



S.A.V. S.p.A. Società Alluminio Veneto, through the compliance with the values, principles, responsibilities and ethical commitments set out in its "Code of Ethics" which has always inspired it in the conduct of business and corporate activities, and to which all those who have, in any capacity, relationships and relations with the Company are required to adhere, intends to ensure the health and safety of people, contribute to a sustainable development for the environment and satisfy customers' needs by offering high quality products, in order to obtain a fair economic return. To pursue these objectives, S.A.V. S.p.A. has introduced an integrated management system for Safety, Environment, Quality and Energy management, as well as a management system for social responsibility.

Our Company believes that the principles and objectives of the Standards:

- ISO 45001 for Health and Safety Management at workplace;
- ISO 14001 and EMAS for Environmental Management;
- ISO 50001 for Energy Management;
- ISO 9001 and IATF 16949 for Product and Process Quality Management;
- A.S.I. Aluminium Stewardship Initiative, for the promotion of sustainability throughout the aluminium sector;

are fundamental requirements for the management and development of the own industrial activities.

S.A.V. S.p.A. therefore conducts its business with the commitment to:

- **take** an active role with regard to safety, the protection of workers, the environment, the energy management, in the performance of the activity of producing aluminium foundry alloys in ingot shape, and all activities technically related to it, using all measures to reduce risks and, where possible, to eliminate dangers, the prevention of accidents (be they accidents or missed accidents "near miss"), occupational illnesses, pollution and support for the purchase and design of energy efficient products and services, promoting the achievement of goals and objectives aimed at continuous improvement and sustainable development of the activities;
- **define** the objectives, review, plan and continuously improve its own management systems and own performances;
- **set up** a programme that establishes objectives, activities to improve environmental performance and that would provide for monitoring and analysis of environmental performance;
- **maintaining** compliance with legal and other subscribed requirements, also through an open and transparent dialogue with the community and entities, and the implementation of all necessary control measures;
- **condemn** and oppose any conduct that might constitute an act of corruption;
- **develop** and maintain active control and monitoring programmes of all production and technically related activities according to their impact and importance, in order to prevent possible situations of non-compliance with the management system requirements, as well as anticipating possible future needs;
- **ensure** the implementation of and compliance, also through the activities carried out by the independent supervisory body, of the organisational model, the code of ethics, and the management systems that support it;
- **promote**, through education, information and training activities, an awareness for safety, environment, quality and energy management, to all personnel working with S.A.V. or on its behalf, depending on the peculiarity of the professional activity carried out, so that they acquire the necessary knowledge, competence and awareness to perform their tasks;
- **promote** the adoption of production and management techniques that guarantee the environmental protection, including in relation to biodiversity, in line with the best available technologies;
- **promote** the reduction of greenhouse gas emissions (GHG), as well as a sustainable use of energy resources by encouraging the adoption of techniques and behaviours aimed at energy efficiency and at the use, where possible, of renewable energies, by constantly monitoring their consumption;
- **promote** the reduction, where possible, of the generated waste, by committing to manage waste according to the mitigation hierarchy, in order to foster a circular economy;
- **use** production processes that guarantee the safeguarding of air quality, in line with the best available techniques;
- **promote** a sustainable use of water resources by encouraging, where possible, the adoption of techniques and behaviours aimed at reducing the water use;
- **promote** production processes that ensure the proper handling of all chemical substances used;
- **valorise** the recycling of aluminium and of all materials used and produced;
- **promote** the consultation and active participation of workers and workers' representatives, and through their contribution, to improve every aspect of the activity and, in particular, health and safety at workplace;
- **guarantee** the respect for human rights and gender equality, by rejecting and opposing all forms of modern slavery;
- **guarantee** the workers a suitable working environment, by ensuring an ergonomic workstation and a treatment based on dignity and respect with no harassment, violence, inhuman treatment, or any treatment detrimental to dignity, ensuring a remuneration being not lower than the minimums established by collective bargaining, as well as the compliance with the regulations in force concerning working hours, equal opportunities, maternity and paternity protection;
- **guarantee** the absence of any form of direct or indirect discrimination, that, by way of example, can be traced back to gender, race, nationality or social origin, religion, disability, sexual orientation, trade union membership, political affiliation, age or religion;



- **guarantee** all workers the authority to suspend the work activities within the scope of their own duties, that are deemed hazardous to health and safety, harmful to the environment and that do not guarantee the quality of the product required by the customer;
- **not resort to, nor support** the employment of workers under the legal age limits, opposing all forms of forced and compulsory labour;
- **keep** the dialogue open and foster cooperation at all levels between the company resources with the involvement and consultation of workers, guaranteeing their freedom of association and prohibiting all forms of forced labour;
- **manage** its own activities with the aim of preventing accidents, injuries and occupational diseases of those who work in the workplaces, also through an adequate assessment of the risks present in the company, including the assessment of chemical risk, noise risk, vibration risk, artificial optical radiation risk, ATEX risk, work-related stress risk and fire risk, providing workers with personal protective equipment that is suitable for the risks present, using safe machinery that complies with current regulations and is maintained in accordance with the relevant maintenance schedules, adequately managing the chemical substances used, preparing suitable fire protection measures, providing for adequate emergency procedures and informing and training workers so that they are able to implement the measures envisaged in the event of emergency situations;
- **provide for** the necessary resources and information to ensure that workplaces, operating methods and organisational aspects are implemented in a manner that safeguards the health and safety of workers, the environment, the energy management, the company assets, third parties and the community in which the company operates;
- **adopt** processes to ensure the analysis and evaluation of suppliers in order to ensure responsible sourcing and compliant with the legislation in force, in particular, with regard to the procurement of raw materials, this means to ensure compliance also of EU Regulation 2017/821 (conflict minerals), of EC Regulation 1907/2006 (REACH) and of EC Regulation 1272/2008 (CLP);
- **evaluate** the suppliers' respect for human rights and the fundamental human rights, of the environment, and require them to comply with the S.A.V. Code of Ethics;
- **ensure**, through constant, open and continuous dialogue, that contractors, service providers and suppliers adopt behaviour consistent with this policy;
- **document**, communicate and share the objectives, methods used and results obtained;
- **develop** and maintain open and collaborative relations with local authorities and all stakeholders;
- **promote**, disseminate and ensure that this Policy is known and implemented by all stakeholders.

S.A.V. intends to identify the best procedures and best behaviours to achieve its objectives and meet the needs of customers and stakeholders. With a view to the continuous improvement of our organisation, it is worth remembering that the constancy and repetitiveness of the behaviours, the maintenance and circulation of information and the work of inter-functional teams are the basis of the effective quality of our products and the safety of our work. The work of each one of us must therefore be oriented to transforming all extemporaneous behaviours unrelated to a context of corporate universality into coordinated actions carried out according to the rules we have given ourselves, possibly supplementing and/or replacing them with others that are more up-to-date in the face of evolving requirements of the stakeholders. With a view to continuous improvement, S.A.V., undertakes to analyse the causes of any eventual injuries or near misses and, in general, of all the non-conformities that have occurred, in order to achieve the objective:

ZERO ACCIDENTS - 100% ENVIRONMENTAL PROTECTION - ZERO DEFECTS

100% ENERGY EFFICIENCY

We are aware that the development of such major programmes can only be successful through the sharing of goals we have set for ourselves, and we continue on our path aiming to global quality, day after day, aware of the added value we give to our product.