ASI CERTIFICATION **PERFORMANCE STANDARD**

PRESENTED TO

Raffmetal S.p.A

CERTIFICATE NUMBER	ASI STANDARD	CERTIFICATION LEVEL	ASI ACCREDITED AUDITING FIRM
89	**PERFORMANCE STANDARD (V3.1 2023)**	**FULL CERTIFICATION**	**BUREAU VERITAS CERTIFICATION**
	DATE OF ISSUE	DATE OF EXPIRY	CERTIFIED SINCE
	21 JUNE 2026	**20 JUNE 2029**	**10 AUGUST 2020**

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

Production and trade of standardised and industrial Aluminium alloys in ingot form, continuous bar castings and in the liquid state through the phases of purchasing, storage, sorting and processing of Scrap metal, both within ferrous and non-ferrous materials at the Raffmetal S.p.A Casto and Odolo plants and the Silval S.p.A plant (Italy).

AUDIT REPORT
PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Raffmetal and Fondital
ENTITY NAME	Raffmetal S.p.A.
CERTIFICATION SCOPE	Production and trade of standardised and industrial Aluminium alloys in ingot form, continuous bar castings and in the liquid state through the phases of purchasing, storage, sorting and processing of Scrap metal, both within ferrous and non-ferrous materials at the Raffmetal S.p.A Casto and Odolo plants and the Silval S.p.A plant (Italy).
SUPPLY CHAIN ACTIVITIES	• Aluminium Re-melting/Refining • Casthouses
ASI STANDARD	• Performance Standard V3.1
AUDIT TYPE	• Initial Certification Audit (8 – 10 July 2020) • Surveillance Audit (18 February 2022) • Re-Certification Audit and Scope Change (10 – 13 July 2023) • Surveillance Audit (5 – 7 February 2025) • Surveillance Audit (17 – 31 October 2025) • Re-Certification Audit and Scope Change (26 – 29 May 2026)
AUDIT FIRM	Bureau Veritas Certification
AUDIT DATE	• 8 – 10 July 2020 (Initial Certification Audit) • 18 February 2022 (Surveillance Audit) • 10 – 13 July 2023 (Re-Certification Audit and Scope Change) • 5 – 7 February 2025 (Surveillance Audit) • 17 – 31 October 2025 (Surveillance Audit) • 26 – 29 May 2026 (Re-Certification Audit and Scope Change)
AUDIT REPORT SUBMISSION	• 25 July 2020 (Initial Certification Audit) • 12 April 2022 (Surveillance Audit) • 31 July 2023 (Re-Certification Audit and Scope Change) • 15 February 2025 (Surveillance Audit) • 7 November 2025 (Surveillance Audit) • 16 June 2026 (Re-Certification Audit and Scope Change)
AUDIT SCOPE	Initial Certification Audit (8 – 10 July 2020) The Audit Scope covered the Production and trade of standardised and industrial Aluminium alloys in ingot form, continuous bar castings and in the liquid state through the phases of purchasing, storage, sorting and processing of Scrap metal, both within ferrous and non-ferrous materials at Casto, via Malpaga 82 and Odolo, via Brescia 60.

Supply chain activities included in the Audit Scope:

- Aluminium Re-Melting/Refining

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

<u>Surveillance Audit (18 February 2022)</u>

The Audit Scope covered the Production and trade of standardised and industrial Aluminium alloys in ingot form, continuous bar castings and in the liquid state through the phases of purchasing, storage, sorting and processing of Scrap metal, both within ferrous and non-ferrous materials at Casto, via Malpaga 82 and Odolo, via Brescia 60.

Supply chain activities included in the Audit Scope:

- Aluminium Re-Melting/Refining

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

<u>Re-Certification Audit and Scope Change (10 - 13 July 2023)</u>

The Audit Scope covered the production and trade of standardised and industrial Aluminium alloys in ingot form, continuous bar castings and in the liquid state through the phases of purchasing, storage, sorting and processing of Scrap metal at the Casto and Odolo plants (Italy).

Supply chain activities included in the Audit Scope:

- Aluminium Re-Melting/Refining
- Casthouses

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

<u>Surveillance Audit (5 – 7 February 2025)</u>

The Audit Scope covered the production and trade of standardised and industrial Aluminium alloys in ingot form, continuous bar castings and in the liquid state through the phases of purchasing, storage, sorting and processing of Scrap metal at the Casto and Odolo plants (Italy).

Supply chain activities included in the Audit Scope:

- Aluminium Re-Melting/Refining
- Casthouses

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

<u>Surveillance Audit (17 – 31 October 2025)</u>

The Audit Scope covered the production and trade of standardised and industrial Aluminium alloys in ingot form, continuous bar castings and in the liquid state through the phases of purchasing, storage, sorting and processing of Scrap metal at the Casto and Odolo plants (Italy).

Supply chain activities included in the Audit Scope:

- Aluminium Re-Melting/Refining
- Casthouses

Criteria that were identified as non-conformities from the previous Audit were included in the Audit Scope.

<u>Re-Certification Audit and Scope Change (26 – 29 May 2026)</u>

The Audit Scope covered the production and trade of standardised and industrial Aluminium alloys in ingot form, continuous bar castings and in the liquid state through the phases of purchasing, storage, sorting and processing of Scrap metal at the Casto, Odolo and Silval plants (Italy).

Supply chain activities included in the Audit Scope:

- Aluminium Re-Melting/Refining

	• Casthouses Criteria that were identified as non-conformities from the previous Audit were included in the Audit Scope.
AUDIT OUTCOME	• Certification
AUDIT METHODOLOGY DECLARATION	The Auditors confirm that: ☑ The information provided by the Entity is true and accurate to the best knowledge of the Auditor(s) preparing this report. ☑ The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous. ☑ The Audit Scope and audit methodology are sufficient to establish confidence that the findings are indicative of the performance of the Entity's defined Certification Scope. ☑ The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.
CERTIFICATION PERIOD	21 June 2026 – 20 June 2029
NEXT AUDIT TYPE	Re-Certification Audit
NEXT AUDIT DATE	20 June 2029
CERTIFICATE NUMBER	89
	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

Raffmetal (the 'Entity') is one of Europe's leading producers of recycled Aluminium alloys and is a leading international contributor to the 'circular economy'. With a production capacity of over 350,000 tonnes annually, the Entity currently employs over 500 people and operates through three sites, with two production plants in Casto and Odolo and a logistics hub for finished product storage in Nuvolera, in the province of Brescia, Italy.

The Entity is a qualified supplier to global clients in the automotive, construction, and consumer goods sectors. Drawing on over forty years of experience, the Entity expanded its product portfolio in 2020 with the introduction of SILVAL, recycled primary Aluminium alloys, with performance equivalent to primary bauxite alloys. This new range is produced at the Silval Special Alloys Plant, located in Vobarno, which has been a wholly owned subsidiary of Raffmetal S.p.A since March 2025.

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	Medium	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 is certified to both the ISO 14001 and ISO 45001 and in conforming to these Standards, maintains a list of Applicable Laws and legal compliance requirements and conducts internal audits. The Entity's Management System conforms to Italian law decree 231/01, which requires that legal compliance audits are undertaken by a supervising body, the OdV (Organismo di Vigilanza: Vigilating Body).
1.2 Anti-Corruption	Conformance	The Entity has a Management System conforming to Italian law decree 231/01 that requires both a Code of Ethics and internal audits on anti-Corruption undertaken by a supervising body (OdV). The Code of Ethics is available at: Raffmetal: https://www.raffmetal.com/download Silval: https://www.silval.it/en
1.3a-e Code of Conduct	Conformance	The Entity has implemented a Management System conforming to Italian Law decree 231/01 that requires both a Code of Ethics and internal audits on anti-Corruption to be undertaken by a supervising body (OdV). The Code of Ethics is available at: Raffmetal: https://www.raffmetal.com/download Silval: https://www.silval.it/en
2. POLICY AND MANAGEMENT		
2.1a-f Environmental, Social, and Governance Policy	Conformance	The Entity has an integrated corporate Policy that is documented and endorsed by senior management, available at: Raffmetal: https://www.raffmetal.com/download Silval: https://www.silval.it/en
2.2a-c Leadership	Conformance	The Entity has established a procedure to define and communicate responsibilities and authorities of the Policies. Management ensures that all Workers are aware of information regarding the Entity (Nominal Organisational Charts are available) and promotes the use of appropriate information tools and their dissemination. The Entity's Management Systems Manager is the senior manager appointed for compliance with, and implementation of the ASI Performance Standard. This appointment is included in the position description.
2.3a Environmental and Social Management Systems - Environmental	Conformance	The Entity's Management System is certified in accordance with both the ISO 14001 and ISO 50001 Standards. The certificates are available at: Raffmetal: https://www.raffmetal.com/download Silval: https://www.silval.it/en
2.3b Environmental and Social Management Systems - Social	Conformance	The Entity has implemented both the Code of Ethics and an Organisational and Management Model, which are consistent with the requirements of a social Management System and include statements and policies on recruiting, human resources management and health and safety. The Human Resources department has its own procedures to continuously deliver conformity to the national

CRITERION	RATING	COMMENT
		Collective Bargaining Agreement (CBA) for work-related matters including wages and working hours. The Code of Ethics is available at: Raffmetal: https://www.raffmetal.com/download Silval: https://www.silval.it/en The CBA is available at: https://www.fiom-cgil.it/net/index.php/industria-privata-e-installazione-impianti/ccnl-federmeccanica
2.4a-e Responsible Sourcing	Conformance	The Entity's integrated Policy addresses suppliers and sub-contractors, as does the Code of Ethics. The Purchasing Department Manager was interviewed and working conditions of subcontractors were audited. All purchase orders reference the Entity's Code of Ethics and law decree 231. Subcontractors, including maintenance suppliers and construction companies, are kept under control following an internal procedure. For further information, refer to: Raffmetal: https://www.raffmetal.com/download Silval: https://www.silval.it/en
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. However, the Entity has a procedure and undertaken a risk assessment to address environmental and quality matters. A separate ethics risk assessment has been undertaken.
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. However, the Entity has a procedure and undertaken a risk assessment to address environmental and quality matters. A separate ethics risk assessment has been undertaken.
2.7a-f Emergency Response Plan	Conformance	The Entity has both a certified Environmental (ISO 14001) and Energy Management System (ISO 5001). The Health and Safety (ISO 45001) certifications are available at: Raffmetal: https://www.raffmetal.com/download Silval: https://www.silval.it/en The Entity's Emergency Response Plan is available to Stakeholders upon request.
2.8a-d Suspended Operations	Conformance	The Entity has established emergency plans that address the action required in the event of environmental accidents that have repercussions on the environment (e.g. shutdown of abatement plants or purification plants, and remediation associated with underground tank leakage). The Entity's Quality Department evaluates other social and governance risks. All potential environmental impacts associated with suspended operations are managed by internal procedures and the integrated environmental authorisations establish requirements for any material social and governance issues.
2.9a-b Mergers and Acquisitions	Conformance	During the Audit, the Entity's senior management confirmed that should a merger or acquisition be planned in future, advisors would be engaged in accordance with the Entity's internal 'Purchase of goods, services advices and consultancies' procedure.

CRITERION	RATING	COMMENT
2.10a-b Closure, Decommissioning and Divestment	Conformance	During the Audit, the Entity's senior management confirmed that should any closure, decommissioning or divestment activity be planned in future, advisors would be engaged in accordance with the Entity's internal 'Purchase of goods, services advices and consultancies' procedure.
3. TRANSPARENCY		
3.1a-b Sustainability Reporting	Conformance	The Entity prepares a Sustainability Report, independently assured to the Global Reporting Initiative (GRI) Standards by Det Norske Veritas (DNV). Reports were published annually for 2019 and 2020 and a biannual report published for 2021-2022. The 2024 Sustainability Report is currently available upon request: https://www.raffmetal.com/contact-us/ The Entity's Company Profile and ESG Abstract is available at: https://www.raffmetal.com/download In accordance with the Italian Civil Code, statutory financial statements are available upon request at the Chamber of Commerce.
3.2 Non-compliance and Liabilities	Conformance	Senior management confirmed that no significant fines, prosecutions, penalties and sanctions were received by the Entity over the previous two years. Should such situations arise in the future, the Entity will disclose these publicly through its Sustainability Report.
3.3a-c Payments to Governments	Conformance	The Entity has implemented a Management System conforming to Italian law Decree 231/01 that requires both a Code of Ethics and internal audits on anti-Corruption undertaken by a supervising body (OdV). The Code of Ethics is available at: https://www.raffmetal.com/download Payments to governments are regulated and guaranteed by Applicable Law. Senior management confirmed that all payments made to governments and public administration are undertaken legally.
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	The Entity has established a Grievance Resolution Mechanism that is publicly available and is described in the Code of Ethics: https://www.raffmetal.com/download
4. MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment	Conformance	The Entity has performed a complete and thorough Life Cycle Assessment (LCA) on its Aluminium Products. Environmental Product Disclosure (EPD) pre-certification was obtained in May 2022 for Aluminium ingots and Aluminium in liquid form. The EPD for Aluminium Oxide (Alumina) is currently in progress. The Entity also has EPD Climate Declarations for Aluminium ingots and liquid Aluminium.
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	The Entity has performed a complete and thorough Life Cycle Assessment (LCA) on its Aluminium products. Environmental Product Disclosure (EPD) pre-certification was obtained in May 2022 for Aluminium ingots and Aluminium in liquid form. The EPD for Aluminium Oxide (Alumina) was obtained in December 2025. The Entity also has EPD Climate declarations for Aluminium ingot and liquid Aluminium.

CRITERION	RATING	COMMENT
		The EPD reports and EPD Climate Declarations are publicly available at: https://www.environdec.com/library Upon customers' request, the Entity provides EPD report data. The LCA document is also available to Stakeholders upon request. The EPDs are available at: https://www.raffmetal.com/download
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 has developed and implemented procedures for the total recovery of Aluminium waste. Scrap is segregated by type and alloy. Operators are trained and regularly evaluated.
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 promotes Policies for the efficient implementation of recycling systems and promotes a culture of recycling at every level of the Entity. Further information on the recycling strategies is included in the Sustainability Report, which is available on request: https://www.raffmetal.com/contact-us The Entity is committed to supporting its suppliers to identify and select Scrap based on its origin. Additionally, the Entity is focussed on the physical state of the Scrap to optimise use and improve the overall efficiency of the entire production process, including further categorisation of raw materials by internally creating new 'families' and sub-groups of Scrap.
5. GREENHOUSE GAS EMISSIONS		
5.1a-b Disclosure of GHG Emissions and Energy Use	Conformance	The Sustainability Report is developed in accordance with the GRI Standards and discloses the Entity's Greenhouse Gas (GHG) emissions. Annual Scope 1, 2 and 3 emissions are calculated. The Scope 3 emissions data are available upon request. Independent verification of the Sustainability Report is provided by DNV. The 2024 Sustainability Report is available upon request via: https://www.raffmetal.com/contact-us
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	The Entity has implemented a certified energy Management System that provides energy consumption reduction objectives, which are

CRITERION	RATING	COMMENT
		reviewed annually. The Entity's 2024 Sustainability Report includes GHG emissions objectives and reduction targets and is available upon request via: https://www.raffmetal.com/contact-us The Entity participates in a European Aluminium Association (EAA) technical working group with a goal to define science-based decarbonisation pathways and has developed a decarbonisation strategy based on the ISO 14064 Standard. The Entity's GHG Emissions Reduction Plan and GHG Emissions Reduction Pathway have been developed using the ASI methodology, with a 2023 baseline year.
5.3b-e GHG Emissions Reduction Plans -Targets, review and disclosure	Conformance	The Entity has implemented an ISO 50001 certified Energy Management System that provides energy consumption reduction objectives, which are reviewed annually. The Sustainability Report includes GHG emissions objectives and reduction targets and is available upon request: https://www.raffmetal.com/contact-us The Entity is adopting the GHG Emissions Reduction Plan and GHG Emissions Reduction Pathway as one of the tools used as reference for its Decarbonisation plan developed.
5.4 GHG Emissions Management	Conformance	The Entity has implemented an Energy Management System certified to ISO 50001. The certificate is available at: https://www.raffmetal.com/download The Entity has implemented the development, recording and maintenance of energy analysis and identified the appropriate indicators for monitoring and measuring energy performance and GHG emissions.
6. EMISSIONS, EFFLUENTS AND WASTE		
6.1a-f Emissions to Air	Conformance	Each Facility has an environmental authorisation (Autorizzazione Integrata Ambientale, AIA) conforming to Italian law (Dlgs. 152/2006). The Entity must communicate to the public administration its air emissions annually. Other audits (e.g., ISO 14001) of the Entity have determined that its air emissions comply with local law and the AIA. Air emissions data are included in the Sustainability Report, which is available on request at: https://www.raffmetal.com/contact-us All data regarding review of plans to minimise Emissions to Air are also available on request to Stakeholders.
6.2a-g Discharges to Water	Conformance	Each Facility has an environmental authorisation (AIA) conforming to Italian law (Dlgs. 152/2006). The Entity must communicate to the public administration its water emissions annually. Other audits (e.g., ISO 14001) of the Entity have determined that Discharges to Water comply with local law and the AIA. Water data are included in the Sustainability Report, which is available on request at: https://www.raffmetal.com/contact-us Data regarding the review of plans to minimise discharges to water are available on request to Stakeholders.
6.3a-g Assessment and Management of Spills and Leakages	Conformance	The Entity has implemented an ISO 14001 certified Environmental Management System and undertaken a risk assessment on Spills and Leakages. Workers receive training on reporting situations that may impact both health and safety and the environment and Spills and

CRITERION	RATING	COMMENT
		Leakages are considered unsafe situations to be reported. There is no evidence of Spills or Leakages outside the Entity's premises. External communication plans are available to interested parties upon request: https://www.raffmetal.com/contact-us Major Spills and Leakages must be reported to the public administration as a requirement of the environmental authorisation.
6.4a-b Public Disclosure of Spills and Leakages	Conformance	Each Facility has an environmental authorisation (AIA) conforming to Italian law (Dlgs. 152/2006). The Entity must communicate to the public administration any Spills and Leakages which occur. A Spill or Leakage is considered an emergency according to the Entity's internal procedure. Spill information (if any) is included in the Sustainability Report, which is available upon request at: https://www.raffmetal.com/contact-us
6.5a-c Waste Management and Reporting	Conformance	The Entity has an ISO 14001 certified Management System to manage waste and established objectives for the Production Department to reduce Scrap and waste generation. Both Facilities report on the Waste generated and the associated final destination under Italian law Decree 152/2006. The report, Modello Unico di Dichiarazione (MUD): Unique Form of Declaration), is submitted to the public administration annually. Waste data are also available in the Sustainability Report, which is available upon request at: https://www.raffmetal.com/contact-us
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 100% recovered. The process is described in a technical attachment to the environmental authorisation (AIA) of the Casto Facility. Aluminium and salt are recovered in the internal production process while Aluminium oxides are sent to other companies and are utilised in the production of concrete and bricks. The Sustainability Report discloses details on the quantity of Dross recovered internally. The Sustainability Report is available on request at: http://www.raffmetal.com/web_eng/contatti.asp
7. WATER STEWARDSHIP		
7.1a-b Water Assessment and Disclosure	Conformance	The Entity is certified to ISO 14001, which requires the Entity to undertake an environmental analysis that includes the mapping of its water sources and water usage. The latest analysis was undertaken in February 2025. The Entity has implemented a specific 'Water Management' procedure. Both Facilities have an environmental authorisation conforming to Italian law Dlgs. 152/2006, which includes allowed quotas of water withdrawal. The Entity has implemented a water management plan. Public disclosure is in accordance with Applicable Law and made annually on the web portal of the Lombardy Region (AIDA). These data are available upon request.
7.2a-e Water Management	Conformance	The Entity is certified against ISO 14001 and has implemented a water management plan. Public disclosure is in accordance with Applicable

CRITERION	RATING	COMMENT
		Law and made annually on the web portal of the Lombardy Region (AIDA). The data are available upon request.
8. BIODIVERSITY AND ECOSYSTEM SERVICES		
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	The Entity has undertaken a risk assessment on Biodiversity and Ecosystem Services as part of the general environmental risk assessment as required for the Entity's ISO 14001 certification. The assessment determined there was no significant risk to, or impacts on, Biodiversity and Ecosystem Services.
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment – Priority	Conformance	The Entity has undertaken a risk assessment on Biodiversity and Ecosystem Services and no significant risk to or impacts on Ecosystem Services was determined.
8.2a-g Biodiversity Management	Not Applicable	This Criterion is not applicable to the Entity as its 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 its risk assessment determined there was no significant risk to Biodiversity or Ecosystem Services.
8.4 Alien Species	Conformance	The Entity has undertaken a risk assessment on Biodiversity and Ecosystem Services as part of the general environmental risk assessment as required for the Entity's ISO 14001 certification. To mitigate the introduction of Alien Species, the Entity has developed instructions for suppliers to treat wooden pallets according to the International Standard on Phytosanitary Measures (ISPM).
8.5a-b Commitment to "No Go" in World Heritage Properties	Conformance	The Entity does not conduct operations or develop New Projects within the boundaries of sites included in the UNESCO World Heritage List. The Entity's premises are not located within areas classified as Sites of Community Importance (SCI), Special Areas of Conservation (SAC), or Special Protection Areas (SAP).
8.6a-d Protected Areas	Conformance	The Entity's premises are not located within areas classified as Sites of Community Importance (SCI), Special Areas of Conservation (SAC), or Special Protection Areas (SAP), as confirmed by review of the World Database on Protected Areas (WDPA) portal.
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's Company Policy includes a commitment on Human Rights: https://www.raffmetal.com/download The Entity has implemented a Human Rights Due Diligence process. There was no evidence of adverse Human Rights impacts identified

CRITERION	RATING	COMMENT
		either in the documentation or through direct questioning of both management and Workers.
9.2a-e Gender Equity and Women's Empowerment	Conformance	In Italy, gender Discrimination is illegal and Applicable Law protects maternity and women's rights in the workplace. The Entity's integrated Policy requires compliance with Applicable Law. Female Workers interviewed stated that are comfortable with their job, colleagues and the Entity. The Entity has implemented a dedicated 'Diversity and Inclusion Policy', which addresses the barriers to professional development, Discrimination, Violence and Harassment, and implementation of a program which promotes gender equity and women's empowerment. The Policy is available to Stakeholders upon request. The primary document is the Entity's Code of Ethics, which is available at: Raffmetal: https://www.raffmetal.com/download Silval: https://www.silval.it/en
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 in the Lombardy Prealps region of northern Italy, as defined by Article 1 of ILO Convention 169.
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 in the Lombardy Prealps region of northern Italy, as defined by Article 1 of ILO Convention 169 and there are no New Projects or Major Changes to existing Facilities.
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, as defined by Article 1 of ILO Convention 169 and there are no New Projects or Major Changes to existing Facilities.
9.5a Cultural and Sacred Heritage - Identification	Conformance	The Entity has determined that there are no Indigenous Peoples nor any cultural or sacred assets located in the Entity's Area of Influence or within the industrial location of their Facilities.
9.5b Cultural and Sacred Heritage - Impacts	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples nor any cultural or sacred assets located in the Entity's Area of Influence or within the industrial location of their Facilities.
9.6a-i Displacement	Not Applicable	This Criterion is not applicable to the Entity, as there are no New Projects or Major Changes to existing Facilities, nor any projects involving the resettlement or displacement of populations or local residents. The Entity has however established a procedure to minimise negative impacts of change.
9.7a-h Affected Populations and Organisations	Conformance	The Entity's Due Diligence assessment has not identified issues regarding Local Communities. A communication channel is available to all interested parties at: https://www.raffmetal.com/contact-us The Entity has established procedures for projects that may have an impact on the external environment. An assessment of interested

CRITERION	RATING	COMMENT
		parties and the context to the Entity to evaluate risks and opportunities has been undertaken. Additionally, specific guidelines and authorisation procedures are applied by the municipality for substantial and non-substantial modifications. The Entity contributes to the Local Community growth by supporting local associations, including schools and sports. All requests for contributions are analysed and evaluated by an internal technical commission. To verify the effectiveness of their initiatives, the Entity regularly engages with the community and other collaborators.
9.8a Conflict-Affected and High-Risk Areas - Strong management systems	Not Applicable	This Criterion is not applicable to the Entity as it does not source directly or indirectly any Bauxite, Alumina or Primary Aluminium.
9.8b Conflict-Affected and High-Risk Areas - Identify and assess risks	Not Applicable	This Criterion is not applicable to the Entity as it does not source directly or indirectly any Bauxite, Alumina or Primary Aluminium.
9.8c Conflict-Affected and High-Risk Areas - Strategy to respond to risks	Not Applicable	This Criterion is not applicable to the Entity as it does not source directly or indirectly any Bauxite, Alumina or Primary Aluminium.
9.8d Conflict-Affected and High-Risk Areas - Audit of due diligence	Not Applicable	This Criterion is not applicable to the Entity as it does not source directly or indirectly any Bauxite, Alumina or Primary Aluminium.
9.8e Conflict-Affected and High-Risk Areas - Report annually	Not Applicable	This Criterion is not applicable to the Entity as it does not source directly or indirectly any Bauxite, Alumina or Primary Aluminium.
9.9 Security practice	Conformance	The provision of security services at the Entity is governed by contracts with authorised security companies. This process includes an assessment of legality, in accordance with the Entity's Human Rights Policy.
10. LABOUR RIGHTS		
10.1a-c Freedom of Association and Right to Collective Bargaining	Conformance	Whilst there is no Trade Union representative at the Entity, individual Workers are members of the local Unions. Workers are free to join Trade Unions, however interviewed Workers stated that they prefer to discuss work-related issues directly with their supervisors. The Audit found no evidence of Discrimination against Workers involved with a Trade Union. In Italy, all Workers are covered by a Collective Bargaining Agreement (CBA) agreed at national level among Trade Unions and industry representatives. The CBA recognises the freedom of Trade Union activity.
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 where the right to Freedom of Association and Collective Bargaining are not restricted.

CRITERION	RATING	COMMENT
10.2a Child Labour	Conformance	The Entity has implemented Policies for the management of Child Labour. At the commencement of employment, Workers provide an identification card with their date of birth, and the Entity retains a copy of the document. Child Labour is prohibited in Italy.
10.3a-c Forced Labour	Minor Non-Conformance	The Entity's Policy and Code of Ethics specifies the legal protection of Human Rights. A sample of Migrant Workers were interviewed, and a sample of Workers' personnel files was reviewed. No evidence of Forced Labour was identified. A draft Modern Slavery Statement has been prepared by the Entity. It has not however publicly disclosed an annual Modern Slavery Statement detailing their actions to address modern slavery.
10.4a-c Non-Discrimination	Conformance	The Entity's Code of Ethics prescribes equal opportunity for all Workers. The Entity has established a procedure on staff recruitment and management that outlines the conditions for hiring and selection of personnel. The current procedures are consistent with the Code of Ethics. No evidence of Discrimination was found during the Audit nor in the most recent Supervisory Body audit.
10.5 Communication and engagement	Conformance	Workers confirmed during Audit interviews that they have access to supervisors and managers, or they can contact an appropriate Trade Union to discuss working conditions and resolution of workplace issues. A Grievance Mechanism is referenced in the Entity's Code of Ethics (paragraph 11). Training on this matter is provided to employees. No grievances have been raised in the last five years.
10.6a-g Violence and Harassment	Conformance	Disciplinary practices are ruled by the Collective Bargaining Agreement and by local legislation (Law 300/1970). There was no evidence identified during the Audit of corporal punishment, mental or physical coercion, harassment, and gender-based violence including sexual harassment, or verbal abuse were identified during the audit. Review of Code of Ethics according decree law 231/2001, and according to the annual review of the management systems. Documents are available to Stakeholders upon request: https://www.raffmetal.com/download
10.7a-c Remuneration	Conformance	Payroll information conforms with the standard forms approved by the public administration. Interviewed Workers confirmed their understanding of the contents of payroll slips and that payments were made on time. A sample of payrolls and bank transfers were reviewed during the audit. The date of payment is fixed each month.
10.8a-c Working Time	Conformance	The Collective Bargaining Agreement (CBA) and local law (Decree 66/2003) establish the requirements for working hours, Overtime, Overtime payment rates and annual leave. The Entity prepares a monthly report for managers and supervisors on working hours and Overtime. There was no evidence identified during the Audit of any discrepancy between the CBA and data provided.
10.9a-b Informing Workers of Rights	Conformance	The National Collective Labor Agreement (CCNL) (Italian labour law) applies to the Entity and is available at: https://www.contrattometalmeccanici.it The Entity's Human Resources and Payroll Departments inform Workers of their rights and duties in accordance with the industry CCNL. Up to

CRITERION	RATING	COMMENT
		date information on changes to the CCNL are communicated with Workers on the Entity's portal.
11. OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Management System	Conformance	The Entity has implemented an Occupational Health and Safety (OH&S) Management System that conforms to the requirements of ISO 45001.
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Conformance	The Entity has implemented an ISO45001-based OH&S Management System and implements procedures for managing improvements in Worker Health and Safety. Indicators are monitored regularly and annually reported. Whilst not yet publicly available, upon request the Entity can provide reporting on the comparison of its OH&S performance with peer businesses and leading practice.
11.2 Employee engagement on Health and Safety	Conformance	The Entity has implemented an OH&S Management System conforming to ISO 45001 and implements procedures for managing improvements in Worker Health and Safety. Indicators are monitored regularly and annually reported. Workers are trained to report situations that may affect both Health and Safety and environmental issues. Workers interviewed during the Audit confirmed their awareness of this requirement.

ASI LIMITATION OF LIABILITY DISCLAIMER

DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	24 July 2020	Issued (Initial Certification Audit)
1	18 January 2022	Next Audit Type and Date revised to Surveillance Audit, as required under the Overall Maturity Rating assigned by the auditor in the Initial Certification Audit.
2	14 April 2022	Surveillance Audit
3	3 November 2023	Re-Certification Audit and Scope Change - Full Certification Scope Change to apply PS V3; and included 'Casthouses' to more accurately reflect the Entity's supply chain activities.
4	21 March 2025	Surveillance Audit – Provisional Certification
5	22 December 2025	Surveillance Audit – Provisional Certification
6	5 August 2026	Re-Certification Audit and Scope Change - Full Certification Scope Change to add Silval SpA (transfer of Certificate 477). A three-month extension was approved by ASI.