PERFORMANCE

STANDARD

OVERVIEW

MEMBER NAME	Raffmetal and Fondital
ENTITY NAME	Silval SpA
CERTIFICATION SCOPE	Production of primary Aluminium alloys from recycled content through the stages of melting and continuous casting, in Vobarno, Italy.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthouses
ASI STANDARD	<ul style="list-style-type: none">Performance Standard V2
ACQUISITION / DIVESTMENT	<p>On 16 December 2024, a 'Newco' named Silval Special Alloys Plant SpA (in short 'Silval SpA') was created and all responsibilities of the Special Alloys department were transferred from Fondital SpA. On 27 February 2025, Raffmetal acquired the shares of Silval SpA as a wholly owned subsidiary.</p> <p>This Certification is based on Fondital's multi-site Certification 293, and as Fondital was the controlling Entity at the time of the last audit, 'Fondital' remains referenced throughout this Report.</p> <p>For all certification transfers to different controlling Entities, ASI requires a Surveillance Audit of the new controlling Entity to be undertaken within 12 months from the transfer of Entity ownership, or a Re-Certification Audit if the current Certification Period expires within the 12 month provision.</p> <p>All transferred certifications are deemed 'Provisional' until the successful completion of a Surveillance Audit or Re-Certification Audit.</p>
AUDIT TYPE	<ul style="list-style-type: none">Initial Certification Audit
AUDIT FIRM	Bureau Veritas Certification
AUDIT DATE	<ul style="list-style-type: none">10 – 19 May 2023
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">31 May 2023

AUDIT SCOPE	<p><u>Initial Certification Audit (10 – 19 May 2023):</u></p> <p>The Audit Scope covers the manufacturing of automotive parts by melting, high-pressure die-casting, heat treatment, machining and high-grade aluminium special alloys from recycled content at Special Alloys - Via Provinciale 49, Vobarno.</p> <p>The supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none"> • Aluminium Re-melting/Refining • Casthouses • Material Conversion (Production and Transformation) <p>All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.</p>
AUDIT OUTCOME	<ul style="list-style-type: none"> • Full 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	27 February 2025 – 26 February 2026
NEXT AUDIT TYPE	Surveillance Audit
NEXT AUDIT DUE DATE	26 February 2026
CERTIFICATE NUMBER	477

SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity has planned, established, implemented and maintained an adequate process for assessing compliance with legal and other requirements. A procedure has been implemented which provides the frequency and method for periodic assessment of compliance with legislative requirements. Records on compliance with legislative requirements are maintained and a legislative list is kept updated by both the compliance function and the Management Systems function.
1.2 Anti-Corruption	Conformance	The Entity has equipped itself with a Management System, in accordance with Legislative Decree 231/01, which provides for the presence of a Code of Ethics and internal audits on Anti-Corruption by a Supervisory Board. The Board has the task of supervising the operation and compliance of the Entity, the management model and ensuring that it is updated. This Supervisor Board is in direct relationship with the Board of Directors, to which it reports any violations.
1.3 Code of Conduct	Conformance	The Entity has established a Code of Ethics, available at: https://fondital.my.salesforce.com/sfc/p/#58000000Z4PW/a/4I0000026ZGd/v6t2sOG8qnpV3EAZg_AyCSN_fW2wzFM9tp2j3Wh.fUw
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	The Entity has established a Code of Ethics that has been developed in response to the main laws, guidelines and regulations existing at both national and international levels in terms of corporate social responsibility, corporate governance, Human Rights and the environment. The Code of Ethics is available at: https://fondital.my.salesforce.com/sfc/p/#58000000Z4PW/a/4I0000026ZGd/v6t2sOG8qnpV3EAZg_AyCSN_fW2wzFM9tp2j3Wh.fUw
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	The Integrated System Policy is reviewed periodically for continued suitability and adequacy. The Policy clearly describes the Entity's commitment to the use and provision of resources to ensure continuous improvement. The Policy is signed by the Executive Board.

CRITERION	RATING	COMMENT
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	The Integrated System Policy is communicated internally through the company intranet and on notice boards in all offices. It is available to external interested parties on the website: https://fondital.my.salesforce.com/sfc/p/#58000000Z4PW/a/4I0000026ZGd/v6t2sOG8qnpV3EAZg_AyCSN_fW2wzFM9tp2j3Wh.fUw
2.2 Leadership	Conformance	The Entity has appointed a manager tasked with supervising and ensuring the correct implementation of all Management Systems and with direct responsibility for the integrated requirements.
2.3a Environmental and Social Management Systems (environmental)	Conformance	The Entity has implemented an Environmental Management System, which is third-party certified to ISO 14001 certified.
2.3b Environmental and Social Management Systems (social)	Conformance	The Entity has implemented a Social Responsibility Management System which is integrated with the social responsibility requirements.
2.4 Responsible Sourcing	Conformance	The Entity has implemented a Code of Ethics and Integrated System Policy that covers Environment, Energy, Health and Safety, Quality and Social Responsibility. These are shared with suppliers. The Entity conducts periodic monitoring of suppliers and outsourcers to ensure they follow environmental, energy and safety issues. This Policy is formalised in the Entity's procurement procedures as part of their integrated Management System.
2.5 Impact Assessments	Conformance	The Entity has established processes to undertake Impact Assessments for New Projects or Major Changes. The Management System lists all Stakeholders and the impact on their interests while also incorporating a gender analysis. In addition, the Entity has a documented health and safety risk assessment, as required by Legislative Decree 81/2008.
2.6 Emergency Response Plan	Conformance	The Entity has certified its sites with a safety and Environmental Management System compliant with ISO 14001 and 45001 standards and has developed environmental and safety emergency plans in compliance with local legislation. (Legislative Decree 81/2008 for Safety and Legislative Decree 152/06 for the environment).
2.7 Mergers and Acquisitions	Conformance	The Entity has defined a process within the framework of the Legislative Decree 231/01 Model that requires, the preparation of a Due Diligence and risk analysis in the case of any acquisition.

CRITERION	RATING	COMMENT
2.8 Closure, Decommissioning and Divestment	Conformance	There are no divestments planned by the Entity. However, if they occur in future, the Entity has established a process to develop a management plan. If a closure, decommissioning, divestment, merger, or acquisition is planned, the Collective Bargaining Agreement (CBA) and environmental permit rules will be adhered, to minimise impacts on Stakeholders.
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Minor Non-Conformance	The Entity's Sustainability Report (for the 2020 - 2022 period) is in development and has not yet been released. The Sustainability Report has been prepared in accordance with the Global Reporting Initiative (GRI) Guidelines. The topics addressed in the Sustainability Report fully meet the requirements of the ASI standard. However, the report is in draft and not yet publicly disclosed.
3.2 Non-compliance and liabilities	Conformance	As of the date of the audit, there have been no significant fines, judgments or penalties related to non-compliance with Applicable Law received by the Entity. There are no disputes of any kind or nature. Should such situations arise in the future, the Entity will disclose these publicly through the Sustainability Report.
3.3a Payments to governments (legal and contractual)	Conformance	The Entity has established a Management System, in accordance with the Model Legislative Decree 231/01, which includes both a Code of Ethics and internal controls on Anti-Corruption undertaken by the Supervisory Board. This process requires the presence of a control body, composed of both internal and external participants, with the task of supervising the application, effectiveness and updating of the Model.
3.3b Payments to governments (disclosure – bauxite mining)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
3.4 Stakeholder complaints, grievances and requests for information	Conformance	The Entity has implemented a grievance mechanism that is publicly available and is included in the Code of Ethics: https://fondital.my.salesforce.com/sfc/p/#58000000Z4PW/a/4I0000026ZGd/v6t2sOG8qnpV3EAZg_AyCSN_fW2wzFM9tp2j3Wh.fUw Stakeholders can contact the Entity via the email: odv@fondital.it .
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	The Entity has developed a Life Cycle Assessment (LCA) report which provides a cradle-to-gate analysis

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		of the production process of Automotive Aluminium Parts.
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	The LCA report is not published on the website however is provided to interested parties upon request.
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	The LCA report is not published on the website however is provided to interested parties upon request.
4.2 Product design	Conformance	The Entity produces products according to customer specifications, so it does not undertake product design and development. However, the Entity has established a procedure that defines the steps to be followed for product design if and as required.
4.3a Aluminium Process Scrap (targets)	Conformance	The Entity monitors all production cycles for each phase of the process and records standard process rejects and extra rejects using dedicated software. Measurements are used to minimise waste in each cycle and to standardise it. Process waste is reduced to a minimum and fully respects the parameters defined by ASI.
4.3b Aluminium Process Scrap (alloy separation)	Conformance	The Entity has established internal procedures for waste recovery in accordance with the provisions of the ISO 14001 certified Environmental Management System. Aluminium alloys are identified and separated correctly. This process is critical for the management and recycling of any non-conforming castings.
4.4a Collection and recycling of products at end-of-life (strategy)	Conformance	The Entity has implemented internal procedures for waste recovery in accordance with the provisions of the ISO 14001 certified Environmental Management System. The Entity uses a significant amount of recycled material.
4.4b Collection and recycling of products at end-of-life (engagement)	Conformance	The Entity has implemented a process for receiving Aluminium waste from collection centres. The sorting, shredding treatment, and preparing of the material for the smelter is managed by Raffmetal (Group company and sole supplier of scrap for smelting), which is ASI Certified.
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		
5.1 Disclosure of GHG emissions and energy use	Conformance	The Entity monitors all energy consumption that generates direct (i.e., natural gas) or indirect (i.e., electricity) emissions to overall Greenhouse Gases (GHG) emissions. Based on this monitoring, potential efficiency projects are analysed to achieve a continuous reduction in consumption. The Entity has

CRITERION	RATING	COMMENT
		accounted for GHG emissions in accordance with ISO 50001. A document on GHG emissions and energy use is available upon request and it is planned to be included in the next publication of the Sustainability Report.
5.2 GHG emissions reductions	Conformance	The Entity monitors all energy consumption that generates direct (i.e., natural gas) or indirect (i.e., electricity) emissions to overall greenhouse gas emissions. Based on this monitoring, potential efficiency projects are analysed to achieve a continuous reduction in consumption. The Entity has accounted for GHG emissions in accordance with ISO 50001 and the information is available upon request.
5.3a Aluminium Smelting (management system)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.3b Aluminium Smelting (up to and including 2020)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.3c Aluminium Smelting (after 2020)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
PRINCIPLE 6 EMISSIONS, EFFLUENTS AND WASTE		
6.1 Emissions to Air	Conformance	The Entity has an Environmental Authorisation (AIA or Integrated Environmental Permit), which includes the management of atmospheric emissions, in accordance with Legislative Decree 152/2006. The Entity annually reports its atmospheric emissions to the public administration authority. The Entity conducts internal audits of compliance and the verification of reporting to the public administration authority is undertaken of the ISO 14001 certification requirements.
6.2 Discharges to Water	Conformance	The Entity's plants are equipped with a water recycling system consisting of evaporative tower recycling. The point of final discharge of wastewater is monitored to prevent any kind of external contamination. The Environmental Management System ensures compliance with mandatory regulations and with Legislative Decree 152/06.
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	The Entity has conducted an assessment where Spills and Leakage may occur and is referenced within the environmental risk assessment developed in compliance with the requirements of the ISO 14001 certification.

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6.3b Assessment and Management of Spills and Leakage (management)	Conformance	The Entity has prepared a series of internal control procedures and programs for the management of emergencies including Spills and Leakage. Specific training tests are undertaken annually for the management of environmental emergencies. The emergency plans are developed in accordance with the requirements of the ISO 14001 certification and compliance with Legislative Decree 152/06.
6.4a Reporting of Spills (immediate disclosure)	Conformance	The Entity holds an environmental authorisation conforming to Italian law Dlgs. 152/2006 (Autorizzazione Integrata Ambientale (AIA): Environmental Integrated Authorisation). This authorisation includes waste management, and the Entity must communicate to the public administration any Spills and Leakage. The Entity has demonstrated there is no evidence of uncontrolled Spills or Leakage.
6.4b Reporting of Spills (regular reporting)	Conformance	The Entity reports the type and potential impact of any Spills and environmental incidents through the Sustainability Report and in accordance with the relevant procedure. No environmental accidents have yet been recorded.
6.5a Waste management and reporting (strategy)	Conformance	Based on the principles of sustainability and circularity, the Entity aims to maximise waste recovery by sending only a small (non-recoverable) part of waste for disposal. Aluminium waste produced at all stages through the production process is recovered internally and remelted. Waste is managed in accordance with the provisions of Legislative Decree 152/06 and within the framework of ISO 14001 certification.
6.5b Waste management and reporting (disclosure)	Conformance	The Entity is required to report the amount of Hazardous and Non-Hazardous Waste produced in accordance with Legislative Decree 152/06 and as required by ISO 14001 certification. Waste has been considered in the Entity's environmental risk assessment. Legislative Decree 152/2006 also requires the Entity to produce an annual report called MUD (Modello Unico di Dichiarazione), which must be sent annually to the public administration.
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.

CRITERION	RATING	COMMENT
6.6d Bauxite Residue (marine and aquatic environments)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6e Bauxite Residue (state of the art technologies)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6f Bauxite Residue (remediation)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7a Spent Pot Lining (SPL) (storage and management)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7b Spent Pot Lining (SPL) (recovery and recycling)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
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	Slag is recovered and disposed of in accordance with Legislative Decree 152/06 and with the ISO 14001 standard.
6.8b Dross (recycling)	Conformance	The Entity recovers and disposes of Slag in accordance with Legislative Decree 152/06 and ISO 14001. The Entity monitors and recycles Slag in its production process. Slag data are monitored and are available with product details. All Slag that cannot be recycled in the process is sent to waste treatment plants with appropriate technology to recycle Slag.
6.8c Dross (review of alternatives)	Conformance	Slag is recovered and disposed of in accordance with Legislative Decree 152/06 and the applied ISO 14001 standard. All Slag that cannot be recycled in the process is sent to waste treatment plants with appropriate technology to recycle Slag.
PRINCIPLE 7 WATER STEWARDSHIP		
7.1a Water assessment (mapping)	Conformance	The Entity has conducted an environmental analysis that includes the mapping of water sources and uses. Both the Entity's plants hold environmental permits that comply with Legislative Decree 152/2006. A permit for well water extraction called 'Concession for the small derivation of groundwater, by means of a well' is also held by the Entity.

CRITERION	RATING	COMMENT
7.1b Water assessment (risk assessment)	Conformance	The Entity has undertaken a risk assessment that specifically assessed water-related risks. Additionally, the Entity has received an environmental permit under Legislative Decree 152/2006, which sets quotas for both water withdrawal and discharge. The main water-related risk identified relates to the exceedance of concession limits.
7.2a Water management (management plans)	Conformance	The Entity has implemented Internal audits and operational control measures to manage and monitor water use. However, consumption is typically much lower than authorised.
7.2b Water management (monitoring)	Conformance	Monitoring of water consumption is undertaken monthly and recorded in a special register. The data recorded during the monitoring period, referring to the amount of water delivered illustrates a level of consistency in consumption.
7.3 Disclosure of water usage and risks	Conformance	The Entity is required to monitor its consumption in accordance with the provisions of Legislative Decree 152/06 and ISO 14001. The Entity makes this information available upon request through the Sustainability Report prior to its publication.
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	The Entity has conducted a biodiversity risk assessment as part of the overall environmental risk assessment. No significant risks to biodiversity were identified.
8.2a Biodiversity management (biodiversity action plans)	Not Applicable	This Criterion is not applicable, as the Entity identified Material biodiversity impacts in the risk assessment as low.
8.2b Biodiversity management (consultation and mitigation hierarchy)	Not Applicable	This Criterion is not applicable, as the Entity identified Material biodiversity impacts in the risk assessment as low.
8.2c Biodiversity management (reporting)	Not Applicable	This Criterion is not applicable, as the Entity identified Material biodiversity impacts in the risk assessment as low.
8.3 Alien Species	Conformance	The likelihood of introducing exotic species that could have negative or significant impacts on biodiversity is low. A risk assessment of biodiversity has been undertaken as part of the overall environmental risk assessment.
8.4a Commitment to “No Go” in World Heritage properties (exploration and new mines)	Not Applicable	This Criterion is not applicable to the Entity’s Certification Scope.

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8.4b Commitment to “No Go” in World Heritage properties (existing mines)	Not Applicable	This Criterion is not applicable to the Entity’s Certification Scope.
8.5a Mine rehabilitation (best available techniques)	Not Applicable	This Criterion is not applicable to the Entity’s Certification Scope.
8.5b Mine rehabilitation (financial provisions)	Not Applicable	This Criterion is not applicable to the Entity’s Certification Scope.
PRINCIPLE 9 HUMAN RIGHTS		
9.1a Human Rights Due Diligence (policy)	Conformance	The Entity’s commitment to respect for Human Rights is outlined in the Integrated System Policy, Code of Ethics and Model Legislative Decree 231/01. The Human Rights Due Diligence process is undertaken by the Entity consistently. Compliance with applicable mandatory labour law has also been verified.
9.1b Human Rights Due Diligence (process)	Conformance	The Entity’s commitment to respect for Human Rights is outlined in the Integrated Policy, Code of Ethics, and compliance with the Model Legislative Decree 231/01. Compliance with applicable mandatory labour law has also been verified. The Entity has implemented a Due Diligence Process based on the OECD Guidance.
9.1c Human Rights Due Diligence (remediation)	Conformance	The Entity’s commitment to respect for Human Rights is expressed in the Integrated System Policy, Code of Ethics and Legislative Decree 231/01 Model. There is no evidence of adverse Human Rights impacts in both the supply chain and internal management.
9.2 Women’s Rights	Conformance	The Entity has included Women’s specific rights as part of a risk assessment and has implemented a Human Resource procedure to conduct a gender gap analysis for the protection of women’s rights. The Entity has implemented a Due Diligence Process based on the OECD Guidance and conducted a risk assessment where the specific rights are women are identified.
9.3 Indigenous Peoples	Not Applicable	The Criterion is not applicable as the Entity does not operate on sites occupied by Indigenous Peoples.
9.4 Free, Prior, and Informed Consent (FPIC)	Not Applicable	The Criterion is not applicable as the Entity does not operate on sites that are occupied by Indigenous Peoples or projects that impact them.
9.5 Cultural and sacred heritage	Conformance	The Entity has conducted a risk assessment which is updated annually. No sacred or cultural heritage sites are present in the Entity’s Area of Influence because the Facilities are in an industrial area.

CRITERION	RATING	COMMENT
9.6a Resettlements (avoid or minimise)	Conformance	The Entity has conducted a risk assessment and is updated annually. No sacred or cultural heritage sites are present in the Entity's Area of Influence because the Facilities are in an industrial area.
9.6b Resettlements (where unavoidable)	Conformance	There are no resettlements expected. In the event of transfers and re-establishments of any facilities, an assessment of related social risks will be undertaken. Currently, there are none planned.
9.7a Local Communities (rights and interests)	Conformance	The Entity has conducted a risk assessment which is updated annually. The Entity's ASI Management System addresses environmental, social, cultural, gender and Human Rights impacts. Local Communities are included as Stakeholders as per ISO 14001 certification. No material risks have been identified that relate to Local Communities. Community relations are regulated by the relevant local authorities, municipality and province offices and ARPA (Regional Environmental Protection Agency). A communication channel is made available to Stakeholders.
9.7b Local Communities (impacts)	Conformance	Material risks have been identified that relate to Community relations are regulated by the relevant local authorities, municipality and province offices and ARPA (Regional Environmental Protection Agency).
9.7c Local Communities (livelihoods)	Conformance	The Entity supports Local Community development and employs approximately 66 per cent of the local population within the local area.
9.8 Conflict-Affected and High-Risk Areas	Conformance	The Entity has conducted a supplier risk assessment, which analysed the risks associated with the potential origin of the Aluminium used. It confirmed that suppliers are not located within conflict-prone areas.
9.9 Security practice	Conformance	The Entity does not use private security providers. Local police provide local security services as required.
PRINCIPLE 10 LABOUR RIGHTS		
10.1a Freedom of Association and Right to Collective Bargaining (freedom of association)	Conformance	The Entity's Senior management has no bias against unions, and Workers interviewed during the audit made note that they feel free to contact unions. There is a union representation at the Entity.
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Conformance	The Entity is part of the ongoing National Collective Labor Agreement (CCNL) agreed upon by industry representatives and union representatives.

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10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Not Applicable	This Criterion is not applicable as there are no restrictions to Freedom of Association and Collective Bargaining in Italy.
10.2a Child Labour (minimum age)	Conformance	There is no evidence of Child Labour at the Entity, and it is regulated by documents and the hiring process requires identification. Due diligence has been conducted and suppliers must sign the Code of Ethics and Integrated System Policy.
10.2b Child Labour (hazardous)	Conformance	There is no evidence of Child Labour at the Entity. The issue of Child Labour is regulated by documents. Supply chain Due Diligence has been conducted and suppliers must sign the Code of Ethics and Integrated System Policy.
10.2c Child Labour (worst forms)	Conformance	There is no evidence of Child Labour at the Entity and is regulated by documents. Supply chain Due Diligence has been conducted and suppliers must sign the Code of Ethics and Integrated System Policy.
10.3a Forced Labour (human trafficking)	Conformance	There is no evidence of Forced Labour at the Entity. Supply Chain Due Diligence has been conducted and suppliers must sign the Code of Ethics and Integrated System Policy.
10.3b Forced Labour (deposits, fees, advances)	Conformance	There is no evidence of Forced Labour at the Entity. Supply Chain Due Diligence has been conducted and suppliers must sign the Code of Ethics and Integrated System Policy. Workers do not have to pay any fees.
10.3c Forced Labour (migrant workers)	Conformance	There is no evidence of Forced Labour at the Entity. Supply chain Due Diligence has been conducted and suppliers must sign the Code of Ethics and company policy. Audit interviews and a document review confirm there are no requests to lodge deposits or any security payment.
10.3d Forced Labour (debt bondage)	Conformance	There is no evidence of Forced Labour at the Entity. Supply Chain Due Diligence has been conducted, and suppliers must sign the Code of Ethics and company policy. Audit interviews and a document review confirm there is no Debt Bondage.
10.3e Forced Labour (freedom of movement)	Conformance	There is no evidence of Forced Labour at the Entity. Supply Chain Due Diligence has been conducted and suppliers must sign the Code of Ethics and company policy. There are no restrictions on movement unless relating to safety issues. Workers are free to leave their workplace at the end of working hours, or in case of immediate danger.

CRITERION	RATING	COMMENT
10.3f Forced Labour (retention of identity papers, permits, certificates)	Conformance	There is no evidence of Forced Labour at the Entity. Supply Chain Due Diligence has been conducted, and suppliers must sign the Code of Ethics and the Company Policy. There is no evidence of original documents being retained.
10.3g Forced Labour (freedom to terminate employment)	Conformance	There is no evidence of Forced Labour at the Entity. Supply Chain Due Diligence has been conducted, and suppliers must sign the Code of Ethics and company policy. Workers can terminate their employment freely, in conformance to the rules of the Collective Bargaining Agreement.
10.4 Non-Discrimination	Conformance	There is no evidence of discrimination at the Entity including in hiring and career development. Statements on this are included in the Code of Ethics and Integrated System Policy. The Entity has established procedures for the hiring of personnel and the ongoing management of the employee-employer relationship.
10.5 Communication and engagement	Conformance	The Entity has established communication channels that are accessible to all Workers. Workers reported having access to supervisors and managers. A safety meeting is held once a year between managers and worker representatives, as required by local law.
10.6 Disciplinary practices	Conformance	The Entity's disciplinary measures are governed by the National Collective Labor Agreement (CCNL) and there is no evidence of violations.
10.7a Remuneration (living wage)	Conformance	The wage level is regulated by the National Collective Labor Agreement (NCA) valid from January 2021. A basic wage calculation was used for 2023 which determined the lowest wage payable by the Entity to be higher than this.
10.7b Remuneration (method of payment)	Conformance	The Entity issues all Workers a legible pay check and wages are paid as required by the Collective Bargaining Agreement (CCNL) every month by bank transfer.
10.8 Working Time	Conformance	The Entity complies with Applicable Laws and industry standards on working hours. Working hours are recorded and Overtime is always voluntary. Attendance, absences, annual leave, and sick leave are recorded on the payroll. There are no recorded cases of Overtime hours beyond the legal limits.

CRITERION	RATING	COMMENT
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	The Entity has implemented a Management System that is ISO 45001 certified. The Entity complies with all mandatory health and safety regulations, including Legislative Decree 81/08.
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	The Entity has implemented a Management System that is ISO 45001 certified. The certification ensures compliance with mandatory health and safety regulations, including Legislative Decree 81/08. The Entity's Integrated System Policy, includes a commitment to comply with the law.
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Conformance	The Entity is ISO 45001 certified. The certification ensures compliance with mandatory health and safety regulations, including Legislative Decree 81/08. The commitment to comply with Applicable Laws on Workers' health and safety is included in Integrated Policy. Italy subscribes to ILO Conventions and therefore compliance with Italian laws also ensures compliance with the conventions.
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	The company is ISO 45001 certified. The certification demonstrates compliance with mandatory health and safety regulations, including Legislative Decree 81/08. Workers are aware of the risks and safe practices for their duties and their right to refuse or stop unsafe work. This is enshrined in the Italian Occupational Health and Safety law Legislative Decree 81/08. The Entity's Integrated policy includes a commitment to comply with the law.
11.2 OH&S Management System	Conformance	The Entity is ISO 45001 certified. The Integrated Policy signed by the Executive Board, includes a commitment to implement to ensure ethical propriety, land protection, and respect for human and social rights.
11.3 Employee engagement on health and safety	Conformance	Each worker is trained to report situations that may affect both health and safety and the environment. During the interviews, Workers demonstrated that they were aware of this mechanism. The Entity holds an annual meeting whereby the health and safety representative, the employer, and the employees meet.
11.4 OH&S performance	Conformance	The Entity has established a procedure for monitoring health and safety performance as part of the integrated Management System. As required by Legislative Decree 81/2008, an annual meeting to review health and safety performance is mandatory with senior management, worker representatives and a competent

CRITERION	RATING	COMMENT
		physician. The minutes of the meeting were reviewed, and indicators related to the frequency and severity of accidents, near misses, and medical examination results and improvements were discussed.

Document Control and Version History

Revision	Date	Notes
0	28 May 2025	Transfer of Initial Certification Audit details (as relevant) from Fondital SpA Certificate 293 Rev 0 as Special Alloys was removed due to ownership change. The company name changed to Silval SpA.