

# ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

# EURAL GNUTTI S.p.A.

CERTIFICATE NUMBER  
**440**

ASI STANDARD  
**PERFORMANCE  
STANDARD  
(V3 2022)**

CERTIFICATION LEVEL  
**FULL  
CERTIFICATION**

ASI ACCREDITED  
AUDITING FIRM  
**DNV BUSINESS  
ASSURANCE  
SERVICES UK LTD.**

DATE OF ISSUE  
**17 APRIL 2025**

DATE OF EXPIRY  
**16 APRIL 2028**

CERTIFIED SINCE  
**17 APRIL 2025**

## AUTHORISED BY

A handwritten signature in black ink, appearing to be 'J. Hall', with a long horizontal line extending to the right.

Aluminium Stewardship Initiative Ltd  
ACN 606 661 125, Australia  
[info@aluminium-stewardship.org](mailto:info@aluminium-stewardship.org)

*Validity of this Certificate is subject to continued conformance with the applicable ASI Standard and can be verified at*  
[www.aluminium-stewardship.org](http://www.aluminium-stewardship.org)

## CERTIFICATION SCOPE

Production of billets in special Aluminium alloys through the process of casting, alloying, homogenisation and cooling at the EURAL GNUTTI S.p.A. Facility in Pontevico (Brescia), Italy.  
Production of bars, tubes and profiles in Aluminium alloys through the process of cutting, scalping, extrusion, cooling, pickling, cold-drawing and aging at EURAL GNUTTI S.p.A. Facility in Rovato (Brescia), Italy.

# AUDIT REPORT PERFORMANCE STANDARD

## OVERVIEW

MEMBER NAME	EURAL GNUTTI S.p.A.
ENTITY NAME	EURAL GNUTTI S.p.A.
CERTIFICATION SCOPE	Production of billets in special Aluminium alloys through the process of casting, alloying, homogenisation and cooling at the EURAL GNUTTI S.p.A. Facility in Ponteviso (Brescia), Italy. Production of bars, tubes and profiles in Aluminium alloys through the process of cutting, scalping, extrusion, cooling, pickling, cold-drawing and aging at the EURAL GNUTTI S.p.A. Facility in Rovato (Brescia), Italy.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none"><li>Aluminium Re-melting/Refining</li><li>Casthouses</li><li>Semi-Fabrication</li></ul>
ASI STANDARD	Performance Standard V3
AUDIT TYPE	<ul style="list-style-type: none"><li>Initial Certification Audit</li></ul>
AUDIT FIRM	DNV Business Assurance Services UK Ltd.
AUDIT DATE	<ul style="list-style-type: none"><li>20 – 22 November 2024</li></ul>
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none"><li>14 January 2025</li></ul>
AUDIT SCOPE	<p>The Audit Scope included the production of billets in special Aluminium alloys through the process of casting, alloying, homogenisation and cooling at the EURAL GNUTTI S.p.A. Facility in Ponteviso (Brescia), Italy. Production of bars, tubes and profiles in Aluminium alloys through the process of cutting, scalping, extrusion, cooling, pickling, cold-drawing and aging at the EURAL GNUTTI S.p.A. Facility in Rovato (Brescia), Italy.</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none"><li>Aluminium Re-melting/Refining</li><li>Casthouses</li><li>Semi-Fabrication</li></ul> <p>All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.</p>
AUDIT OUTCOME	<ul style="list-style-type: none"><li>Certification</li></ul>
AUDIT METHODOLOGY DECLARATION	<p>The Auditors confirm that:</p> <ul style="list-style-type: none"><li><input checked="" type="checkbox"/> The information provided by the Entity is true and accurate to the best knowledge of the Auditor(s) preparing this report.</li></ul>

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- ☑ 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.
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CERTIFICATION PERIOD 17 April 2025 – 16 April 2028

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NEXT AUDIT TYPE Surveillance Audit

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NEXT AUDIT DATE 16 October 2026

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CERTIFICATE NUMBER 440

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

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

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

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## ENTITY OVERVIEW

Eural Gnutti S.p.A (‘the Entity’) operates two Facilities, a casthouse and an extrusion/fabrication plant, both located in Brescia, Italy. The Entity produces Aluminium alloy billets at its casthouse through the process of casting, alloying, homogenisation and cooling. The Entity also produces extruded and drawn bars and extruded profiles in Aluminium alloy at their extrusion/fabrication plant. The Entity currently employs 400 Workers at both Facilities. Current production is around 60,000 tonnes for industrial applications in sectors such as mechanical engineering, automotive, pneumatic, oleo hydraulics and heatsinks. The Entity supplies a global market with its semi-finished Aluminium products and focuses on using advanced technology to achieve consistent quality.

## 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
<b>SYSTEMS</b>	High	Medium	Medium	MEDIUM
<b>RISKS</b>	High	High	High	HIGH
<b>PERFORMANCE</b>	High	High	High	HIGH
<b>OVERALL</b>			<b>HIGH</b>	

## FINDINGS

CRITERION	RATING	COMMENT
<b>1. BUSINESS INTEGRITY</b>		
1.1 Legal Compliance	Conformance	The Entity has a system in place to maintain awareness of, and to ensure Compliance with Applicable Law. The effectiveness of the system is evident through management review compliance evaluations as well as what has been described in the Entity's 2023 Sustainability Report.
1.2 Anti-Corruption	Conformance	The Entity's position against Corruption is evident through statements prohibiting Corruption made in the Entity's Code of Ethics, the 2023 Sustainability Report and communication with employees and Suppliers. The Entity's Code of Ethics is disclosed on their website at: <a href="https://www.ural.com/suppliers?lang=it">https://www.ural.com/suppliers?lang=it</a>
1.3a-e Code of Conduct	Conformance	The Entity has publicly disclosed their Code of Ethics, which is accessible on the Entity's website at: <a href="https://www.ural.com/suppliers?lang=it">https://www.ural.com/suppliers?lang=it</a>
<b>2. POLICY AND MANAGEMENT</b>		
2.1a-f Environmental, Social, and Governance Policy	Conformance	The Entity has established Environmental, Social, and Governance Policies that are endorsed by senior management. The Policies are communicated both internally and externally, and are accessible on the Entity's website at: <a href="https://www.ural.com/ural-gnutti-policies?lang=it">https://www.ural.com/ural-gnutti-policies?lang=it</a>
2.2a-c Leadership	Conformance	The Entity has nominated senior Management Representatives as having overall responsibility and authority for ensuring conformance with the requirements of the ASI Performance Standard. The Policies and procedures are reviewed and updated regularly, and senior management approves all corporate Policies and procedures. The Sustainability Manager has the principal responsibility for the implementation, communication and maintenance of Policies and procedures related to the ASI Performance Standard.
2.3a Environmental and Social Management Systems – Environmental	Conformance	The Entity has an Environmental Management System that is certified against ISO 14001:2015 and ISO 50001:2018 Standards. The Entity's ISO Standard certificates are available on their website at: <a href="https://www.ural.com/qualita/certificati?lang=it">https://www.ural.com/qualita/certificati?lang=it</a>
2.3b Environmental and Social Management Systems – Social	Conformance	The Entity has implemented an Integrated Management System based on the SA8000 standard, although the Entity is not SA8000 certified currently. The Entity's Integrated Management addresses all topics raised in the SA8000 Standard. The Entity's Code of Ethics and organizational model are consistent with the requirements of a SA8000 Social Management System. The Entity operates in accordance with their internal procedures and relevant Applicable Law such as the <i>Contratto Collettivo Nazionale di Lavoro</i> (Collective National Work Agreement).
2.4a-e Responsible Sourcing	Conformance	The Entity has disclosed their Responsible Sourcing Policy. The Entity has implemented a system to evaluate all Suppliers against ESG principles.

CRITERION	RATING	COMMENT
		The Responsible Sourcing Policy is disclosed at: <a href="https://www.ural.com/wp-content/uploads/Sustainable_procurement_management_system_11.pdf">https://www.ural.com/wp-content/uploads/Sustainable_procurement_management_system_11.pdf</a>
2.5a-g Environmental and Social Impact Assessments	Not Applicable	This Criterion is not applicable to the Entity as there have been no New Projects or Major Changes to existing Facilities.
2.6a-h Human Rights Impact Assessment	Not Applicable	This Criterion is not applicable to the Entity as there have been no New Projects or Major Changes to existing Facilities.
2.7a-f Emergency Response Plan	Conformance	The Entity has developed an Emergency Response Plan, and relevant elements from the Emergency Response Plan are disclosed in the Entity's Sustainability report. The current version of the Emergency Response Plan is lodged with local authorities every four years.  The Entity's Sustainability Report is available on request from their website at: <a href="https://www.ural.com/sustainability">https://www.ural.com/sustainability</a>
2.8a-d Suspended Operations	Conformance	The Entity has developed a Business Resilience Plan to address situations where it may have to suspend or significantly alter operations due to factors outside its control, which takes into account Material adverse environmental, social and governance impacts.
2.9a-b Mergers and Acquisitions	Conformance	The Entity has established a procedure to be used in potential Mergers and Acquisitions, ensuring the review of Environmental, Social and Governance (ESG) issues in the Due Diligence process.
2.10a-b Closure, Decommissioning and Divestment	Conformance	The Entity has defined processes and procedures to review ESG issues in the planning process for closure, decommissioning and divestment.
<b>3. TRANSPARENCY</b>		
3.1a-b Sustainability Reporting	Conformance	The Entity has issued a Sustainability Report related to year 2023, following GRI guidelines. The Entity's Sustainability Report is available on request from their website at: <a href="https://www.ural.com/sustainability">https://www.ural.com/sustainability</a>  Alternatively, the Sustainability Report can be requested by email from <a href="mailto:sustainability@ural.com">sustainability@ural.com</a>
3.2 Non-compliance and Liabilities	Conformance	The Entity discloses in their Sustainability Report any non-compliances or liabilities. No non-compliances or liabilities were reported in the previous year.
3.3a-c Payments to Governments	Conformance	The Entity discloses payments to governing agencies or political parties in the annual Sustainability Report. The Entity has reported that no such payments occurred in the previous year.
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	The Entity has implemented a whistleblowing procedure. Reports can be made by emailing the dedicated email address at: <a href="mailto:segnalazioni.odv.ural@gmail.com">segnalazioni.odv.ural@gmail.com</a>

CRITERION	RATING	COMMENT
		The process for making a Complaint is disclosed on their website under the page dedicated to reporting/whistleblowing which is accessible at: <a href="https://www.eural.com/whistleblowing?lang=it">https://www.eural.com/whistleblowing?lang=it</a>
<b>4. MATERIAL STEWARDSHIP</b>		
4.1a Environmental Life Cycle Assessment	Conformance	The Entity has performed a Life Cycle Assessment (LCA) on two of its products made of the most representative alloys. The Entity is certified according to ISO 14001:2015. Information on the methodology used is available in the Entity's Sustainability report 2023 (page 86-87), which is available on request from their website at: <a href="https://www.eural.com/sustainability">https://www.eural.com/sustainability</a>
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	The Entity has performed a Life Cycle Assessment (LCA) on two of its products made of the most representative alloys.  The LCA report is available upon request at the Entity's website at: <a href="https://www.eural.com/sustainability">https://www.eural.com/sustainability</a>
4.2 Product Design	Conformance	The Entity has integrated clear objectives in the design and development process for products or components to enhance sustainability, including the environmental life cycle impacts of the end product.
4.3a-b Aluminium Process Scrap	Conformance	The Entity has established strategies that has set a target of 100% for the collection of Scrap, recycling and/or reuse, which will support a circular economy approach.
4.4a-c Collection and Recycling of Products at End of Life - Material Conversion and other Manufacturing	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.4d Collection and Recycling of Products at End of Life	Conformance	The Entity adopts circular economy principles, efficiently managing to reintegrate the majority of its Aluminium waste products into the production cycle. Details on the strategy and related targets are included in their 2023 Sustainability Report in the Circular Economy section, and partnerships are described on page 34 of the Report.  The Entity's Sustainability Report is available on request from their website at: <a href="https://www.eural.com/sustainability">https://www.eural.com/sustainability</a>
<b>5. GREENHOUSE GAS EMISSIONS</b>		
5.1a-b Disclosure of GHG Emissions and Energy Use	Minor Non-Conformance	The Entity's 2023 Sustainability Report is developed in accordance with the Global Reporting Initiative (GRI) Standards and discloses the Entity's Greenhouse Gas (GHG) Scope 1 and Scope 2 emissions. The emissions are independently verified by IGQ - Istituto Italiano di Garanzia della Qualità.  The Entity's Sustainability Report is available on request from their website at: <a href="https://www.eural.com/sustainability">https://www.eural.com/sustainability</a>  The Entity is working towards the future disclosure of GHG emissions Scope 3, however these are not yet publicly disclosed.

CRITERION	RATING	COMMENT
5.2a Aluminium Smelter GHG Emissions Intensity - Started production after 2020	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.2b Aluminium Smelter GHG Emissions Intensity - In production up to and including 2020	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.3a-e GHG Emissions Reduction Plans	Conformance	<p>The Entity has developed a GHG Emissions Reduction Pathway consistent with a 1.5°C warming scenario, using the ASI GHG Pathways Calculation Tool.</p> <p>The Entity's GHG Emissions Reduction Plan is available on request from their website at: <a href="https://www.ural.com/sustainability">https://www.ural.com/sustainability</a></p>
5.4 GHG Emissions Management	Conformance	<p>The Entity is ISO 50001:2018 and ISO 14001:2015 certified and continuous improvements are a central requirement of these certifications. A 'roadmap' on emission reduction has been established and is available upon request on Entity's website at: <a href="https://www.ural.com/sustainability">https://www.ural.com/sustainability</a></p>
<b>6. EMISSIONS, EFFLUENTS AND WASTE</b>		
6.1a-f Emissions to Air	Conformance	<p>The Entity has implemented systems and procedures to minimise impacts and reports Emissions to Air to authorities and internally. The Entity discloses their Emissions to Air and performance in their 2023 Sustainability Report (page 77). The Entity also discloses their Plan for reducing emissions in this Report (page 82).</p> <p>The Entity's Sustainability Report is available on request from their website at: <a href="https://www.ural.com/sustainability">https://www.ural.com/sustainability</a></p>
6.2a-g Discharges to Water	Conformance	<p>The Entity has implemented systems and procedures to minimise impacts and reports Discharges to Water to authorities and internally.</p> <p>The Entity discloses Discharges to Water in their 2023 Sustainability Report (page 76). The Entity's Sustainability Report is available on request from their website at: <a href="https://www.ural.com/sustainability">https://www.ural.com/sustainability</a></p>
6.3a-g Assessment and Management of Spills and Leakages	Conformance	<p>The Entity is ISO 14001:2015 certified and regularly assesses major risks related to environmental aspects and potential Spills and Leakage from the production processes. The Entity discloses relevant details, including from risk assessment, in their 2023 Sustainability Report which is available on request from their website at: <a href="https://www.ural.com/sustainability">https://www.ural.com/sustainability</a></p>
6.4a-b Public Disclosure of Spills and Leakages	Conformance	<p>The Entity has an Environmental Authorization (AIA) conforming to Italian law (Dlgs. 152/2006). The Entity must communicate to the public administration any Spills and Leakages which occur. No incidents have occurred nor been reported in recent years. Management and disclosure of Spills and Leakages is addressed in the Entity's Sustainability Report 2023, as well as in the Emergency Preparedness Plan. The Entity's Sustainability Report is available on request from their website at: <a href="https://www.ural.com/sustainability">https://www.ural.com/sustainability</a></p>

CRITERION	RATING	COMMENT
6.5a-c Waste Management and Reporting	Conformance	The Entity has implemented a strategy for recycling and Waste mitigation, developed in accordance with the waste mitigation hierarchy. Projects and investments to improve recycling and reduce waste have been implemented and planned. The disposal of waste complies with legal requirements. The Entity discloses its Waste management strategy along with quantities of Hazardous and Non-Hazardous Waste in their 2023 Sustainability Report (page 73) which is available on request from their website at: <a href="https://www.eural.com/sustainability">https://www.eural.com/sustainability</a>
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	The Entity implements processes to reduce the generation of Dross generated from the Entity's operations is measured by volume for monitoring purposes and is stored in a covered storage area and separated by alloy type. A Dross press has been installed. Dross produced is sold to a recycling company. No Dross is sent to landfill. The Entity has established a Dross Management Flow Procedure which is reviewed at planned intervals, most recently in 2024.
<b>7. WATER STEWARDSHIP</b>		
7.1a-b Water Assessment and Disclosure	Conformance	The Entity's water consumption is mapped, measured and reported annually to the Authorities and disclosed in the Sustainability Report 2023. Water consumption is addressed the Entity's risk assessment. The Entity's Sustainability Report is available on request from their website at: <a href="https://www.eural.com/sustainability">https://www.eural.com/sustainability</a>
7.2a-e Water Management	Conformance	The Entity has mapped its risks, implemented a management plan and established time-bound targets and actions. Water management structure includes measuring, reporting and identifying plans for improvements. Water consumption numbers and plans for reduction, addressed as part of the 2023 Sustainability Report which is available on request from their website at: <a href="https://www.eural.com/sustainability">https://www.eural.com/sustainability</a>
<b>8. BIODIVERSITY AND ECOSYSTEM SERVICES</b>		
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	The Entity has undertaken a risk assessment on Biodiversity and Ecosystem Services as part of the general environmental risk assessment as required for the Entity's ISO 14001:2015 certification. The assessment determined there was no significant risk to, or impacts on Biodiversity and Ecosystem Services.
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 identified in the environmental risk assessment 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 identified in the environmental risk assessment are assessed and documented as low

CRITERION	RATING	COMMENT
8.3a-c Management of Priority Ecosystem Services	Not Applicable	This Criterion is not applicable to the Entity as no Priority Ecosystem Services are identified in the environmental risk assessment.
8.4 Alien Species	Conformance	The Entity has undertaken a risk assessment on Biodiversity and Ecosystem Services as part of the general environmental risk assessment as required for the Entity's ISO 14001:2015 certification. Mitigating actions to prevent the deliberate or accidental introduction of Alien Species have been implemented.
8.5a-b Commitment to "No Go" in World Heritage Properties	Conformance	The Entity does not conduct operations or develop New Projects within the boundaries of sites included in the UNESCO World Heritage List.  The Entity's premises are not located within areas classified as Sites of Community Importance (SCI), Special Areas of Conservation (SAC), or Special Protection Areas (SAP).
8.6a-d Protected Areas	Conformance	The Entity does not conduct operations in or adjacent to classified Protected Areas.  The Entity's premises are not located within areas classified as Sites of Community Importance (SCI), Special Areas of Conservation (SAC), or Special Protection Areas (SAP).
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.
<b>9. HUMAN RIGHTS</b>		
9.1a-d Human Rights Due Diligence	Conformance	The Entity has developed a Social Responsibility Management system that includes Human Rights Due Diligence. Human Rights risks have been evaluated with the result of a low risk for the local populations or organization. A whistleblowing channel is available online and a remediation method is described in the Human Resources Procedure as mechanisms to identify and address risks arising.  The Entity's policies including the Social Accountability Policy are available on their website at: <a href="https://www.ural.com/ural-gnutti-policies">https://www.ural.com/ural-gnutti-policies</a>  The Entity's commitments to respect Human Rights is stated also in the Sustainability Report 2023, which is available on request from their website at: <a href="https://www.ural.com/sustainability">https://www.ural.com/sustainability</a>
9.2a-e Gender Equity and Women's Empowerment	Minor Non-Conformance	The Entity's integrated policy requires legal compliance, and, in Italy, discrimination against women is illegal. Management reviews have confirmed compliance with local relevant laws. The Entity's Code of Ethics also addresses gender equality and works against any form of Discrimination.  The Entity's social risk assessment concluded that Gender Equity and Women's Empowerment issues are of low risk.  However, currently no dedicated formalised program promoting Gender Equity and Women's Empowerment has been established, although an action plan has been implemented to establish such a program. The action plan includes responsibilities and deadlines.

CRITERION	RATING	COMMENT
9.3a-i Indigenous Peoples	Not Applicable	This Criterion is not applicable to the Entity as there are no Indigenous People as defined by Article 1 of ILO Convention 169, in the Entity's area of influence, the Lombardy Prealps in northern Italy.
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 People as defined by Article 1 of ILO Convention 169, in the Entity's area of influence, the Lombardy Prealps in northern Italy.
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 People as defined by Article 1 of ILO Convention 169, in the Entity's area of influence, the Lombardy Prealps in northern Italy.
9.5a Cultural and Sacred Heritage – Identification	Not Applicable	This Criterion is not applicable to the Entity as there have been no Cultural and Sacred heritage features identified in the Entity's Area of Influence of the Entity as the facilities are located within industrial areas.
9.5b Cultural and Sacred Heritage – Impacts	Not Applicable	This Criterion is not applicable to the Entity as there have been no Cultural and Sacred heritage features identified in the Entity's Area of Influence of the Entity as the facilities are located within industrial areas.
9.6a-i Displacement	Not Applicable	The Entity does not have current displacement activities and has not had displacement activities previously.
9.7a-h Affected Populations and Organisations	Conformance	<p>The Entity has developed a Social Responsibility Management system that includes Human Rights Due Diligence and operates on the Social Responsibility Policy available online. Human Rights risks have been evaluated with the result of a low risk for the local populations or organization. A whistleblowing channel is available online and a remediation method is described in the Human Resources Procedure as mechanisms to identify and address risks arising.</p> <p>The Entity makes donations and sponsorships to local organisations and associations.</p> <p>The Entity's relevant policies including the Social Accountability Policy are available on their website at: <a href="https://www.eural.com/eur-al-gnutti-policies">https://www.eural.com/eur-al-gnutti-policies</a></p>
9.8a Conflict-Affected and High-Risk Areas - Strong management systems	Conformance	<p>The Entity has established a Responsible Procurement Policy, which is available on the Entity's website. The Entity has evaluated the risk of Conflict-Affected and High-Risk Areas (CAHRAs) in its supply chain and manages these risks through a dedicated survey and evaluation of raw material Suppliers.</p> <p>The Entity's relevant policies including the Responsible Procurement Policy are available on their website at: <a href="https://www.eural.com/eur-al-gnutti-policies">https://www.eural.com/eur-al-gnutti-policies</a></p>

CRITERION	RATING	COMMENT
9.8b Conflict-Affected and High-Risk Areas - Identify and assess risks	Conformance	<p>The Entity has established a Responsible Procurement Policy, available online. The Entity has evaluated the risk of CAHRAs in its supply chain and manages these risks through a dedicated survey and evaluation of raw material Suppliers.</p> <p>The Entity's relevant policies including the Responsible Procurement Policy are available on their website at: <a href="https://www.eural.com/euralgnutti-policies">https://www.eural.com/euralgnutti-policies</a></p>
9.8c Conflict-Affected and High-Risk Areas - Strategy to respond to risks	Conformance	<p>The Entity has evaluated the risk of CAHRAs in its supply chain. The Entity has established a procedure dedicated to 'blacklist' any supplies should any significant risks emerge.</p>
9.8d Conflict-Affected and High-Risk Areas - Audit of due diligence	Conformance	<p>Due diligence assessment has been undertaken on the Entity's supply chain through a series of questionnaires. All Suppliers are currently evaluated as being low risk.</p>
9.8e Conflict-Affected and High-Risk Areas - Report annually	Conformance	<p>The Entity confirms the self-assessment statements periodically and provides a Conflict Minerals Reporting Template (CMRT) file to their involved Suppliers. The Entity describes the Supplier qualification process in their Sustainability Report and provides the result of their risk assessment that includes the protection of human rights and working conditions in the supply chain. The Entity's 2023 Sustainability Report is available on request from their website at: <a href="https://www.eural.com/sustainability">https://www.eural.com/sustainability</a></p>
9.9 Security practice	Conformance	<p>The Entity used security services from contracted external private providers. The provision of security services is governed by contracts with authorised security companies. This process includes an evaluation of social and governance issues, in accordance with the Entity's Human Rights Policy.</p>
<b>10. LABOUR RIGHTS</b>		
10.1a-c Freedom of Association and Right to Collective Bargaining	Conformance	<p>The Entity applies the relevant Collective Bargaining Agreement, entitled <i>Metalmeccanica industria</i>. In both facilities in which the Entity operates there are Trade Union representatives that have been elected by Workers and the Entity makes provision for Worker meetings. Union representatives regularly meet with the Entity's senior management, demonstrating a well-functioning dialogue.</p>
10.1d Freedom of Association and Right to Collective Bargaining - Alternative means in context of Applicable Law	Not Applicable	<p>This Criterion is not applicable to the Entity as it operates in a country (Italy) where the right to Freedom of Association and Collective Bargaining are not restricted.</p>
10.2a-c Child Labour	Conformance	<p>The Entity has made a commitment against Child Labour in its Code of Ethics, their Social Responsibility Policy and in its Human Resources Management procedure.</p> <p>The Entity implements a procedure that guarantees the absence of Child Labour. At the Audit date, no minors were employed by the Entity.</p> <p>The Entity's Code of Ethics is disclosed on their website at: <a href="https://www.eural.com/suppliers?lang=it">https://www.eural.com/suppliers?lang=it</a></p>

CRITERION	RATING	COMMENT
		The Entity's Policies including their Social Responsibility Policy are disclosed on their website at: <a href="https://www.ural.com/ural-gnutti-policies">https://www.ural.com/ural-gnutti-policies</a>
10.3a-c Forced Labour	Conformance	<p>The Entity makes a commitment against Forced Labour in its Code of Ethics, in their Social Responsibility Policy and in its Human Resources Management procedure.</p> <p>There is no evidence of Forced Labour within the Entity. The Entity requires Suppliers to adhere to its Code of Ethics.</p> <p>The Entity discloses an annual Statement on Modern Slavery on their website which is accessible at: <a href="https://www.ural.com/wp-content/uploads/2025-01-15-Modern_Slavery-Eural-2025-Rev-01-EN.pdf">https://www.ural.com/wp-content/uploads/2025-01-15-Modern_Slavery-Eural-2025-Rev-01-EN.pdf</a></p>
10.4a-c Non-Discrimination	Conformance	<p>The Entity makes a commitment against Discrimination in their Code of Ethics, in their Social Responsibility Policy and in their Human Resources Management procedure.</p> <p>No evidence of Discrimination was identified in the Entity. Salaries are determined in accordance with the salary levels prescribed in the applicable Collective Bargaining Agreement against the tasks performed, and bonuses are based on collective performance, such that gender does not influence remuneration.</p>
10.5 Communication and engagement	Conformance	Workers have elected Worker Representatives for Health and Safety and for Union rights at both sites. Periodic meetings among Workers representatives and the management are held, which on some occasions involve external unions.
10.6a-g Violence and Harassment	Conformance	<p>The Entity commits to work against Violence and Harassment in its Code of Ethics. Disciplinary practices are managed in accordance with the Collective Bargaining Agreement and by local legislation.</p> <p>The Entity's Code of Ethics is disclosed on their website at: <a href="https://www.ural.com/suppliers?lang=it">https://www.ural.com/suppliers?lang=it</a></p>
10.7a-c Remuneration	Conformance	<p>The Entity applies the salary levels and premium rates (&gt;25%) as defined in the Collective Bargaining Agreement, that is the <i>Metalmeccanica industria</i>. These rates are written into Workers' contracts.</p> <p>A second level agreement with the Unions prescribes monthly bonuses for all Entity employees. Payment is made regularly on the 12<sup>th</sup> day of each month.</p>
10.8a-c Working Time	Conformance	<p>The Entity applies working hours as defined by the Collective Bargaining Agreement,.</p> <p>The Entity is currently seeking additional resources for its Maintenance department, as isolated cases of overtime exceedance have been noted.</p>
10.9a-b Informing Workers of Rights	Conformance	Workers' contracts contain all relevant information on their rights, in accordance with the recent Italian law " <i>Decreto Trasparenza</i> " (D.L. n. 48/2023)". Freedom of Association and Collective Bargaining are respected.

CRITERION	RATING	COMMENT
<b>11. OCCUPATIONAL HEALTH AND SAFETY</b>		
11.1a Occupational Health and Safety (OH&S) Management System	Conformance	<p>The Entity has implemented an Occupational Health and Safety (OH&amp;S) Management System, integrated with other Management Systems established including a Policy approved by senior management. The continual suitability, adequacy and effectiveness of the Policy are reviewed in the annual management review meeting. The Management System is aligned with requirements of the ISO 45001 standard, including mapping of risks and opportunities, evaluation of laws and regulations, establishing improvement targets, internal audits and planned evaluation of performance.</p> <p>The Entity's commitments towards protecting Workers Health and Safety are also stated in their 2023 Sustainability Report.</p>
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Conformance	<p>The Entity has implemented an Occupational Health and Safety (OH&amp;S) Management system, integrated with other Management Systems established including a Policy approved by senior management. The continual suitability, adequacy and effectiveness of the Policy are reviewed in the annual management review meeting. The Management System is aligned with requirements of the ISO 45001 standard, including mapping of risks and opportunities, evaluation of laws and regulations, establishing improvement targets, internal audits and planned evaluation of performance.</p> <p>The Entity discloses the performance of their OH&amp;S Management System in their 2023 Sustainability Report (page 56) which is available on request from their website at: <a href="https://www.eural.com/sustainability">https://www.eural.com/sustainability</a></p>
11.2 Employee engagement on Health and Safety	Conformance	<p>The Entity has established Committees with Workers addressing OH&amp;S and holds weekly meetings established addressing OH&amp;S issues. These meetings were confirmed during Worker interviews. The Workers are encouraged to report any concerns or to provide advice and suggestions on OH&amp;S issues either personally or through their Worker representative. The Entity's management responds to the concerns and advice on OH&amp;S issues from Workers. Management provides training on OH&amp;S issues as required.</p>

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#### DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	17 April 2025	Initial Certification Audit – Full Certification
1	23 March 2026	Correction to the supply chain activities listed