



SEDE LEGALE :

VIA COLOMBO, 5
35010 TREBASELEGHE (PD) ITALY
PARTITA I.V.A. 03630290280 - COD. FISCALE 02513660247
N° REG. IMPRESE PD 02513660247 - R.E.A. PD N° 259028
CAP. SOCIALE € 621.000,00 I.V.
SOCIETÀ CON SOCIO UNICO SOGGETTA A DIREZIONE E COORDINAMENTO DI S.W.E. SRL

SEDI OPERATIVE E STABILIMENTI :

VIA COLOMBO, 5
35010 TREBASELEGHE (PD) ITALY
VIA DELL'ARTIGIANATO, 4
35010 TREBASELEGHE (PD) ITALY
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MODERN SLAVERY DECLARATION 2024

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, serfdom, forced and compulsory labour and human trafficking and other forms of covert exploitation of workers by third parties, all of which have in common the deprivation of a person's freedom by another for the purpose of exploiting him or her for personal or commercial gain.

This statement provides an overview of our business and supply chain, highlighting S.A.V. S.p.A.'s actions to understand the potential risks of modern slavery related to its business and to implement processes to ensure that modern slavery is not present in our business and supply chain.

This declaration refers to actions and activities carried out during the financial year from 1 January 2024 to 31 December 2024.

We are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems to ensure that modern slavery does not occur in any part of our business or supply chain.

In line with our corporate culture and ethics, we are committed to being a socially responsible organisation. This means ensuring the health, safety and security of people who come into contact with our activities.

We are also committed to transparency in our activities and our approach to combating modern slavery.

We expect all of our contractors, suppliers and other business partners to respect the ethical and social principles that guide S.A.V. S.p.A. and we encourage them to maintain a transparent approach, reporting any critical situations through the available channels and in the event that we discover that one of our suppliers is involved in a modern slavery offence, our main concern will be to protect the safety of the workers involved. We will then act to identify the source of the offence and remedy any shortcomings by conducting preliminary investigations and deciding whether or not further investigations are necessary. Once the cause(s) of the wrongdoing or breach has been identified, we will engage with our supplier to agree on a corrective action plan. Repeated and serious breaches, abuses within our supply chain and that of our suppliers will not be tolerated, and will be dealt with promptly and rigorously.

Our activity

Since 1996, the year it was founded, S.A.V. S.p.A. has specialised in the production of primary, semi-primary and special aluminium alloys produced according to customer or international technical specifications.

S.A.V. S.p.A.'s production takes place in the municipality of Trebaseleghe in the province of Padua.



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The customers of S.A.V. S.p.A.

Our clients range from large multinational companies (for example car manufacturers) to national and local businesses.

Policies on slavery and human trafficking

S.A.V. S.p.A. is committed to acting in accordance with the law. S.A.V. S.p.A. and its employees operate under policies designed to ensure a high standard of social compliance, governance and ethics, including the Code of Conduct, which includes specific principles against modern slavery and forced labour.

In the section of the Code of Conduct on human rights, we affirm that S.A.V. S.p.A. will under no circumstances resort to forced or compulsory labour, servitude or slavery.

We do not accept or tolerate any aspect of forced or compulsory labour, we comply with laws on forced and child labour in all our activities, and require the same of our employees and suppliers.

The workers of S.A.V. S.p.A.

All workers at S.A.V. S.p.A. are covered by the CCNL Metalmeccanici Industria (Collective Labour Agreement) and no worker is subjected to forced or compulsory labour, servitude or slavery situations in compliance with the legal and contractual provisions in force.

Reporting

S.A.V. S.p.A. applies a 'Speak Up' or whistleblowing policy. This policy is designed to enable employees throughout the company and anyone who sees the need to do so to report situations that highlight or indicate illegality, unethical behaviour or other serious wrongdoing, including any cases or suspicions of modern slavery. This also includes reporting actions or practices by our suppliers that may be in conflict with the Code of Conduct.

Training

In 2024, training was provided to S.A.V. S.p.A. workers on the Code of Conduct, with a focus on the principles of combating modern slavery and respect for human rights. Staff involved in relations with suppliers and customers were made aware of the importance of reporting any suspicions or risks of non-compliant practices.

Suppliers

S.A.V. S.p.A. is committed to working with the right business partners to support the company, selecting them on the basis of social, ethical, environmental and commercial responsibility aspects.

It is an essential requirement that suppliers and business partners comply with the Code of Conduct of S.A.V. S.p.A. or have adopted Codes of Conduct with principles and



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commitments similar to those of S.A.V. S.p.A.. Such compliance includes the prohibition of forced labour, exploitation or any other form of modern slavery and represents an essential condition for maintaining the collaboration relationship.

S.A.V. S.p.A.'s largest procurement expenditure concerns primary aluminium and scrap for use in its production cycle as well as energy resources.

The Global Slavery Index published by the Walk Free Foundation is used to identify the countries in which the company's activities present a higher level of risk. The risk assessment takes into consideration the location of production, the criticality of the product, the reliability of the supplier, the codes of conduct of the suppliers and the certifications held by the supplier.

From the assessments carried out, it emerges that primary aluminium is mainly purchased from suppliers worldwide that have a rigorous ethical and quality approach also considering that they are certified according to the ASI standard - Aluminium Stewardship Initiative - and therefore subject to periodic audits by certification bodies. As far as scrap is concerned, it emerges that the material is mainly purchased from EU suppliers who must comply, by virtue of the geographical location of the business, with particularly stringent regulations concerning individual freedoms and workers' rights, as also emerges from the data concerning modern slavery in EU territories published in the Global Slavery Index. As far as service providers are concerned, they are mainly located in Italy.

No reports of human rights violations, modern slavery, forced or compulsory labour were received during 2024.

At present, considering the controls already introduced and implemented, there are no specific audits on suppliers to combat modern slavery. However, S.A.V. S.p.A. reserves the right to address critical issues detected through dialogue with business partners and corrective actions in the event of non-compliance.

Our conclusion

We recognise that combating modern slavery is an ongoing journey. Although there are currently no specific audits or training programmes for suppliers, S.A.V. S.p.A. is committed to progressively improving its approach, collaborating with business partners who share our values and working to identify and reduce risks.

We encourage our partners, stakeholders and all those who will read our statement to help us move forward, by contacting the company directly through the appropriate channels, and we commit to reviewing any feedback and taking any consequent action.