# ASI CERTIFICATION **PERFORMANCE STANDARD**

PRESENTED TO

# Aluphoenix Srl

| CERTIFICATE NUMBER | ASI STANDARD | CERTIFICATION LEVEL | ASI ACCREDITED AUDITING FIRM |
|---|---|---|---|
| **292** | **PERFORMANCE STANDARD (V3.1 2023)** | **FULL CERTIFICATION** | **BUREAU VERITAS CERTIFICATION** |
| | DATE OF ISSUE | DATE OF EXPIRY | CERTIFIED SINCE |
| | **14 JUNE 2026** | **13 JUNE 2029** | **14 JUNE 2023** |

AUTHORISED BY

Aluminium Stewardship Initiative Ltd
ACN 606 661 125, Australia
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***

CERTIFICATION SCOPE

The melting and amalgamation of high-grade Aluminium into alloys. The refining and recovery of Aluminium-based Scrap, at the Aluphoenix facility located in Riese Pio X, Italy.

# AUDIT REPORT **PERFORMANCE STANDARD**

## OVERVIEW

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| MEMBER NAME | Aluphoenix Srl |
| ENTITY NAME | Aluphoenix facility of Riese Pio X, Italy |
| CERTIFICATION SCOPE | The melting and amalgamation of high-grade Aluminium into alloys. The refining and recovery of Aluminium-based Scrap, at the Aluphoenix facility located in Riese Pio X, Italy. |
| SUPPLY CHAIN ACTIVITIES | • Aluminium Re-melting/Refining<br>• Casthouses |
| ASI STANDARD | Performance Standard V3.1 |
| AUDIT TYPE | • Initial Certification Audit (25 – 27 May 2023)<br>• Re-Certification Audit and Scope Change (14 -16 May 2026) |
| AUDIT FIRM | Bureau Veritas Certification |
| AUDIT DATE | • 25 – 27 May 2023 (Initial Certification Audit)<br>• 14 – 16 May 2026 (Re-Certification Audit and Scope Change) |
| AUDIT REPORT SUBMISSION | • 30 May 2023 (Initial Certification Audit)<br>• 12 June 2026 (Re-Certification Audit and Scope Change) |
| AUDIT SCOPE | <u>Initial Certification Audit (25 – 27 May 2023)</u><br>The melting and amalgamation of high-grade Aluminium into alloys. The refining and recovery of Aluminium-based Scrap, at the Aluphoenix facility located in Riese Pio X, Italy.<br>Supply chain activities included in the Audit Scope:<br>• Aluminium Re-melting/Refining<br>• Casthouses<br>All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.<br><u>Re-Certification Audit and Scope Change (14 – 16 May 2026)</u><br>The melting and amalgamation of high-grade Aluminium into alloys. The refining and recovery of Aluminium-based Scrap, at the Aluphoenix facility located in Riese Pio X, Italy.<br>Supply chain activities included in the Audit Scope:<br>• Aluminium Re-melting/Refining<br>• Casthouses<br>All relevant Criteria in the ASI Performance Standard were included in the Audit Scope. |

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| AUDIT OUTCOME | • Certification |
| AUDIT METHODOLOGY DECLARATION | The Auditors confirm that:<br>☑ The information provided by the Entity is true and accurate to the best knowledge of the Auditor(s) preparing this report.<br>☑ The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous.<br>☑ 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.<br>☑ The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective. |
| CERTIFICATION PERIOD | 14 June 2026 – 13 June 2029 |
| NEXT AUDIT TYPE | Re-Certification Audit |
| NEXT AUDIT DATE | 13 June 2029 |
| CERTIFICATE NUMBER | 292 |
| | If you have an inquiry or complaint about this Certification, go to the third-party EthicsPoint portal at: https://Aluminium-stewardship.ethicspoint.com/<br>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.<br>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

Aluphoenix Srl (the 'Entity') is located in an industrial area Riese Pio X, located in the Treviso province in north-eastern Italy. The Entity occupies an area of approximately 5,000 square metres (m2) and includes two melting furnaces, an 'in-line' refining furnace, 1 'stacking and cooling' line and two spectrometry laboratories.

The Entity produces high-purity Aluminium alloy ingots for foundries, producing ingots weighing between 6.5–7.5 kilograms, with a thickness of 50 mm and a length of 680 mm. Their compact size and weight make them easy to handle, whether manually or with automated grippers. These ingots are typically sold within the European markets for the automotive, appliance and furniture.

At the time of the Audit, the Entity employed 27 persons.

## MATURITY RATINGS

A rating of maturity (low, medium or high) determined by the Auditor that provides a general assessment in terms of systems, Residual Risk and performance assigned to a Sustainability Component.

Maturity ratings are not a direct assessment of conformance to the Standard.

| | GOVERNANCE | ENVIRONMENT | SOCIAL | COMBINED RATING |
|---|---|---|---|---|
| **SYSTEMS** | High | High | High | HIGH |
| **RISKS** | High | High | High | HIGH |
| **PERFORMANCE** | High | High | High | HIGH |
| **OVERALL** | HIGH | | | |

## FINDINGS

| CRITERION | RATING | COMMENT |
|---|---|---|
| 1. BUSINESS INTEGRITY | | |
| 1.1 Legal Compliance | Conformance | The Entity has an Environmental Management System that is certified to ISO 14001. A register of applicable environmental laws has been developed, and legal compliance internal audits are regularly undertaken. The Entity also has established a management system that conforms to Italian Law Decree 231/01 that requires internal audits undertaken by the supervising body called OdV (Organismo di Vigilanza: Vigilating Body) |
| 1.2 Anti-Corruption | Conformance | The Entity also has established a Management System that conforms to Italian Law Decree 231/01 that requires a Code of Ethics and internal audits on anti-Corruption to be undertaken by OdV (Organismo di Vigilanza: Vigilating Body) The Code of Ethics is available at: https://www.aluphoenix.com/wp-content/uploads/2026/04/TABO03_04_00-Codice-Etico.pdf |
| 1.3a-e Code of Conduct | Conformance | The Entity also has established a Management System that conforms to Italian Law Decree 231/01 that requires a Code of Ethics and internal audits on anti-Corruption to be undertaken by OdV (Organismo di Vigilanza: Vigilating Body) The Code of Ethics is available at: https://www.aluphoenix.com/wp-content/uploads/2026/04/TABO03_04_00-Codice-Etico.pdf |
| 2. POLICY AND MANAGEMENT | | |
| 2.1a-f Environmental, Social, and Governance Policy | Conformance | The Entity has developed and implemented a general Sustainability Policy, which is available at: https://www.aluphoenix.com/wp-content/uploads/2026/04/QEP_07_00-Politica-per-la-Qualita-per-lAmbiente-ASI.pdf |
| 2.2a-c Leadership | Conformance | The Entity has nominated a Management Representative (Senior Manager – Management System Assurance) who has overall responsibility and authority for the requirements of the Entity's ASI program. |
| 2.3a Environmental and Social Management Systems - Environmental | Conformance | The Entity has an Environmental Management System that is certified to ISO 14001. The current certificate is available at: https://www.aluphoenix.com/wp-content/uploads/2024/01/cert_iso-14001_2015_it_en_Nr-50-100-10899-Rev.005.pdf |
| 2.3b Environmental and Social Management Systems - Social | Conformance | The Entity's Ethical Code and Organisational Model are consistent with the requirements of a Social Management System, which includes statements and policies on recruiting, Human Resources (HR) management and Health and Safety. The Entity's HR Department has developed and implemented its own procedures to continuously deliver conformity to the National CBA (Collective Bargaining Agreement) for work-related matters including wages and working hours. |
| 2.4a-e Responsible Sourcing | Conformance | The Entity recently updated its procedures for the management of suppliers and responsible sourcing. All suppliers are required to |

| CRITERION | RATING | COMMENT |
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| | | complete a questionnaire with information on their work and ethical practices questionnaire.<br>The Code of Conduct for suppliers is available at: https://www.aluphoenix.com/wp-content/uploads/2026/04/TAPU06-Codice-di-condotta-per-i-fornitori.pdf |
| 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 in recent years. |
| 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 in recent years. |
| 2.7a-f Emergency Response Plan | Conformance | The Entity has a site-wide emergency plan, last updated in April 2024 where regular drills are undertaken, as required under local law. The emergency plan is publicly available upon request. |
| 2.8a-d Suspended Operations | Conformance | The Entity has developed and implemented a 'Contingency Plan' document that prescribes measures to implement in the case of any failure in plant equipment, and/or the need to suspend operations. |
| 2.9a-b Mergers and Acquisitions | Conformance | The Entity has developed and implemented a series of procedures to manage Environmental, Social and Governance issues relating to mergers and acquisition events. In addition, both the CBA (Collective Bargaining Agreement) and Environmental Permit specify requirements to minimise impacts on interested parties. |
| 2.10a-b Closure, Decommissioning and Divestment | Conformance | The Entity has developed and implemented a series of procedures to manage Environmental, Social and Governance issues relating to closure, decommissioning or divestment activities were to occur in future. In addition, both the CBA (Collective Bargaining Agreement) and Environmental Permit specify requirements to minimise impacts on interested parties. |
| 3. TRANSPARENCY | | |
| 3.1a-b Sustainability Reporting | Conformance | The Entity has prepared an annual Sustainability Report, available at: https://www.aluphoenix.com/wp-content/uploads/2026/04/Corporate-sustainability-report_2025_IT.pdf<br>Additional ESG-related information is also available on request via: https://www.aluphoenix.com/contatti/ |
| 3.2 Non-Compliance and Liabilities | Conformance | Non-Compliance and liability data are available in the Entity's annual Sustainability Report, available at: https://www.aluphoenix.com/wp-content/uploads/2026/04/Corporate-sustainability-report_2025_IT.pdf |
| 3.3a-c Payments to Governments | Conformance | A statement relating to Government payment data is available in the Entity's annual Sustainability Report, available at: https://www.aluphoenix.com/wp-content/uploads/2026/04/Corporate-sustainability-report_2025_IT.pdf |

| CRITERION | RATING | COMMENT |
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| 3.4a-f Stakeholder Complaints, Grievances and Requests for Information | Conformance | The Entity has developed and implemented a Grievance Mechanism, which is publicly accessible via: https://www.aluphoenix.com/wp-content/uploads/2026/05/SHMSA00_00_00-Modulo-di-segnalazione-e-reclami-in-merito-al.pdf<br>The Entity has developed a supporting procedure for the management of grievances. |
| 4. MATERIAL STEWARDSHIP | | |
| 4.1a Environmental Life Cycle Assessment | Conformance | A Life Cycle Perspective Evaluation has been developed that considers the impacts of major Products and process according to ISO 14001. In addition, there is a Life Cycle Assessment (LCA) developed according to ISO 14040 and ISO 14044 for four specific Products. |
| 4.1b-c Environmental Life Cycle Assessment – Disclosure | Conformance | A Life Cycle Perspective Evaluation has been developed that considers the impacts of major Products and process according to ISO 14001. In addition, there is a Life Cycle Assessment (LCA) developed according to ISO 14040 and ISO 14044 for four specific Products.<br>LCAs are available to customers upon request. Assumptions including system boundaries have been defined in the LCA reports. |
| 4.2 Product Design | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope |
| 4.3a-b Aluminium Process Scrap | Conformance | The Entity manages its own internal Scrap, which is re-introduced into its production process. Scrap data are monitored internally and are available with details for production. Scrap and waste are separated as per the Entity's operational control procedures. |
| 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 holds an Environmental Permit: AIA (Autorizzazione Integrata Ambientale: Environmental Integrated Authorization) conforming to Italian law Dlgs. 152/2006. This authorisation includes waste management and in accordance with the authorisation principles, the Entity must communicate to the public administration its waste production data and the final destination of waste materials annually. |
| 5. GHG EMISSIONS | | |
| 5.1a-b Disclosure of GHG Emissions and Energy Use | Conformance | Greenhouse Gas (GHG) emissions data and targets relating to GHG and energy use are presented in the Entity's annual Sustainability Report, available at: https://www.aluphoenix.com/wp-content/uploads/2026/04/Corporate-sustainability-report_2025_IT.pdf. The Entity is working on disaggregating the Scope-specific emissions as part of its next Sustainability Report. |
| 5.2a Aluminium Smelter GHG Emissions Intensity – | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope. |

| CRITERION | RATING | COMMENT |
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| Started production after 2020 | | |
| 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 | GHG emissions data and targets relating to GHG and energy use are presented in the Entity's annual Sustainability Report, available at: https://www.aluphoenix.com/wp-content/uploads/2026/04/Corporate-sustainability-report_2025_IT.pdf<br>The Entity has developed GHG Emissions Reductions Pathways and Intermediate Targets accordingly, using the ASI calculation tool. Given the small size of the Entity, these data are only currently available on request via: https://www.aluphoenix.com/contatti/ |
| 5.3b-e GHG Emissions Reduction Plans - Targets, review and disclosure | Conformance | GHG emissions data and targets relating to GHG and energy use are presented in the Entity's annual Sustainability Report, available at: https://www.aluphoenix.com/wp-content/uploads/2026/04/Corporate-sustainability-report_2025_IT.pdf<br>The Entity has developed GHG Emissions Reductions Pathways and Intermediate Targets accordingly, using the ASI calculation tool. Given the small size of the Entity, these data are only currently available on request via: https://www.aluphoenix.com/contatti/ |
| 5.4 GHG Emissions Management | Conformance | In accordance with its ISO 14001 certified Environmental Management System, the Entity has developed energy-related actions, presented in the Entity's annual Sustainability Report in Section 10, available at: https://www.aluphoenix.com/wp-content/uploads/2026/04/Corporate-sustainability-report_2025_IT.pdf |
| 6. EMISSIONS, EFFLUENTS AND WASTE | | |
| 6.1a-f Emissions to Air | Conformance | In accordance the Entity's environmental authorisation, it must communicate its air emissions on an annual basis to the public administration. Recent ISO 14001 and internal audits and assessments determined that air emissions conform to local law and the AIA (Autorizzazione Integrata Ambientale: Environmental Integrated Authorization). |
| 6.2a-g Discharges to Water | Conformance | In accordance with the Entity's environmental authorisation, it must communicate its water discharges on an annual basis to the public administration. Recent ISO 14001 and internal audits and assessments determined that discharges to water conform to local law and the AIA. |
| 6.3a-g Assessment and Management of Spills and Leakages | Conformance | The Entity's Environmental Management System includes a risk assessment, which addresses the specific assessment of Spills and Leakages. Internal audits are undertaken by the Entity. There is no evidence of Spills or Leakages outside the Entity's premises. An external communication plan requires that information is available on request to all interested parties; and major spills and leakages must |

| CRITERION | RATING | COMMENT |
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| | | be reported to the public administration as a requirement of the Environmental Integrated Authorization. |
| 6.4a-b Public Disclosure of Spills and Leakages | Conformance | Under the Entity's Environmental Management System, a Spill or Leakage is considered a non-conformity and is recorded. No evidence of Spills or Leakages were noted during the Audit.<br>Information on Material Spills (if and as they occur) is available upon request. No Spills or Leakages have occurred over the past three years. A statement on spills and leakages is included in the Entity's Sustainability Report, available at: https://www.aluphoenix.com/wp-content/uploads/2026/04/Corporate-sustainability-report_2025_IT.pdf |
| 6.5a-c Waste Management and Reporting | Conformance | The Entity reports its waste production data to the public administration via the MUD (Modello Unico di Dichiarazione: Unique Form of Declaration). Internal audits are undertaken regularly which confirm that the Entity's waste management processes conform to local law and the AIA. |
| 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 reports its waste production data (inclusive of Dross) to the public administration via the MUD. Internal audits are undertaken regularly which confirm that the Entity's waste management processes conform to local law and the AIA. |
| 7. WATER STEWARDSHIP | | |
| 7.1a-b Water Assessment and Disclosure | Conformance | In accordance with the Entity's environmental authorisation, it must communicate its water use on an annual basis to the public administration. Recent ISO 14001 and internal audits and assessments determined that discharges to water conform to local law and the AIA.<br>Information on water usage is also included in the Sustainability Report, available at: https://www.aluphoenix.com/wp-content/uploads/2026/05/Corporate-sustainability-report_2025_IT.pdf |
| 7.2a-e Water Management | Conformance | Although the Entity's risk assessment determined water use as low risk, the Entity must communicate its water use on an annual basis to the public administration in accordance with the Entity's environmental authorisation. Recent ISO 14001 and internal audits and assessments determined that discharges to water conform to local law and the AIA (Autorizzazione Integrata Ambientale: Environmental Integrated Authorization)<br>Information on water usage is also included in the Sustainability Report, available at: https://www.aluphoenix.com/wp-content/uploads/2026/05/Corporate-sustainability-report_2025_IT.pdf |
| 8. BIODIVERSITY AND ECOSYSTEM SERVICES | | |

| CRITERION | RATING | COMMENT |
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| 8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment | Conformance | A risk assessment on Biodiversity has been undertaken by the Entity as part of its general environmental risk assessment. It is documented in a specific document named VIncA (Valuation Incidenza Ambientale: Evaluation of Environmental Impact). No significant risks affecting Biodiversity were identified. |
| 8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority | Conformance | A risk assessment on Ecosystem Services has been undertaken by the Entity as part of its general environmental risk assessment and documented in the VIncA (Valuation Incidenza Ambientale: Evaluation of Environmental Impact) report. No significant risks affecting Ecosystem Services were identified. |
| 8.2a-g Biodiversity Management | Not Applicable | This Criterion is not applicable to the Entity as the environmental risk assessment did not identify any significant risks to Biodiversity. |
| 8.3a-c Management of Priority Ecosystem Services | Not Applicable | This Criterion is not applicable to the Entity as the environmental risk assessment did not identify any significant risks to Ecosystem Services. |
| 8.4 Alien Species | Conformance | A risk assessment on Biodiversity has been undertaken by the Entity as part of its general environmental risk assessment, which included Alien Species. The introduction of Alien Species is a risk mitigated by internal processes. |
| 8.5a-b Commitment to 'No Go' in World Heritage Properties | Conformance | The Entity operates in an industrial area and there are no World Heritage Properties located within or adjacent to its Area of Influence. A risk assessment on World Heritage Properties was included as part of the Entity's general environmental risk assessment. |
| 8.6a-d Protected Areas | Conformance | The Entity operates in an industrial area and there are no Protected Areas located within or adjacent to its Area of Influence. A risk assessment on Protected Areas was included as part of the Entity's general environmental risk assessment. |
| 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, available at: http://www.aluphoenix.com/wp-content/uploads/2026/04/TABO03_04_00-Codice-Etico.pdf<br>The Human Rights Due Diligence process has been documented in a formalised procedure and affected populations are also considered in this process via a context analysis document that describes all interested parties and the impact on their interests. This document also considers gender analysis. |
| 9.2a-e Gender Equity and Women's Empowerment | Conformance | The Entity's Human Resources Management and Gender Equity procedures conform to local law DLgs 151/2001 and provide the framework for gender equity across the Entity.<br>The Sustainability Report provides further information, available at: https://www.aluphoenix.com/wp- |

| CRITERION | RATING | COMMENT |
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| | | content/uploads/2026/05/Corporate-sustainability-report_2025_IT.pdf<br>Further information is also available on request. |
| 9.3a-i Indigenous Peoples | Not Applicable | This Criterion is not applicable to the Entity, as no Indigenous Peoples are 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 no Indigenous Peoples are 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 have been no New Projects of Major Changes and no Indigenous Peoples within the Entity's Area of Influence. |
| 9.5a Cultural and Sacred Heritage – Identification | Conformance | A Cultural and Sacred Heritage Identification Procedure has been developed that provides the Entity with a formal process to adhere to in case of any future major project or change. |
| 9.5b Cultural and Sacred Heritage – Impacts | Conformance | A Cultural and Sacred Heritage Identification Procedure has been developed that provides the Entity with a formal process to adhere to in case of any future major project or change. |
| 9.6a-i Displacement | Not Applicable | This Criterion is not applicable to the Entity as no resettlements are being considered or have taken place since joining ASI or are expected to occur during the Certification Period. |
| 9.7a-h Affected Populations and Organisations | Conformance | The Entity's Due Diligence process has not identified issues or impacts relating to Local Communities. A communication channel is available to all interested parties at: https://www.aluphoenix.com/wp-content/uploads/2026/05/SHMSA00_00_00-Modulo-di-segnalazione-e-reclami-in-merito-al.pdf |
| 9.8a Conflict-Affected and High-Risk Areas - Strong Management Systems | Conformance | The Entity's supplier selection, evaluation and audit procedures have not identified any contribution by the Entity either directly or indirectly to any activity in, or from Conflict-Affected and High-Risk Areas (CAHRAs) and does not contribute to armed conflict or Human Rights abuses. |
| 9.8b Conflict-Affected and High-Risk Areas - Identify and assess risks | Conformance | A risk assessment on social and Human Rights issues was recently updated in April 2026, which confirmed there were no specific risks in the Entity's supply chain related to Conflict-Affected and High-Risk Areas (CAHRAs). |
| 9.8c Conflict-Affected and High-Risk Areas - Strategy to respond to risks | Conformance | A risk assessment on social and Human Rights issues was recently updated in April 2026, which confirmed there were no specific risks in |

| CRITERION | RATING | COMMENT |
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| | | the Entity's supply chain related to Conflict-Affected and High-Risk Areas (CAHRAs).<br>A supply chain specific Code of Conduct has been developed by the Entity, available at: https://www.aluphoenix.com/wp-content/uploads/2026/04/TAPU06-Codice-di-condotta-per-i-fornitori.pdf |
| 9.8d Conflict-Affected and High-Risk Areas - Audit of due diligence | Conformance | The Entity's Due Diligence processes were included in this ASI Audit, which addresses this requirement. |
| 9.8e Conflict-Affected and High-Risk Areas – Report annually | Conformance | A supply chain specific Code of Conduct has been developed by the Entity, available at: https://www.aluphoenix.com/wp-content/uploads/2026/04/TAPU06-Codice-di-condotta-per-i-fornitori.pdf<br>The Entity's Sustainability Report includes a supply chain specific risk summary, available at: https://www.aluphoenix.com/wp-content/uploads/2026/05/Corporate-sustainability-report_2025_IT.pdf<br>Further information is available on request. |
| 9.9 Security practice | Not Applicable | This Criterion is not applicable to the Entity as it does not hire or engage any security personnel. |
| 10. LABOUR RIGHTS | | |
| 10.1a-c Freedom of Association and Right to Collective Bargaining | Conformance | In Italy, all Workers are covered by a Collective Bargaining Agreement (CBA) agreed at a National level among Trade Unions and industry representatives. Presently, there are no Workers at the Entity that are Union members. Workers interviewed during the Audit stated that they did not have any need for union representation at this time, as all Workers are covered by the National CBA. Regardless, contact information for the four main Italian Trade Unions are available throughout the Entity's premises. |
| 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 restriction to Freedom of Association and Collective Bargaining in Italy. |
| 10.2a Child Labour | Conformance | During the Entity's hiring process, every Worker must provide an identity card with their date of birth and a copy is retained in the personal file of the Worker. In Italy, the hiring of Workers under the age of 15 years is illegal, and during the Audit it was noted that there was no evidence of underage labour present at the Entity. |
| 10.3a-c Forced Labour | Conformance | The Entity addresses Human Rights, including Forced Labour, in its Policy and Code of Ethics. Workers interviewed during the Audit, which included a sample of migrant Workers, found no evidence of Forced Labour, payment of fees and deposits, debt bondage, or retention of documents.<br>Workers are free to leave the Entity with an advanced notice that is from eight to 90 days depending on the job and seniority in |

| CRITERION | RATING | COMMENT |
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| | | compliance with Applicable Law and the Collective Bargaining Agreement.<br>The Entity's Modern Slavery Policy is available at: https://www.aluphoenix.com/wp-content/uploads/2026/04/SA-Politica-contro-la-schiavitu.pdf |
| 10.4a-c Non-Discrimination | Conformance | The Entity's Code of Ethics prescribes equal opportunities for all Workers. The Collective Bargaining Agreement and procedure establishes rules for the hiring and selection of personnel. The procedure is consistent with Code of Ethics. No evidence of Discrimination was found. |
| 10.5 Communication and engagement | Conformance | Workers are engaged, and Worker interviews conducted during the Audit confirmed that they have access to supervisors and managers. No grievances were raised in the last two years. A Grievance Mechanism linked to the Code of Ethics is available. |
| 10.6a-g Violence and Harassment | Conformance | Disciplinary practices are ruled by the Collective Bargaining Agreement and by local laws. There was no evidence found of corporal punishment, mental or physical coercion, harassment, and gender-based Violence including sexual Harassment, or verbal abuse. |
| 10.7a-d Remuneration | Conformance | The Entity's remuneration payments to Workers are above the minimum legal wage, which is over the national living wage. Payroll details and bank transfers were sampled and were in conformance. Payrolls are conforming to standard forms approved by the public administration, and interviewed Workers stated that they understand the contents of payroll and that payments were made on time. |
| 10.8a-c Working Time | Conformance | The Collective Bargaining Agreement and local laws determine working hours, Overtime, Overtime payment rates and annual leave entitlements. Overtime is regularly reported in payroll data, and no evidence of exceeding limits was identified. |
| 10.9a-b Informing Workers of Rights | Conformance | All Workers are informed about their rights and all required conditions of the National CBA (Collective Bargaining Agreement) as per local law - Dlgs 104/2022, which was confirmed during interviews undertaken during the Audit. |
| 11. OCCUPATIONAL HEALTH AND SAFETY | | |
| 11.1a Occupational Health and Safety (OH&S) Management System | Conformance | The Entity has developed and implemented an Occupational Health and Safety (OH&S) Management System with a complete risk assessment, relevant operational procedures and annual management review. Operational controls are considered sound. |
| 11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure | Conformance | The Entity has developed and implemented an OH&S Management System with a complete risk assessment, relevant operational procedures and annual management review. Disclosure of OH&S performance is included in the Entity's Sustainability Report, available at: https://www.aluphoenix.com/wp-content/uploads/2026/05/Corporate-sustainability-report_2025_IT.pdf |

| CRITERION | RATING | COMMENT |
|---|---|---|
| 11.2 Employee engagement on Health and Safety | Conformance | Every Worker is trained to report situations that may affect both Health and Safety and environmental issues. There is a RLS (Rappresentante dei Lavoratori per la Sicurezza) Workers' Representative for Health and Safety at the Entity, who was elected by Workers. |

## ASI LIMITATION OF LIABILITY DISCLAIMER



## DOCUMENT CONTROL AND VERSION HISTORY

| REVISION | DATE | NOTES |
|---|---|---|
| 0 | 14 June 2023 | Initial Certification Audit – Full Certification |
| 1 | 10 July 2026 | Re-Certification and Scope Change Audit – Full Certification;<br>Scope Change to apply PSv3.1. |