

ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

Metra S.p.A – Foall S.r.l.

CERTIFICATE NUMBER
205

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

DATE OF ISSUE
31 JULY 2025

CERTIFICATION LEVEL
**FULL
CERTIFICATION**

DATE OF EXPIRY
30 JULY 2028

ASI ACCREDITED
AUDITING FIRM
**BUREAU VERITAS
CERTIFICATION**

CERTIFIED SINCE
1 JUNE 2022

AUTHORISED BY

A stylized, handwritten signature in black ink, consisting of a large, flowing 'M' followed by a horizontal line.

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

CERTIFICATION SCOPE

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

AUDIT REPORT PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Metra Holding S.p.A.
ENTITY NAME	Metra S.p.A. – Foall S.r.l.
CERTIFICATION SCOPE	Re-melting of primary and secondary Aluminium and manufacture of Aluminium alloy extruded sections in Rodengo Saiano, Italy.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthousesSemi-FabricationMaterial Conversion
ASI STANDARD	<ul style="list-style-type: none">Performance Standard V3.1
AUDIT TYPE	<ul style="list-style-type: none">Initial Certification Audit (20 – 21 April 2022)Surveillance Audit (27 – 28 November 2023)Re-Certification Audit and Scope Change (8 – 10 April 2025)
AUDIT FIRM	Bureau Veritas Certification
AUDIT DATE	<ul style="list-style-type: none">20 – 21 April 2022 (Initial Certification Audit)27 – 28 November 2023 (Surveillance Audit)8 – 10 April 2025 (Re-Certification Audit and Scope Change)
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">9 May 2022 (Initial Certification Audit)28 December 2023 (Surveillance Audit)28 April 2025 (Re-Certification Audit and Scope Change)
AUDIT SCOPE	<p><u>Initial Certification Audit (20 – 21 April 2022)</u></p> <p>The Audit Scope included the re-melting of primary and secondary Aluminium (Foall S.r.l.) and manufacture of Aluminium alloy extruded sections (Metra S.p.A.) in Rodengo Saiano, Italy.</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthousesSemi-FabricationMaterial Conversion (Production and Transformation) <p>All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.</p> <p><u>Surveillance Audit (27 – 28 November 2023)</u></p> <p>The Audit Scope included the re-melting of primary and secondary Aluminium (Foall S.r.l.) and manufacture of Aluminium alloy extruded sections (Metra S.p.A.) in Rodengo Saiano, Italy.</p>

Supply chain activities included in the Audit Scope:

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

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

Re-Certification Audit and Scope Change (8 – 10 April 2025)

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

Supply chain activities included in the Audit Scope:

- Aluminium Re-melting/Refining
- Casthouses
- Semi-Fabrication
- Material Conversion

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

AUDIT OUTCOME

- Certification

AUDIT METHODOLOGY
DECLARATION

The Auditors confirm that:

- ☒ The information provided by the Entity is true and accurate to the best knowledge of the Auditor(s) preparing this report.
- ☒ The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous.
- ☒ The Audit Scope and audit methodology are sufficient to establish confidence that the findings are indicative of the performance of the Entity's defined Certification Scope.
- ☒ The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.

CERTIFICATION PERIOD

31 July 2025 – 30 July 2028

NEXT AUDIT TYPE

Surveillance Audit

NEXT AUDIT DATE

30 January 2027

CERTIFICATE NUMBER

205



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

Metra Holding (the 'Entity') is located in Rodengo-Saiano, near Brescia in northern Italy and produces extruded Aluminium alloy profiles for construction and industrial use. The Entity was founded in 1962 and has continued to evolve throughout its history, with a current production capacity of over 190,000 tonnes of Aluminium per year. In recent years the Entity has undergone notable changes by merging new companies within the Metra Group and expanding in new sectors, including a railway division, with financial support for this expansion provided by KPS Capital Partners. The Entity currently employs approximately 310 persons and is located in an industrial precinct which is surrounding to the east and south by agricultural land, with the nearest residential areas located approximately 400 metres to the north-west.

Metra is the leading company of the Foall Group, which has a foundry that is included in the Certification Scope, as it is the foundry that feeds the extrusion lines of Metra.

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	Medium	HIGH
RISKS	High	High	High	HIGH
PERFORMANCE	High	High	High	HIGH
OVERALL	HIGH			

FINDINGS

CRITERION	RATING	COMMENT
1. BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity operates a Management System, based on local law which ensures Compliance with Applicable Law. The Entity has implemented a procedure to review and update the legal requirements related to the environment, Health and Safety, work-related law and financial matters. Internal audits have been conducted by a specialised consultant for Health and Safety and environmental matters. External consultants provide updates on legal requirements.
1.2 Anti-Corruption	Conformance	The Entity operates a Management System, based on local law which ensures Compliance with Applicable Law and includes anti-Corruption. The Entity's Code of Ethics is publicly available: https://www.metra.eu/pdf/Metra_CodiceEtico.pdf (in Italian only) There is no evidence of any incidents related to Bribery and Corruption.
1.3a-e Code of Conduct	Conformance	The Entity operates a Management System, based on local law which ensures Compliance with Applicable Law. The Entity has implemented a Code of Conduct and prepared a Sustainability Report, both available at: https://www.metra.eu/pdf/Metra_CodiceEtico.pdf (in Italian only) https://www.metra.eu/pdf/rendicontazione-non-finanziaria-asi-gruppo-metra-2023.pdf (in English) Training on the Code of Conduct is provided to all Workers and information is available for all interested parties.
2. POLICY AND MANAGEMENT		
2.1a-f Environmental, Social, and Governance Policy	Conformance	The Entity has an integrated Environmental and Social Policy consistent with the environmental, social and governance practices of ASI Standards publicly available at: https://www.metra.eu/pdf/metra-politica-integrata-it.pdf It is signed by the Entity's Chief Executive Officer and was last reviewed in March 2025.
2.2a-c Leadership	Conformance	The Entity has appointed a senior manager as a Management Representative to ensure ongoing conformance with the ASI Performance Standard.
2.3a Environmental and Social Management Systems – Environmental	Conformance	The Entity is operated by two legal entities, Metra S.p.A. (a producer of extruded profiles) and Foall S.r.l. (a re-melter producing billets and ingots) and has implemented an Environmental Management System (EMS). The Metra division of the Entity's EMS is certified to ISO 14001 and the Certificate is available at: https://www.metra.eu/certificazioni/ Foall operates an Environment Management System (not certified to date), and conducts environmental analysis and undergoes internal audits.
2.3b Environmental and Social Management Systems – Social	Conformance	The Entity's Environmental and Social Policy includes statements on social responsibility, and a Sustainability Report is publicly available and provides information on Social Management System

CRITERION	RATING	COMMENT
		<p>performance. A Social Responsibility Manual has been issued and was last reviewed in February 2025.</p> <p>Social issues are included in the Entity's management review process. A Social Performance Report is publicly available at https://www.metra.eu/pdf/rendicontazione-non-finanziaria-asi-gruppo-metra-2023.pdf</p> <p>The Environmental and Social Policy is available at: https://www.metra.eu/pdf/metra-politica-integrata-it.pdf</p>
2.4a-e Responsible Sourcing	Conformance	<p>The Entity has implemented procedures for the qualification of suppliers for Management Systems certified against ISO 9001, ISO 14001; ISO 45001 and the ASI Performance Standard. The Entity has undertaken a supplier risk assessment, and all suppliers are informed of the integrated Policy and Code of Ethics and are required to complete Supplier Evaluation Forms.</p> <p>The Entity has a Conflict Minerals Reporting questionnaire which is sent to the main customers of Metra and the risk assessment identified that there are no minerals from Conflict-Affected and High-Risk Areas (CAHRAs) used.</p> <p>Statements on responsible sourcing are included in the Integrated Policy and the Sustainability Report, both available at: https://www.metra.eu/sostenibilita/</p>
2.5a-g Environmental and Social Impact Assessments	Not Applicable	<p>This Criterion is not applicable to the Entity as there have been no recent Major Changes and/or New Projects within the scope of the Entity.</p> <p>The Entity has implemented procedures that address environmental, social, cultural, gender topics and Human Rights Impact Assessments, should future Major Changes and/or New Projects occur.</p>
2.6a-h Human Rights Impact Assessment	Not Applicable	<p>This Criterion is not applicable to the Entity as there have been no recent Major Changes and/or New Projects within the scope of the Entity.</p>
2.7a-f Emergency Response Plan	Conformance	<p>The Entity has developed and implemented Emergency Response Plans in accordance with its established Environmental Management System. The emergency procedure is clearly presented at the Entity's premises and communicated to all persons entering the Facility. A copy of the Plans can be provided upon request via a lodged request at: https://www.metra.eu/contatti/</p>
2.8a-d Suspended Operations	Conformance	<p>The Entity has developed a procedure that aims to increase resilience and ensure its business plan remains updated with potential scenarios that could lead to the suspension of its operations.</p>
2.9a-b Mergers and Acquisitions	Conformance	<p>The Entity has developed a procedure that addresses environmental, social, cultural, gender issues and overall Human Rights Impact Assessments associated with Major Changes, which covers mergers and acquisitions.</p>
2.10a-b Closure, Decommissioning and Divestment	Conformance	<p>The Entity has developed a procedure that addresses environmental, social, cultural, gender issues and overall Human Rights Impact</p>

CRITERION	RATING	COMMENT
		Assessments associated with any closure, decommissioning and divestment activities.
3. TRANSPARENCY		
3.1a-b Sustainability Reporting	Conformance	<p>The Entity has produced a Sustainability Report which is publicly available at: https://www.metra.eu/pdf/rendicontazione-non-finanziaria-asi-gruppo-metra-2023.pdf</p> <p>The Report discloses information on environmental, social and Health and Safety impacts. At the time of the Audit, an updated Sustainability Report was being finalised which will disclose data for the 2024 calendar year.</p>
3.2 Non-compliance and Liabilities	Conformance	<p>The Entity has produced a Sustainability Report which is publicly available at: https://www.metra.eu/pdf/rendicontazione-non-finanziaria-asi-gruppo-metra-2023.pdf</p> <p>The Report discloses information on environmental, social and Health and Safety impacts. At the time of the Audit, an updated Sustainability Report was being finalised which will disclose data for the 2024 calendar year.</p> <p>Economic impacts and a complete accountability statement as per Italian law have been communicated to the local Chamber of Commerce and are publicly available on request to the Chamber of Commerce of Brescia: https://bs.camcom.it/</p>
3.3a-c Payments to Governments	Conformance	Italian law forbids payments to the public administration outside a legal or contractual basis. The Entity has a Management System to ensure Compliance with local law. There is no evidence of any violations on this issue.
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	<p>The Entity's complaint mechanism is described in its Code of Ethics: https://www.metra.eu/pdf/codice-di-condotta-manuale-e-bilancio-etico-sociale-2025.pdf</p> <p>Any complaints can be lodged using this link: https://www.metra.eu/pdf/mod-segnalazione-reclami.pdf</p> <p>In addition, a 'whistleblowing' procedure has been implemented as per local laws, and is publicly available at: https://extranet.metra.eu/canale-di-denuncia.html</p>
4. MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment	Conformance	The Environmental Product Declaration (EPD) Report for the Entity's five main products was last updated in 2022 (with reference data for 2020 and 2021) and includes key Life Cycle Assessment (LCA) data.
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	<p>The Environmental Product Declaration (EPD) Report for the Entity's five main products was last updated in 2022 (with reference data for 2020 and 2021) and includes key LCA data and is publicly available on request or available for download at: https://www.epditaly.it/ricerca-epd/?wpv_view_count=100003484&wpv-tipologia-epd=0&wpv_post_search=Metra&wpv_filter_submit=Cerca</p>

CRITERION	RATING	COMMENT
4.2 Product Design	Conformance	The Entity is not engaged in the design and development of products, because its work is exclusively based on the customer's design. The objectives on the environmental impacts of the Product coincide with environmental objectives of the client company in reducing energy consumption and use of raw materials.
4.3a-b Aluminium Process Scrap	Conformance	The Entity has a very low production rate of process Scrap. Scrap that cannot be recycled using the Entity's technologies is delivered to waste treatment plants to be recycled. The Audit identified adequate separation of all materials including raw Aluminium alloys and other materials to be added to produce alloys as a finished product.
4.4a-c Collection and Recycling of Products at End of Life – Material Conversion and other Manufacturing	Conformance	The Entity's environmental authorisation (conforming to Italian law Dlgs.152/2006) includes waste management. Following the principles of authorisation, the Entity on an annual basis, must communicate to public administration its production of wastes and the final destination of wastes. The name of this declaration is MUD (Modello Unico di Dichiarazione: Unique Form of Declaration).
4.4d Collection and Recycling of Products at End of Life	Conformance	The Entity's environmental authorisation (conforming to Italian law Dlgs.152/2006) includes waste management. Following the principles of authorisation, the Entity on an annual basis, must communicate to public administration its production of wastes and the final destination of wastes. The name of this declaration is MUD (Modello Unico di Dichiarazione: Unique Form of Declaration).
5. GREENHOUSE GAS EMISSIONS		
5.1a-b Disclosure of GHG Emissions and Energy Use	Minor Non-Conformance	<p>The Entity publicly reports its Greenhouse Gas (GHG) Emissions and energy use performance via its Annual Emissions List 2023/Carbon Footprint Report. Two scenarios are evaluated. The first (Scenario 1) is relative to the totality of the new organisational structure including Metra Color and Metra components.</p> <p>The second (Scenario 2), on the other hand, does not include the two absorbed companies and is comparable with the emissions prior to the 2023 merger.</p> <p>Although the GHG calculations and the data collection are publicly available, the report does not explicitly state which GHG Protocol scopes are covered in each scenario. Additionally, Scope 3 emissions are not clearly reported in the Sustainability Report.</p> <p>A complete analysis of GHG-related performance is available in the Sustainability Report, available at: https://www.metra.eu/pdf/rendicontazione-non-finanziaria-asi-gruppo-metra-2023.pdf</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.

CRITERION	RATING	COMMENT
5.3a GHG Emissions Reduction Plans	Conformance	<p>The Entity has developed a GHG Emissions Reduction Plan and established a specific pathway, which is included in the Entity's management review with the pathway developed (for both foundries) using the ASI Pathway Calculation Tool. The complete program with details of phases, resources, means, and timelines is available on the Metra Sustainability Plan (internal company document).</p> <p>An extract of the information is publicly available in the Sustainability Report, available at: https://www.metra.eu/pdf/rendicontazione-non-finanziaria-asi-gruppo-metra-2023.pdf</p>
5.3b-e GHG Emissions Reduction Plans – Targets, review and disclosure	Minor Non-Conformance	<p>The Entity has developed an emissions reduction plan and reduction pathway using ISO 14064-1:2019-based methodology. The Entity has ensured that the pathways development approach used in its ISO 14064 calculations is consistent with the ASI Pathways Calculation Tool. A full set of goals and both intermediate and end targets have been set to reduce GHG emissions by 2050.</p> <p>The main GHG reduction objectives are detailed in the Entity's Organisational Carbon Footprint Report, however, a full copy of this Report is currently not available to the public. The complete program with details of phases, resources, means, and timeliness is also included in the Metra Sustainability Plan, which is also currently an internal company document. An extract is available on request only, via: https://www.metra.eu/contatti/</p> <p>An extract of the information is publicly available in the Sustainability Report, available at: https://www.metra.eu/pdf/rendicontazione-non-finanziaria-asi-gruppo-metra-2023.pdf</p>
5.4 GHG Emissions Management	Conformance	<p>The Entity's Environmental Management System (EMS) incorporates the operational and procedural controls for all GHG Emissions on site. GHG-related goals and targets have been set to reduce GHG emissions up to 2050 and actions have been developed and incorporated into the Entity's EMS.</p>
6. EMISSIONS, EFFLUENTS AND WASTE		
6.1a-f Emissions to Air	Conformance	<p>Both the Entity's two Facilities have its own environmental authorisation conforming to Italian law Dlgs. 152/2006. As per the authorisations, each emissions point must be monitored, and a test must be conducted annually. The reports are disclosed to local authorities and are compliant with legal requirements and within the legal limit.</p>
6.2a-g Discharges to Waters	Conformance	<p>Both the Entity's two Facilities have its own environmental authorisation conforming to Italian law Dlgs. 152/2006. As per these authorisations, each emissions point must be monitored, and a test must be conducted annually. The reports are disclosed to local authorities and are compliant with legal requirements and within the legal limit.</p>
6.3a-g Assessment and Management of Spills and Leakages	Conformance	<p>The Entity has a Management System developed in accordance with the ISO 14001 standard, and a risk assessment including Spills and Leakages has been performed.</p> <p>The environmental risk assessment assigns a very low value to the risk of Spills and Leakages in indoor areas and a high value in outdoor areas. In any case, if one of these events occurs, it is a non-</p>

CRITERION	RATING	COMMENT
		<p>compliance with the ISO 14001 Management System and, as an emergency, must be addressed following the Emergency Plan and the Spill procedure and included in the Sustainability Report.</p> <p>https://www.metra.eu/pdf/rendicontazione-non-finanziaria-asi-gruppo-metra-2023.pdf (in English)</p>
6.4a-b Public Disclosure of Spills and Leakages	Conformance	<p>If a Spill event occurs, information will be disclosed in the Sustainability Report, available at: https://www.metra.eu/pdf/rendicontazione-non-finanziaria-asi-gruppo-metra-2023.pdf (in English)</p>
6.5a-c Waste Management and Reporting	Conformance	<p>As per its ISO 14001 Environmental Management System, the Entity has developed and implemented procedures for managing waste to ensure that the majority of waste material is recycled. The Entity's Environmental Authorisation (conforming to Italian law Dlgs. 152/2006) requires the Entity to communicate to the public administration on an annual basis its production of wastes and the final destination of wastes as per the Modello Unico di Dichiarazione Ambientale (the MUD).</p> <p>The MUD is available on request from the local Chamber of Commerce via: https://www.bs.camcom.it</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	Conformance	<p>All Aluminium Scrap produced at the Entity is re-melted in the foundry, resulting in only an eligible amount of waste Aluminium. Dross is treated as waste in accordance with the European Waste Code (EWC) 100315, and it is sent off-site for recovery.</p> <p>The Entity has established a target of at least 90 percent Dross recovery. For the past two years, the rate of Dross recovery has been 100 percent.</p>
7. WATER STEWARDSHIP		
7.1a-b Water Assessment and Disclosure	Conformance	<p>The Entity's operational water supply is obtained through authorised wells. The water supply for sanitary use, the canteen and the fire-fighting network is sourced from a local aqueduct.</p> <p>The EMS risk assessment confirmed that there are no significant water-related risks on site. Basic water consumption data is disclosed in the Sustainability Report, available at: https://www.metra.eu/pdf/rendicontazione-non-finanziaria-asi-gruppo-metra-2023.pdf</p>
7.2a-e Water Management	Not Applicable	This Criterion is not applicable to the Entity, as there are no significant water-related risks identified.
8. BIODIVERSITY AND ECOSYSTEM SERVICES		

CRITERION	RATING	COMMENT
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	The Entity has conducted a Biodiversity risk assessment as part of its general environmental risk assessment. There are no significant impacts on Biodiversity identified.
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Not Applicable	This Criterion is not applicable to the Entity, as the risks and potential impacts on Biodiversity and Ecosystem Services are assessed and documented as low.
8.2a-g Biodiversity Management	Not Applicable	This Criterion is not applicable to the Entity, as the risks and potential impacts on Biodiversity and Ecosystem Services 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. The Entity has assessed the risks and potential impacts on Biodiversity and Ecosystem Services are assessed and documented as low.
8.4 Alien Species	Conformance	The Entity has conducted a Biodiversity risk assessment as part of its general environmental risk assessment. There are no significant impacts on Biodiversity identified. However, the introduction of Alien Species is mitigated by internal processes including instructions for suppliers to treat wooden pallets according to international standards (i.e. ISPM).
8.5a-b Commitment to "No Go" in World Heritage Properties	Conformance	The Entity has assessed relevant databases, and it has been confirmed that there are no World Heritage Properties present within the Entity's Area of Influence.
8.6a-d Protected Areas	Conformance	The Entity has assessed relevant databases, and it has been confirmed that there are no Protected Areas present within the Entity's Area of Influence.
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 Policy that includes a statement on Human Rights, which has been signed by the CEO and was last reviewed in March 2025. The Policy is available at: https://www.metra.eu/pdf/metra-politica-integrata-it.pdf</p> <p>A Due Diligence assessment of Human Rights, with a specific focus on women's rights has been completed and is summarised in the following document: https://www.metra.eu/pdf/codice-di-condotta-manuale-e-bilancio-etico-sociale-2025.pdf</p> <p>The Entity commits to update this Policy at least every five years. There is no evidence of adverse Human Rights impacts in both the Entity's supply chain and internal activities.</p>

CRITERION	RATING	COMMENT
9.2a-e Gender Equity and Women's Empowerment	Conformance	<p>The Entity has developed and implemented a strategic plan for women empowerment, which is summarised in the following document: https://www.metra.eu/pdf/codice-di-condotta-manuale-e-bilancio-etico-sociale-2025.pdf</p> <p>The full document 'Strategic Plan for Women Empowerment' remains confidential, however, an extract is available upon request.</p>
9.3a-i Indigenous Peoples	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples within the Entity's Area of Influence.
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 within the Entity's Area of Influence.
9.4b Free, Prior, and Informed Consent (FPIC) - Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9.4c Free, Prior, and Informed Consent (FPIC) - Demonstrate support	Not Applicable	<p>This Criterion is not applicable to the Entity, as there are no Indigenous Peoples within the Entity's Area of Influence.</p> <p>However, the Entity has developed a procedure that addresses environmental, social, cultural, gender and overall Human Rights Impact of change including Indigenous Peoples' rights.</p>
9.5a Cultural and Sacred Heritage - Identification	Conformance	<p>A risk assessment has been completed that considered features of Cultural and Sacred Heritage, of which a summary is provided in the following: https://www.metra.eu/pdf/codice-di-condotta-manuale-e-bilancio-etico-sociale-2025.pdf</p> <p>The risk assessment determined that there are no Cultural and Sacred Heritage sites are present in the Entity's Area of Influence.</p>
9.5b Cultural and Sacred Heritage - Impacts	Not Applicable	This Criterion is not applicable to the Entity, as no Cultural and Sacred Heritage sites are present in the Entity's Area of Influence.
9.6a-i Displacement	Not Applicable	<p>This Criterion is not applicable to the Entity, as there are no New Projects or Major Changes planned, and no Business activities that have resulted in displacement or resettlement.</p> <p>However, the Entity has developed a procedure that addresses environmental, social, cultural, gender and overall Human Rights in the event of significant change. There are no such events proposed nor foreseen to occur in the future.</p>
9.7a-h Affected Populations and Organisations	Conformance	<p>The Entity has developed a procedure that addresses environmental, social, cultural, gender and overall Human Rights. The Sustainability Report includes information on its efforts in sustaining the Local Community. The Report is available at: https://www.metra.eu/pdf/rendicontazione-non-finanziaria-asi-gruppo-metra-2023.pdf</p>
9.8a Conflict-Affected and High-Risk Areas - Strong Management Systems	Conformance	The Entity has completed a risk assessment for conflict minerals and has determined that no metal or minerals from Conflict-Affected High-Risk Areas (CAHRAs) are used. A supply chain map, risk areas

CRITERION	RATING	COMMENT
		and supplier evaluations contain detailed data. An extract of this information is available on request.
9.8b Conflict-Affected and High-Risk Areas – Identify and assess risks	Conformance	The Entity has completed a risk assessment for conflict minerals and has determined that no metal or minerals from CAHRAs are used.
9.8c Conflict-Affected and High-Risk Areas – Strategy to respond to risks	Conformance	The Entity has completed a risk assessment for conflict minerals and has determined that no metal or minerals from CAHRAs are used. A supply chain map, risk areas and supplier evaluations contain detailed data. An extract of this information is available on request.
9.8d Conflict-Affected and High-Risk Areas – Audit of due diligence	Conformance	The Entity's Due Diligence processes were included in the scope of this ASI Performance Standard Certification Audit and addresses this requirement.
9.8e Conflict-Affected and High-Risk Areas – Report annually	Conformance	The Entity's supply chain Due Diligence is disclosed in the Sustainability Report. A supply chain map, risk areas and supplier evaluations contain detailed data. An extract of this information is available on request.
9.9 Security practice	Conformance	Whilst there are no private security providers engaged at the Entity, a statement on security practices is included in the Entity's Code of Conduct, available at: https://www.metra.eu/pdf/codice-di-condotta-manuale-e-bilancio-etico-sociale-2025.pdf
10.1a-c Freedom of Association and Right to Collective Bargaining	Conformance	<p>The Entity's Senior Management endorses the presence of Trade Unions on site and Workers confirmed during Audit interviews that they feel free to contact Trade Unions. There are Trade Union representatives on site, which have been elected by Workers. A statement on Trade Unions is incorporated into the following two documents:</p> <p>https://www.metra.eu/pdf/metra-politica-integrata-it.pdf</p> <p>https://www.metra.eu/pdf/codice-di-condotta-manuale-e-bilancio-etico-sociale-2025.pdf</p> <p>As is typical in Italy, the Entity operates a National Collective Bargaining Agreement (CBA) agreed by industry representatives and Trade Unions Representatives.</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 the right to Freedom of Association and Collective Bargaining are not restricted in the country (Italy) where the Entity operates.
10.2a Child Labour	Conformance	<p>There is no evidence on site of Child Labour. The Entity's position on Child Labour is detailed in the Code of Conduct. Refer to:</p> <p>https://www.metra.eu/pdf/codice-di-condotta-manuale-e-bilancio-etico-sociale-2025.pdf</p> <p>A supply chain Due Diligence was undertaken, and suppliers agreed to the Entity's Code of Ethics and Integrated Policy.</p>

CRITERION	RATING	COMMENT
10.3a-c Forced Labour	Minor Non-Conformance	<p>There is no evidence on site of Forced Labour. The Entity's position on Forced Labour is detailed in the Code of Conduct. Refer to: https://www.metra.eu/pdf/codice-di-condotta-manuale-e-bilancio-etico-sociale-2025.pdf</p> <p>A supply chain Due Diligence was undertaken, and suppliers agreed to the Entity's Code of Conduct and Integrated Policy.</p> <p>The Entity, however, has not yet prepared and disclosed a 'stand-alone' Modern Slavery Statement.</p>
10.4a-c Non-Discrimination	Conformance	<p>The Entity addresses Discrimination in its Code of Ethics and the Integrated Policy. There is no evidence of Discrimination on site. Promotion, advancement and salary are based on a 'Management By Objectives' (MBO) system and the 'Metra Group Annual Incentive Plan'. For Workers not involved in the MBO, there is a process to review their salary and/or position based on formal communications amongst managers and supervisors.</p>
10.5 Communication and engagement	Conformance	<p>Workers' representatives have free access to the Human Resources Department. Meetings are held quarterly and the safety meeting for managers and Workers' representatives are held annually according to local law.</p>
10.6a-g Violence and Harassment	Conformance	<p>The prevention and management of Violence and Harassment is included in the Code of Ethics and Policy. Refer to: https://www.metra.eu/pdf/metra-politica-integrata-it.pdf and https://www.metra.eu/pdf/codice-di-condotta-manuale-e-bilancio-etico-sociale-2025.pdf</p> <p>Disciplinary practices on site are ruled by local law 300/1970 and the National CBA. The whole matter of lawfulness in the workplace is ruled by the Entity's Human Resources Management procedure.</p>
10.7a-c Remuneration	Conformance	<p>The National CBA determines the wages of employees. An Entity-specific CBA ensures that wages provided are above the minimum legal thresholds. The lowest wage at the Entity is well above the 'living wage', as defined by the Italian National Statistics Institute (ISTAT).</p> <p>All Workers are provided with clear pay slips, and wages are paid monthly.</p>
10.8a-c Working Time	Conformance	<p>Each Worker has an electronic badge to record the start and end of each working shift, and these data are used to produce payslips. Leave entitlements and Overtime are defined by the CBA. The normal Working Time is 40 hours per week, Monday to Friday. Workers in production areas have different shift schemes as defined by the CBA at the Entity level. Overtime is regularly paid with extra allowances in accordance with the CBA.</p>
10.9a-b Informing Workers of Rights	Conformance	<p>Full information on working conditions is included in the letters of employment and the complete text of both National and Company Collective Bargaining Agreements. As per local law 300/1970 in Italy there is no restriction on Trade Union's activity on site.</p>

11. OCCUPATIONAL HEALTH AND SAFETY

CRITERION	RATING	COMMENT
11.1a Occupational Health and Safety (OH&S) Management System	Conformance	<p>The Entity has developed and implemented an Occupational Health and Safety (OH&S) Management System which is certified to ISO 45001. For the Foall site, the OH&S Management System is not certified but is managed consistently with ISO 45001.</p> <p>All OH&S risks have been identified and procedures and work instructions developed and implemented as required, and an annual review meeting with management and Worker representatives has been established.</p>
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Minor Non-Conformance	<p>As per local laws, the OH&S Management System is reviewed on an annual basis, where this review includes the analysis of what occurred in the previous year and the changes in Health and Safety management. There is a communication system established for Workers and their representatives to request changes, review any changes and keep any gaps under control. OH&S performance is publicly disclosed at: https://www.metra.eu/pdf/rendicontazione-non-finanziaria-asi-gruppo-metra-2023.pdf</p> <p>There are however, no leading indicators provided in the Sustainability Report, and no discussion or disclosure of any comparison of Health and Safety performance with peers.</p>
11.2 Employee engagement on Health and Safety	Conformance	<p>Workers' representatives for Health and Safety are freely elected by Workers. In accordance with local law, Workers' representatives participate in annual meetings with senior management.</p> <p>Workers can also access the complaints mechanism via a reporting and complaint form at: https://www.metra.eu/pdf/mod-segnalazione-reclami.pdf</p>

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DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	1 June 2022	Initial Certification Audit – Full Certification
1	17 January 2024	Surveillance Audit
2	31 July 2025	Re-Certification and Scope Change Audit – Full Certification Scope Change to apply Performance Standard V3.1.