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ASI CERTIFICATION  
PERFORMANCE  
STANDARD



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PRESENTED TO

**S.A.V. S.P.A.**  
**SOCIETÀ ALLUMINIO**  
**VENETO**

CERTIFICATE  
NUMBER

188

ASI  
STANDARD

PERFORMANCE  
STANDARD  
(V2 2017)

CERTIFICATION  
LEVEL

FULL  
CERTIFICATION

ASI ACCREDITED  
AUDITOR

BUREAU  
VERITAS  
CERTIFICATION

DATE OF ISSUE

24 FEBRUARY 2022

DATE OF EXPIRY

23 FEBRUARY 2025

CERTIFIED SINCE

24 FEBRUARY 2022

AUTHORISED BY

A handwritten signature in black ink, appearing to be 'J. H.', written over a light green background.

Aluminium Stewardship Initiative Ltd  
ACN 606 661 125, Australia  
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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](http://www.aluminium-stewardship.org)*

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CERTIFICATION SCOPE

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.

# SUMMARY 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
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 the Colombo and dell'Artigianato facilities in Trebaseleghe Italy.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none"><li>Aluminium Re-melting/Refining</li><li>Casthouses</li></ul>
ASI STANDARD	<ul style="list-style-type: none"><li>Performance Standard V2</li></ul>
AUDIT TYPE	<ul style="list-style-type: none"><li>Initial Certification Audit</li></ul>
AUDIT FIRM	Bureau Veritas Certification
AUDIT DATE	<ul style="list-style-type: none"><li>13 – 14 January 2022</li></ul>
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none"><li>28 January 2022</li></ul>
AUDIT SCOPE	<p>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.</p> <p>The Supply Chain Activities included in the audit scope:</p> <ul style="list-style-type: none"><li>Aluminium Re-melting/Refining</li><li>Casthouses</li></ul> <p>All relevant Criteria in the ASI Performance Standard were included in the audit scope.</p>
AUDIT OUTCOME	<ul style="list-style-type: none"><li>Certification</li></ul>
AUDIT METHODOLOGY DECLARATION	<p>The Auditors confirm that:</p> <ul style="list-style-type: none"><li><input checked="" type="checkbox"/> The information provided by the Entity is true and accurate to the best knowledge of the Auditor(s) preparing this report.</li></ul>

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- ✔ 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      24 February 2022 – 23 February 2025

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NEXT AUDIT TYPE      Re-Certification Audit

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NEXT AUDIT DUE DATE      23 February 2025

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CERTIFICATE NUMBER      188

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## SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity operates a management system called "Organizational model 231" and is based on local law and is used to manage its conformance to Applicable Law. A procedure that ensures review and updating of legal requirements and a list of legal requirements is implemented. Internal audits are performed and no non-conformances were found.
1.2 Anti-Corruption	Conformance	The Entity operates a management system called "Organizational model 231" and is based on local law and is used to manage its conformance to Applicable Law. The main documents are the Code of Conduct and the Sustainability Report - both are available on the internet. Code of Conduct: <a href="https://www.sav-al.com/file?oid=61ceca7710834b0426bfc165">https://www.sav-al.com/file?oid=61ceca7710834b0426bfc165</a> Sustainability Report: <a href="https://www.sav-al.com/file?oid=6143728310834b044515e387">https://www.sav-al.com/file?oid=6143728310834b044515e387</a>
1.3 Code of Conduct	Conformance	A Code of Conduct has been documented and implemented. There is no evidence of sanctions against the Entity related to the matter of environment, health and safety, work-law or corruption. The Code of Conduct is available at: <a href="https://www.sav-al.com/file?oid=61ceca7710834b0426bfc165">https://www.sav-al.com/file?oid=61ceca7710834b0426bfc165</a>
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	A Policy has been documented and received endorsement by senior management. The Policy is available at: <a href="https://www.sav-al.com/file?oid=6149f3a810834b0445b43eed">https://www.sav-al.com/file?oid=6149f3a810834b0445b43eed</a>
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	A Policy has been documented and received endorsement by the CEO. The Policy is available at: <a href="https://www.sav-al.com/file?oid=6149f3a810834b0445b43eed">https://www.sav-al.com/file?oid=6149f3a810834b0445b43eed</a>
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	A Policy is available at the Entity's premises and is publicly available on the internet at: <a href="https://www.sav-al.com/file?oid=6149f3a810834b0445b43eed">https://www.sav-al.com/file?oid=6149f3a810834b0445b43eed</a>

CRITERION	RATING	COMMENT
2.2 Leadership	Conformance	The Entity's organizational chart, last revised in January 2022, includes a workgroup with responsibilities for ASI Standards implementation, which includes the Energy Manager, Human Resources Manager, Health and Safety Manager and Environmental Manager. The overall responsibility is assigned to the CEO.
2.3a Environmental and Social Management Systems (environmental)	Conformance	The Entity is certified to ISO 14001 with the certificate available at: <a href="https://www.sav-al.com/file?oid=605cbeab10834b0411505b05">https://www.sav-al.com/file?oid=605cbeab10834b0411505b05</a> The Entity is also EMAS registered, with the certificate available at: <a href="https://www.sav-al.com/file?oid=5f9a7c8110834b042792ed05">https://www.sav-al.com/file?oid=5f9a7c8110834b042792ed05</a>
2.3b Environmental and Social Management Systems (social)	Conformance	The Entity has implemented an Environmental Management System certified against ISO 14001, and also operates a Social Management System aligned with SA8000 but it is not certified. The Entity's policy includes statements on social responsibility, and a sustainability report is publicly available; which provides information on Social Management System performance. A social responsibility manual has been issued. The ISO 14001 certificate is available at: <a href="https://www.sav-al.com/file?oid=605cbeab10834b0411505b05">https://www.sav-al.com/file?oid=605cbeab10834b0411505b05</a> The Sustainability report is available at: <a href="https://www.sav-al.com/file?oid=6143728310834b044515e387">https://www.sav-al.com/file?oid=6143728310834b044515e387</a> The Policy is available at: <a href="https://www.sav-al.com/file?oid=6149f3a810834b0445b43eed">https://www.sav-al.com/file?oid=6149f3a810834b0445b43eed</a>
2.4 Responsible Sourcing	Conformance	The Entity has developed and implemented a procedure which describes parameters for qualification of suppliers for all Management Systems (ISO 14001; ISO 45001 and social responsibility). A supplier list is available and a Due Diligence assessment is undertaken and information on certification and Conflict-Affected and High-Risk Areas statements of suppliers is collected. All suppliers are required to subscribe to the Code of Conduct.
2.5 Impact Assessments	Conformance	The Entity's Change Management Procedure addresses environmental, social, cultural, gender and overall Human Rights impact of change.

CRITERION	RATING	COMMENT
2.6 Emergency Response Plan	Conformance	Emergency Response Plan development and implementation at the Entity has been undertaken as part of its certified Environmental Management System (ISO 14001).
2.7 Mergers and Acquisitions	Conformance	The Entity's Change Management Procedure addresses environmental, social, cultural, gender and overall Human Rights impact of major change including merger and acquisitions.
2.8 Closure, Decommissioning and Divestment	Conformance	The Entity's Change Management Procedure addresses environmental, social, cultural, gender and overall Human Rights impact of major change including decommissioning and divestment.
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	<p>The Entity has produced a Sustainability Report which is publicly available at:  <a href="https://www.sav-al.com/file?oid=6143728310834b044515e387">https://www.sav-al.com/file?oid=6143728310834b044515e387</a></p> <p>The Report discloses environmental, social and health and safety impacts and is updated to 31 December 2020. A new report with data updated to 31 December 2021 is being produced.</p> <p>As per the Entity's EMAS certification, a more detailed statement on environmental impacts is available on request at:  <a href="https://www.sav-al.com/en/contacts">https://www.sav-al.com/en/contacts</a></p>
3.2 Non-compliance and liabilities	Conformance	<p>The Entity has produced a Sustainability Report which is publicly available at:  <a href="https://www.sav-al.com/file?oid=6143728310834b044515e387">https://www.sav-al.com/file?oid=6143728310834b044515e387</a></p> <p>The Report discloses environmental, social and health and safety impacts and is updated to 31 December 2020. A new report with data updated to 31 December 2021 is being produced. Information on fines in 2020, of which there were none, is disclosed on page 11 of the Sustainability Report.</p>
3.3a Payments to governments (legal and contractual)	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.
3.3b Payments to governments (disclosure - bauxite mining)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
3.4 Stakeholder complaints, grievances and requests for information	Conformance	The Entity's complaints mechanism is described in the Code of Conduct publicly available at: <a href="https://www.sav-al.com/file?oid=61ceca7710834b0426bfc165">https://www.sav-al.com/file?oid=61ceca7710834b0426bfc165</a> and also available at: <a href="https://www.sav-al.com/en/contacts">https://www.sav-al.com/en/contacts</a>
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	A cradle to gate Life Cycle Assessment (LCA) has been conducted for the main alloys.
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	A cradle to gate Life Cycle Assessment (LCA) has been conducted for the main alloys.
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	A Life Cycle Assessment for the whole production is publicly available in the Environmental Statement as per EMAS registration. The environmental statement includes underlying assumptions and system boundaries.
4.2 Product design	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.3a Aluminium Process Scrap (targets)	Conformance	The Entity has very low Process Scrap production. A review of data confirms approximately 98% of scrap is recycled internally. Scrap that is not recyclable with existing technology at the Entity is delivered to waste treatment plants for recycling.
4.3b Aluminium Process Scrap (alloy separation)	Conformance	Correct separation of all materials occurs on site, including raw aluminium alloys and other materials added for realization of alloys as finished product.
4.4a Collection and recycling of products at end-of-life (strategy)	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 public administration its production of wastes and the final destination of wastes.
4.4b Collection and recycling of products at end-of-life (engagement)	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 public administration its production of wastes and the final destination of wastes.
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		

CRITERION	RATING	COMMENT
5.1 Disclosure of GHG emissions and energy use	Conformance	As per the Entity's EMAS certification, an Environmental Statement is publicly available on request, which includes GHG emissions and energy data. The latest available statement is updated to 31 December 2020, a new issue with data at 31 December 2021 is currently being produced. Requests can be made at: <a href="https://www.sav-al.com/en/contacts">https://www.sav-al.com/en/contacts</a>
5.2 GHG emissions reductions	Conformance	As per the Entity's EMAS certification, an Environmental Statement is publicly available on request, which includes GHG emissions and energy data. The latest available statement is updated to 31 December 2020, a new issue with data at 31 December 2021 is currently being produced. Requests can be made at: <a href="https://www.sav-al.com/en/contacts">https://www.sav-al.com/en/contacts</a> <a href="https://www.sav-al.com/en/contacts">https://www.sav-al.com/en/contacts</a> Chapter 16 of the Environmental Statement contains a reduction of energy usage target and the planning to achieve the target.
5.3a Aluminium Smelting (management system)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.3b Aluminium Smelting (up to and including 2020)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.3c Aluminium Smelting (after 2020)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
PRINCIPLE 6 EMISSIONS, EFFLUENTS AND WASTE		
6.1 Emissions to Air	Conformance	Each of the Entity's two facilities has its own environmental authorization conforming to Italian law. This includes an authorization for Emissions to Air where on an annual basis, must communicate to the public administration its emissions to air. In addition to these mandatory communications as per EMAS certification an annual Environmental Statement is publicly available on request.
6.2 Discharges to Water	Conformance	Due to the technology presently in use in the production processes, there are no Discharges to Water, other than connection with public sewage for employee rest rooms.
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	The Entity has a Management System conforming to ISO 14001 which includes a risk assessment that has determined the risk from Spills and Leakages to be very low.



CRITERION	RATING	COMMENT
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	An emergency procedure has been developed and implemented, and includes scenarios relating to Spills and Leakage.
6.4a Reporting of Spills (immediate disclosure)	Conformance	An emergency procedure has been developed and implemented, and includes scenarios relating to Spills and Leakage. Any spills, if they occur, are reported in the Sustainability Report: <a href="https://www.sav-al.com/file?oid=6143728310834b044515e387">https://www.sav-al.com/file?oid=6143728310834b044515e387</a>
6.4b Reporting of Spills (regular reporting)	Conformance	The environmental risk assessment has rated Spills and Leakage as a low risk. Any spills, if they occur are reported in the Sustainability Report: <a href="https://www.sav-al.com/file?oid=6143728310834b044515e387">https://www.sav-al.com/file?oid=6143728310834b044515e387</a>
6.5a Waste management and reporting (strategy)	Conformance	Procedures for the management of Waste on site have been developed and implemented. The majority of all wastes are recycled and the Waste Mitigation Hierarchy is followed.
6.5b Waste management and reporting (disclosure)	Conformance	Each of the Entity's two facilities has its own environmental authorization conforming to Italian law. This includes an authorization where the Entity must communicate on an annual basis to the public administration its production of Wastes and the final destination of Waste materials.
6.6a Bauxite Residue (storage construction)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6b Bauxite Residue (integrity checks and controls)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6c Bauxite Residue (water discharge)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6d Bauxite Residue (marine and aquatic environments)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6e Bauxite Residue (start of the art technologies)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6f Bauxite Residue (remediation)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7a Spent Pot Lining (SPL) (storage and management)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7b Spent Pot Lining (SPL) (recovery and recycling)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
6.7c Spent Pot Lining (SPL) (Untreated SPL)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7d Spent Pot Lining (SPL) (review of alternatives)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7e Spent Pot Lining (SPL) (marine and aquatic environments)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8a Dross (recovery)	Conformance	As per the EMAS and ISO 14001 Management Systems, procedures for the management of wastes and Dross have been implemented. The current recycling ratio is greater than 90%. A description of the process is included in the Environmental Statement which is available on request via: <a href="https://www.sav-al.com/en/contacts">https://www.sav-al.com/en/contacts</a>
6.8b Dross (recycling)	Conformance	Each of the Entity's two facilities has its own environmental authorization conforming to Italian law. This includes an authorization where the Entity must communicate on an annual basis to the public administration its production of wastes and the final destination of waste materials, including Dross – where all Dross material is sent to recycling facilities.
6.8c Dross (review of alternatives)	Conformance	Each of the Entity's two facilities has its own environmental authorization conforming to Italian law. This includes an authorization where the Entity must communicate on an annual basis to the public administration its production of wastes and the final destination of waste materials, including Dross – where all Dross material is sent to recycling facilities.
PRINCIPLE 7 WATER STEWARDSHIP		
7.1a Water assessment (mapping)	Conformance	The technology used in the production process inherently has very low water usage, with water sourced from rainwater capture and public sources. A risk assessment and mapping of water sources and water usage has been undertaken.
7.1b Water assessment (risk assessment)	Conformance	The technology used in the production process inherently has very low water usage, with water sourced from rainwater capture and public sources. A risk assessment and mapping of water sources and water usage has been undertaken.
7.2a Water management (management plans)	Conformance	The technology used in the production process inherently has very low water usage, with water

CRITERION	RATING	COMMENT
		sourced from rainwater capture and public sources. A risk assessment and mapping of water sources and water usage has been undertaken. Water related issues are included in the Entity's management review.
7.2b Water management (monitoring)	Conformance	The technology used in the production process inherently has very low water usage, with water sourced from rainwater capture and public sources. A risk assessment and mapping of water sources and water usage has been undertaken. Water related issues are included in the Entity's management review.
7.3 Disclosure of water usage and risks	Conformance	The technology used in the production process inherently has very low water usage, with water sourced from rainwater capture and public sources. A risk assessment and mapping of water sources and water usage has been undertaken. Water related issues are included in the Entity's management review.
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	A risk assessment on biodiversity has been incorporated as part of the general environmental risk assessment. No significant risks affecting biodiversity were found.
8.2a Biodiversity management (biodiversity action plans)	Conformance	A risk assessment on biodiversity has been incorporated as part of the general environmental risk assessment. No significant risks affecting biodiversity were found.
8.2b Biodiversity management (consultation and mitigation hierarchy)	Conformance	A risk assessment on biodiversity has been incorporated as part of the general environmental risk assessment. No significant risks affecting biodiversity were found.
8.2c Biodiversity management (reporting)	Conformance	A risk assessment on biodiversity has been incorporated as part of the general environmental risk assessment. No significant risks affecting biodiversity were found.
8.3 Alien Species	Conformance	A risk assessment on biodiversity has been incorporated as part of the general environmental risk assessment. No significant risks affecting biodiversity were found – this includes an assessment of Alien (weed) Species.

CRITERION	RATING	COMMENT
8.4a Commitment to “No Go” in World Heritage properties (exploration and new mines)	Not Applicable	This Criterion is not applicable to the Entity’s Certification Scope.
8.4b Commitment to “No Go” in World Heritage properties (existing operations)	Not Applicable	This Criterion is not applicable to the Entity’s Certification Scope.
8.5a Mine rehabilitation (best available techniques)	Not Applicable	This Criterion is not applicable to the Entity’s Certification Scope.
8.5b Mine rehabilitation (financial provisions)	Not Applicable	This Criterion is not applicable to the Entity’s Certification Scope.
PRINCIPLE 9 HUMAN RIGHTS		
9.1a Human Rights Due Diligence (policy)	Conformance	The Entity has developed a Policy and a Code of Conduct which both include statements on Human Rights. The Policy is available at: <a href="https://www.sav-al.com/file?oid=6149f3a810834b0445b43eed">https://www.sav-al.com/file?oid=6149f3a810834b0445b43eed</a> The Code of Ethics is available at: <a href="https://www.sav-al.com/file?oid=61ceca7710834b0426bfc165">https://www.sav-al.com/file?oid=61ceca7710834b0426bfc165</a>
9.1b Human Rights Due Diligence (process)	Conformance	A risk assessment was last undertaken in July 2021 and is updated annually. There is a procedure to manage human resources that addresses risks resulting from annual assessment. The risk assessment addresses the whole of supply chain and all suppliers.
9.1c Human Rights Due Diligence (remediation)	Conformance	There was no evidence of adverse Human Rights impacts in both the supply chain and the Entity.
9.2 Women’s Rights	Conformance	Specific rights of women are included in the Entity’s primary risk assessment. There is a procedure to manage human resources that addresses risks resulting from annual assessment. The risk assessment addresses the whole of supply chain and all suppliers.
9.3 Indigenous Peoples	Conformance	There is a procedure to manage human resources that addresses risks resulting from annual assessment. The risk assessment addresses the whole of supply chain and all suppliers. In the Entity’s Area of Influence there are no Indigenous People as defined by UN and ILO.
9.4 Free, Prior, and Informed Consent (FPIC)	Conformance	The Entity’s change management procedure addresses environmental, social, cultural, gender and overall Human Rights impact of change.

CRITERION	RATING	COMMENT
		Indigenous People as per UN definition are not present in the area, they are included in the overall Human Rights Due Diligence.
9.5 Cultural and sacred heritage	Conformance	A risk assessment was last undertaken in July 2021 and is updated annually. The Entity's change management procedure addresses environmental, social, cultural, gender and overall Human Rights impact of change.
9.6a Resettlements (avoid or minimise)	Conformance	A risk assessment was last undertaken in July 2021 and is updated annually. The Entity's change management procedure addresses environmental, social, cultural, gender and overall Human Rights impact of change.
9.6b Resettlements (where unavoidable)	Conformance	A risk assessment was last undertaken in July 2021 and is updated annually. The Entity's change management procedure addresses environmental, social, cultural, gender and overall Human Rights impact of change.
9.7a Local Communities (rights and interests)	Conformance	A risk assessment was last undertaken in July 2021 and is updated annually. The Entity's change management procedure addresses environmental, social, cultural, gender and overall Human Rights impact of change. Local Communities are included as a relevant interested party.
9.7b Local Communities (impacts)	Conformance	A risk assessment was last undertaken in July 2021 and is updated annually. The Entity's change management procedure addresses environmental, social, cultural, gender and overall Human Rights impact of change. Local Communities are included as a relevant interested party. The Entity supports charity projects for Local Communities.
9.7c Local Communities (livelihoods)	Conformance	A risk assessment was last undertaken in July 2021 and is updated annually. The Entity's change management procedure addresses environmental, social, cultural, gender and overall Human Rights impact of change. Local Communities are included as a relevant interested party. The Entity supports charity projects for Local Communities.
9.8 Conflict-Affected and High-Risk Areas	Conformance	The Entity has developed and implemented a procedure which describes parameters for qualification of suppliers for all Management Systems (e.g. ISO 14001; ISO 45001 and social responsibility), which requires a Due Diligence assessment and collection of information on

CRITERION	RATING	COMMENT
		<p>certifications and Conflict-Affected and High-Risk Areas statements of suppliers.</p> <p>All suppliers are required to subscribe the Code of Conduct.</p>
9.9 Security practice	Conformance	There are no private security providers engaged at the Entity. The only security provider is local police that comply as per local laws.
PRINCIPLE 10 LABOUR RIGHTS		
10.1a Freedom of Association and Right to Collective Bargaining (freedom of association)	Conformance	<p>Senior management has no prejudices against Trade Unions and workers interviewed stated they are free to contact Trade Unions and their rights are respected by the Entity. A statement on Trade Unions is included in both the main Policy and Code of Ethics:</p> <p><a href="https://www.sav-al.com/file?oid=6149f3a810834b0445b43eed">https://www.sav-al.com/file?oid=6149f3a810834b0445b43eed</a></p> <p><a href="https://www.sav-al.com/file?oid=61ceca7710834b0426bfc165">https://www.sav-al.com/file?oid=61ceca7710834b0426bfc165</a></p>
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Conformance	The Entity operates a Collective Bargaining Agreement (CBA) agreed by industry representatives and Trade Unions Representatives.
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Not Applicable	In Italy there are no restrictions to Freedom of Association and Collective Bargaining. No alternative means of association are needed.
10.2a Child Labour (minimum age)	Conformance	There is no evidence of Child Labour at the Entity, and is managed by an internal procedure. Throughout the supply chain, due diligence has been undertaken and suppliers have committed to the Entity's Code of Ethics and Policy.
10.2b Child Labour (hazardous)	Conformance	There is no evidence of Child Labour at the Entity, and is managed by an internal procedure. Throughout the supply chain, due diligence has been undertaken and suppliers have committed to the Entity's Code of Ethics and Policy.
10.2c Child Labour (worst forms)	Conformance	There is no evidence of Child Labour at the Entity, and is managed by an internal procedure. Throughout the supply chain, due diligence has been undertaken and suppliers have committed to the Entity's Code of Ethics and Policy.
10.3a Forced Labour (human trafficking)	Conformance	There is no evidence of Forced Labour or human trafficking. Statements on this matter are included in the Code of Ethics and Policy.

CRITERION	RATING	COMMENT
10.3b Forced Labour (deposits, fees, advances)	Conformance	There is no evidence of Forced Labour or Human Trafficking. Statements on this matter are included in the Code of Ethics and Policy.
10.3c Forced Labour (migrant workers)	Conformance	There is no evidence of Forced Labour or Human Trafficking. Statements on this matter are included in the Code of Ethics and Policy. No request to lodge deposits or any security payments were identified from employee interviews and a document review.
10.3d Forced Labour (debt bondage)	Conformance	There is no evidence of Forced Labour or Human Trafficking. Statements on this matter are included in the Code of Ethics and Policy. No request to lodge deposits or any security payment were identified from employee interviews and a document review.
10.3e Forced Labour (freedom of movement)	Conformance	There is no evidence of Forced Labour or Human Trafficking. Statements on this matter are included in the Code of Ethics and Policy. There are no restrictions to movement, unless for safety issues and workers are free to leave their workplace at the end of working hours.
10.3f Forced Labour (retention of identity papers, permits, certificates)	Conformance	There is no evidence of Forced Labour or Human Trafficking. There is no evidence of the retention of original personal documentation.
10.3g Forced Labour (freedom to terminate employment)	Conformance	There is no evidence of Forced Labour or Human Trafficking. Workers can terminate their employment freely, in conformance to the rules of Collective Bargaining Agreement, with a pre-determined notice period.
10.4 Non-Discrimination	Conformance	There is no evidence of Discrimination at the Entity. Statements on this matter are included in Code of Ethics and Policy. The matter of Discrimination in hiring, salary, promotion, training, advancement opportunities is included in the Human Resources Procedure.
10.5 Communication and engagement	Conformance	As per local laws an annual meeting among management and Workers representatives is held for 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 document review and interviews.

CRITERION	RATING	COMMENT
10.6 Disciplinary practices	Conformance	Disciplinary measures are managed under the national Collective Bargaining Agreement (CBA). There is no evidence of violations. Wages are ruled by the national Collective Bargaining Agreement (CBA), with the lowest wage in the CBA higher than the poverty level as defined by national statistics institute (ISTAT) – Living wage is not an issue.
10.7a Remuneration (living wage)	Conformance	Wages are ruled by the national Collective Bargaining Agreement (CBA), with the lowest wage in the CBA higher than the poverty level as defined by the national statistics institute (ISTAT) – Living wage is not an issue.
10.7b Remuneration (method of payment)	Conformance	All Workers are provided with clearly readable pay slips. Wages are paid as per the Collective Bargaining Agreement (CBA) on a monthly basis, typically on the tenth of each month by bank transfer.
10.8 Working Time	Conformance	Each Worker has an electronic badge to record start and end of his/her Working Time which ensures the accurate payment of wages. Rest days, holidays, annual leave and overtime are ruled by the Collective Bargaining Agreement (CBA). No evidence of nonconformity to the CBA was evident from both interviews and document review. Overtime is under the legal limit (250 hours per year).
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	The Entity is certified against ISO 45001 and has its own policy covering Health and Safety issues which is endorsed by senior management. The Policy is publicly available and workers interviewed were aware of its contents. The Policy is available at: <a href="https://www.sav-al.com/file?oid=6149f3a810834b0445b43eed">https://www.sav-al.com/file?oid=6149f3a810834b0445b43eed</a> The ISO 45001 certificate is available at: <a href="https://www.sav-al.com/file?oid=5e41869810834b0439ddf211">https://www.sav-al.com/file?oid=5e41869810834b0439ddf211</a>
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	The Entity is certified against ISO 45001 and has its own policy covering Health and Safety issues which is endorsed by senior management. The Policy is publicly available for both the public and workers. The Policy is available at: <a href="https://www.sav-al.com/file?oid=6149f3a810834b0445b43eed">https://www.sav-al.com/file?oid=6149f3a810834b0445b43eed</a> The ISO 45001 certificate is available at:



CRITERION	RATING	COMMENT
		<a href="https://www.sav-al.com/file?oid=5e41869810834b0439ddf211">https://www.sav-al.com/file?oid=5e41869810834b0439ddf211</a>
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Conformance	The Entity is certified against ISO 45001 and has its own policy covering Health and Safety issues which is endorsed by senior management and includes a commitment to comply with laws and ILO conventions.
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	The Entity is certified against ISO 45001 and has its own policy covering Health and Safety issues which is endorsed by senior management. The Policy includes that Workers have the right to understand the hazards and safe practices for their work, and the authority to refuse or stop unsafe work.
11.2 OH&S Management System	Conformance	The Entity is certified against ISO 45001, valid until December 2022. The certificate is available at: <a href="https://www.sav-al.com/file?oid=5e41869810834b0439ddf211">https://www.sav-al.com/file?oid=5e41869810834b0439ddf211</a>
11.3 Employee engagement on health and safety	Conformance	There is a Workers' representative for Health and Safety issues as well as a complaint mechanism as per the Communication, Participation and Consultation Procedure.
11.4 OH&S performance	Conformance	Senior management review, an annual worker meeting for health and safety, and a review of Health and Safety (H&S) performance and the H&S Risk Assessment is undertaken, which assists in ensuring continuous improvement in the H&S Management System.

#### **Document Control and Version History**

Revision	Date	Notes
0	24 February 2022	Initial Certification Audit – Full Certification