## ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

# S.A.V. S.p.A. Società Alluminio Veneto

CERTIFICATE NUMBER

188

#### ASI STANDARD

PERFORMANCE STANDARD (V3.1 2023)

DATE OF ISSUE

24 FEBRUARY 2025

CERTIFICATION

**CERTIFICATION LEVEL** 

FULL

DATE OF EXPIRY

**23 FEBRUARY 2028** 

ASI ACCREDITED AUDITING FIRM

### BUREAU VERITAS CERTIFICATION

**CERTIFIED SINCE** 

24 FEBRUARY 2022

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, storage and sale of Aluminium alloy ingots through the phases of purchase, warehouse, processing and remelting of raw materials and metal scraps at Colombo 5 (including the buildings at Via Colombo 3 and Via Vasco de Gama 4) and dell'Artigianato 4, in Trebaseleghe Italy.

# AUDIT REPORT PERFORMANCE STANDARD

## **OVERVIEW**

MEMBER NAME	S.A.V. S.p.A. Società Alluminio Veneto				
ENTITY NAME	S.A.V. S.p.A. Società Alluminio Veneto Production, storage and sale of Aluminium alloy ingots through the phases of purchase, warehouse, processing and remelting of raw materials and metal scraps at Colombo 5 (including the buildings at Via Colombo 3 and Via Vasco de Gama 4) and dell'Artigianato 4, in Trebaseleghe Italy.				
CERTIFICATION SCOPE					
SUPPLY CHAIN ACTIVITIES	<ul><li>Aluminium Re-melting/Refining</li><li>Casthouses</li></ul>				
ASI STANDARD	Performance Standard V3.1				
AUDIT TYPE	<ul> <li>Initial Certification Audit (13 – 14 January 2022)</li> <li>Re-Certification Audit and Scope Change (17 – 20 February 2025)</li> </ul>				
AUDIT FIRM	Bureau Veritas Certification				
AUDIT DATE	<ul> <li>13 – 14 January 2022 (Initial Certification Audit)</li> <li>17 – 20 February 2025 (Re-Certification Audit and Scope Change)</li> </ul>				
AUDIT REPORT SUBMISSION	<ul> <li>28 January 2022 (Initial Certification Audit)</li> <li>28 February 2025 (Re-Certification Audit and Scope Change)</li> </ul>				
AUDIT SCOPE	<ul> <li>Initial Certification Audit (13 – 14 January 2022)</li> <li>Production, storage and sale of Aluminium alloy ingots through the phases of purchase, warehouse, processing and remelting of raw materials and metal scrap, at the Colombo and dell'Artigianato Facilities in Trebaseleghe Italy.</li> <li>The Supply Chain Activities included in the Audit Scope: <ul> <li>Aluminium Re-melting/Refining</li> <li>Casthouses</li> </ul> </li> <li>All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.</li> <li><u>Re-Certification Audit and Scope Change (17 – 20 February 2025)</u></li> <li>The Audit Scope includes the production, storage and sale of Aluminium alloy ingots through the phases of purchase.</li> </ul>				
	through the phases of purchase, warehouse, processing and remelting of raw materials and metal scraps, at the Colombo 5 (including the buildings at Via Colombo 3 and Via Vasco de Gama 4) and dell'Artigianato 4 Facilities, in Trebaseleghe, Italy. The 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.		
AUDIT OUTCOME	Full Certification		
AUDIT METHODOLOGY DECLARATION	The Auditors confirm that:		
	$\square$ 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	24 February 2025 – 23 February 2028		
NEXT AUDIT TYPE	Surveillance Audit		
NEXT AUDIT DATE	23 February 2027		
CERTIFICATE NUMBER	188		
	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**

S.A.V. S.p.A. Società Alluminio Veneto ('the Entity') is a producer of Aluminium alloy ingots for remelting that has operated in Trebaseleghe in the province of Padua (Italy) since 1996. Production takes place in two sites that are approximately 250 metres apart. The original historical site is located at 4 Via dall'Artigianato in Trebaseleghe, while the main and registered office is located at 5 Via Colombo, also in Trebaseleghe. Production takes place in an industrial area.

The Entity currently has 80 employees, including 68 Workers at the production site in Via Colombo 5, which includes 16 women Workers, and 12 Workers at the site in Via dell'Artigianato 4.

The Entity produces customised alloys for its customers as well as supplying Aluminium alloys according to other industry standards. The alloys produced by the Entity are used in all Aluminium casting production processes that utilise different casting techniques such as:

- chill casting
- sand casting
- low pressure casting
- die casting
- lost wax casting

The Entity's production capacity is approximately 100,000 tonnes per year, and Products are supplied to Aluminium casting producers, mainly located in Europe. Product quality and customisation, alongside flexibility of service enables the Entity to serve customers in diverse downstream industrial sectors such as automotive, transport, aeronautics, shipbuilding, household appliances, industrial machinery, electrical, construction, building and food.

The Entity produces on three independent production lines. The plants and warehouses have a surface area of 65,000 m<sup>2</sup>, of which 40,000 m<sup>2</sup> is covered. All activities take place indoors, from the unloading and storage of raw materials to the loading of the finished Product onto the truck for delivery to the customer.

The Stakeholders relevant to the Entity are all government control and verification bodies, Local Communities and customers, as well as all collaborators who have professional relationships in any form (suppliers, consultants, professionals, etc.).

The Entity is currently implementing internal improvement plans concerning, among other things, energy efficiency and the reduction of Greenhouse Gas emissions.

## 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.

	GOVERNANCE	ENVIRONMENT	SOCIAL	COMBINED RATING
SYSTEMS	High	High	High	HIGH
RISKS	High	Medium	High	HIGH
PERFORMANCE	High	High	High	HIGH
OVERALL		HIG	H	

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

## FINDINGS

CRITERION	RATING	COMMENT
1. BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity has implemented a Management System called 'Organizational Model 231' that is based on local law to manage its Compliance with Applicable Law. The Entity has implemented a procedure that ensures the regular review and updating of their register of legal requirements. Internal audits on legal Compliance are performed and currently no non-conformances have been identified.
1.2 Anti-Corruption	Conformance	The Entity has implemented a Management System called 'Organizational model 231' that is based on local law to manage its Compliance with Applicable Law including anti-Corruption measures. The Entity has disclosed its Code of Conduct and Ethics and Sustainability Report which both set out the Entity's anti-Corruption position. The Code of Conduct and Ethics is disclosed on the Entity's website and is accessible at: <u>https://www.sav-al.com/en/legal</u> The Sustainability Report is disclosed on the Entity's website and is accessible at: <u>https://www.sav-al.com/en/sustainability/social- sustainability</u>
1.3a-e Code of Conduct	Conformance	The Entity has implemented and documented a Code of Conduct and Ethics. The Code of Conduct and Ethics is reviewed annually or in response to any significant changes. The Entity trains its employees on the content of the Code of Conduct and Ethics through periodical training meetings. There is no evidence of any sanctions against the Entity related to the environment, health and safety, workplace law or Corruption. The Code of Conduct and Ethics is disclosed on the Entity's website and is accessible at: <u>https://www.sav-al.com/en/legal</u>
2. POLICY AND MANAGEMEN	т	
2.1a-f Environmental, Social, and Governance Policy	Conformance	The Entity has developed and implemented a Policy documenting their safety, environmental, quality, energy and social responsibility practices. The Policy has been endorsed by senior management. The Policy is accessible on the Entity's website at: <u>https://www.sav-</u> al.com/en/about/mission-policy
2.2a-c Leadership	Conformance	Overall responsibility for the implementation of the ASI Performance Standard (PS) is assigned to the Entity's Chief Executive Officer. Roles and responsibilities for implementation are set out in the Entity's organisational chart, last revised in January 2025. The organisational framework establishes a workgroup with responsibilities for ASI Standards implementation, which includes the Energy Manager, Human Resources Manager, Health and Safety Manager and Environmental Manager.
2.3a Environmental and Social Management Systems – Environmental	Conformance	The Entity has implemented an Integrated Management System that includes an Environmental Management System that is certified to ISO 14001:2015 and EMAS standards. The effectiveness of the Integrated Management System is reviewed at periodic intervals.

CRITERION	RATING	COMMENT
		The Entity's certificates to ISO 14001:2015 and EMAS standards and other relevant standards are disclosed at: <u>https://www.sav-</u> al.com/en/certifications
2.3b Environmental and Social Management Systems – Social	Conformance	The Entity has implemented an Integrated Management System that incorporates a Social Management System. The Social Management System is aligned with the SA8000 standard, although the Entity is not certified to this standard. The Entity's Policy suite includes statements on social responsibility, the social responsibility manual and a Sustainability Report that is publicly available and provides information on the performance of the Social Management System. The Entity's Sustainability Report is available at: <u>https://www.sav- al.com/en/sustainability/social-sustainability</u> The Entity's Policy that documents their safety, environmental, quality, energy and social responsibility practices is available at: <u>https://www.sav-al.com/en/about/mission-policy</u>
2.4a-e Responsible Sourcing	Conformance	The Entity has integrated responsible sourcing considerations into their Code of Conduct and Ethics. The Entity has established a procedure which describes parameters for the qualification of suppliers for all Management Systems, including ISO 14001; ISO 45001 and social responsibility Management Systems. A supplier list is available and a Due Diligence assessment has been undertaken. Information on relevant certifications and Conflict-Affected and High- Risk Areas (CAHRAs) statements of suppliers are collected. All suppliers are required to subscribe to the Code of Conduct and Ethics which is accessible at: <u>https://www.sav-al.com/en/legal</u>
2.5a-g Environmental and Social Impact Assessments	Not Applicable	This Criterion is not applicable to the Entity as no New Projects or Major Changes are currently planned. The Entity's Change Management Procedure addresses environmental, social, cultural, gender and overall Human Rights impacts of any changes.
2.6a-h Human Rights Impact Assessment	Not Applicable	This Criterion is not applicable to the Entity as no New Projects or Major Changes are currently planned. The Entity's Change Management Procedure addresses environmental, social, cultural, gender and overall Human Rights impacts of any changes.
2.7a-f Emergency Response Plan	Minor Non- Conformance	The Entity has developed and implemented an Emergency Response Plan as part of their ISO 14001:2015 certified Environmental Management System. Key information from the Emergency Response Plan is provided to local government to inform the government's regional emergency response plan. Although the Entity has an Emergency Response Plan in which relevant emergency scenarios have been identified and the related emergency plans have been managed, including the frequency of the related simulations, there is no evidence that the frequencies defined in the emergency plan have been determined based on a risk assessment for each emergency scenario.

CRITERION	RATING	COMMENT
2.8a-d Suspended Operations	Conformance	The Entity has implemented a certified Integrated Management System (IMS) for Occupational Health and Safety (OH&S), environmental and energy protection, quality, and information security. The Entity has also implemented a Social Management System based on the SA8000 standard. For each aspect of the IMS, there is an in-depth risk and opportunity assessment with a focus on ensuring business continuity and resilience. The risk analysis and mitigation measures are reviewed at least annually and the status of the improvement plan is regularly updated.
2.9a-b Mergers and Acquisitions	Conformance	The Entity's Change Management Procedure addresses the environmental, social, cultural, gender and overall Human Rights impacts of Major Changes including mergers and acquisitions.
2.10a-b Closure, Decommissioning and Divestment	Conformance	The Entity's Change Management Procedure addresses the environmental, social, cultural, gender and overall Human Rights impacts of Major Changes including decommissioning and divestment.
3. TRANSPARENCY		
3.1a-b Sustainability Reporting	Conformance	The Entity discloses an annual Sustainability Report which reports on environmental, social and health and safety impacts and performance. The Entity's 2024 Sustainability Report is accessible at: https://www.sav-al.com/en/sustainability/social-sustainability The Entity also prepares a detailed Statement on Environmental Impacts as part of their EMAS certification. The Statement on Environmental Impacts is available on request at: https://www.sav- al.com/en/contacts
3.2 Non-compliance and Liabilities	Conformance	The Entity discloses any fines or penalties in their annual Sustainability Report which is accessible at: <u>https://www.sav-</u> al.com/en/sustainability/social-sustainability
3.3a-c Payments to Governments	Conformance	Italian law forbids payments to public administration outside a legal or contractual basis. The Entity has a Management System with specific procedures to ensure legal compliance conforms to local laws. No evidence of violation of these procedures was noted. The Entity discloses their position on payments to governments and gives an overview of taxes paid in their Sustainability Report which is accessible at: <u>https://www.sav-al.com/en/sustainability/social-</u> <u>sustainability</u>
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	The Entity has developed a procedure to receive complaints and grievances from Stakeholders. The process for submitting complaints is disclosed in the Entity's Code of Conduct and Ethics which is accessible at: <u>https://www.sav-al.com/en/legal</u> The Entity's contact information for making complaints can be found on their website at: <u>https://www.sav-al.com/en/contacts</u>

CRITERION	RATING	COMMENT
4. MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment	Conformance	A Life Cycle Assessment (LCA) has been conducted for the main alloys the Entity produces following a 'cradle-to-gate' approach. In 2024 the Entity obtained certification to the ISO 14067 standard using a systematic and documented approach.
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	The LCA for the Entity's Products is available to customers on request for the specific Products supplied. The documentation relating to the product LCA includes all the basic assumptions made and the system boundaries used as well as all the other applicable requirements defined by ISO 14067, ISO 14040, ISO 14044 and the Product Category Rules (PCR) standards where applicable.
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's main activity is the recovery of Pre-Consumer and Post- Consumer Scrap produced by third parties. The Entity generates a very small amount of Aluminium Process Scrap. 100% of Aluminium Process Scrap is recovered directly in the Entity's production process. The data reported in the latest review of the Entity's management system also show that approximately 98% of the waste generated by the Entity is recycled in other authorised treatment plants. The remaining 2% of waste produced is sent to authorised recovery/disposal plants for appropriate treatment, as required by national legislation. All materials are correctly separated on site, including raw Aluminium alloys and other materials added for the production of alloys as finished products.
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	Each of the Entity's two Facilities has its own environmental authorization conforming to Italian law. Following the principles of this authorization the Entity must communicate to the public administration its production of Scrap and the final destination of Scrap to support recycling initiatives.
5. GREENHOUSE GAS EMISSIO	ONS	
5.1a-b Disclosure of GHG Emissions and Energy Use	Conformance	The Entity has measured and disclosed their Scope 1 – 3 Greenhouse Gas (GHG) emissions. The emissions data have been independently verified. The Entity's GHG emissions are disclosed in the 2024 Sustainability Report, accessible at: <u>https://www.sav-</u> <u>al.com/en/sustainability/social-sustainability</u>
		Further information is provided in the Entity's detailed Statement on Environmental Impacts that is prepared as part of their EMAS certification. The Statement on Environmental Impacts is available on request at: <u>https://www.sav-al.com/en/contacts</u>

CRITERION	RATING	COMMENT
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 developed and implemented a GHG Emissions Reduction Plan based on a 1.5°C warming scenario using the ASI methodology and has incorporated this Plan into their Environmental Management System. The GHG Emissions Reduction Plan addresses both Indirect and Direct GHG emissions. The Entity has established two reduction curves, one for Scope 1 and Scope 2 emissions and another for Scope 3 Category 1 emissions related to raw material supply, both based on a 2019 baseline year. Five-year Intermediate Targets have also been defined and are monitored annually as part of the Entity's management review process. Progress against GHG emissions reduction targets are reported on in the annual Sustainability Report. The 2024 Sustainability Report states that targets for 2023 have been met or exceeded.
		The summary GHG Emissions Reduction Plan is disclosed in the Entity's 2024 Sustainability Report, accessible at: <u>https://www.sav-</u> al.com/en/sustainability/social-sustainability
		Further information is provided in the Entity's detailed Statement on Environmental Impacts that is prepared as part of their EMAS certification. The Statement on Environmental Impacts is available on request at: https://www.sav-al.com/en/contacts
5.3b-e GHG Emissions Reduction Plans – Targets, review and disclosure	Conformance	Progress on the GHG Emissions Reduction Plan and the associated Pathway is included in the Entity's Sustainability Report, which is available on the Entity's website and in the environmental declaration available on request. The strategy and methods for reducing GHG emissions are reviewed annually during the management reviews or whenever changes within the company affects the progress and objectives of the plans.
		The Entity's 2024 Sustainability Report is accessible at: https://www.sav-al.com/en/sustainability/social-sustainability The Entity's detailed Statement on Environmental Impacts is available on request at: https://www.sav-al.com/en/contacts
5.4 GHG Emissions Management	Conformance	The Entity has incorporated the GHG Emissions Reduction Plan into their Integrated Management System, which is certified to ISO 50001, ISO 14001:2015 and EMAS standards. As a key component of the company's IMS, the GHG Emissions Reduction Plan is subject to verification during the internal and external audits as defined in the Entity's audit program.
6. EMISSIONS, EFFLUENTS AN	D WASTE	
6.1a-f Emissions to Air	Conformance	The Entity monitors Emissions to Air at each of its two Facilities. Each Facility has its own environmental authorization conforming to Italian

CRITERION	RATING	COMMENT
		law which include a requirement for the Entity to report its Emissions to Air to the public administration on an annual basis.
		The Entity discloses their Emissions to Air in their detailed Statement on Environmental Impacts, which is available on request at: https://www.sav-al.com/en/contacts
6.2a-g Discharges to Water	Conformance	The Entity currently has no Material Discharges to Water due to the technology currently used in the production processes. The only Discharges to Water are the connection to public wastewater system associated with washroom facilities.
6.3a-g Assessment and Management of Spills and Leakages	Conformance	The Entity has a Management System conforming to ISO 14001:2015, which includes a risk assessment that has determined the risk from Spills and Leakages to be very low.
		An emergency procedure has been developed and implemented that includes scenarios relating to Spills and Leakages.
6.4a-b Public Disclosure of Spills and Leakages	Conformance	An emergency procedure has been developed and implemented that includes scenarios relating to Spills and Leakages. The environmental risk assessment has determined the risk from Spills and Leakages to be very low. Any Spills or Leakages that may occur are reported in the Entity's Sustainability Report, accessible at: <u>https://www.sav-</u> al.com/en/sustainability/social-sustainability
6.5a-c Waste Management and Reporting	Minor Non- Conformance	The Entity has developed and implemented procedures for on-site Waste management. The majority of Waste produced is recycled and the Waste Mitigation Hierarchy is followed. The Entity discloses the quantity of Waste produced and its management outcome in their annual Sustainability Report, accessible at: <u>https://www.sav-</u> al.com/en/sustainability/social-sustainability
		More detailed information on Waste production and management is provided in the Entity's detailed Statement on Environmental Impacts that is prepared as part of their EMAS certification, available on request at: https://www.sav-al.com/en/contacts
		Both Facilities have their own environmental authorisation in accordance with Italian law that includes a requirement whereby the Entity must annually report its generation of Waste and their final destination to the public administration.
		However, the Entity's risk assessment document does not show the review date for the chemical risk assessment document which is required to be updated with the risk assessment for the handling of Waste produced. The chemical risk assessment document is an integral part of the overall risk assessment document.
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	As required by the EMAS and ISO 14001 Management Systems, procedures have been implemented for the management of Waste and Slag. The current Dross recycling rate is 100%, and no Dross is landfilled.

CRITERION	RATING	COMMENT
		Both Facilities have their own environmental authorisation in accordance with Italian law that includes a requirement whereby the Entity must annually report to the public administration its generation of Wastes, including Dross and their final destination.
7. WATER STEWARDSHIP		
7.1a-b Water Assessment and Disclosure	Conformance	The technology used in the Entity's production process inherently has very low water usage. Water is sourced from rainwater capture and public sources. A risk assessment and mapping of water sources and water usage has been undertaken and the risks are demonstrated to be low. Water related issues are included in the Entity's periodic management review.
		The Entity discloses its water withdrawal in their detailed Statement on Environmental Impacts, which is available on request at: https://www.sav-al.com/en/contacts
7.2a-e Water Management	Not Applicable	This Criterion is not applicable to the Entity, as the risk assessment determined that the water-related risks are low.
8. BIODIVERSITY AND ECOSY	STEM SERVICES	
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	A risk assessment on Biodiversity has been incorporated as part of the Entity's general environmental risk assessment. No significant risks affecting Biodiversity were found. The Entity's operations are within an industrial area.
		The Entity conducted an analysis of the impacts on Biodiversity during the preliminary authorization phase carried out to obtain permission to commence operations. The Entity keeps the environmental analysis updated, in which the impacts on the main environmental indicators are assessed including the Biodiversity in the Entity's Area of Influence.
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Not Applicable	This Criterion is not applicable to the Entity, as the risks to Biodiversity and Ecosystem Services have been assessed and demonstrated to be low.
8.2a-g Biodiversity Management	Not Applicable	This Criterion is not applicable to the Entity, as the risks to Biodiversity have been assessed and demonstrated to be low.
8.3a-c Management of Priority Ecosystem Services	Not Applicable	This Criterion is not applicable to the Entity, as the risks to Biodiversity and Ecosystem Services have been assessed and demonstrated to be low. There are no Priority Ecosystem Services.
8.4 Alien Species	Conformance	Impacts on Biodiversity have been assessed as part of the Entity's general environmental risk assessment. This risk assessment included an assessment of risks from Alien (weed) Species, which determined the risks were negligible.
8.5a-b Commitment to "No Go" in World Heritage Properties	Conformance	There are no World Heritage Sites in the Entity's Area of Influence.

CRITERION	RATING	COMMENT
8.6a-d Protected Areas	Conformance	As documented in the Entity's 'Environmental Analysis' document, there are no Protected and/or special classified Areas in the Entity's Area of Influence. The Entity carries out its activities in an area already classified as an industrial zone by the relevant public administration.
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 a Policy documenting their safety, environmental, quality, energy and social responsibility practices and a Code of Conduct and Ethics which both include statements on Human Rights. The Policy is accessible at: <u>https://www.sav-</u>
		al.com/en/about/mission-policy
		The Code of Conduct and Ethics is accessible at: <u>https://www.sav-</u> al.com/en/legal
		The Entity most recently conducted a gender sensitive Human Rights risk assessment in July 2024. The risk assessment is updated annually, and a procedure is in place that addresses risks resulting from the annual assessment. The risk assessment addresses the whole of supply chain and all suppliers. In addition, the Entity has carried out a social risk assessment in November 2024.
		The risk assessments identified no evidence of adverse Human Rights impacts in either the supply chain or within the Entity.
9.2a-e Gender Equity and Women's Empowerment	Conformance	The Entity carried out a gender equality risk assessment and no critical risks were found. Female staff perform key functions within the Entity and the Audit did not identify any Discrimination in pay or opportunities for female staff.
		The Entity has established a three-year programme to promote gender equity, which is reassessed in the event of non-compliance or otherwise at the three-year deadline. The programme involves opportunities for female training, remuneration reviews and assessment of other relevant indications. In addition, an annual report on labour relations is prepared, which also examines the situation of female staff, assesses for the existence of critical situations, considers the roles held by female staff and assesses the pay gap. The annual audit on social issues also examines gender equality. The Sustainability Report reports on the possible presence of Harassment and Discrimination as well as the situation of female staff within the organisation. The Sustainability Report is accessible at: https://www.sav-al.com/en/sustainability/social-sustainability
9.3a-i Indigenous Peoples	Not Applicable	This Criterion is not applicable to the Entity as there are no Indigenous People as defined by UN and ILO within the Entity's Area of Influence.
9.4a Free, Prior, and Informed Consent (FPIC) - New Projects or Major Changes	Not Applicable	This Criterion is not applicable to the Entity as there are no Indigenous People as defined by UN and ILO within the Entity's Area of Influence.

CRITERION	RATING	COMMENT
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 People as defined by UN and ILO within the Entity's Area of Influence.
9.5a Cultural and Sacred Heritage – Identification	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous People as defined by UN and ILO nor any cultural or sacred sites or values within the Entity's Area of Influence. The Entity operates in designated industrial areas.
9.5b Cultural and Sacred Heritage – Impacts	Not Applicable	This Criterion is not applicable to the Entity as there are no Indigenous People as defined by UN and ILO nor any cultural or sacred sites or values within the Entity's Area of Influence. The Entity operates in designated industrial areas.
9.6a-i Displacement	Not Applicable	This Criterion is not applicable to the Entity, as there is no current or past displacement.
9.7a-h Affected Populations and Organisations	Conformance	The Entity has conducted an environmental analysis and social responsibility risk assessment which identified no negative impacts on the Local Community from the Entity's activities in either environmental or social spheres. The Entity operates in an industrial area and most of their Workers and contractors reside in the immediate vicinity. The Entity contributes to local initiatives and activities through donations and sponsorship.
9.8a Conflict-Affected and High-Risk Areas - Strong management systems	Conformance	The Entity has developed and implemented a procedure which describes the parameters for qualification of suppliers against all Management Systems. This procedure requires a Due Diligence assessment and collection of information on each suppliers' Certification status against the ASI Performance Standard or other relevant standards and Conflict-Affected and High-Risk Areas (CAHRAs) statements . All suppliers are required to subscribe to the Entity's Code of Conduct and Ethics.
9.8b Conflict-Affected and High-Risk Areas - Identify and assess risks	Conformance	As part of their Management System for social responsibility the Entity has carried out a specific assessment of the risk of contributing, directly or indirectly, to armed conflicts or Human Rights violations in CAHRAs or to modern slavery. The assessment determined that the Entity does not contribute to such situations due to the implementation of its supplier qualification process. The Integrated Management System is based on a supplier
		qualification procedure that considers the supplier's certification status, the type of product supplied and the country of origin in order to guarantee a responsible supply chain.
		The risk assessment in relation to the supply chain is reviewed annually.

CRITERION	RATING	COMMENT
9.8c Conflict-Affected and High-Risk Areas - Strategy to respond to risks	Conformance	Whilst the Entity's assessment determined that the risks in the supply chain are low, procedures are in place for situations where the preliminary risk assessment of a supplier is not successful and the Social Management Manual sets out the corrective actions required where there has been a direct or indirect impact on Human Rights.
9.8d Conflict-Affected and High-Risk Areas - Audit of due diligence	Conformance	The Entity's Due Diligence practices have been audited as part of their ISO certification audits as well as this ASI Performance Standard Audit.
9.8e Conflict-Affected and High-Risk Areas - Report annually	Conformance	The Entity reports on their social evaluation of suppliers in their annual Sustainability Report, accessible at: <u>https://www.sav-</u> al.com/en/sustainability/social-sustainability
9.9 Security practice	Conformance	There Entity has no external security service. Security is managed directly by the Entity's staff, as well as by the local public service. Both groups are committed to respect Human Rights.
10. LABOUR RIGHTS		
10.1a-c Freedom of Association and Right to Collective Bargaining	Conformance	The Entity's senior management has no prejudices against Trade Unions, and Workers interviewed stated that they are free to contact and join Trade Unions and that their rights are respected by the Entity. A statement on Trade Unions is included in both the Entity's Company Policy and their Code of Conduct and Ethics.
		The Code of Conduct and Ethics is accessible at: <u>https://www.sav-</u> <u>al.com/en/legal</u>
		The Company Policy is accessible at: <u>https://www.sav-</u> <u>al.com/en/about/mission-policy</u>
		The Entity operates under a Collective Bargaining Agreement (CBA) that has been agreed by industry representatives and Trade Union representatives.
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 are no restrictions to Freedom of Association and Collective Bargaining in Italy.
10.2a-c Child Labour	Conformance	There is no evidence of Child Labour at the Entity and the risk of Child Labour is managed by an internal procedure. Due Diligence has been undertaken throughout the supply chain and suppliers have committed to the Entity's Code of Conduct and Ethics and Policy.
10.3a-c Forced Labour	Conformance	The Entity has developed and disclosed an annual Modern Slavery Statement, accessible at: https://www.sav-al.com/en/legal The Entity's Policy and Code of Conduct and Ethics prohibit the use of Forced Labour and commit to respecting Human Rights. No indications of Forced Labour of any kind were identified in the Audit. The Entity does not take financial deposits from Workers and does not keep any original employee identity documents. Employees are free to resign voluntarily in accordance with Applicable Law and the National Collective Labour Agreement (CCNL).

CRITERION	RATING	COMMENT
		The Code of Conduct and Ethics is accessible at: <u>https://www.sav-</u> <u>al.com/en/legal</u>
		The Company Policy is accessible at: <u>https://www.sav-</u> <u>al.com/en/about/mission-policy</u>
10.4a-c Non-Discrimination	Conformance	There is no evidence of Discrimination at the Entity. Statements against Discrimination are included in the Entity's Code of Conduct and Ethics and the Policy. The process for avoiding Discrimination in hiring, salary, promotion, training, advancement opportunities is established in the Entity's Human Resources Procedure.
10.5 Communication and engagement	Conformance	A periodic meeting among management and Workers' representatives is held to discuss Health and Safety issues. For other issues including compensation or working hours, direct engagement is preferred. No evidence of threat of reprisal, intimidation or Harassment emerged from both either the document review or Worker interviews.
10.6a-g Violence and Harassment	Conformance	Disciplinary measures are managed under the national CBA. There is no evidence of violations of the Agreement.
		It is expressly specified in the Entity's Company Policy and Code of Conduct and Ethics that Harassment, Violence or Discrimination are not permitted. The Policy and Code are published on the Entity's website and are reviewed periodically or in the event of gaps or non- conformities as part of the Entity's Integrated Management System (social responsibility). The risks of Violence and Harassment are assessed by the Entity in its social risk assessment, in which the Workers' safety representative is involved. During training activities Workers are reminded that discriminatory, harassing or violent behaviour must not be adopted and that every Worker has the right to report such conduct. The Code of Conduct and Ethics is accessible at: <u>https://www.sav-</u>
		al.com/en/legal The Company Policy is accessible at: <u>https://www.sav-</u> al.com/en/about/mission-policy
10.7a-c Remuneration	Conformance	Wages are governed by the national Collective Bargaining Agreement (CBA). The lowest wage in the CBA is higher than the poverty level as defined by the national statistics institute (ISTAT). The payment of a living wage is not an issue for the Entity.
		All Workers are provided with clearly readable pay slips. Wages are paid as per the CBA on a monthly basis, typically on the tenth day of each month by bank transfer.
10.8a-c Working Time	Conformance	Each Worker has an electronic badge to record the start and end of their Working Time, which ensures the accurate payment of wages. Rest days, holidays, annual leave and Overtime are ruled by the CBA. No evidence of nonconformity to the CBA was evident from either interviews or document review. Overtime worked is under the legal limit (250 hours per year).
10.9a-b Informing Workers of Rights	Conformance	At the time of recruitment, Workers receive relevant information as specified in the regulations in force.
		The relevant information, pursuant to the so-called <i>Transparency Decree</i> , is displayed on the notice board and the CCNL can be

CRITERION	RATING	COMMENT		
		consulted at the Entity offices. In addition, there is an explicit reference to the CCNL in the Entity's employment contracts.		
11. OCCUPATIONAL HEALTH AND SAFETY				
11.1a Occupational Health and Safety (OH&S) Management System	Conformance	The Entity has implemented an OH&S Management System that is certified against ISO 45001:2018. The Entity's ISO 45001:2018 certificate is accessible at: https://www.sav-al.com/en/certifications/security		
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Conformance	The Entity's OH&S Management System is audited at least once a year by an independent Third Party. In addition, a review of the management of the Management System is carried out at least annually in order to verify its effectiveness and, if necessary, to make the appropriate changes.		
		Performance indicators are monitored as part of the OH&S Management System, including frequency of accidents; frequency of near misses; occupational diseases; accident frequency; hours of training; and percentage of staff in training.		
		The indicators are compared with the results of the relevant sector available in sector publications. The comparison is disclosed in the Sustainability Report, accessible at: <u>https://www.sav-</u> al.com/en/sustainability/social-sustainability		
11.2 Employee engagement on Health and Safety	Conformance	The Entity has implemented an OH&S Management System that is certified against ISO 45001:2018. The Entity can demonstrate strong Worker engagement on OH&S matters as part of this Management System. The Entity's ISO 45001:2018 certificate is accessible at: https://www.sav-al.com/en/certifications/security		

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#### DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	24 February 2022	Initial Certification Audit – Full Certification
1	9 May 2025	Re-Certification Audit and Scope Change – Full Certification Scope Change to apply PS V3.1