



REGISTERED OFFICE:

VIA COLOMBO, 5
35010 TREBASELEGHE (PD) ITALY
VAT No. 03630290280 - Tax Code 02513660247
PD Company Register No. 02513660247 - PD Economic and Administrative Register
(R.E.A.) No. 259028
SHARE CAPITAL €621,000.00 fully paid up
SINGLE-MEMBER COMPANY SUBJECT TO THE MANAGEMENT AND CO-ORDINATION OF
S.W.E. SRL

OPERATIONAL OFFICES AND FACILITIES:

VIA COLOMBO, 5
35010 TREBASELEGHE (PD) ITALY
VIA DELL'ARTIGIANATO, 4
35010 TREBASELEGHE (PD) ITALY
Tel. 049 9386191 Fax 049 9387828
E-MAIL: info@sav-al.com WEB: www.sav-al.com

DECLARATION ON MODERN SLAVERY 2025

Modern slavery is a crime and a violation of the fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour, human trafficking and other forms of covert exploitation of workers by third parties; all these forms share the common feature of deprivation of a person's freedom by another person for the purpose of exploiting them for personal or commercial gain.

This declaration provides an overview of our business and our supply chain, highlighting the actions taken by S.A.V. S.p.A. to understand the potential risks of modern slavery related to its own activities and to implement the processes that ensure that modern slavery is not present within our business activity, nor within the supply chain.

This declaration relates to the actions and activities carried out during the financial year from 1 January 2025 to 31 December 2025.

We are committed to acting ethically and with integrity in all our business dealings and relationships, implementing and enforcing effective systems in order to ensure that modern slavery does not occur anywhere within our business activity, nor within the 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 protection of people who come into contact with our activities.

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

We expect all our contractors, suppliers and other business partners to adhere to the ethical and social principles that guide S.A.V. S.p.A. and we encourage them to maintaining a transparent approach, signalling any eventaul critical situations through the available channels; in the case should we discover that one of our suppliers is involved in an offence relating to modern slavery, our primary concern will be to protect the safety of the workers involved. Subsequently, we will take steps to identify the source of the offence and remedy any shortcomings by conducting preliminary investigations and the decision as to whether further investigations are necessary or not. Once the cause (or causes) of the offence or breach has been identified, we will work with our supplier to agree on a corrective action plan. Repeated and serious breaches, as well as abuses within our supply chain and that of our suppliers, will not be tolerated and will be tackled promptly and rigorously.

Our business

Since its foundation in 1996, S.A.V. S.p.A. has specialised in the production of primary, semi-primary and special aluminium alloys, manufactured in accordance with customer specifications or international technical standards.

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



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S.A.V. S.p.A.'s customers

Our customers range from large multinational companies (such as 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 in accordance with policies designed to ensure high standards of social compliance, governance and ethics, among these the Code of Ethics, which sets out specific principles against modern slavery and forced labour.

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

We do not accept nor tolerate any form of forced or compulsory labour, and we comply with laws on forced labour and child labour in all our activities; we require the same of our employees and suppliers.

S.A.V. S.p.A. workers

The National Collective Labour Agreement for the Metalworking Industry -CCNL- applies to all S.A.V. S.p.A. workers, and no worker is subjected to forced or compulsory labour, servitude or slavery, in accordance with the applicable legal and contractual provisions.

Signalling

S.A.V. S.p.A. operates a 'Speak Up' or whistleblowing policy. This policy has been designed to enable employees throughout the company, and anyone else who deems it necessary, to report situations that highlight or indicate illegality, unethical behaviour or other serious irregularities, including any cases or suspicions of modern slavery. This also includes reporting actions or practices by our suppliers that may be in breach of the Code of Ethics.

Training

In 2025, training was provided to S.A.V. S.p.A. staff on the Code of Ethics, with a focus on the principles of combating modern slavery and respecting human rights. Staff involved in dealings with suppliers and customers were made aware of the importance of reporting any suspicion or risk 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 considerations.

It is an essential requirement that suppliers and business partners comply with the S.A.V. S.p.A. Code of Ethics or have adopted Codes of Conduct containing principles and commitments similar to those of S.A.V. S.p.A.. Such compliance includes the prohibition of



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forced labour, exploitation or any other form of modern slavery and is an essential condition for maintaining the business relationship.

The largest item of expenditure in S.A.V. S.p.A.'s purchases relates to primary aluminium and scrap metal 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 where the company's operations present the highest level of risk. The risk assessment takes into account the location of production, the criticality of the product, the reliability of the supplier, the suppliers' codes of ethics and the certifications held by the supplier.

The assessments carried out show that primary aluminium is mainly purchased from global suppliers that adhere to strict ethical and quality standards, particularly given that these suppliers are certified to the ASI standard - Aluminium Stewardship Initiative - and are therefore subject to regular audits by certification bodies.

With regard to scrap metal, it appears that the material is purchased mainly from EU suppliers who, by virtue of the geographical location of their operations, must comply with legislation offering particularly strong safeguards regarding individual freedoms and workers' rights, as is also evident from the data on modern slavery in the EU published in the Global Slavery Index. As for service providers, these are predominantly based in Italy.

During 2025, no reports were received concerning violations of human rights, modern slavery, or forced or compulsory labour.

At present, given the controls already introduced and implemented, no specific audits to suppliers are planned to combat modern slavery. However, S.A.V. S.p.A. reserves the right to address any issues identified through dialogue with business partners and to take corrective action in the event of non-compliance.

Our conclusion

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

We encourage our partners, stakeholders and anyone reading this declaration to help us make progress by contacting the company directly through the appropriate channels, and we are committed to reviewing any feedback and to adopt any consequent action.