

ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

European Metals Srl

CERTIFICATE NUMBER
457

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

CERTIFICATION LEVEL
**PROVISIONAL
CERTIFICATION***

ASI ACCREDITED
AUDITING FIRM
**BUREAU VERITAS
CERTIFICATION**

DATE OF ISSUE
27 APRIL 2026

DATE OF EXPIRY
26 APRIL 2027

CERTIFIED SINCE
27 APRIL 2026

AUTHORISED BY

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

CERTIFICATION SCOPE

Manufacture of Aluminium alloys
rolled by remelting, continuous
casting, cold rolling, heat
treatments and slitting for various
markets including food, feed and
flexible packaging and technical
applications, Volpiano (TO), Italy.

* Provisional Certification is valid
for the period of one year, during
which the company can address
the non-conformances assessed
and subsequently seek full
certification

AUDIT REPORT PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	European Metals Srl
ENTITY NAME	European Metals Srl
CERTIFICATION SCOPE	Manufacture of Aluminium alloys rolled by remelting, continuous casting, cold rolling, heat treatments and slitting for various markets including food, feed and flexible packaging and technical applications, Volpiano (TO), Italy.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">• Casthouses• Semi-Fabrication• Material Conversion
ASI STANDARD	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 October – 17 December 2025
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">• 21 February 2026
AUDIT SCOPE	<p>The Audit Scope covered the manufacture of Aluminium alloys rolled by remelting, continuous casting, cold rolling, heat treatments and slitting for various markets including food, feed and flexible packaging and technical applications, at the European Metals Facility, located in Volpiano (TO), Italy.</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none">• Casthouses• Semi-Fabrication• Material Conversion <p>All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.</p>
AUDIT OUTCOME	<ul style="list-style-type: none">• Provisional 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.

The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.

CERTIFICATION PERIOD 27 April 2026 – 26 April 2027

NEXT AUDIT TYPE Surveillance Audit

NEXT AUDIT DATE 27 October 2026

CERTIFICATE NUMBER 546



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

European Metals Srl (the 'Entity') is located in Strada Brandizzo 130, Volpiano (TO), Italy and was founded in 2020, following the acquisition by Dingsheng Aluminium Group of Comital Srl, a long-established Italian manufacturer of thin Aluminium foil, which had been operating in Volpiano since 1963.

The Entity covers an area of approximately 85,000 square metres (m²) with an annual production capacity of 30,000 metric tonnes and currently employs approximately 250 persons. The key physical features of the Entity includes one continuous casting line, a breakdown mill, four foil mills, six intermediate annealing furnaces, five separators, 18 final annealing furnaces, a packaging area and warehouse. The Entity specialises in the production of thin Aluminium foil and its alloys, ranging from 6 to 50 microns in thickness, with different mechanical characteristics and widths.

The Aluminium foil is sold to customers mainly for the following types of products:

1. Converter foil, for the manufacture of food packaging and flexible packaging;
2. Household foil; and,
3. Pharmaceutical applications (e.g. for the manufacture of blister packs for medicines).

The nearest township to the Entity is Volpiano, situated two kilometres from the Facility and nearby receptors include the San Giovanni River which runs adjacent to the township of Volpiano. Key external stakeholders include regulatory bodies including Città Metropolitana di Torino (CMT), ARPA Piemonte, Comune di Volpiano and the local town of Volpiano.

No construction, upgrade, expansion or decommissioning activities are planned at present.

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	Medium	High	Medium	MEDIUM
RISKS	Medium	Medium	Medium	MEDIUM
PERFORMANCE	Medium	Low	Medium	MEDIUM
OVERALL		MEDIUM		

FINDINGS

CRITERION	RATING	COMMENT
1. BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	<p>The Entity's Environmental Management System is certified to ISO 14001. As required under the ASI Standard, the Entity has developed a complete list of applicable environmental laws on the internal portal and legal compliance internal audits are undertaken regularly.</p> <p>The Management System conforms to Italian law Decree 231/01 that requires internal audits on legal compliance to be undertaken by the supervising body OdV (Organismo di Vigilanza: Vigilating Body).</p> <p>For more information, refer to: https://www.europeanmetals.it/wp-content/uploads/2025/02/EM-MOG-Parte-Generale.pdf</p>
1.2 Anti-Corruption	Conformance	<p>The Entity's Management System conforms to Italian law Decree 231/01 that requires internal audits on anti-Corruption to be undertaken by the supervising body OdV .</p> <p>For more information, refer to: https://www.europeanmetals.it/wp-content/uploads/2025/12/06.-European-Metals-Ethic-Code-ENG-REV2.pdf</p>
1.3a-e Code of Conduct	Conformance	<p>The Entity has developed and implemented a Code of Ethics, which is periodically updated and available to all Workers and contractors. The Code is available at: https://www.europeanmetals.it/wp-content/uploads/2024/10/Codice_Etico_Rev2_0.pdf</p>
2. POLICY AND MANAGEMENT		
2.1a-f Environmental, Social, and Governance Policy	Conformance	<p>The Entity has developed and implemented a Health & Safety and Environmental Policy according to ISO 14001 and ISO 45001 Standards. The Policy is periodically reviewed and updated during the Entity's regular management review process. The Policy is made available to all Workers via the 'Info Point' intranet system.</p> <p>Information and communication of the Policy to Workers is provided during the induction process according to an internal document and procedure. This Policy is available at: https://www.europeanmetals.it/en/about-us/#policy</p>
2.2a-c Leadership	Conformance	<p>The Entity's General Manager and Plant Manager are both nominated as Management Representatives to lead the implementation of the Policies and of the Integrated Management System.</p>
2.3a Environmental and Social Management Systems - Environmental	Conformance	<p>The Entity has developed and implemented an Environmental Management System, which is certified to ISO 14001:2015.</p>
2.3b Environmental and Social Management Systems - Social	Conformance	<p>The Entity has defined a Code of Ethics and organisational model consistent with the requirements of a social Management System. The Management System includes statements and policies on recruiting, human resources and Health and Safety. The Human Resources Department has its own procedures to continuously deliver conformity to the National Collective Bargaining Agreement (CBA) for work-related matters including wages and working hours.</p>

CRITERION	RATING	COMMENT
		The Code is available at: https://www.europeanmetals.it/wp-content/uploads/2024/10/Codice_Etico_Rev2_0.pdf
2.4a-e Responsible Sourcing	Conformance	<p>The Entity's main raw material suppliers of Aluminium and foil stock are certified to both ISO 14001 and the ASI Performance Standard.</p> <p>The Entity also manages different kinds of declarations including Conflict Minerals declarations (such as CMRT, EMRT, AMRT) and declarations of origin and traceability of raw material (for foil stock).</p> <p>The Entity's Responsible Sourcing Policy is available at: https://www.europeanmetals.it/en/about-us/#policy</p>
2.5a-g Environmental and Social Impact Assessments	Not Applicable	This Criterion is not applicable to the Entity as it is not currently implementing any 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 it is not currently implementing any New Projects or Major Changes to existing Facilities.
2.7a-f Emergency Response Plan	Conformance	<p>The Entity has implemented an Emergency Response Plan (ERP), which is also a requirement under Italian Law, D.Lgs 81:2008 – 'Consolidated law on health and safety at work'.</p> <p>The ERP includes crisis organisation, procedures, assessments of the insurance company, on-site fire brigades, and annual evacuation tests. The ERP is periodically updated and is an operational document for internal use, that can be shared upon specific request to Stakeholders via: https://www.europeanmetals.it/en/contacts/</p>
2.8a-d Suspended Operations	Conformance	The Entity has defined a Business Continuity Plan, which aims to ensure continuity of supply for the following situations: breakdowns of key equipment, interruptions of external supply products, interruption of services, labour shortages, fires, infrastructure problems, cyber-attacks and natural disasters.
2.9a-b Mergers and Acquisitions	Conformance	<p>The Entity must notify of any changes planned or relating to the characteristics, operation or upgrading of the installation that may have an impact on the community and environment. In the event of changes in the ownership of the plant management, both previous and new operators shall notify the relevant Authorities, for the purposes of transferring the Integrated Environmental Authorisation.</p> <p>No mergers or acquisitions have occurred during the previous three years, and there are currently no such plans in the future.</p>
2.10a-b Closure, Decommissioning and Divestment	Conformance	<p>The Entity must notify of any changes planned or relating to the characteristics, operation or upgrading of the installation that may have an impact on the community and environment.</p> <p>In the event of any closure, decommissioning or divestment event, the Entity shall notify the Authorities, for the purposes of transferring the Integrated Environmental Authorisation, as requested by the Integrated Environmental Authorisation – Sez.3 e 9.</p>

3. TRANSPARENCY

CRITERION	RATING	COMMENT
3.1a-b Sustainability Reporting	Major Non-Conformance	The Entity has not prepared or disclosed a Sustainability Report. At the time of the Audit, the Entity had commenced preparation of a ECOVADIS Sustainability evaluation.
3.2 Non-compliance and Liabilities	Conformance	No significant fines, prosecutions, penalties and sanctions have been received by the Entity over the previous five years. Should there be significant fines, prosecutions, penalties and sanctions received in future, those would be indicated in the Entity's Balance Sheet, as part of its financial reporting obligations.
3.3a-c Payments to Governments	Conformance	No payments have been made to Governments or political parties.
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	The Entity manages a 'Whistleblowing' Procedure according to the MOG 231 - General section. Email contact addresses are provided for the Supervisory Body, as well as the Entity, which are available at: https://whistleblowersoftware.com/secure/europeanmetals
4. MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment	Minor Non-Conformance	<p>The Entity manages an annual inventory of the Greenhouse Gas (GHG) emissions at site level for the reporting of Scope 1, 2 and 3 emission types. The inventory is developed using a 'cradle-to-gate' approach and it has been developed in accordance with internationally recognised reporting principles established by the Greenhouse Gas Protocol standards.</p> <p>Whilst these data assist in informing customers and other Stakeholders of the life cycle impacts of the Entity's Products, the Entity has not completed a full evaluation of the life cycle impacts for its major Product lines.</p>
4.1b-c Environmental Life Cycle Assessment - Disclosure	Minor Non-Conformance	<p>The Entity manages an annual inventory of the GHG emissions at site level for the reporting of Scope 1, 2 and 3 emission types. The inventory is developed using a 'cradle-to-gate' approach and it has been developed in accordance with internationally recognised reporting principles established by the Greenhouse Gas Protocol standards.</p> <p>Whilst these data assist in informing customers and other Stakeholders of the life cycle impacts of the Entity's Products, there is no evidence of a public communication on LCA including public access to the LCA information and its underlying assumptions and system boundaries.</p>
4.2 Product Design	Conformance	<p>The Entity has defined a Technical Data Sheet for its Converter Foil Product which includes chemical composition, metallurgic temper and mechanical properties for every alloy type.</p> <p>The Entity is not involved directly in the development and the Product is a standard alloy manufactured according to customer specifications and requests.</p>
4.3a-b Aluminium Process Scrap	Conformance	The Entity has implemented a dedicated Aluminium Scrap press department, where baling and palletising Scrap from the rolling and splitting departments is undertake, using automatic pneumatic transport systems and forklift trucks.

CRITERION	RATING	COMMENT
		Collected Scrap is baled using automatic/semi- automatic pressing systems that adjust its volume; it is then strapped using manual palletising systems.
4.4a-c Collection and Recycling of Products at End of Life - Material Conversion and other Manufacturing	Conformance	Collected Scrap is reused in the internal casthouse at 100% and sold as secondary material to other customers. The Entity has received a dedicated consent for 'Management of Scrap as a by-product' by the Environment and Surveillance Department - Environmental Assessments - A.I.A. (Integrated Environmental Authorization) Unit of the city of Turin. The Entity can provide this document upon request via: https://www.europeanmetals.it/en/contacts/
4.4d Collection and Recycling of Products at End of Life	Conformance	The Entity has implemented a dedicated Aluminium Scrap press department, where baling and palletising Scrap from the rolling and splitting departments is undertaken, using automatic pneumatic transport systems and forklift trucks.
5. GREENHOUSE GAS EMISSIONS		
5.1a-b Disclosure of GHG Emissions and Energy Use	Major Non-Conformance	<p>The Entity commenced the formal collection and reporting of GHG Emissions and energy use in 2022 utilising support provided by an external consulting firm. The data relate to Scope 1, Scope 2, and Scope 3 emission types, with the inventory developed in accordance with the Greenhouse Gas Protocol and ISO 14064-1. The GHG emissions data are available to Stakeholders upon request.</p> <p>There is no evidence of an independent verification of the data prior of the publication however, and secondly there is no full public disclosure of GHG emissions data.</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	Conformance	<p>The Entity has developed and implemented a Sustainability Strategy that has been developed using Scope 1, 2 and 3 GHG emissions data for 2022, 2023 and 2024, and includes an improvement plan with actions and targets up to 2030.</p> <p>The Entity uses the ASI method to define GHG Emissions Reduction Pathways.</p>
5.3b-e GHG Emissions Reduction Plans - Targets, review and disclosure	Major Non-Conformance	<p>The Entity has developed and implemented a Sustainability Strategy that has been developed using Scope 1, 2 and 3 GHG emissions data for 2022, 2023 and 2024, and includes an improvement plan with actions and targets up to 2030.</p> <p>Whilst this information is available upon request, the Entity has not effectively completed and disclosed its GHG Emissions Reduction Pathway and reduction plans and has not established formal Intermediate Targets.</p>

CRITERION	RATING	COMMENT
5.4 GHG Emissions Management	Conformance	The Entity manages the activity of emission reporting and reduction measures as part of its Environmental Management System. The Entity adopts specific procedures and operating controls to achieve performance aligned to the GHG Emissions Reduction Plan and targets.
6. EMISSIONS, EFFLUENTS AND WASTE		
6.1a-f Emissions to Air	Conformance	In accordance with its Integrated Environmental Authorization (AIA) (Italian law Dlgs. 152/2006), the Entity publicly communicates its air emissions data to the public administration. The Entity issues an Annual Environmental Report with the results of the periodical controls of the Emissions to Air. Air emissions monitoring is undertaken by an external laboratory.
6.2a-g Discharges to Water	Conformance	In accordance with its AIA (Italian law Dlgs. 152/2006), the Entity publicly communicates its discharges data to the public administration. The Entity issues an Annual Environmental Report with the results of the periodical controls of the Discharges to Water.
6.3a-g Assessment and Management of Spills and Leakages	Conformance	In accordance with its AIA (Italian law Dlgs. 152/2006), the Entity publicly communicates its discharges data to the public administration. The Entity issues an Annual Environmental Report with the results of the periodical controls of the Discharges to Water, including any Spills and Leakages. The Entity has developed and implemented a Product Spill Instruction Standard Operating Procedure (SOP) and a risk map of the facility. According to the internal Emergency Response Plan (ERP), the Entity regularly undertakes drills according to the internal Environmental Schedule.
6.4a-b Public Disclosure of Spills and Leakages	Minor Non-Conformance	The Entity has had no Leakages or Spills in the previous three years. The Entity regularly undertakes drills according to the internal Environmental Schedule. In the AIA document, disclosure is required in the event of an uncontrolled discharge. There is no evidence however that the Entity publicly discloses its Spills and Leakages data.
6.5a-c Waste Management and Reporting	Conformance	In accordance with its AIA (Italian law Dlgs. 152/2006), a MUD (Modello Unico di Dichiarazione: Unique Form of Declaration) must be sent to the public administration annually. The Entity issues an Annual Environmental Report with the results of the periodical controls of the wastes generated. Public disclosure is facilitated via annual communications to the public administration.
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 manages Dross from the Aluminium re-melting process where it is stored in special containers in a dedicated area. Slag is disposed of as waste, using the appropriate waste form.

CRITERION	RATING	COMMENT
		<p>Dross is stored inside the production facilities on impermeable flooring protected from the weather and 100% of Dross is recovered and not disposed of in landfills. It is used to produce other alloys and other products such as refractory materials.</p> <p>The Entity issues an Annual Environmental Report with the results of the periodical controls of the wastes (including Dross) generated. Public disclosure is facilitated via annual communications to public administration.</p>
7. WATER STEWARDSHIP		
7.1a-b Water Assessment and Disclosure	Conformance	<p>In accordance with its Integrated environmental Authorization (AIA) (Italian law DLgs. 152/2006), the Entity publicly communicates its water data to the public administration. The Entity issues an Annual Environmental Report with the results of water withdrawal quantities, including water taken from aquifers and wells, and industrial wastewater discharged into surface water bodies.</p> <p>The Report is shared with the Province of Turin, the ARPA and the municipality, which facilitates public disclosure. The Entity's Annual Environmental Report is also available upon request via: https://www.europeanmetals.it/en/contacts/</p>
7.2a-e Water Management	Not Applicable	This Criterion is not applicable to the Entity as the water-related risk has been assessed as low.
8. BIODIVERSITY AND ECOSYSTEM SERVICES		
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	The Entity is located within a well-defined industrial area. The impact on Biodiversity and Ecosystem Services is limited predominantly to the use of water resources, which is undertaken in Compliance with National law.
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment – Priority	Conformance	The Entity is located within a well-defined industrial area. The impact on Biodiversity and Ecosystem Services is limited predominantly to the use of water resources, which is undertaken in Compliance with National law.
8.2a-g Biodiversity Management	Not Applicable	This Criterion is not applicable to the Entity, as the Entity's risk assessment determined there was no significant risk to Biodiversity or Ecosystem Services.
8.3a-c Management of Priority Ecosystem Services	Not Applicable	This Criterion is not applicable to the Entity, as the Entity's risk assessment determined there was no significant risk to Biodiversity or Ecosystem Services.
8.4 Alien Species	Conformance	The Entity's environmental risk assessment, undertaken as part of its ISO 14001 requirements, determined that there are no Alien Species present on site, and the risk for introduction onto the premises is minimal.
8.5a-b Commitment to "No Go" in World Heritage Properties	Conformance	The Entity is located within a well-defined industrial area. The Entity does not operate within, nor adjacent to any World Heritage Properties.

CRITERION	RATING	COMMENT
8.6a-d Protected Areas	Conformance	The Entity is located within a well-defined industrial area. The Entity does not operate within, nor adjacent to any defined Protected Areas.
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	The Entity has developed and implemented a Code of Ethics and plans to develop a supporting Code of Conduct in the near future based on Human Rights risk assessment undertaken by the Entity (including an 'ethical and behavioural principles' assessment). The Code of Ethics is available at: https://www.europeanmetals.it/wp-content/uploads/2024/10/Codice_Etico_Rev2_0.pdf
9.2a-e Gender Equity and Women's Empowerment	Minor Non-Conformance	<p>The Entity's Code of Ethics includes an assessment of 'ethical and behavioural principles' and the 'recognition of the value of the individual and the principle of equality and non-Discrimination'.</p> <p>The Entity protects and promotes the value of the human person, who must not be discriminated against on the basis of age, sex, ethnic origin, religion, sexual orientation, gender identity, nationality, political or trade union opinions. Following this principle, the Entity rejects and condemns any form of Discrimination based on personal characteristics, Trade Union membership, political affiliation, gender, ethnic origin, religion, disability, age, sexual orientation, or gender identity.</p> <p>Further information is also available in the National Labor Agreement for Metalworkers, available at: https://www.contrattometalmeccanici.it/contratto-metalmeccanici/</p> <p>Whilst the Entity does monitor the total number of women in total employees and the total number of women in management roles, there is no public disclosure of information relating to the implementation and performance of women's initiatives.</p>
9.3a-i Indigenous Peoples	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples in 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 in 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 in the Entity's Area of Influence.

CRITERION	RATING	COMMENT
9.5a Cultural and Sacred Heritage - Identification	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples, nor features of cultural or sacred heritage in 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, nor features of cultural or sacred heritage in the Entity's Area of Influence.
9.6a-i Displacement	Conformance	<p>The Entity currently has no projects involving the resettlement or displacement of populations or local residents, and no resettlement is planned in place. In case of New Projects and Major Changes, the Entity will still consider any potential for resettlement.</p> <p>Italian law and legislative decrees allow for the establishment of companies only in areas used for industrial development.</p>
9.7a-h Affected Populations and Organisations	Conformance	The Entity's Integrated Environmental Authorization (AIA) allow for the establishment of companies only in areas used for industrial development, and after a dedicated risk/impact analysis on the Human Rights, the Entity respects the legal and customary rights and interests of local communities in relation to their lands and livelihoods, as well as their related access to and use of natural resources.
9.8a Conflict-Affected and High-Risk Areas - Strong management systems	Conformance	<p>The Entity has developed a standard conflict minerals assessment protocol for the assessment of the country of origin of raw materials which is completed by each Aluminium supplier to the Entity. This process informs the development and maintenance of a qualified vendor list.</p> <p>For more information on Conflict-Affected and High-Risk Areas, refer to the Supply Chain Policy, available at: https://www.europeanmetals.it/en/about-us/#policy</p>
9.8b Conflict-Affected and High-Risk Areas - Identify and assess risks	Conformance	<p>The Entity's assessment process includes conflict minerals reporting annually by its Aluminium suppliers (AMRT, CMRT and EMRT) and the origin of the raw material reported on analysis certificates.</p> <p>All suppliers are ASI Performance Standard certified and located in Europe (Italy and UK) with low risk for involvement in armed conflict or Human Rights abuses. Actions are defined where appropriate in order to reduce the overall risk and the impact.</p>
9.8c Conflict-Affected and High-Risk Areas - Strategy to respond to risks	Conformance	<p>The Entity's assessment process includes conflict minerals reporting annually by its Aluminium suppliers (AMRT, CMRT and EMRT) and the origin of the raw material reported on analysis certificates.</p> <p>All suppliers are ASI Performance Standard certified and located in Europe (Italy and UK) with low risk for involvement in armed conflict or Human Rights abuses. Actions are defined where appropriate in order to reduce the overall risk and the impact.</p>
9.8d Conflict-Affected and High-Risk Areas - Audit of due diligence	Conformance	This ASI Performance Standard Audit satisfies the requirements of this Criterion.

CRITERION	RATING	COMMENT
9.8e Conflict-Affected and High-Risk Areas - Report annually	Minor Non-Conformance	Whilst the Entity annually updates its qualified vendor list and conflict minerals assessment, there is currently no public disclosure of this assessment and potential impacts to its supply chain.
9.9 Security practice	Conformance	The Entity's security is provided by an external company with non-armed personnel. Entrance management involves verification of specific documents, which must be associated with a QR code for entry into the premises. Appropriate training has been provided to relevant personnel.
10. LABOUR RIGHTS		
10.1a-c Freedom of Association and Right to Collective Bargaining	Conformance	<p>The Entity respects the rights of Workers to unite freely, seek representation and join the Works Councils without interference. The Italian National Collective Labor Contract applies to the Entity. Refer to: https://www.contrattometalmeccanici.it</p> <p>In Italy, all Workers are covered by a Collective Bargaining Agreement (CBA) agreed at national level among Trade Unions and industry representatives, and the CBA recognises the freedom of Trade Union activity.</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 it operates in a country (Italy) where the right to Freedom of Association and Collective Bargaining are not restricted.
10.2a Child Labour	Conformance	The Entity rejects the use of illegal and Child Labour and requires its external collaborators (e.g. partners, customers, suppliers and consultants) to specifically comply with applicable regulations and actively combat the use of the above-mentioned categories of personnel.
10.3a-c Forced Labour	Minor Non-Conformance	<p>Italian law states that Forced Labour is illegal, to which the Entity subscribes. The Entity rejects modern slavery and requires its external collaborators (e.g. partners, customers, suppliers and consultants) to specifically comply with applicable regulations and actively combat the use of the above-mentioned categories of personnel.</p> <p>Whilst the Entity has developed and implemented a Code of Ethics and adheres to the Italian National Collective Labor Contract (https://www.contrattometalmeccanici.it), it however has not publicly disclosed an annual Modern Slavery Statement.</p>
10.4a-c Non-Discrimination	Conformance	<p>The Entity's commitment to non-Discrimination is declared in its Code of Ethics. To date, the Entity has not had any cases of Discrimination. The Entity's employment processes are applied equally to both women and men. Both genders are given equal opportunities to use their abilities and propensities and have the chance to advance in their working careers. Further information is available at: https://www.europeanmetals.it/wp-content/uploads/2024/10/Codice_Etico_Rev2_0.pdf</p>
10.5 Communication and engagement	Conformance	Upon employment at the Entity, a new Worker receives a copy of the National Collective Bargaining Agreement which includes information and procedures regarding working conditions and resolution of

CRITERION	RATING	COMMENT
		<p>workplace and compensation issues, without threat of reprisal, intimidation or Violence and Harassment.</p> <p>The Entity's 'whistleblowing' procedure is available at: https://whistleblowersoftware.com/secure/europeanmetals</p>
10.6a-g Violence and Harassment	Conformance	<p>The Entity acts in full compliance with the provisions of Article 2087 of the Italian Civil Code ('Protection of Working Conditions'), the Consolidated Law on Health and Safety in the Workplace and other Applicable Laws or regulations in light of the specific activities it undertakes. The Entity's risk assessment process evaluates risks specifically associated with Violence and Harassment on a biennial basis.</p> <p>Disciplinary practices at the Entity are governed by the Collective Bargaining Agreement and by local law, Law 300/1970. No evidence of corporal punishment, mental or physical coercion, harassment, and gender-based violence including sexual harassment, or verbal abuse was found during the Audit.</p>
10.7a-c Remuneration	Conformance	<p>All Workers at the Entity are covered under the National Collective Labor contract, as per Italian Labour Law (refer to: https://www.contrattometalmeccanici.it, which includes provisions relating to remuneration and ensuring a basic living wage.</p>
10.8a-c Working Time	Conformance	<p>Each of the Entity's Workers has an electronic badge to record the start and end of their Working Time, which ensures the accurate payment of wages. Rest days, holidays, annual leave and Overtime are ruled by the CBA. No evidence of nonconformity to the CBA was evident from either interviews or document review. Overtime worked is under the legal limit (i.e. 250 hours per year).</p>
10.9a-b Informing Workers of Rights	Conformance	<p>Interviews undertaken with Workers during the Audit did not identify any concerns relating to communications with staff on Worker rights and no concerns relating to Worker meetings/briefings where communication of Freedom of Association rights, or equivalent measures has occurred.</p>
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 which is planned for certification to ISO 45001 during 2026. The Management System includes appropriate organisational context, leadership and Worker participation, a Health & Safety Policy, risks evaluation, procedures and records.</p> <p>The Entity's OH&S risk assessment is updated regularly, procedures are implemented and regular management reviews are undertaken.</p>
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Conformance	<p>The Entity's OH&S risk assessment is updated regularly, procedures are implemented and regular management reviews are undertaken.</p> <p>The Entity has developed and are tracking Health and Safety Key Performance Indicators (KPIs) that include Lost Time Injuries (LTI), number of incidents and 'near misses' that are available upon request, via: https://www.europeanmetals.it/en/contacts/</p>

CRITERION	RATING	COMMENT
11.2 Employee engagement on Health and Safety	Conformance	Every Worker is trained so that anyone who encounters abnormal or hazardous Health and Safety or environmental situations can report to the relevant supervisor or internal HSE department. This type of communication is essential to assess Workers' Health and Safety conditions, to better identify and address actual and potential risks, and to promote continuous improvement for Health and Safety issues in the workplace.

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DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	27 April 2026	Initial Certification Audit – Provisional Certification