

ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

Laminazione Sottile Group

CERTIFICATE NUMBER
124

ASI STANDARD
PERFORMANCE
STANDARD
(V3.1 2023)

DATE OF ISSUE
29 MARCH 2024

CERTIFICATION LEVEL
FULL
CERTIFICATION

DATE OF EXPIRY
28 MARCH 2027

ASI ACCREDITED
AUDITING FIRM
BUREAU VERITAS
CERTIFICATION

CERTIFIED SINCE
29 MARCH 2021

AUTHORISED BY

A handwritten signature in black ink, appearing to be 'J. H.', followed by a long horizontal line.

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

CERTIFICATION SCOPE

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

AUDIT REPORT PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Laminazione Sottile S.p.A.
ENTITY NAME	Laminazione Sottile Group
CERTIFICATION SCOPE	Manufacturing of semi-finished Aluminium coils and sheets at Laminazione Sottile Plant (Italy), coil coating at Italcoat Plant (Italy) and coating/printing at IPS Industrial Packaging Solution Plant (Italy).
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Semi-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 (21 – 29 January 2021)Surveillance Audit (2 – 5 May 2022)Re-Certification and Scope Change Audit (18 January – 26 February 2024)Surveillance Audit (10 – 28 March 2025)
AUDIT FIRM	Bureau Veritas Certification
AUDIT DATE	<ul style="list-style-type: none">21 – 29 January 2021 (Initial Certification Audit)2 – 5 May 2022 (Surveillance Audit)18 January – 26 February 2024 (Re-Certification Audit and Scope Change)10 – 28 March 2025 (Surveillance Audit)
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">27 February 2021 (Initial Certification Audit)30 June 2022 (Surveillance Audit)1 May 2024 (Re-Certification Audit and Scope Change)24 April 2025 (Surveillance Audit)
AUDIT SCOPE	<p><u>Initial Certification Audit (21 – 29 January 2021)</u></p> <p>The Audit Scope included the activities at the Laminazione Sottile, Italcoat and IPS Industrial Packaging Solution plants in Italy.</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none">Semi-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 (2 – 5 May 2022)</u></p> <p>The Audit Scope included the activities at the Laminazione Sottile, Italcoat and IPS Industrial Packaging Solution plants in Italy.</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none">Semi-Fabrication

- Material Conversion (Production and Transformation)

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

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

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

Supply chain activities included in the Audit Scope:

- Semi-Fabrication
- Material Conversion

All applicable criteria in the ASI Performance Standard were included in the Audit Scope.

Surveillance Audit (10 – 28 March 2025)

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

Supply chain activities included in the Audit Scope:

- 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

29 March 2024 – 28 March 2027

NEXT AUDIT TYPE

Re-Certification Audit

NEXT AUDIT DATE

28 March 2027

CERTIFICATE NUMBER

124



If you have an inquiry or complaint about this Certification, go to the third-party EthicsPoint portal at: <https://aluminium-stewardship.ethicspoint.com/>

EthicsPoint is a comprehensive and confidential reporting tool that enables complaints to be securely raised, managed and responded to. This enables anonymity to be maintained where desired by complainants, or as relevant to whistleblowing situations.

Information is available in five languages – English, French, Chinese, German and Portuguese (Brazil). Translation services provided by EthicsPoint enable complaints and correspondence to be managed in multiple languages.

ENTITY OVERVIEW

The Laminazione Sottile Group specialises in the transformation of Aluminium and comprises ten companies operating across the full Aluminium supply chain. These include **Laminazione Sottile**, **Italcoat**, **Contital**, and **IPS Industrial Packaging Solution** in Italy; the **i2r** Group with facilities in the United Kingdom, South Korea, and the United States; **PLLANA GmbH** in Germany; and **Contital Türkiye**. The Group produces Aluminium coils in various shapes, alloys, and surface treatments (including painting and printing), as well as Aluminium trays primarily for the food and beverage sector.

Three companies are included in the Certification Scope and consist of the 'Entity':

- Laminazione Sottile S.p.A. – Designs, manufactures, and surface-treats Aluminium and its alloys.
- Italcoat S.r.l. – Designs and produces painted Aluminium strips and sheets using coil coating technology.
- IPS Industrial Packaging Solution – Produces lacquered, printed, and laminated flexible Aluminium packaging for pharmaceutical, food, and cosmetic applications.

Laminazione Sottile S.p.A.

Founded in 1923 and based in Caserta, Italy, Laminazione Sottile S.p.A. operates a 15-hectare site employing approximately 700 Workers. The production cycle encompasses foundry operations, hot, semi-hot and cold rolling, thermal and chemical treatments, slitting, and warehousing. Infrastructure includes five foundry lines, multiple rolling mills, degreasing lines, slitters, two warehouses (finished products and stock), administrative offices, a training academy, medical clinic, quality control and R&D laboratories, parking areas, and a power station. The facility produces 130,000 tonnes per year of semi-finished Aluminium coils and sheets for a range of industries, including:

- Packaging (e.g. cans, containers, closures, capsules)
- HVAC-R (e.g. evaporators, condensers, rotors)
- Automotive and aerospace (e.g. heat shields, honeycomb panels)
- Construction (e.g. panels, tiles)

The production cycle encompasses foundry operations, hot, semi-hot and cold rolling, thermal and chemical treatments, slitting, and warehousing. Infrastructure includes five foundry lines, multiple rolling mills, degreasing lines, slitters, two warehouses (finished products and stock), administrative offices, a training academy, medical clinic, quality control and R&D laboratories, parking areas, and a power station.

- Sensitive receptors: The towns of Marcianise and San Marco Evangelista, and the Caserta Royal Palace.
- Stakeholders: Local Communities, public offices, regulators, EAFA, Confindustria, Consorzio CIAL, employees, Trade Unions, customers, suppliers, and shareholders.

Italcoat S.r.l.

Established in 1991 and commencing production in 1993 at its 25-hectare site in Pignataro Maggiore (Caserta), Italcoat S.r.l. focuses on the surface treatment and coating of rolled Aluminium coils in gauges from 40 to 400 microns. It employs around 78 workers and 40 contractors. With a capacity of over 24,000 tonnes annually and 21,000 tonnes sold in 2023, Italcoat uses lacquering, printing, and slitting processes. Its coatings enhance Aluminium's properties, offering corrosion resistance, food contact compliance, UV resistance, and improved thermal exchange.

Facilities include three coating lines, slitting lines, warehouses, offices, a medical clinic, and a quality control lab.

- Sensitive receptor: Pignataro Maggiore.
- Stakeholders: Local Communities, public offices, regulators, EAFA, Confindustria, employees, Trade Unions, customers, suppliers, and shareholders.

IPS Industrial Packaging Solution S.r.l.

Founded in 2015 and located in Alessandria (Spinetta Marengo), IPS supplies lacquered, laminated, embossed, and printed Aluminium foil for flexible packaging. In 2023, it sold 3,750 tonnes of products to the food, beverage, and pharmaceutical sectors. Its 3-hectare facility employs around 55 staff and 18 contractors. Operations include coating, printing, and slitting, supported by two coating/printing lines, slitting lines, warehouses, administrative offices, a medical clinic, and a quality control laboratory.

- Sensitive receptor: Spinetta Marengo.
- Stakeholders: Local Communities, public offices, regulators, EAFA, Confindustria, employees, Trade Unions, customers, suppliers, and shareholders.

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

CRITICAL INCIDENT – MARCH 2024

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

This incident resulted in the suspension of the Entity's ISO 45001 certificate until a special audit was undertaken alongside a renewal audit in June 2025. It is essential to note that certification body's audit report considered current evidence of judicial investigations initiated by the Italian Public Prosecutor's Office. No new non-conformances were reported, however, several observations were made. The Entity had implemented comprehensive actions to address all identified potential causes without prioritising their significance, following the classification of several possible causes. A general action plan was also established.

In response to this incident, the ASI Lead Auditor brought forward the ASI Surveillance Audit by six months (i.e. to 10 – 28 March 2025). The ASI Audit identified no Major Non-conformances. A Minor Non-Conformance was issued, not relating to the production line where the incident occurred but to a different piece of machinery. The finding does not directly relate to the incident but rather reflects a misalignment between existing procedures and the recording of operational activity. In response to this Non-Conformance, the Entity immediately implemented targeted training for all operational and non-operational personnel.

Following the critical incident, the Italian Public Prosecutor's Office temporarily took control of four production lines (machinery) operated by the Entity, which included the production line where the fatality occurred and three similar production machines. This process was undertaken in accordance with Italian Regulations, as required following any fatal incident. Following an evaluation of safety measures by relevant Italian authorities, the three similar production lines were released from control in May 2024. Following a further visit, the production line where the fatality occurred was released from seizure in August 2024.

FINDINGS

CRITERION	RATING	COMMENT
1. BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity has planned, established, implemented, and maintained adequate processes for assessing Compliance with legal and other requirements. A procedure has been implemented that provides for the frequency and method for periodic assessment of Compliance with legislative requirements. Records on Compliance with legislative requirements are maintained.
1.2 Anti-Corruption	Conformance	The Entity has established a Management System with a Code of Ethics and internal anti-Corruption processes compliant with Legislative Decree 231/01 (corporate responsibility for crimes perpetuated in the interest or to the advantage of a legal entity) supervised by Organismo di Vigilanza (OdV).
1.3a-e Code of Conduct	Conformance	<p>The Entity has implemented the Laminazione Sottile Group Code of Ethics: https://www.laminazionesottile.com/en/the-group/ethics-and-compliance</p> <p>The Code of Ethics expresses the principles, values, and rules of conduct inherent in the actions of the companies within the Laminazione Sottile Group.</p>
2. POLICY AND MANAGEMENT		
2.1a-f Environmental, Social, and Governance Policy	Conformance	<p>The Entity has various Policies that commits to environment, health and safety, and social responsibility, which are documented, endorsed by senior management and shared with all Workers. The Group's Social Responsibility Policy is available at: https://www.laminazionesottile.com/en/sustainability/social-responsibility</p> <p>Each Facility implements an Integrated Policy on Quality, Safety and Environment, available at:</p> <p>Laminazione Sottile: https://www.laminazionesottile.com/en/sustainability/quality</p> <p>Italcoat and IPS: https://www.italcoat.com/sustainability/social-responsibility</p> <p>Management guarantees periodic reviews and consistency with strategic objectives, including environmental and safety aspects. The Policies ensures Compliance with regulations and aims for safe working conditions and environmental protection.</p>
2.2a-c Leadership	Conformance	All functions of the Entity work towards the implementation of the Management System, and the senior management ensure commitment to the ASI Performance Standard requirements through an inter-functional team. This team is adequately trained and knowledgeable about the ASI Standards.
2.3a Environmental and Social Management Systems – Environmental	Conformance	The Entity has adopted Environmental Management Systems certified by accredited assessment bodies and compliant with UNI EN ISO 14001 to guarantee the continuous improvement of its environmental performance. Current certification information is available at:

CRITERION	RATING	COMMENT
		<p>Laminazione Sottile S.p.A.: https://www.laminazionesottile.com/wp-content/uploads/2023/04/LS-ISO-14001-2015-IT_scad.2026.pdf</p> <p>Italcoat S.r.l. and IPS Industrial Packaging Solution S.r.l.: https://www.italcoat.com/it/sostenibilita/certificazioni</p>
2.3b Environmental and Social Management Systems – Social	Conformance	<p>Laminazione Sottile S.p.A. has implemented an SA8000 certified Social Management System: https://www.laminazionesottile.com/en/sustainability/certifications</p> <p>The IPS Industrial Packaging Solution S.r.l. and Italcoat S.r.l. sites do not currently have a certified Social Management System. However, both sites have implemented the Entity's Code of Ethics, and the Organisational Model is consistent with the requirements of a Social Management System with statements and Policies on recruiting, human resources management and Health and Safety. The Human Resources department has procedures to continuously deliver conformity to the national Collective Bargaining Agreement for work-related matters, including wages and working hours.</p> <p>Code of Ethics: https://www.laminazionesottile.com/en/the-group/ethics-and-compliance</p>
2.4a-e Responsible Sourcing	Conformance	<p>The Entity has implemented a Procedure that describes how the Laminazione Sottile Group manages the procurement and assignment of outsourced activities. The Procedure describes the checks to be undertaken on products and services, including environment and sustainability aspects.</p> <p>The Entity's Social Responsibility Policy is available at: https://www.laminazionesottile.com/wp-content/uploads/2025/06/LS-Social-Responsibility-Policy-2025-05-31.pdf</p>
2.5a-g Environmental and Social Impact Assessments	Not Applicable	<p>This Criterion is not applicable to the Entity, as there have not been any current, or recently completed New Projects or Major Changes. However, the Entity has documented Impact Assessments, taking into consideration normal operating conditions, start-up and shutdown phases and emergencies, and past, present, and planned activities. Specific procedures are in place for assessing direct and indirect environmental aspects.</p>
2.6a-h Human Rights Impact Assessment	Not Applicable	<p>This Criterion is not applicable to the Entity, as there have not been any current, or recently completed New Projects or Major Changes. However, the Entity has a documented risk assessment that includes Human Rights to identify and prioritise areas. The Social Performance Team is responsible for assessing the risks covered by this assessment, and Management approves the document and any remedial actions in the improvement plan.</p>
2.7a-f Emergency Response Plan	Minor Non-Conformance	<p>The Entity has prepared site-specific procedures to predict and manage emergencies related to both environmental and safety systems. The procedures cover the actions required to prevent or mitigate the impacts from potential emergencies, respond to emergencies and planning for periodic testing. Additionally, each Facility periodically undertakes simulations or drills to evaluate the effectiveness of planned actions. The emergency plans are communicated to Visitors and suppliers who enter the sites and are also available to Stakeholders upon request.</p>

CRITERION	RATING	COMMENT
		However, there is no evidence that the Entity has considered the link between the emergency response plans and the risk evaluation document.
2.8a-d Suspended Operations	Conformance	The Entity has developed a Contingency Plan that identifies and assesses significant business risk and includes mitigating actions. The Plan is periodically updated by the Quality Assurance department and shared with all the business functions involved. Additionally, site-specific emergency response plans are implemented, and emergency drills are regularly undertaken.
2.9a-b Mergers and Acquisitions	Conformance	There has been no recent merger or acquisition activity. The Entity has implemented the Group Environmental, Social and Governance Due Diligence Policy, which addresses governance, environmental and social parameters in the event of any merger or acquisition.
2.10a-b Closure, Decommissioning and Divestment	Conformance	There has been no recent closure, decommissioning, or divestment activity. The Entity has implemented the Group Environmental, Social and Governance Due Diligence Policy, which addresses governance, environmental and social parameters in the event of any closure, decommissioning, or divestment.
3. TRANSPARENCY		
3.1a-b Sustainability Reporting	Conformance	The Entity annually communicates its performance and approach to governance, environmental and social issues via the Laminazione Sottile Group Sustainability Report, available at: https://www.italcoat.com/sustainability https://www.laminazionecottile.com/en/sustainability
3.2 Non-compliance and Liabilities	Conformance	The Entity discloses that there have been no disputes or sanctions for non-Compliance with environmental legislation, in the Sustainability Report, pages 36-37 and 109: https://www.laminazionecottile.com/en/sustainability There have been no reported cases of Corruption or anti-competitive behaviour, and no violation of laws or regulations in the social or economic areas.
3.3a-c Payments to Governments	Conformance	The Entity has established a Management System, which includes a Code of Ethics and internal anti-Corruption processes, which is compliant with Legislative Decree 231/01 (corporate responsibility for crimes perpetrated in the interest or to the advantage of a legal entity). The Entity declares that it does not make payments to Government parties, which is addressed in the Code of Ethics, pages 7-8: https://www.laminazionecottile.com/en/the-group/ethics-and-compliance The Entity's senior management confirmed that all payments made to the Government and public administration are on a legal basis, which includes taxes. The Organisational Models adopted by the Entity include a set of principles and rules of conduct, operating procedures and disciplinary sanctions aimed at preventing the commission of crimes and guaranteeing ethical behaviour from those who work on behalf of the Entity. Relevant information will be made available to Stakeholders upon request.

CRITERION	RATING	COMMENT
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	<p>The Entity has established effective tools for receiving and investigating complaints and suggestions for improvement from Stakeholders. These tools include letterboxes, dedicated email addresses and periodic meetings between Workers and their representatives. External Stakeholders can report or submit requests or complaints through the tools indicated on the websites for all sites.</p> <p>IPS Industrial Packaging Solution S.r.l.: https://www.ipstech.it/whistleblowing</p> <p>Italcoat S.r.l.: https://www.italcoat.com/whistleblowing-policy</p> <p>Laminazione Sottile S.p.A.: https://www.laminazionesottile.com/it/whistleblowing</p>
4. MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment	Conformance	<p>The Entity has conducted two Life Cycle Assessment (LCA) studies in accordance with ISO 14040:2006 and ISO 14044:2006/Amd 1:2017 on the final Products manufactured by Contital S.r.l. (part of the same Group). The Entity supplies Contital S.r.l. the plain and lacquered aluminium coils and sheets, which are converted to Aluminium containers for the food and beverage industry.</p> <p>The LCA has a cradle-to-gate approach and includes the processes associated with the Laminazione Sottile and Italcoat plants.</p>
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	<p>The Entity's LCA studies on the final products manufactured by Contital S.r.l. (part of the same Group). The LCA has a cradle-to-gate approach and includes the processes associated with the Laminazione Sottile and Italcoat plants. These studies are shared with specific and selected customers.</p>
4.2 Product Design	Conformance	<p>The Entity's Research and Development (R&D) activities are centralised at the Group level, who are responsible for integrating sustainability objectives in the design and development process. Currently, industrial-scale experimentation is underway with two pilot customers for capsule and box products, which includes using a higher percentage of waste and decreasing the number of alloys.</p>
4.3a-b Aluminium Process Scrap	Conformance	<p>Based on its ISO 14001 certified Management System, the Entity has developed an improvement plan with environmental objectives, management review processes and measurable targets. The Scrap derived from various treatments are recovered via an internal recycling mechanism or returned to the foundry. The minimisation of waste is achieved through the recycling of Scrap. Any Scrap returned from manufacturing processes is separated by the type of internal alloy then stored in a dedicated storage area and entirely recovered in the smelting processes. Data are monitored and available every month with details for department, product, and plant.</p>
4.4a-c Collection and Recycling of Products at End of Life - Material Conversion and other Manufacturing	Conformance	<p>The Entity has processes in place for the recovery of Aluminium Process Scrap from industrial processing. Semi-finished Products are supplied to customers who transform them into finished products. The resulting Scrap is returned to the factory to be remelted and re-transformed into laminates.</p> <p>Whilst the Entity does not currently recycle Post-Consumer Scrap, it is engaged in a project to recycle post-consumer materials in future.</p>

CRITERION	RATING	COMMENT
		<p>The Entity's recycling strategy is available in the Sustainability Report 2023, chapter 6: https://www.laminazionesottile.com/en/sustainability/sustainability-report</p>
4.4d Collection and Recycling of Products at End of Life	Conformance	<p>At present, the Entity does not have a process for recycling Post-Consumer Aluminium Scrap. However, a collaboration with the Italian consortium responsible for the collection of Aluminium waste (Consorzio Nazionale Imballaggi Alluminio (CIAL)) is being planned for the near future. Additionally, the Aluminium sold by Laminazione Sottile S.p.A. or Italcoat S.r.l. to industrial customers is, in some cases, collected as Scrap and used as raw material. This occurs with larger customers currently, however, there are plans to further improve this process in the near future.</p>
5. GREENHOUSE GAS EMISSIONS		
5.1a-b Disclosure of GHG Emissions and Energy Use	Minor Non-Conformance	<p>Laminazione Sottile S.p.A site participates in the Emission Trading System (ETS) and in compliance with EC 1221/2009, GHG data for the site are disclosed in the independently verified Environmental Declaration in chapter 10.6 and energy use (gas and electricity) on pages 36-39: https://www.laminazionesottile.com/wp-content/uploads/2024/09/DA-Laminazione-Sottile-2024-v2_CONVALIDATA.pdf</p> <p>For the IPS Industrial Packaging Solution S.r.l. and Italcoat S.r.l. sites, GHG emissions are not independently disclosed as they are not included in the ETS.</p> <p>The GHG emissions for all three sites are sent to the National Authority and are validated by an accredited body. Scope 1 and 2 GHG emissions are consolidated at Group level in the Sustainability Report, chapter 6.7, on pages 48-49. Energy use data is provided in the Sustainability Report on pages 36-37 and 44: https://www.laminazionesottile.com/en/sustainability/sustainability-report</p> <p>However, the Entity has not provided GHG emissions data by source, and whilst year-on-year reduction data is provided for Scopes 1 and 2, no Scope 3 data is provided.</p>
5.2a Aluminium Smelter GHG Emissions Intensity - Started production after 2020	Not Applicable	<p>This Criterion is not applicable to the Entity's Certification Scope.</p>
5.2b Aluminium Smelter GHG Emissions Intensity - In production up to and including 2020	Not Applicable	<p>This Criterion is not applicable to the Entity's Certification Scope.</p>
5.3a GHG Emissions Reduction Plans	Minor Non-Conformance	<p>The Entity has established a GHG Emissions Reduction Plan and GHG Emissions Reduction Pathway, which is disclosed in the Sustainability Report, pages 48-50: https://www.laminazionesottile.com/en/sustainability/sustainability-report</p>

CRITERION	RATING	COMMENT
		<p>The implementation of the Plan has resulted in the reduction of emissions through the adoption of advanced technologies and advanced maintenance programs.</p> <p>However, there is no Objective Evidence to support the Entity's GHG Emissions Reduction Pathway is aligned with the ASI Methodology.</p>
5.3b-e GHG Emissions Reduction Plans – Targets, review and disclosure	Minor Non-Conformance	<p>The Entity has established a GHG Emissions Reduction Plan and GHG Emissions Reduction Pathway, which is disclosed in the Sustainability Report, pages 48-50: https://www.laminazione sottile.com/en/sustainability/sustainability-report</p> <p>Implementation of the Plan to date has resulted in emissions, in terms of pollutant concentrations, remaining below authorised legal limits, with action related to the adoption of advanced technologies and advanced maintenance programs.</p> <p>The Entity has disclosed Intermediate Targets to reduce emissions by 25% by 2025 and 50% by 2030, by sourcing low carbon footprint Primary Aluminium and increasing the percentage of recycled material.</p> <p>However, the Entity's Pathway includes Intermediate Targets that are absolute and expressed as percentages only. Whilst this absolute Pathway appears to align with the ASI Methodology, there is a lack of supporting evidence, such as a specified baseline year (rather than implied baseline year of 2022) or inclusion of baseline emissions intensities.</p>
5.4 GHG Emissions Management	Conformance	<p>Whilst the Entity does not have a certified ISO 14064 or ISO 50001 Management System, a series of procedures and operating instructions have been implemented for the management of the operational controls necessary to obtain performance in accordance with the GHG Emissions Reduction Plan and objectives.</p>
6. EMISSIONS, EFFLUENTS AND WASTE		
6.1a-f Emissions to Air	Conformance	<p>Each of the Entity's three sites has an Integrated Environmental Authorisation (AIA) in Compliance with Italian law, Decree 152/2006 (Code on the Environment regarding all matters concerning environmental protection). This Authorisation addresses waste management, emissions, discharges, and water supply.</p> <p>Following the authorisation principles, each site must annually disclose atmospheric emissions to the public administration. Emissions are also disclosed in the Sustainability Report, chapter 14, page 107: https://www.laminazione sottile.com/en/sustainability/sustainability-report/</p>
6.2a-g Discharges to Water	Conformance	<p>Each of the Entity's three sites has an AIA in accordance with Italian law, Decree 152/2006. This Authorisation addresses waste management, emissions, discharges, and water supply.</p> <p>Water discharge data are disclosed in the Environmental Declarations, available at: Laminazione Sottile S.p.A. (paragraph 10.7): https://www.laminazione sottile.com/wp-</p>

CRITERION	RATING	COMMENT
		<p>content/uploads/2024/09/DA-Laminazione-Sottile-2024-v2_CONVALIDATA.pdf</p> <p>Italcoat S.r.l. (paragraph 10.5): https://www.italcoat.com/sustainability/health-safety-environment</p> <p>IPS Industrial Packaging Solution S.r.l. (paragraph 11.10): https://www.italcoat.com/sustainability/health-safety-environment</p>
6.3a-g Assessment and Management of Spills and Leakages	Conformance	<p>The Entity has established a Management System certified to ISO 14001 and conducted a risk assessment to identify potential Spills and Leakages and documented procedures for managing accidental Spills. The Entity provides training on environmental emergency management at least annually.</p> <p>The risk assessments are available through Environmental Declarations: Laminazione Sottile S.p.A. (paragraph 3.2 and paragraph 10): https://www.laminazionesottile.com/wp-content/uploads/2024/09/DA-Laminazione-Sottile-2024-v2_CONVALIDATA.pdf</p> <p>Italcoat S.r.l. (paragraph 3.2 and paragraph 10): https://www.italcoat.com/wp-content/uploads/2024/09/DA-Italcoat-2024_CONVALIDATA.pdf</p> <p>IPS Industrial Packaging Solution S.r.l. (paragraph 4.2 and paragraph 10): https://www.italcoat.com/wp-content/uploads/2024/01/DA-IPS-2023.pdf</p>
6.4a-b Public Disclosure of Spills and Leakages	Conformance	<p>To date, there have been no significant Spills or Leakages at the Entity. Any environmental accidents or Spills are disclosed to the Stakeholders through the Sustainability Report and Environmental Declarations available on the Entity's websites (www.laminazionesottile.com and www.italcoat.com/it).</p> <p>The Entity has implemented the Laminazione Sottile Group procedures that require any situation involving the loss or Spill of dangerous substances to be promptly communicated to the competent bodies.</p>
6.5a-c Waste Management and Reporting	Conformance	<p>Waste management is governed by internal procedures compliant with ISO 14001:2015. These procedures regulate the operational and legal management of waste generated by the Entity. The Entity annually declares the quantities of Hazardous and Non-Hazardous Waste produced according to Legislative Decree 152/2006, where the annual declaration (MUD) is mandatory.</p> <p>The management of waste is undertaken by third parties, who are authorised for the transport and final disposal or recovery. The Entity records the internal movements of the waste produced.</p> <p>Information on waste generation is published annually in the Sustainability Report, pages 106-107: https://www.laminazionesottile.com/en/sustainability/sustainability-report</p> <p>Public information on the quantity of Hazardous and Non-Hazardous Waste produced for each site: Laminazione Sottile S.p.A. (paragraph 10.8): https://www.laminazionesottile.com/wp-content/uploads/2024/09/DA-Laminazione-Sottile-2024-v2_CONVALIDATA.pdf</p>

CRITERION	RATING	COMMENT
		<p>Italcoat S.r.l. (paragraph 10.6): https://www.italcoat.com/wp-content/uploads/2024/09/DA-Italcoat-2024_CONVALIDATA.pdf</p> <p>IPS Industrial Packaging Solution S.r.l. (paragraph 11.12): https://www.italcoat.com/wp-content/uploads/2024/01/DA-IPS-2023.pdf</p>
6.6a-g Bauxite Residue	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7a-f Spent Pot Lining (SPL)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8a-d Dross	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
7. WATER STEWARDSHIP		
7.1a-b Water Assessment and Disclosure	Conformance	<p>The Entity's risk analysis included a mapping of water sources and water consumption. Each site has its own groundwater wells which guarantee all production water needs of the plants and an environmental authorisation (AIA) that requires annual reporting of water withdrawals. Potable water is supplied by the municipal aqueduct and consumption is monitored by a sealed meter. Internal audits and operational controls are implemented to monitor water use.</p> <p>There are no Material risks linked to the use of water, water used is recovered and managed via a recirculation system.</p> <p>Data on water use by source and type is available in the Sustainability Report, chapter 6: https://www.laminazioniessotile.com/en/sustainability/sustainability-report</p>
7.2a-e Water Management	Not Applicable	This Criterion is not applicable to the Entity, as no Material water-related risks were identified in the risk assessment. However, the Entity has implemented water resource management plans for each of the three sites aimed at reducing consumption over the years.
8. BIODIVERSITY AND ECOSYSTEM SERVICES		
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	A risk assessment of the impacts on Biodiversity was undertaken as part of the Entity's environmental analysis, risk analysis, and assessment of environmental aspects under the environmental Management System. The results demonstrate that the risk to Biodiversity and Ecosystem Services is low. The Entity does not operate in Protected Areas, and there are no key Biodiversity areas or threatened species that are impacted by the Entity's activities.
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Not Applicable	This Criterion is not applicable to the Entity, as the risk to and impacts on Biodiversity and Ecosystem Services were determined to be low and no significant risk to Biodiversity and Ecosystem Services was identified. This aspect was also noted in the environmental analysis documents, risk analysis, and assessment of environmental aspects and impacts.

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8.2a-g Biodiversity Management	Not Applicable	This Criterion is not applicable to the Entity, as the risk to and impacts on Biodiversity and Ecosystem Services were determined to be low and no significant risk to Biodiversity was identified.
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. This aspect was also noted in the environmental analysis documents, risk analysis, and assessment of environmental aspects and impacts.
8.4 Alien Species	Conformance	The introduction of exotic species is a risk that is mitigated by the Entity through internal processes such as requiring suppliers to treat wooden pallets according to international standards, such as International Standards for Phytosanitary Measures (ISPM).
8.5a-b Commitment to "No Go" in World Heritage Properties	Conformance	The Entity has confirmed that their operational sites are not located near World Heritage sites or sites of natural interest. They have demonstrated there are no New Projects or Major Changes that impact World Heritage assets.
8.6a-d Protected Areas	Conformance	The Entity has conducted a risk assessment and the impact on Biodiversity is covered in the environmental analysis documents, risk analysis, assessment of environmental aspects and impacts. No Protected Areas have been identified in the area affected by the Entity's activities.
8.6e Protected Areas - Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.7a-i Mine Rehabilitation	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9. HUMAN RIGHTS		
9.1a-d Human Rights Due Diligence	Conformance	<p>The Entity's commitment to respecting Human Rights is expressed in the Social Responsibility Policy and Code of Ethics documents.</p> <p>Social Responsibility Policy: https://www.laminazionesottile.com/en/sustainability/sustainability-report</p> <p>Code of Ethics: https://www.laminazionesottile.com/en/the-group/ethics-and-compliance</p> <p>The Social Responsibility Policy outlines the Due Diligence process as a tool for implementing the Group's commitments to ensure respect for Human Rights. The Due Diligence process involves identifying areas of activity that may pose a risk of Human Rights violations, surveying existing measures in those areas to mitigate the risk, evaluating whether those measures are sufficient, identifying areas where risk reduction is necessary, providing input for improvement plans in high-risk areas, and ensuring follow-up on improvement actions.</p> <p>Interviews and documents reviewed during the Audit confirmed that there have been no Human Rights violations.</p>
9.2a-e Gender Equity and Women's Empowerment	Conformance	The Entity prohibits Discrimination based on differences in gender, age, state of health, nationality, or ethnic group, and political or religious opinions. The Entity has adopted an Organisational Model

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		<p>according to Legislative Decree 231/2001 and implemented a confidential and anonymous reporting system, a tool for communicating any offences and violations to the Supervisory Body. There were no cases of Discrimination reported during 2022 - 2024.</p> <p>Over recent years, the Entity has actively increased the presence of female staff in historically male areas, both clerical and technical. Parental leave is an important indicator for the Entity, with a positive return-to-work rate which has contributed to the number of female Workers increasing over recent years. Further information on equal gender opportunities is available in the Sustainable Report, Chapter 7.2: https://www.laminazioneosottile.com/en/sustainability/sustainability-report</p>
9.3a-i Indigenous Peoples	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples present where the Entity operates.
9.4a Free, Prior, and Informed Consent (FPIC) - New Projects or Major Changes	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples present where the Entity operates. However, an evaluation of Indigenous Peoples' consent will be carried out in the case of New Projects or Major Changes.
9.4b Free, Prior, and Informed Consent (FPIC) - Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9.4c Free, Prior, and Informed Consent (FPIC) - Demonstrate support	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples present where the Entity operates.
9.5a Cultural and Sacred Heritage - Identification	Not Applicable	This Criterion is not applicable to the Entity, as there are no sites of cultural value and/or sacred heritage within the Entity's Area of Influence.
9.5b Cultural and Sacred Heritage - Impacts	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples present where the Entity operates. However, an evaluation of Indigenous Peoples' consent will be undertaken in the case of New Projects or Major Changes.
9.6a-i Displacement	Not Applicable	This Criterion is not applicable to the Entity, as there are no New Projects and Major Changes that require resettlement. A social risk assessment would be carried out in the event of resettlement.
9.7a-h Affected Populations and Organisations	Conformance	<p>The Entity's risk assessment did not identify issues affecting Local Communities, however, various communication channels are available to all interested parties: https://www.laminazioneosottile.com/en/sustainability/social-responsibility</p> <p>The Entity is committed to contributing to the development of the Local Community through social activities of various kinds. Initiatives, projects, cultural events, and associations focused on scientific research are supported. Further information is available in the Sustainable Report, Chapter 12:</p>

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		https://www.laminazione sottile.com/en/sustainability/sustainability-report/ The Entity has implemented an ESG Due Diligence Policy and Human Rights Policy which includes a Human Rights Due Diligence process.
9.8a Conflict-Affected and High-Risk Areas – Strong Management Systems	Conformance	The Entity has implemented an SA8000 Management System certified by an independent third party. The Management System includes policies and procedures that analyse the risk of Human Rights violations within both its own organisation and the entire supply chain. The Social Responsibility Policy and the Integrated Quality, Safety and Environment (QSE) Policies ensure Due Diligence is undertaken in accordance with the OECD Due Diligence Guidance of Minerals from Conflict-Affected and High-Risk Areas. These Policies are published on the website of each site.
9.8b Conflict-Affected and High-Risk Areas – Identify and assess risks	Conformance	The Entity has adopted an SA8000 Management System approach that analyses the risk of Human Rights violations throughout the supply chain. All suppliers are required to comply with the Group's Code of Ethics.
9.8c Conflict-Affected and High-Risk Areas – Strategy to respond to risks	Conformance	The Entity's supply chain risk assessment demonstrated no significant identifiers. However, according to an internal procedure, if there are any risks identified in future Due Diligence reviews, senior management will develop a strategic plan.
9.8d Conflict-Affected and High-Risk Areas – Audit of due diligence	Conformance	This ASI Performance Standard Audit satisfies the requirements of this Criterion.
9.8e Conflict-Affected and High-Risk Areas – Report annually	Conformance	The Entity annually reports on its supply chain management and commitment to implementing a sustainable procurement process in the Sustainability Report, chapter 9: https://www.laminazione sottile.com/en/sustainability/sustainability-report/
9.9 Security practice	Conformance	An after-hours security service is provided by an external company for the purpose of protecting or safeguarding the premises, people, and material assets. Security officers are unarmed. The security contractor must comply with the Entity's Supplier Code of Conduct, which includes confirming commitment to respect Human Rights and be subject to audits. During the daytime, security activities are carried out by internal staff, and surveillance and access control is in Compliance with the law. All Visitors are asked for an identity document before authorising access to the establishment.
10. LABOUR RIGHTS		
10.1a-c Freedom of Association and Right to Collective Bargaining	Conformance	Workers are covered by a Collective Labour Agreement (CCNL) agreed at the national level between Trade Unions and sector representatives. Workers are free to join any organisation of their choice, and the Entity guarantees that their choice does not lead to negative consequences such as Harassment, intimidation, or retaliation. Currently, the unionisation rate at Group level is approximately 20%.

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		Feedback received during the Worker interviews undertaken as part of the Audit was positive and confirmed that no situations have emerged in which the right to Freedom of Association and Collective Bargaining is impeded. Union representatives have been elected for Workers. The Entity provides suitable facilities for meetings between Workers and the Union representatives, and Trade Union representatives regularly meet with senior management.
10.1d Freedom of Association and Right to Collective Bargaining - Alternative means in context of Applicable Law	Not Applicable	This Criterion is not applicable to the Entity, as Applicable Law in Italy does not limit the right to Freedom of Association and Collective Bargaining.
10.2a Child Labour	Conformance	The Entity does not use nor support the use of Child Labour. The commitment not to hire or employ children (including children under the age of 18 years) in work activities is included in the Entity's Social Responsibility Policy and Code of Ethics.
10.3a-c Forced Labour	Conformance	<p>The Entity has declared its commitment to not support or use Forced Labor directly or through labour hire agencies. Its actions to address modern slavery are included in the Code of Ethics: https://www.laminazioneottile.com/en/the-group/ethics-and-compliance</p> <p>Interviews with employees demonstrated the Entity respects the right to freedom of movement during the working day and guaranteed breaks. Workers are not forced to accept work, are free to collectively bargain and terminate the employment relationship in accordance with Italian regulations.</p> <p>The Entity's Modern Slavery Statement is publicly disclosed at: https://www.laminazioneottile.com/en/sustainability/social-responsibility</p>
10.4a-c Non-Discrimination	Conformance	<p>The Entity's Code of Ethics establishes equal opportunities for all Workers. The Collective Bargaining Agreement regulates the production bonus for all Workers. The Social Responsibility Policy guarantees equal opportunities and non-Discrimination in the recruitment, Remuneration, promotion, training, opportunities for advancement or dismissal of any worker based on sex, race, national or social origin, religion or any other condition that may give rise to Discrimination.</p> <p>The Entity has implemented an annual performance management system to evaluate performance based on the assignment of area and the personal objectives of any professional development plan. There was no evidence of Discrimination found during the Audit.</p>
10.5 Communication and engagement	Conformance	<p>The Entity has implemented various methods of communication and involvement between management and Workers, this includes periodic meetings between managers and employees, training courses, and communication via noticeboards and monitors.</p> <p>All Workers and Stakeholders have the opportunity to make complaints anonymously, with the process outlined in the Social Responsibility Policy and Whistleblowing Policy (included in the Human Rights Policy), available at</p>

CRITERION	RATING	COMMENT
		https://www.laminazionesottile.com/en/sustainability/social-responsibility https://www.italcoat.com/sustainability/social-responsibility
10.6a-g Violence and Harassment	Conformance	<p>The Entity is against all forms of Harassment and Violence, and the commitment is communicated to all Stakeholders through the Code of Ethics, the Social Responsibility Policy, and the Whistleblowing Policy. The work environment appears free from coercive or oppressive attitudes. All applicable disciplinary measures are defined and in Compliance with the Collective Labour Agreement (CCNL) and are accepted by Workers. The Policies are regularly communicated to Workers via the company noticeboard. There are no disputes at the Entity regarding Violence and Harassment.</p> <p>Social Responsibility Policy: https://www.laminazionesottile.com/en/sustainability/social-responsibility</p> <p>Code of Ethics: https://www.laminazionesottile.com/en/the-group/ethics-and-compliance</p>
10.7a-c Remuneration	Conformance	<p>Salary levels at the Entity are in accordance with the sector Collective Labour Agreement. During the Audit, various documents relating to Remuneration were sampled (pay slips, employment contracts, and certificate of contributions compliance). The evidence reviewed during the Audit demonstrated that the lowest-paid position at the company offers a salary that is significantly higher than the minimum subsistence level (living wage). Workers interviewed said they understood the contents of their payslips and received their wages on time.</p>
10.8a-c Working Time	Conformance	<p>The Entity complies with Applicable Law and industry standards regarding working hours (including Overtime). Working Time is recorded using magnetic badges and Overtime is voluntary. A sample of payslips examined during the Audit confirmed that detailed information such as attendance records, absences, and leave allowances, is included,</p>
10.9a-b Informing Workers of Rights	Conformance	<p>The Entity uses various strategies to inform employees about their rights, including working groups aimed at improving individual production areas, processes, and technical-organisational systems, and communication campaigns such as workshops, focus groups, and interactive seminars to inform employees on various topics including Workers' rights, innovation projects, and organisational changes.</p> <p>In addition, the Entity utilises the company noticeboard and the intranet as tools to inform its employees. These platforms are accessible to all employees and are used to publish the Code of Ethics, updates, information from Trade Unions, and the Collective Labour Agreement.</p> <p>The Entity is also certified according to the SA8000 standard. Furthermore, training on social responsibility has been provided to all employees.</p>

CRITERION	RATING	COMMENT
11. OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Management System	Minor Non-Conformance	<p>The Entity has established an ISO 45001 certified, Occupational Health and Safety (OH&S) Management System certified by an accredited body. The Management System documentation consists of a management manual, operating procedures, registration forms, a register of legal requirements, and a schedule of legal requirements. An external consultant conducts an annual legal Compliance audit.</p> <p>On 12 March 2024, a critical incident occurred at the Laminazione Sottile plant, which resulted in the fatality of a Worker. Refer to page 5 of this Audit Report for additional context.</p> <p>In May 2024, the Entity engaged a third party to conduct internal audits of legal compliance and of the OH&S Management System. These audits are performed annually in accordance with ISO 45001 requirements.</p> <p>The fatality resulted in the suspension of the Entity's ISO 45001 certificate until a special audit was undertaken alongside an ISO 45001 renewal audit undertaken in June 2025. It is essential to note, that certification body's audit report included current evidence of judicial investigations initiated by the Italian Public Prosecutor's Office. No new non-conformances were reported, however several observations were made. The Entity has since implemented a series of comprehensive actions to address all identified potential causes following the classification of several possible causes. A general action plan was also established.</p> <p>After the incident, the Public Prosecutor's Office seized four production lines operated by the Entity. The production line where the facility occurred and three similar production lines (machinery), as required by regulations in cases of fatal incidents. Following an evaluation of safety measures by the public authorities, the four production lines were all released from seizure (3 in May 2024 and the latter in August 2024), in accordance with the criminal protocol. The ASI Audit determined that the process to manage the OH&S Management System is still not fully effective. The application of the new procedure introduced by the Entity for controlling machinery safety systems through a specific register, following the incident, is not yet fully aligned with operational conditions. The finding does not directly relate to the incident but rather indicates a misalignment between established procedures and the documentation of operational activities. In response to this Non-Conformance, the Entity immediately implemented targeted training for all operational and non-operational personnel.</p>
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Conformance	<p>The Entity is third-party audited on an annual basis to verify the state of development and conformance of the OH&S Management System with the standard. Safety improvement objectives are established or updated every six months and shared with social partners to provide evidence of continuous improvement. The Entity communicates annually regarding the maintenance of the Management System (including the results of third-party audits), monitoring objectives and indicators, trends in accidents and injuries, comparison with peer Businesses, prevention initiatives and mitigation of impacts on health and safety at work. Refer to the Sustainability Report, chapter 8 for further information:</p> <p>https://www.laminazioneSottile.com/en/sustainability/sustainability-report</p>

CRITERION	RATING	COMMENT
		The Entity has demonstrated transparency by disclosing information on the fatality and the subsequent review of its OH&S Management System in its 2024 Sustainability Report, which at the time of the ASI Audit was in draft and had not yet been published.
11.2 Employee engagement on Health and Safety	Conformance	The Entity has established a Health and Safety Committee to ensure the continuous improvement of Workers' Health and Safety. This includes periodic and formal risk assessments to identify and address real and potential risks to health and safety, as well as investigating the causes of accidents and their management. The Committee is comprised of managers, executives, and Workers' representatives. The HSE Department meetings are held regularly to discuss health, safety, and environmental matters.

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DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	29 March 2021	Initial Certification Audit – Full Certification
1	3 August 2022	Surveillance Audit
2	21 June 2024	Re-Certification and Scope Change Audit – Full Certification
3	6 August 2024	Corrected the Maturity Rating from 'Low' to 'Medium' for the Performance Maturity Category for 'Governance'
4	15 June 2025	Surveillance Audit Correction to the rating of 8.3a-c in Rev 2 and 3 to 'Not Applicable'