

ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

Slim Aluminium S.p.A

CERTIFICATE NUMBER
128

ASI STANDARD
PERFORMANCE
STANDARD
(V3 2022)

CERTIFICATION LEVEL
FULL
CERTIFICATION

ASI ACCREDITED
AUDITING FIRM
BUREAU VERITAS
CERTIFICATION

DATE OF ISSUE
11 MAY 2024

DATE OF EXPIRY
10 MAY 2027

CERTIFIED SINCE
11 MAY 2021

AUTHORISED BY

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

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

CERTIFICATION SCOPE

Manufacturing of Aluminium alloys
rolled products by remelting,
casting, hot and cold rolling and
heat treatments (EA17).

AUDIT REPORT PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Slim Aluminium S.p.A.
ENTITY NAME	Slim Aluminium S.p.A.
Certification Scope	Manufacturing of Aluminium alloys rolled products by remelting, casting, hot and cold rolling and heat treatments (EA17).
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Semi-Fabrication
ASI STANDARD	<ul style="list-style-type: none">Performance Standard V3
AUDIT TYPE	<ul style="list-style-type: none">Initial Certification Audit (24 – 25 February 2021)Surveillance Audit (16 – 17 May 2022)Re-Certification Audit and Scope Change (18 – 21 March 2024)
AUDIT FIRM	Bureau Veritas Certification
AUDIT DATE	<ul style="list-style-type: none">24 – 25 February 2021 (Initial Certification Audit)16 – 17 May 2022 (Surveillance Audit)18 – 21 March 2024 (Re-Certification Audit and Scope Change)
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">19 March 2021 (Initial Certification Audit)15 November 2022 (Surveillance Audit)15 May 2024 (Re-Certification Audit and Scope Change)
AUDIT SCOPE	<p><u>Initial Certification Audit (24 – 25 February 2021)</u></p> <p>The Audit Scope included all the facilities, functions and services of the Slim Aluminium S.p.A. di Cisterna di Latina plant.</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none">Semi-Fabrication <p>All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.</p> <p><u>Surveillance Audit (16 – 17 May 2022)</u></p> <p>The Audit Scope included all the facilities, functions and services of the Slim Aluminium S.p.A. di Cisterna di Latina plant.</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none">Semi-Fabrication <p>All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.</p> <p><u>Re-Certification Audit and Scope Change (18 – 21 March 2024)</u></p>

The Audit Scope included all the facilities, functions and services of the Slim Aluminium S.p.A. di Cisterna di Latina plant.

Supply chain activities included in the Audit Scope:

- Semi-Fabrication

All relevant Criteria in the ASI Performance Standard 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.
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CERTIFICATION PERIOD

11 May 2024 – 10 May 2027

NEXT AUDIT TYPE

Surveillance Audit

NEXT AUDIT DATE

11 November 2027

CERTIFICATE NUMBER

128



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

Slim Aluminium S.p.A. (the 'Entity') is a vertically integrated plant which manufactures flat rolled Aluminium products utilising a Casthouse, rolling mills and finishing lines. The Entity is located in Cisterna di Latina, near Rome Italy, and has a maximum capacity of approximately 95,000 tonnes per year operating on a total area of 17.5 hectares. The Entity has been in operation for over 50 years, and supplies a large number of market-leading companies with products offering a gauge range of between 6 µm to 6 mm in soft metal as well as producing hard alloys.

The Entity's Casthouse has a slab production capacity of 120,000 tonnes per annum, and includes two complete melting/casting lines, each one with a melting furnace, holding furnace, degasser, a filtration unit and casting machine. The Entity also has a twin chamber furnace, connected to a fume filtration unit, suitable for contaminated scrap remelting.

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	Medium	Medium	MEDIUM
RISKS	Medium	Medium	Medium	MEDIUM
PERFORMANCE	Medium	Medium	Medium	MEDIUM
OVERALL	MEDIUM			

FINDINGS

CRITERION	RATING	COMMENT
1. BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	A legislative list is kept updated by the Entity's Integrated Management System (IMS) Manager. The updating of this list is facilitated through registration with various trade associations (ASSOMET non-ferrous metals; European Aluminium) that periodically send information on legislative updates to the Entity.
1.2 Anti-Corruption	Conformance	<p>The Entity has developed and implemented a Code of Conduct against Corruption in all its forms. The Code outlines the principles and rules of conduct to which corporate practices must be traced back, capable of guaranteeing the correctness and transparency, reliability and reputation of the Entity.</p> <p>Management, employees, suppliers, customers and any other person who co-operates with the Entity is obliged to know and respect these principles, each within the scope of their own functions, skills and responsibilities.</p> <p>The Entity is committed to promoting the dissemination of the Code of Conduct and undertaking awareness-raising activities on its contents. The Entity has also documented and made public its code of ethics (last update July 2023). The Code of Conduct and the Code of Ethics are available at: https://www.simalu.com/it/modello-231/</p>
1.3a-e Code of Conduct	Conformance	<p>The Entity has documented and made public its Code of Conduct (last update July 2023). The Code of Conduct and the Code of Ethics are available at: https://www.simalu.com/it/modello-231/</p> <p>Both documents express the principles, values and rules of conduct inherent to the Entity's actions. With regards to environmental aspects, further information on the Entity's principles and commitments is available at: https://www.simalu.com/it/environment-2/</p>
2. POLICY AND MANAGEMENT		
2.1a-f Environmental, Social, and Governance Policy	Minor Non-Conformance	<p>Through its Integrated Policy, the Entity expresses its commitments in environmental, social and governance matters. The Integrated Policy also covers other aspects such as energy (ISO 50001), food safety (ISO 22000) and water quality (ISO 15088), available at: https://www.simalu.com/wp-content/uploads/2024/04/Politica-Integrata-Ed3_Rev3_2023_12_ENG-1.pdf</p> <p>The Policy also contains the commitment to respect the human and social rights of suppliers, collaborators and employees. The Policy is implemented by the Entity is consistent with the environmental, social and governance practices included in the ASI Performance Standard. However, at the time of the Audit, the document published on the website and available to interested parties was not the latest version, as approved by the new management.</p>
2.2a-c Leadership	Conformance	The Entity's Senior Management has assigned roles and responsibilities defined in the organisational chart and job description. The Management Representative was appointed and approved by the Entity's Board of Directors. The organisational chart illustrates all key persons and the hierarchical-functional dependency links.

CRITERION	RATING	COMMENT
2.3a Environmental and Social Management Systems - Environmental	Conformance	The Entity has an ISO 14001 certified Management System (certified by DNV GL).
2.3b Environmental and Social Management Systems - Social	Conformance	Whilst the Entity does not have a certified social responsibility management system, it is committed to proceeding towards the integration of social responsibility requirements within its existing Integrated Management System.
2.4a-e Responsible Sourcing	Minor Non-Conformance	The Entity has a structured responsible sourcing management system for its supply chain. However monitoring methods and commitments towards responsible sourcing have not been communicated through a specific Policy.
2.5a-g Environmental and Social Impact Assessments	Minor Non-Conformance	The Entity has documented an environmental and social Impact Assessment that measures risk through probability and harm. The risk assessment is re-evaluated following the planned actions and in the event of significant changes. However, the environmental and social Impact Assessment and the resulting management plan have not been communicated to interested parties.
2.6a-h Human Rights Impact Assessment	Minor Non-Conformance	The Entity has included the issue of Human Rights in its sustainability agenda; and respect for Human Rights is expressed in the Code of Ethics, (paragraphs 3.5 and 3.6): https://www.slimalu.com/wp-content/uploads/2024/02/Slim-Aluminium-Codice-Etico-luglio-2023.pdf However, a specific Human Rights Impact Assessment has not been formalised by the Entity and communicated to interested parties.
2.7a-f Emergency Response Plan	Conformance	The Entity has established and documented a series of procedures to respond to emergency situations and dangerous behaviour. At least annually, the Entity organises and holds drill exercises to respond to emergency scenarios. Emergency plans showing escape routes are distributed at various points within the Entity. The emergency plan is shared with visitors on first entry to the site, and is available to interested parties on request.
2.8a-d Suspended Operations	Minor Non-Conformance	Emergency situations are managed according to the HS-E Emergency Plan procedures. Various mitigation plans are also in place to ensure business continuity (e.g., external plate suppliers, external re-rolling suppliers). Whilst the Entity has procedures for different unplanned scenarios such as long-term production line failures and environmental equipment failures, the Entity has not formalised a Business Resilience Plan as a specific document.
2.9a-b Mergers and Acquisitions	Conformance	No acquisitions have occurred, nor any planned in the near future. The Entity has defined a process within its Organisational Model (pursuant to Legislative Decree 231/01) that reviews environmental and social practices as part of the required Due Diligence review.

CRITERION	RATING	COMMENT
2.10a-b Closure, Decommissioning and Divestment	Conformance	The Entity has no plans to either close or divest, however, the Entity has defined a process which provides that in the event of decommissioning and decommissioning of plants a specific plan is created (within the ISO 14001 certified Environmental Management System which already addresses environmental issues). The Model Legislative Decree 231/01 in place at the Entity establishes a process for the review of social and governance issues.
3. TRANSPARENCY		
3.1a-b Sustainability Reporting	Conformance	<p>The Entity is committed to communicating to its stakeholders, the steps taken and actions undertaken to pursue its sustainability objectives, through an annual Sustainability Report, available at: https://www.simalu.com/wp-content/uploads/2024/01/Slim-Aluminium-Bilancio-di-Sostenibilita-2022.pdf</p> <p>At the time of the Audit, the latest Sustainability Report published reported data for 2022. The document with data for 2023 is in the draft stage, and publication is expected by the third quarter of 2024.</p>
3.2 Non-compliance and Liabilities	Conformance	In the three year period subject to certification and up to the date of the Audit, the Entity has not received fines, convictions or other sanctions relating to non-compliance with the Applicable Regulations. The Entity has also declared that no complaints of any kind or nature have been received. This information is publicly available in the Sustainability Report: https://www.simalu.com/wp-content/uploads/2024/01/Slim-Aluminium-Bilancio-di-Sostenibilita-2022.pdf
3.3a-c Payments to Governments	Conformance	Any payments to Governments are managed by the Entity's management system, compliant with the Legislative Decree Model 231/01 which provides both a Code of Ethics and internal controls on anti-Corruption carried out by a Supervisory Body called OdV.
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	<p>The Entity has implemented a Whistleblowing tool via the Legislative Decree Model 231/01. The tool gives Workers the opportunity to make reports and complaints through a dedicated email address. Strategic points have been identified within the plant in which to install dedicated post offices that guarantee anonymity.</p> <p>The Entity has activated a complaints management system also for external parties. This system ensures the maximum degree of confidentiality in the processing of communications received, to protect the reporting party. Any potential violations or non-compliances can be reported via odv@simalu.com or at: https://www.simalu.com/it/modello-231/</p> <p>During the recent certification period, no internal complaints were received.</p>
4. MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment	Conformance	In 2023, the Entity in collaboration with European Aluminium, developed Environmental Product Declarations (EPD), which include Life Cycle Assessment (LCA) data for its anodised sheets for architectural cladding; anodised sheets for composite panels; and, anodised sheets for industrial cladding. Gabi software was used in the data processing.

CRITERION	RATING	COMMENT
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	<p>Whilst product lifecycle reports are not published on the Entity's website, they are provided to interested parties upon request. An extract relating to Carbon is shown in the Sustainability Report: https://www.slimalu.com/wp-content/uploads/2022/04/Slim-Aluminium-Bilancio-di-Sostenibilita-2020.pdf</p> <p>The Entity has declared that no request has been received in relation to the LCA of the Entity's products. EPD reports were developed in collaboration with European Aluminium for its anodised products for use in the construction sector. More frequent are the requests received from customers relating to the calculation of the Carbon Footprint and the percentage of recycled material present in the Entity's Products purchased.</p>
4.2 Product Design	Conformance	The Entity minimises the environmental impact of the materials produced through maximising the use of Aluminium waste (pre and post-consumer) in the alloys produced.
4.3a-b Aluminium Process Scrap	Conformance	All production cycles are monitored for each phase of the process with the recording of standard process Scrap and extra Scrap via dedicated software. Measurements are used to minimise internal Scrap from each cycle and standardize it. Where necessary, for example in cases where anomalies occur, specific improvement projects are launched to bring waste back within standard limits or even lower. All production Scrap is collected and segregated as per the family of compatible alloys in order to facilitate their reuse in the Entity's foundry. Internal Scrap is 100% recycled. Various tools are available for Scrap collection: dedicated baskets with separation by alloy and type, centralized pneumatic transport systems, and equipment for moulding chipboard or other types of thin Scrap in order to optimise the remelting yield.
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	<p>The Entity participates in a variety of industry associations. In Italy, the most important for the sector for the promotion of recycling is CIAL (National Aluminium Packaging Consortium) which deals with the recovery of Aluminium (post-consumer). At present, CIAL has not signed post-consumer recycling agreements in the Entity's geographical area.</p> <p>The Entity can receive Aluminium slabs/waste (including at End of Life) and remelt them as part of the raw material. Products containing a higher percentage of recycled material are also promoted. The Entity purchases a portion of pre- and post-consumer material from metal collection centres.</p>
5. GREENHOUSE GAS EMISSIONS		
5.1a-b Disclosure of GHG Emissions and Energy Use	Conformance	The Entity has an Energy Management System certified according to the UNI EN ISO 50001 standard. The Entity's CO ₂ emissions related to the consumption of methane, consumption of diesel for generators and Aluminium scrap.

CRITERION	RATING	COMMENT
		<p>An audit is undertaken annually by a certification body to verify the CO₂ values emitted for the site using methane bills and diesel consumption.</p> <p>The Entity annually reports emissions data to public authorities as required by the EU Emissions Trading System (EU ETS). The Entity also publicly discloses Material GHG emissions and energy use by source on an annual basis through the Sustainability Report (page 52): https://www.slimalu.com/wp-content/uploads/2022/04/Slim-Aluminium-Sustainability-Report-2020.pdf</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-e GHG Emissions Reduction Plans	Minor Non-Conformance	<p>All energy consumption that directly (natural gas) or indirectly (electricity) contributes to Greenhouse Gas (GHG) emissions is monitored by the Entity. On the basis of this monitoring, potential efficiency projects are analysed in order to obtain a continuous reduction in consumption.</p> <p>Although the Entity has evaluated various feasibility studies over the period for energy consumption reduction, a defined pathway to reduce GHG emissions in the medium-long term has not yet been prepared and approved by management. Additionally, the GHG emissions reduction targets have not yet been made public.</p>
5.4 GHG Emissions Management	Conformance	The Entity has implemented an energy Management System certified according to the UNI EN ISO 50001 standard, and is used for the management of GHG emissions on site.
6. EMISSIONS, EFFLUENTS AND WASTE		
6.1a-f Emissions to Air	Minor Non-Conformance	<p>The Entity has an Environmental Authorization (AIA or Integrated Environmental Authorisation) which provides for the management of emissions into the atmosphere, in compliance with Legislative Decree 152/2006. Following the authorisation principles, the Entity annually communicates its emissions into the atmosphere to the Public Administration. The Entity undertakes internal audits on compliance with the Authorization and checks on communication to the Public Administration are part of the ISO 14001 certification audit.</p> <p>However, there has been no confirmation as to whether there are any Material (significant) emissions discharged to air.</p>
6.2a-g Discharges to Water	Minor Non-Conformance	The Entity is equipped with three water treatment and purification systems for industrial and civil use. The final wastewater discharge point is constantly monitored in order to prevent any type of external contamination. Purification devices are monitored daily, with all checks recorded weekly.

CRITERION	RATING	COMMENT
		<p>Furthermore, in compliance with the Environmental Authorization (AIA or Integrated Environmental Authorisation), the final discharge point is equipped with an automatic sampler with chiller which makes waste water samples from the previous 12 hours available to the authorities.</p> <p>However, there has been no confirmation as to whether there are any Material (significant) emissions discharged to water.</p>
6.3a-g Assessment and Management of Spills and Leakages	Conformance	As part of the Environmental Analysis (updated in March 2022), an assessment of spills and losses was undertaken. This assessment has analysed the environmental aspect in normal and emergency conditions and evaluates its level of significance.
6.4a-b Public Disclosure of Spills and Leakages	Conformance	<p>The Entity's communication plan provides that any situations of Spills, losses or environmental accidents are promptly communicated to the relevant bodies and the certification body.</p> <p>The Entity externally communicates the type and potential impact of Spills and environmental accidents through the Sustainability Report (page 55). The Entity declares that there have been no material spills at the Entity in the last 20 years.</p>
6.5a-c Waste Management and Reporting	Conformance	<p>The Entity aims to maximise Waste recovery by directing only a small (non-recoverable) component to disposal. Aluminium Scrap produced in all phases of the process is recovered internally as secondary raw material for the melting furnaces. The Entity communicates the quantity of Hazardous and Non-Hazardous Waste generated annually through the Sustainability Report (page 47).</p> <p>During the Audit, the Entity presented the monitoring dossier of the environmental indicators of Aluminium Scrap. Waste has been incorporated into the Entity's environmental aspects register.</p>
6.6a-g Bauxite Residue	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7a-f Spent Pot Lining (SPL)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8a-d Dross	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
7. WATER STEWARDSHIP		
7.1a-b Water Assessment and Disclosure	Conformance	<p>The Entity has two wells for industrial use, one for potable water and two barrier wells for the MISO project (operational safety). Water from two wells are also used for cooling after treatment (industrial use). This description is reported in the Environmental Analysis document (updated in March 2022).</p> <p>The Authority monitors the withdrawal and use of water and analyses the Material risks associated with water. The Entity publicly communicates water consumption and destination in the Sustainability Report (page 50). The Entity undertakes internal monitoring of water consumption on a monthly basis.</p> <p>The data recorded in the monitoring period, referring to the quantity of water resources supplied, demonstrates a decrease in overall water consumption. The Entity's Sustainability Report contains water consumption data per unit of product over a three year trend.</p>

CRITERION	RATING	COMMENT
7.2a-e Water Management	Minor Non-Conformance	<p>The Entity has established a monitoring program for water withdrawn that is consistent with the risk assessment and environmental analysis; this monitoring includes constant control with monthly readings of suppliers and specific indicators (e.g. m³/tonne of finished product).</p> <p>However, the Entity has not yet implemented a water resources management plan that includes both medium and long-term objectives.</p>

8. BIODIVERSITY AND ECOSYSTEM SERVICES

8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	The Entity's Biodiversity risk assessment is covered in the Integrated Environmental Authorization (AIA), which is an obligation under Italian law, Legislative Decree 152/2006. The Annex to the report on territorial, urban and environmental constraints was verified. The Plan included in the AIA is adequately structured and takes into account the mitigation hierarchy in relation to the ongoing reclamation project.
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Not Applicable	This Criterion is not applicable, as the Entity does not operate in or near any areas of Biodiversity value therefore there are no risks of potential impacts on Biodiversity and Ecosystem Services. This aspect was also noted in the environmental analysis, risk analysis, and analysis of environmental aspects and impacts.
8.2a-g Biodiversity Management	Conformance	The Entity's Biodiversity risk assessment is covered in the AIA. The Annex to the report on territorial, urban and environmental constraints was verified. The Plan included in the AIA is adequately structured and takes into account the mitigation hierarchy in relation to the ongoing reclamation project.
8.3a-c Management of Priority Ecosystem Services	Not Applicable	This Criterion is not applicable, as the Entity does not operate in protected areas therefore there are no risks of potential impacts on Biodiversity and Ecosystem Services. This aspect was also noted in the environmental analysis, risk analysis, and analysis of environmental aspects and impacts.
8.4 Alien Species	Conformance	<p>The introduction of exotic species is a risk mitigated by internal processes such as instructions for suppliers to treat wooden pallets according to international standards, such as ISPM.</p> <p>The Entity communicates these aspects on pages 43 and 53 of the Sustainability Report: https://www.simalu.com/wp-content/uploads/2024/01/Slim-Aluminium-Bilancio-di-Sostenibilita-2022.pdf</p>
8.5a-b Commitment to 'No Go' in World Heritage Properties	Conformance	The Entity is not adjacent to, or near any World Heritage Properties and there will be no New Projects, nor any Major Changes that could impact. This commitment is published in the Sustainability Report (page 43): https://www.simalu.com/wp-content/uploads/2024/01/Slim-Aluminium-Bilancio-di-Sostenibilita-2022.pdf
8.6a-d Protected Areas	Conformance	The Entity has a Management System certified against ISO 14001 by an accredited body; and as required by the ISO standard, an assessment of the risk and impact on Biodiversity is covered in the environmental

CRITERION	RATING	COMMENT
		<p>analysis, risk analysis, and evaluation of environmental aspects and impacts on the territory.</p> <p>The results confirm a low risk to Biodiversity. The Entity is not adjacent to, or near any recognised Protected Areas.</p>
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	Minor Non-Conformance	<p>The Entity's commitment to respecting Human Rights is expressed in the Integrated Policy, Code of Ethics and the Organisational Model (pursuant to Legislative Decree 231/01).</p> <p>The Entity however, has not yet formalised and made public a Human Rights Policy document that clearly expresses its commitment to the UN Guiding Principles. In addition, whilst the Entity has included Human Rights in its sustainability agenda by undertaking a series of actions to implement its commitment, a Human Rights Due Diligence process is not formalised.</p>
9.2a-e Gender Equity and Women's Empowerment	Conformance	<p>Gender equality is guaranteed by compliance with regulations and the presence of women in senior and middle management positions (General Manager, middle managers and senior employee executives).</p> <p>The adoption of an Organisational Model pursuant to Legislative Decree 231/01 and a confidential reporting system represent a tool for communicating any crimes and violations to the Supervisory Body in charge.</p> <p>The Entity publicly discloses the effectiveness of measures adopted to promote gender equality on an annual basis through the Sustainability Report: https://www.slimalu.com/wp-content/uploads/2024/01/Slim-Aluminium-Bilancio-di-Sostenibilita-2022.pdf</p>
9.3a-i Indigenous Peoples	Not Applicable	This Criterion does not apply to the Entity, as Indigenous Peoples or their lands, territories and resources are not present or directly affected by the Entity's operations.
9.4a Free, Prior, and Informed Consent (FPIC) - New Projects or Major Changes	Not Applicable	This Criterion does not apply to the Entity, as Indigenous Peoples or their lands, territories and resources are not present or directly affected by the Entity's operations.
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 does not apply to the Entity, as Indigenous Peoples or their lands, territories and resources are not present or directly affected by the Entity's operations.

CRITERION	RATING	COMMENT
9.5a Cultural and Sacred Heritage – Identification	Conformance	The Entity is located in an urbanised area of the Regional Territorial Landscape Plan, and there are no natural or historical constraints. The Entity declares in its environmental analysis document that there are no buildings or artefacts of particular historical and cultural interest near the facility.
9.5b Cultural and Sacred Heritage – Impacts	Not Applicable	This Criterion does not apply to the Entity, as no cultural or sacred heritage features are present or directly affected by the Entity's operations.
9.6a-i Displacement	Conformance	There is no displacement currently anticipated, however in the event of transfers and relocation, the Entity will evaluate the related social risks as required.
9.7a-h Affected Populations and Organisations	Conformance	To date, the Entity has not encountered any negative situations or concerns with respect to its relationship with the local population and/or organizations. Due Diligence policies are in place at the Entity to assess the rights of Local Communities. The Entity states that no resettlements are currently planned, and in the unlikely event of this occurring in future, related social risks will be assessed and mitigation actions developed and implemented.
9.8a Conflict-Affected and High-Risk Areas – Strong Management Systems	Conformance	The Entity uses a variety of pre-existing procedures that relate to supply chain management, and all suppliers are required to comply with the Entity's Code of Ethics.
9.8b Conflict-Affected and High-Risk Areas – Identify and assess risks	Conformance	In accordance with the principles of the OECD (Organization for Economic Co-operation and Development) 'Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas', the Entity has adopted a supplier involvement process inspired by the five phases set out in the guideline. Given that the Entity does not operate directly on the global primary Aluminium market but purchases through European importer traders, these are adopted which in any case are aimed at covering the entire supply chain.
9.8c Conflict-Affected and High-Risk Areas – Strategy to respond to risks	Conformance	The Entity has implemented policies to direct metal purchase quotas towards suppliers who are most attentive to the issue of Human Rights. The supplier evaluation process is in some cases (considered critical) supported by audits, including remotely, of external suppliers while internally, assessments are included in the internal audit program incorporated into the existing Management System.
9.8d Conflict-Affected and High-Risk Areas – Audit of due diligence	Conformance	The Audit undertaken against the ASI Performance Standard has audited the Entity's Due Diligence practices regarding CAHRAs and thus satisfied this Criterion.
9.8e Conflict-Affected and High-Risk Areas – Report annually	Conformance	A report relating to its supply chain management as well as the commitment to implementing a sustainable procurement process will be incorporated into the next Sustainability Report which is currently in draft form, and will be published in mid-2024.
9.9 Security practice	Conformance	An armed night surveillance security services are provided during night time hours, whilst a concierge service is provided during the day by non-armed personnel from an external provider. Supervision and

CRITERION	RATING	COMMENT
		access control are undertaken in compliance with local law. Visitors are asked for an identity document when entering the Entity's facility.
10. LABOUR RIGHTS		
10.1a-c Freedom of Association and Right to Collective Bargaining	Conformance	<p>In Italy all Workers are covered by a Collective Labor Agreement (CCNL) agreed at National level between Trade Unions and sector representatives. The right to Collective Bargaining is guaranteed to all Workers through their representatives. Feedback received from Worker interviews during the Audit was positive and no situations have emerged which may have compromised the right to Freedom of Association and Collective Bargaining.</p> <p>The Entity has adopted a three-year procedure for the renewal of Trade Union representatives. During the Audit it was verified that there have been no Trade Union disputes.</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, as the Entity operates in a country (Italy) where Applicable Law does not restrict the right to Freedom of Association and Collective Bargaining. The Entity recognises and respects Freedom of Association and the right to Collective Bargaining.
10.2a Child Labour	Conformance	The Entity's recruitment procedure and the checking of identity documents guarantees the absence of Child Labour on site. Proof of commitment is available in the Social Responsibility Policy document. No minors were hired by the Entity.
10.3a-c Forced Labour	Minor Non-Conformance	<p>No form of deposit is required either at the time of hiring or subsequently. The Workers interviewed declared that at the time of hiring, the Entity provides them with the PPE required for the risks associated with the job, and their replacement is periodically guaranteed in the event of breakage or wear. There are no Migrant Workers on site.</p> <p>The hiring of direct Workers is formalised through regular employment contracts, while temporary Workers are hired directly or through administrative agencies authorized by the Ministry of Labor.</p> <p>The Entity respects the right to freedom of movement during the working day and breaks are guaranteed. No limitations were identified and Workers can leave the workplace in case of emergency. Workers are free from forms of pressure, are not forced to accept the job or retain it, and are free to negotiate and to terminate employment in accordance with Italian regulations. The Entity does not retain original copies of documents.</p> <p>Workers can freely withdraw from the employment relationship at any time by communicating their resignation to Human Resources. Based on the job and the years of employment, a notice period is required (as prescribed by the national collective agreement applied).</p> <p>The Entity however does not have a current formalised Modern Slavery Statement.</p>
10.4a-c Non-Discrimination	Conformance	The Entity confirms its commitment to refrain from supporting discriminatory practices. There is no interference with the right of staff to follow religious and cultural principles or practices, or to satisfy needs related to race, gender, sexual orientation, the Trade Union or

CRITERION	RATING	COMMENT
		<p>political affiliation. These commitments are expressed in the Code of Ethics and associated procedures.</p> <p>The Entity's Policies guarantee equal opportunities and non-Discrimination in the hiring, remuneration, promotion, training, advancement opportunities or dismissal of any Worker based on sex, race, national or social origin, religion or any other condition that may give rise to Discrimination.</p>
10.5 Communication and engagement	Conformance	Different types of communication have been implemented by the Entity to assist with communication, including meetings with Workers' Safety Representatives, periodic meetings on health and safety between the employer, Competent Doctor, Prevention and Protection Manager, and the Workers' Safety Manager, and meetings with Trade Union representatives.
10.6a-g Violence and Harassment	Conformance	<p>The Entity is against all forms of Harassment and Violence in all its forms. This commitment is covered in the Entity's Code of Ethics: https://www.slimalu.com/wp-content/uploads/2024/02/Slim-Aluminium-Codice-Etico-luglio-2023.pdf</p>
10.7a-d Remuneration	Conformance	<p>The Entity's employment contracts comply with Italian law, which in the event of a new employment relationship, transformation, extension or termination requires the completion of a form called UNILAV which must be transmitted electronically to the Ministry of Labor and Social Policies and to the employee. The lowest salary paid in the Entity is significantly higher than the living wage calculated for the area.</p> <p>Salaries are paid on time, and payslips and details of bank transfers provided to employees. Overtime work is always paid with an increase as provided for in the applied employment contract.</p>
10.8a-c Working Time	Conformance	The Entity complies with Applicable Law and industry standards regarding working hours (including Overtime). The recording of working hours is facilitated via magnetic badges. From the interviews undertaken during the Audit, it emerged that Overtime is always optional and previously authorised by managers. Each pay slip contains details on attendance, absence, annual leave and sick leave.
10.9a-b Informing Workers of Rights	Conformance	<p>The Entity informs Workers of the freedom to join any organisation of their choice and ensures that the choices made do not lead to negative consequences such as victimisation, harassment, intimidation or retaliation by the Entity.</p> <p>In Italy, all Workers are protected by a Collective Labor Agreement (CCNL) agreed at National level between Trade Unions and sector representatives. From the interviews and evidence collected during the Audit, it was found that Entity does not pose any obstacles to the formation or membership of Trade Unions or any other form of association. At the moment there are no disputes between the Entity and the Trade Union representatives.</p> <p>All press releases are posted on the Trade Union noticeboards which are located in various areas of the Entity.</p>

II. OCCUPATIONAL HEALTH AND SAFETY

CRITERION	RATING	COMMENT
11.1a Occupational Health and Safety (OH&S) Management System	Conformance	The Entity has implemented a Management System according to the ISO 45001 standard and has been certified by an independent and accredited body. The Management System adopted is composed of a management manual, procedures, operating instructions, registration forms, register of legislative obligations and the Policy. The documentation is periodically updated and reviewed every year during internal audits and management reviews. The Entity also monitors a series of indicators defined within the Management System for process control.
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Conformance	The Entity periodically maintains the implemented Management System. Through the Sustainability Report, the Entity makes public its indicators used to monitor performance established in the various processes. This information is available at (pages 29, 30, 31 and 32): https://www.slimalu.com/wp-content/uploads/2024/01/Slim-Aluminium-Bilancio-di-Sostenibilita-2022.pdf
11.2 Employee engagement on Health and Safety	Conformance	As required by Italian law, the Entity has structured a joint committee for Health and Safety. The committee includes the employer, the manager of the prevention and protection service, the occupational doctor and the Workers' representative for health and safety at work.

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DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	11 May 2021	Initial Certification Audit (Full Certification)
1	17 December 2022	Surveillance Audit
2	11 May 2024	Re-Certification Audit and Scope Change – Full Certification Scope Change to apply the ASI Performance Standard V3