

ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

Intals S.p.A

CERTIFICATE NUMBER
512

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

CERTIFICATION
LEVEL
**FULL
CERTIFICATION**

ASI ACCREDITED
AUDITING FIRM
**BUREAU VERITAS
CERTIFICATION**

DATE OF ISSUE
16 FEBRUARY 2026

DATE OF EXPIRY
15 FEBRUARY 2029

CERTIFIED SINCE
16 FEBRUARY 2026

AUTHORISED BY

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

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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

Manufacture of Aluminium alloys
for foundry applications and
derivates through mechanical pre-
treatment of Scrap and waste
Aluminium processes including
pyrolysis, melting, casting and
mechanical and chemical-
physical treatment of processing
lines at Intals Parona, Milan Italy.

AUDIT REPORT PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Intals S.p.A.
ENTITY NAME	Intals S.p.A.
CERTIFICATION SCOPE	Manufacture of Aluminium alloys for foundry applications and derivatives through mechanical pre-treatment of Scrap and waste Aluminium processes including pyrolysis, melting, casting and mechanical and chemical-physical treatment of processing lines at Intals Parona, Milan Italy.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthouses
ASI STANDARD	<ul style="list-style-type: none">Performance Standard V3.1
AUDIT TYPE	<ul style="list-style-type: none">Initial Certification Audit
AUDIT FIRM	Bureau Veritas Certification
AUDIT DATE	<ul style="list-style-type: none">24 – 26 September 2025
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">21 October 2025
AUDIT SCOPE	<p>The Audit Scope covers the manufacture of Aluminium alloys for foundry applications and derivatives through mechanical pre-treatment of Scrap and waste Aluminium processes including pyrolysis, melting, casting and mechanical and chemical-physical treatment of processing lines at Intals Parona, Milan Italy.</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthouses <p>All applicable criteria in the ASI Performance Standard were included in the Audit Scope.</p>
AUDIT OUTCOME	<ul style="list-style-type: none">Certification
AUDIT METHODOLOGY DECLARATION	<p>The Auditors confirm that:</p> <ul style="list-style-type: none"><input checked="" type="checkbox"/> The information provided by the Entity is true and accurate to the best knowledge of the Auditor(s) preparing this report.<input checked="" type="checkbox"/> The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous.<input checked="" type="checkbox"/> The Audit Scope and audit methodology are sufficient to establish confidence that the findings are indicative of the performance of the Entity's defined Certification Scope.<input checked="" type="checkbox"/> The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.

CERTIFICATION PERIOD 16 February 2026 – 15 February 2029

NEXT AUDIT TYPE Surveillance Audit

NEXT AUDIT DATE 15 February 2028

CERTIFICATE NUMBER 512



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

Intals S.p.A. (the 'Entity') produces Aluminium ingots and alloys, salt, Aluminium granules (recovered), and Argalum. The Entity was founded in 1935 in Milan and was then initially known as Vedani Carlo Metalli. In 1995, Vedani Carlo Metalli relocated production outside of central Milan, with a 120,000 square metre (m²) plant was built in Parona. In June 2013, Vedani Carlo Metalli changed its name to Intals S.p.A. The Entity produces approximately 150,000 tonnes of Aluminium ingots annually as its main product (pure and alloy Aluminium for foundries, master alloys, and specialty products for steel mills). The ingots are produced from Aluminium Scrap, with the addition of alloying elements, the exact quantities of which depend on the chemical composition of the mixture in the furnace and the desired chemical composition.

Approximately 230 workers are currently employed at the Entity, with 200 at the Parona production site and 30 at the Milan headquarters. The Entity is located in an area classified as an industrial zone, and there are no sensitive receptors that could be affected by production activities. This area in which the plant is located is classified as an 'Industrial Completion Zone'. The surrounding areas are partly agricultural and partly industrial, with numerous production activities. There are no Protected Areas or areas of community interest in the surrounding area.

The Entity is a manufacturer of remelted Aluminium alloy ingots compliant with European standard EN 1676 and other industry standards and is also able to specifically meet its customers' needs by creating customised alloys. The Entity serves a wide range of industrial sectors, including automotive, transportation, aeronautics, naval, household appliances, industrial machinery, electrical, construction, building, and food.

The main stakeholder categories of the Entity include the company owners, employees and contractors, customers, the Local Community and local area, suppliers, local authorities, and external supervisory bodies, Trade Union, supervisory agencies and the media.

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

CRITICAL INCIDENT – SEPTEMBER 2024

On 25 September 2024, a critical incident occurred at the Entity, which resulted in the fatality of a contractor. This incident occurred approximately twelve months before this Audit, which identified no Material issues or findings relating to the management of Occupational Health and Safety (OH&S) at the site. The Entity has demonstrated consistent performance with their OH&S systems, and no non-conformities relating to the relevant Criteria of the ASI Performance Standard have been identified in this ASI Performance Standard Audit.

The Accredited Auditing Firm notified ASI of this incident as soon as it became publicly known, and discussions were held between the ASI Secretariat and both the Lead Auditor and representatives of the Accredited Auditing Firm immediately following to discuss and provide additional context. This Audit Report makes no specific assessment, assumption or commentary on this incident, nor any system, processes or behaviours that may have contributed, or be considered as a possible cause, as formal investigations have been completed by Italian authorities ATS [A local health authority (abbreviated ASI) and the local health unit (AUSL)]. The Entity's ISO 45001 certification was temporarily suspended for a few months, whilst the investigation was undertaken. The certification was then reactivated.

The incident occurred at the warehouse used for storing finished products and miscellaneous material, where a Worker (from an external contractor), fell from the roof during drainage channel cleaning activities. The investigation concluded that the contracting company had commenced work without approval from the Entity. At the time of the incident, the contractor was finalising its DUVRI (Inspection and Risk Assessment Document), and the Entity was waiting to receive photographs of the roof from the contractor. The 'root cause' analysis determined that the Worker was undertaking unsafe roof cleaning work without suitable personal protective equipment without receiving approval to commence work from the Entity. The task coordination agreement, via 'Form M_46', between the Entity and the contracting firm had not yet been completed. The Entity had also not received the DUVRI by the contracting firm.

This Audit assessed the Entity's response and corrective actions arising from the incident investigation and determined that these were appropriate and implemented effectively over the past 12 months. These actions included:

- 1) Amendment to instruction I_HS_10_Management of Contractors. This amendment includes a new flow for the creation of a DUVRI (Inspection and Risk Assessment Document), prepared during the initial phase to accompany the offer requested from the supplier.
- 2) Additional training for all supervisors.
- 3) The delivery of 'work-at-height' training courses for personnel already trained or still to be trained, to further raise awareness of the risks associated with working at height and the use of Category III PPE, also involving external companies.
- 4) Communicating safe 'work-at-height' performance for all employees.
- 5) Roof renovation project with additional installation of lifelines.

FINDINGS

CRITERION	RATING	COMMENT
1. BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	<p>The Entity has developed a complete list of Applicable Laws on the internal portal and legal compliance internal audits are undertaken. Under Italian law decree 231/01, internal audits on legal compliance are undertaken by a supervising body, the OdV Vigilating Body.</p> <p>Documentation has been developed and implemented for managing regulatory updates, internal dissemination of standards and specific documentation, access to information, application of studies, retention and updating, and conformity assessment.</p>
1.2 Anti-Corruption	Conformance	<p>The Entity is committed to combating Corruption in all its forms, including extortion and Bribery, in accordance with Applicable Law and current International Standards.</p> <p>The Entity's 'Ethical and Social Report Manual and Report' is available at https://intals.it/certificazioni/ and also available in the 2024 Sustainability Report (available upon request via): https://intals.it/certificazioni/#contatti</p> <p>An external platform for communications and 'whistleblowing' is available at: https://digitalroom.bdo.it/intals/home.aspx</p>
1.3a-e Code of Conduct	Conformance	<p>The Entity has implemented a Code of Conduct, which includes principles relevant to environmental, social and governance performance. The Code is available at: https://intals.it/certificazioni/</p>
2. POLICY AND MANAGEMENT		
2.1a-f Environmental, Social, and Governance Policy	Conformance	<p>An Integrated Policy has been documented and endorsed by the Entity's senior management and has been specifically shared with key Stakeholders and is also available (in Italian only) at: www.intals.it</p>
2.2a-c Leadership	Conformance	<p>The Entity has formally nominated a Management Representative for the management of the ASI related systems and all other related systems. An ASI organisational chart is available on the Entity's noticeboard and sent via the TEAM SYSTEM app.</p> <p>The Entity has provided appropriate resources needed to implement, maintain, and improve the Management Systems as required.</p>
2.3a Environmental and Social Management Systems - Environmental	Conformance	<p>The Entity has implemented an Environmental Management System which is certified to ISO 14001.</p>
2.3b Environmental and Social Management Systems - Social	Conformance	<p>The Entity's Ethical code and Organisational Model are consistent with the requirements of a Social Management System and includes frameworks for recruiting, Human Resources management and Health and Safety. Further information is available in the 2024 Sustainability Report, available upon request via: https://intals.it/certificazioni/#contatti</p>
2.4a-e Responsible Sourcing	Conformance	<p>The Entity has defined a responsible sourcing approach that integrates ethical, social, and environmental considerations into its relationships within the value chain. This approach is formalised in the</p>

CRITERION	RATING	COMMENT
		<p>Totals Integrated Policy and the Quality, Environmental, and Safety Policy, which outlines their expectations of their suppliers not only on an operational level, but also in relation to corporate objectives and the principles of social responsibility.</p> <p>The Entity's supply chain management approach is outlined in its Manual and Social and Ethical Report. The document explicitly states the goal of going beyond compliance with current legislation, however voluntarily integrating environmental and social considerations into daily management and relationships with all Stakeholders. The Entity's responsible sourcing-related policies are available at: https://intals.it/certificazioni/</p>
2.5a-g Environmental and Social Impact Assessments	Not Applicable	This Criterion is not applicable to the Entity, as there are no New Projects or Major Changes to Facilities.
2.6a-h Human Rights Impact Assessment	Not Applicable	This Criterion is not applicable to the Entity, as there are no New Projects or Major Changes to Facilities.
2.7a-f Emergency Response Plan	Conformance	<p>The Entity has implemented an emergency response plan which includes crisis organisation, procedures, assessments of the insurance company, on-site fire brigades and annual evacuation drills.</p> <p>Management of emergencies is undertaken in accordance with the Entity's Business Continuity Plan. A summary of this information is available in the 2024 Sustainability Report, which is available upon request.</p>
2.8a-d Suspended Operations	Conformance	In the event of suspended operations due to any extenuating circumstances, including a Force Majeure event, the Entity has developed specific internal procedures for implemented should any such activities occur in the future.
2.9a-b Mergers and Acquisitions	Conformance	There are no closure, decommissioning and divestments planned, however, the Entity has developed specific internal procedures for implementation, should any such activities occur in the future.
2.10a-b Closure, Decommissioning and Divestment	Conformance	There are no closure, decommissioning and divestments planned, however, the Entity has developed specific internal procedures for implementation, should any such activities occur in the future.
3. TRANSPARENCY		
3.1a-b Sustainability Reporting	Conformance	The Entity has disclosed its governance approach to environmental, social, and economic impacts, as well as significant environmental, social, and economic impacts related to the ASI Performance Standard Principles in its 2024 Sustainability Report, available upon request via: https://intals.it/certificazioni/
3.2 Non-compliance and Liabilities	Conformance	The Entity publicly discloses information on an annual basis on Material fines, judgments, penalties and non-monetary sanctions for failure to comply with Applicable Law. This information is summarised in its 2024 Sustainability Report, available upon request via: https://intals.it/certificazioni/

CRITERION	RATING	COMMENT
3.3a-c Payments to Governments	Conformance	The Entity complies with strict local legislation and has implemented Policies and procedures regarding payments to Governments. Payments to Governments, other than relevant taxes are not permitted, and every employee is trained on the Code of Conduct annually.
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	The Entity has implemented a Management System, conforming to Italian law degree 231/01 that requires both a Code of Ethics and internal audits on anti-Corruption carried out by a supervising body called OdV (Vigilating Body). The Entity's Code of Ethics and Whistleblowing Reporting Procedures are available at: https://digitalroom.bdo.it/Intals/home.aspx
4. MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment	Conformance	The Entity has completed a Life Cycle Assessment (LCA), which was undertaken in accordance with Environmental Product Declaration (EPD) methodologies, and was independently certified by an accredited third-party. All raw materials were incorporated into the assessment and results are made available on the EDP International website at: https://www.environdec.com/library (Search for 'Intals')
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	The Entity has completed a LCA, which was undertaken in accordance with Environmental Product Declaration (EPD) methodologies, and was independently certified by an accredited third-party. All raw materials were incorporated into the assessment and results are made available on the EDP International website at: https://www.environdec.com/library (Search for 'Intals')
4.2 Product Design	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.3a-b Aluminium Process Scrap	Conformance	Aluminium Scrap is used by the Entity to produce alloys. Aluminium is also recovered internally from salt slag and skimmings are recovered in the process. Fume treatment dust is also recovered, and quantities are regularly monitored. The Entity's Sustainability Report 2024 contains a discussion on the relevant industrial processes aimed at maximum recovery of raw materials and reducing the use of virgin resources. Materials are reused in the processing salt slag recovery department, generating two fully valorised output flows – regenerated salt, reintroduced into the production process, and 'ArgAlum', an Aluminium oxide used as a secondary raw material in the cement and brick sectors.
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 has recently completed a refurbishment project for its incoming raw material sorting and automatic separation systems,

CRITERION	RATING	COMMENT
		<p>which has increased (where technically possible), the use of recovery and recycling internally or at authorised third-party facilities.</p> <p>Over recent years, the Entity has significantly increased the number of recovered cans, actively contributing to its recycling strategy, competing with local, regional or national collection and recycling systems (CIAL).</p> <p>An overview of the Entity's recycling strategy is provided in the 2024 Sustainability Report.</p>
5. GREENHOUSE GAS EMISSIONS		
5.1a-b Disclosure of GHG Emissions and Energy Use	Conformance	<p>The Entity has implemented an Energy Management System which conforms to the general requirements of the ISO 50001 Standard. An overview of the Management System is available at: www.intals.it</p> <p>GHG emissions data (Scopes 1, 2 and 3) have been Independently verified by Bureau Veritas, under an ISO 14064 certification. Annual emissions and energy use data are presented in the 2024 Sustainability Report (pages 22-23), available upon request, via: https://intals.it/certificazioni/#contatt</p>
5.2a Aluminium Smelter GHG Emissions Intensity - Started production after 2020	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.2b Aluminium Smelter GHG Emissions Intensity - In production up to and including 2020	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.3a GHG Emissions Reduction Plans	Minor Non-Conformance	<p>The Entity has developed a GHG Emissions Reduction Plan which has been developed in accordance with a 1.5c degree scenario and using the ASI Emissions Reduction Pathway Tool. The Emissions Reduction Plan is presented in the 2024 Sustainability Report available upon request, via: https://intals.it/certificazioni/#contatt (pages 15-21) and includes a series of Key Performance Indicators (KPIs), and defined targets for 2050 with a baseline year of 2023.</p> <p>The Entity, however, has not developed formal intermediate targets beyond the set baseline year.</p>
5.3b-e GHG Emissions Reduction Plans - Targets, review and disclosure	Minor Non-Conformance	<p>The Entity's GHG Emissions Reduction Plan includes emissions reduction pathways, developed using the ASI Emissions Reduction Pathway Tool, and is disclosed in Annex 1 (pages 3 and 4) of the 2024 Sustainability Report available upon request, via: https://intals.it/certificazioni/#contatt</p> <p>The Entity, however, has not developed formal intermediate targets beyond the set baseline year.</p>
5.4 GHG Emissions Management	Conformance	<p>The Entity has implemented an Energy Management System which conforms to the general requirements of the ISO 50001 standard. An overview of the Management System is available at: www.intals.it</p> <p>Further disclosure of the Entity's Energy Management programme is facilitated by annual communications to the public administration via the national Italian portal AIDA (Environmental Integrated</p>

CRITERION	RATING	COMMENT
		Authorization) and EPRTR (European Pollutant Release and Transfer Register).
6. EMISSIONS, EFFLUENTS AND WASTE		
6.1a-f Emissions to Air	Conformance	<p>The Entity has assessed 'pollution' as a significant environmental issue as part of its double Materiality assessment. Specific Policies and actions relating to air emissions have been developed by the Entity, which are outlined in the 2024 Sustainability Report.</p> <p>The Entity has published air emissions information in the 2024 Sustainability Report (pages 28-29) available upon request, via: https://intals.it/certificazioni/#contatt.</p>
6.2a-g Discharges to Water	Conformance	<p>The Entity has assessed 'pollution' as a significant environmental issue as part of its double Materiality assessment. Specific Policies and actions relating to discharges to water have been developed by the Entity, which are outlined in the 2024 Sustainability Report.</p> <p>The Entity has published water-related information in the 2024 Sustainability Report (pages 33-35) available upon request, via: https://intals.it/certificazioni/#contatt.</p>
6.3a-g Assessment and Management of Spills and Leakages	Conformance	Spills and Leakages are included in the Entity's Environmental Risk Analysis. The Entity has implemented an Emergency and Incidents Plan, which includes Spills and Leakages and the undertaking of drills/simulations.
6.4a-b Public Disclosure of Spills and Leakages	Conformance	The Entity has published that no Spills or Leakages occurred in 2024 in the 2024 Sustainability Report (page 25) available upon request, via: https://intals.it/certificazioni/#contatt .
6.5a-c Waste Management and Reporting	Conformance	<p>Waste management is included in the Entity's Environmental Risk Analysis. As a mandatory requirement under Italian law Decree 152/2006, the Entity provides a MUD (Modello Unico di Dichiarazione - Unique Form of Declaration) Report which is sent to the relevant authority on an annual basis.</p> <p>The Entity has published waste-related information in the 2024 Sustainability Report (pages 42) available upon request, via: https://intals.it/certificazioni/#contatt.</p>
6.6a-g Bauxite Residue	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7a-f Spent Pot Lining (SPL)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8a-d Dross	Conformance	Dross is considered a significant environmental aspect of the Entity and is recovered along with salt dust and skimming internally in the processing salt slag department. Further information is provided in the 'Incoming Resource Metrics' section of the 2024 Sustainability Report.
7. WATER STEWARDSHIP		
7.1a-b Water Assessment and Disclosure	Conformance	A water-related risk assessment has been completed by the Entity with identification, documentation and public disclosure according to environmental analysis as required under the Entity's Environmental

CRITERION	RATING	COMMENT
		<p>Management System. A portion of the treated water is now reused within the production cycle and diverted to the process water storage tank. This initiative has resulted in a 7% reduction in well withdrawals compared to the previous year.</p> <p>Information on the Entity's water management activities and use are disclosed via the 2024 Sustainability Report (page 34).</p>
7.2a-e Water Management	Conformance	The Entity's double Materiality assessment did consider water management as a Material issue for the Entity, however, specific water management activities have been developed and disclosed, via the 2024 Sustainability Report (page 34).
8. BIODIVERSITY AND ECOSYSTEM SERVICES		
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	<p>A risk assessment on Biodiversity was incorporated as part of the Entity's general environmental analysis undertaken as part of the Environmental Management System. A preliminary survey was conducted in 2024 by a qualified consultancy that assessed the proximity of its operating sites to ecologically significant areas and protected natural areas.</p> <p>As the Entity is located in an industrial setting, and through a review of potentially present Biodiversity features of importance in the Area of Influence, Biodiversity and Ecosystem Services are not considered as a significant risk.</p>
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Not Applicable	This Criterion is not applicable to the Entity, as it has determined that the risk to and impacts on Biodiversity and Ecosystem Services are low.
8.2a-g Biodiversity Management	Not Applicable	This Criterion is not applicable to the Entity, as it has determined that the risk to and impacts on Biodiversity and Ecosystem Services are low.
8.3a-c Management of Priority Ecosystem Services	Not Applicable	This Criterion is not applicable to the Entity, as no Priority Ecosystem Services have been identified in its Area of Influence.
8.4 Alien Species	Conformance	The Entity ensures compliance with the international ISPM 15 standard regarding heat treatment at 56°C for at least 30 minutes for wooden pallets and packaging, a standard method for ensuring and regulating the transport of goods on pallets and wooden packaging in international trade. This treatment helps prevent the accidental introduction of invasive Alien Species onto the Entity's premises.
8.5a-b Commitment to "No Go" in World Heritage Properties	Conformance	The Entity is committed to the 'No Go' principle in World Heritage Properties and has developed relevant Policies in support if there are any future expansion plans that could negatively impact World Heritage Properties.
8.6a-d Protected Areas	Conformance	The nearest Protected Area to the Entity is Parco del Ticino, however an assessment confirmed that this location is not within the Entity's Area of Influence. The Entity's commitment to Protected Areas is discussed in the 2024 Sustainability Report (page 39).

CRITERION	RATING	COMMENT
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 Ethics and Social Manual is provided to all employees. This document outlines the Entity's commitments to Human Rights and observes the United Nations Guiding Principles on Business and Rights. The Entity's Integrated Policy includes these principles among its primary objectives and is committed to updating it at least every five years, or in response to changes in operations that may alter Human Rights risks, or if a gap is identified during the control phase.</p> <p>The Integrated Policy is displayed throughout the Entity's premises, provided to all employees upon hiring, and is available on the Entity website in the 'Certifications' section. The Policy has also been provided to all suppliers.</p> <p>Annex III within the 2024 Sustainability Report entitled 'Social Aspects with Reference to Human Rights' provides information on the Entity's approach.</p>
9.2a-e Gender Equity and Women's Empowerment	Conformance	<p>The Entity's Ethics and Social Manual is provided to all employees. This document outlines the Entity's commitments to Human Rights.</p> <p>The Entity strives to ensure equal opportunities and rights for men and women. This commitment is particularly relevant in a sector like the one in which it operates, historically characterised by a male predominance.</p> <p>The Entity has disclosed a brief discussion on its women-related performance and programs in the 2024 Sustainability Report (pages 50 and 59).</p>
9.3a-i Indigenous Peoples	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples within the Entity's Area of Influence.
9.4a Free, Prior, and Informed Consent (FPIC) - New Projects or Major Changes	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples within the Entity's Area of Influence.
9.4b Free, Prior, and Informed Consent (FPIC) - Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9.4c Free, Prior, and Informed Consent (FPIC) - Demonstrate support	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples within the Entity's Area of Influence.
9.5a Cultural and Sacred Heritage - Identification	Conformance	The Entity has conducted a detailed analysis to determine whether its operations may in any way impact upon sacred or cultural heritage sites or values within its Area of Influence. The analysis concluded that there are no impacts and therefore no actions are required to avoid or remediate impacts.

CRITERION	RATING	COMMENT
9.5b Cultural and Sacred Heritage - Impacts	Not Applicable	This Criterion is not applicable to the Entity, as there are no Cultural and Sacred Heritage within the Entity's Area of Influence.
9.6a-i Displacement	Conformance	The Entity recognises that any reorganisation or physical relocation of its Facilities may pose significant challenges, and whilst there are no relocations or corporate reorganizations are planned for the near future, the Entity will initiate provisions under its Change Management Module and related procedures.
9.7a-h Affected Populations and Organisations	Conformance	The Entity respects, in a manner appropriate to its size and circumstances, the legal and customary rights and interests of affected peoples and organisations in their lands, livelihoods, and use of natural resources. Whilst no impacts to potentially Affected Populations and Organisations have been identified, in future if this were to occur, the Entity will implement a plan to identify, prevent, monitor, mitigate, and account for any significant impacts, including impacts on Health and Safety, Human Rights, social and cultural issues, and the environment, resulting from its activities. The Entity will develop the plan in consultation with and, where possible, with the participation of affected peoples. The Entity will in turn commit resources to Local Community development in accordance with the plan.
9.8a Conflict-Affected and High-Risk Areas - Strong management systems	Conformance	To avoid involvement in armed conflict or Human Rights abuses, the Entity conducts risk-based Due Diligence on its Aluminium supply chain, in accordance with the OECD Due Diligence Guidance for Minerals from Conflict-Affected and High-Risk Areas (OECD Guidance), in a manner appropriate to its size and circumstances. The Entity has developed and implemented a Due Diligence process if materials are or may be sourced from designated 'high-risk' areas.
9.8b Conflict-Affected and High-Risk Areas - Identify and assess risks	Conformance	The Entity has developed and implemented a Due Diligence process in the event that materials are or may be sourced from designated 'high-risk' areas. The Entity's Ethics and Social Manual (chapter 13, 'High-Risk Conflict Areas and Security Practice') outlines the identification and assessment processes undertaken by the Entity to identify specific risks in its supply chain.
9.8c Conflict-Affected and High-Risk Areas - Strategy to respond to risks	Conformance	The Entity has developed and implemented a Due Diligence process in the event that materials are or may be sourced from designated 'high-risk' areas. The Entity's Ethics and Social Manual (chapter 13, 'High-Risk Conflict Areas and Security Practice') outlines the identification and assessment processes undertaken by the Entity to identify specific risks in its supply chain and inform any development of strategy(ies) that may be required.
9.8d Conflict-Affected and High-Risk Areas - Audit of due diligence	Conformance	The Entity's Due Diligence practices were included in this ASI Performance Standard Certification Audit, which addresses this requirement.
9.8e Conflict-Affected and High-Risk Areas - Report annually	Conformance	The Entity provides an overview in its 2024 Sustainability Report (page 66) that summarises its approach to Conflict-Affected and High-Risk Areas (CAHRAs).

CRITERION	RATING	COMMENT
9.9 Security practice	Conformance	The Entity's Ethics and Social Manual is provided to all employees and contractors, including the unarmed security service providers. The Manual (chapter 13, 'High-Risk Conflict Areas and Security Practice'), requires security personnel to comply with the Entity's Human Rights obligations and commitments.
10. LABOUR RIGHTS		
10.1a-c Freedom of Association and Right to Collective Bargaining	Conformance	<p>The Entity recognises its employees' right to association to defend and promote their interests, as well as the right to be represented by Trade Unions or other forms of representation, in accordance with the legislation and practices in force in the various countries in which they are employed.</p> <p>Collective Bargaining is recognised as the preferred tool for determining the contractual rules and conditions of its employees, as well as for regulating relations between the Entity and Trade Unions. The Entity is committed to ensuring that employee representatives are not penalised or subjected to any form of retaliation.</p>
10.1d Freedom of Association and Right to Collective Bargaining - Alternative means in context of Applicable Law	Not Applicable	This Criterion is not applicable to the Entity, as there is no legal restriction on the Right of Freedom of Association and Collective Bargaining in the country (Italy) in which it operates.
10.2a Child Labour	Minor Non-Conformance	<p>The Entity rejects the use of any form of Child Labour or persons under the minimum age established by law, as defined by current regulations. The Entity adopts specific procedures for the selection and hiring of Workers. These procedures define the documentation required by Workers for hiring purposes; evaluating this documentation helps prevent Child Labour.</p> <p>Whilst the Entity manages Child Labour risks by defining the minimum working age as 16, and although it has adopted this threshold and developed management strategies in accordance with current regulations, there is no evidence of a risk assessment appropriate to the Entity's circumstances being conducted to assess where there might be a risk of Child Labour.</p>
10.3a-c Forced Labour	Minor Non-Conformance	<p>The Entity rejects the use of Forced or compulsory Labour and guarantees working conditions that comply with Applicable Laws and regulations. The performance of work, both ordinary and extraordinary, is a free expression of the Workers' will, and is free from any form of physical and/or psychological coercion.</p> <p>Whilst the Entity's commitment to mitigating Modern Slavery is incorporated into the Ethics and Social Manual (page 28), a publicly available Modern Slavery Statement is not yet available.</p>
10.4a-c Non-Discrimination	Conformance	The Entity rejects any form of Discrimination based on ethnicity, skin colour, gender, age, disability, sexual orientation, religion, political opinion, nationality, or social origin. The Entity maintains a work environment free from any form of Violence or Harassment. Policies and procedures are implemented to support non-Discrimination such as equal pay for the same function and job, no discriminatory criteria are applied when hiring staff, Workers are offered the same training opportunities, etc.

CRITERION	RATING	COMMENT
		The Entity's approach to ensuring its premises is free from Discrimination is discussed in the 2024 Sustainability Report (page 51).
10.5 Communication and engagement	Conformance	The Entity guarantees open communication and direct engagement with Workers and their representatives regarding working conditions and the resolution of workplace and compensation-related issues, without threats of retaliation, intimidation, Violence, or Harassment.
10.6a-g Violence and Harassment	Conformance	The Entity is committed to maintaining a work environment free from any form of Violence or Harassment. Policies and procedures are established to support the well-being of individuals and to identify and address any issues related to Violence and Harassment. The Entity's mitigating actions to preventing Violence and Harassment is presented in its Ethics and Social Manual.
10.7a-c Remuneration	Conformance	<p>The Entity pays its Workers a salary that provides them with additional income beyond basic needs. Pay slips indicate the composition of the wages received, including any legal deductions. Employment contracts, duly signed by the parties, and copies of the pay slips are archived by the Labor Consultant and the Accountant, respectively. Salaries are paid by bank transfer.</p> <p>The Entity guarantees that the composition of wages and benefits is clearly and regularly disclosed for the benefit of Workers. The Entity guarantees that no 'labour-only' contracts or false apprenticeship programs are entered into, aimed at avoiding fulfilling the Entity's obligations towards its Workers, pursuant to applicable labour and social security legislation.</p> <p>The National Collective Labor Contract (Italian Labour Law) applies throughout the Entity. Refer to: https://www.contrattometalmeccanici.it Payrolls are in conformance with the standard format approved by public administration. During the Audit, interviewed Workers stated they understand the contents of payroll and that payments were always on time.</p>
10.8a-c Working Time	Conformance	The Entity adheres to Applicable Law and industry standards regarding working hours, holidays, and paid annual leave, ensuring that Workers have, on average, at least one day of rest every seven days, and ensuring that the working day does not exceed an average of 8 hours over a six-month period.
10.9a-b Informing Workers of Rights	Conformance	The Entity guarantees open communication and direct engagement with Workers and their representatives regarding working conditions and the resolution of workplace and compensation-related issues, without threats of retaliation, intimidation, Violence, or Harassment. The National Collective Labor Contract (Italian Labour Law) applies throughout the Entity. Refer to: https://www.contrattometalmeccanici.it
11. OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Management System	Conformance	<p>The Entity has developed and implemented an Occupational Health and Safety (OH&S) Management System developed in accordance with ISO 45001. Further information is available at: www.intals.it and in the 2024 Sustainability Report (pages 50-58).</p> <p>An OH&S risk assessment is regularly updated, procedures are implemented and regular management reviews are undertaken.</p>

CRITERION	RATING	COMMENT
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Conformance	<p>The Entity has developed and implemented an Occupational Health and Safety (OH&S) Management System developed in accordance with ISO 45001. An OH&S risk assessment is regularly updated, procedures are implemented and regular management reviews are undertaken.</p> <p>As required under Italian Law: Decree 81:2008 'Consolidated law on health and safety at work', specific safety indicators are present and monitored, and the most representative indicators are incorporated in the 2024 Sustainability Report and accompanying Annex I (ESRS SI-14 Health and Safety Metrics). The Entity proposes to disclose additional OH&S indicators in the 2025 iteration of the Report.</p> <p>As referred to on page 4 of this Report, a critical incident occurred at the Entity on September 25, 2024, in which a maintenance contractor was fatally injured following a fall from the roof during cleaning activities.</p> <p>As the incident had occurred approximately 12 months prior to this Audit, a Non-Conformance has not been raised for this Criterion specifically relating to the incident. Additionally, this Audit assessed the Entity's response and corrective actions arising from the incident investigation and determined that these were appropriate and implemented effectively over the past 12 months. These actions included:</p> <ol style="list-style-type: none"> 1) Amendment to instruction I_HS_10_Management of Contractors. This amendment includes a new flow for the creation of a DUVRI (Inspection and Risk Assessment Document), prepared during the initial phase to accompany the offer requested from the supplier. 2) Supervisor training for all supervisors. 3) The delivery of 'work-at-height' training courses for personnel already trained or still to be trained, to further raise awareness of the risks associated with working at height and the use of Category III PPE, also involving external companies. 4) Communicating safe 'work-at-height' performance for all employees. 5) Additional installation of lifelines for a roof renovation project.
11.2 Employee engagement on Health and Safety	Conformance	<p>OH&S communication, consultation, and employee engagement activities include daily meetings with key managers, weekly meetings with 'middle' management, and monthly meetings. Regular notices on progress of the Entity on OH&S safety aspects are posted on noticeboards. A resource box is made available for feedback and suggestions for improvement. Direct communication between operators and managers is promoted, as well as direct communication with plant management at all levels of the Entity.</p>

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DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	16 February 2026	Initial Certification Audit – Full Certification
