Through its adherence to the values, principles, responsibilities and ethical commitments set out in its 'Code of Ethics,' S.A.V. S.p.A. Società Alluminio Veneto has always conducted its business and corporate activities in a manner that ensures the health and safety of people, contributes to sustainable environmental development and meets customer needs by offering high-quality products in order to achieve a fair economic return.

Responsibility for the implementation of this Policy lies with the Company Management, which defines the strategy, objectives and resources.

To pursue these objectives, S.A.V. S.p.A. has introduced an integrated management system covering Health and Safety, the Environment, Quality and Energy Management, as well as a management system for social responsibility. The operational management of these systems is assigned to dedicated departments, each of which is responsible for monitoring its own indicators and achieving the assigned objectives.

S.A.V. S.p.A. strictly adheres to the principles and objectives of the following standards:

- ISO 45001 for occupational health and safety management;
- ISO 14001 and EMAS for environmental management;
- ISO 50001 for Energy Management;
- ISO 9001 and IATF 16949 for the management of product and process quality;
- A.S.I. (Aluminium Stewardship Initiative), for the promotion of sustainability across the entire aluminium sector.

Therefore, S.A.V. S.p.A. conducts its business with a pledge to:

- **play** an active role in safety, worker protection, the environmental safeguard, and energy management in the production of aluminium alloy ingots for foundries and all technically related activities. The company utilises all appropriate measures to reduce risks and, where possible, eliminate hazards, prevent accidents (whether actual accidents or 'near misses'), occupational diseases and pollution. Moreover, S.A.V. S.p.A. support the procurement and design of energy-efficient products and services, whilst promoting the achievement of targets and objectives aimed at continuous improvement and the sustainable development of its operations;
- **define** objectives, review, plan and constantly improve its management systems and performance; draw up a programme setting out objectives and activities for improving environmental performance, and provide for the monitoring and analysis of environmental performance;
- **ensure** continued compliance with legal requirements and other agreed requirements, including through open and transparent dialogue with the community and authorities, and the implementation of all necessary control measures;
- **condemn** and combat any behaviour that may constitute an act of corruption, extortion or bribery, whilst avoiding situations of conflict of interest;
- **develop** and maintain active control and monitoring programmes for all production and technical activities, based on their impact and significance, in order to prevent any non-compliance with management systems requirements and anticipate future needs;
- **ensure** the implementation of, and compliance with the organisational model, the code of ethics and the management systems underpinning them, including through the activities carried out by the independent supervisory body;
- **promote** an awareness of safety, the environment, quality and energy management amongst all staff working with S.A.V. or on its behalf, through training, information and induction programmes, in accordance with the specific nature of their professional activities, so that they acquire the necessary knowledge, competence and awareness to carry out their duties;
- **promote** the adoption of production and management techniques that ensure environmental protection, including in relation to biodiversity, in line with the best available technologies;
- **promote** the reduction of greenhouse gas (GHG) emissions and encourage the sustainable use of energy resources by adopting techniques and practices that improve energy efficiency and promote the use of renewable energy, while constantly monitoring related consumption;
- **promote** the reduction of waste generated, wherever possible, and manage it in accordance with the waste hierarchy to foster a circular economy;
- **use** production processes that ensure the protection of air quality in line with best available techniques;
- **promote** the sustainable use of water resources by encouraging, where possible, the adoption of techniques and practices that reduce water consumption, where possible;
- **promote** production processes that ensure the proper management of all chemicals used;
- **encourage** the recycling of aluminium and all materials used and produced;
- **promote** consultation and the active participation of workers and their representatives to improve every aspect of the business, particularly health and safety, through their contribution;
- **ensure** respect for human rights and gender equality by rejecting and combating all forms of modern slavery;
- **provide** workers with a suitable working environment by ensuring ergonomic workstations and treatment based on dignity and respect, free from any harassment, violence or inhuman or degrading treatment. This includes guaranteeing remuneration that is no lower than the minimum levels established by collective bargaining agreements, as well as compliance with current legislation regarding working hours, equal opportunities and the protection of maternity and paternity rights;
- **ensure** the absence of any form of direct or indirect discrimination attributable to factors such as gender, race, nationality or social origin, religion, disability, sexual orientation, trade union membership, political affiliation, age or religion;

- **guarantee** all workers the right to suspend work activities within the scope of their duties that are deemed hazardous to health and safety, harmful to the environment, or which do not guarantee the quality of the product required by the customer;
- not to employ, nor to support the employment of, workers below the statutory minimum age, whilst combatting all forms of forced and compulsory labour;
- **maintain** an open dialogue and foster cooperation at all levels amongst the company's staff by involving and consulting workers, guaranteeing their freedom of association and prohibiting all forms of forced labour;
- **manage** its activities with the aim of preventing accidents, injuries and occupational diseases among on-site workers, including through an adequate assessment of the risks within the company, such as chemical, noise, vibration, artificial optical radiation, ATEX risks, work-related stress risks and fire risks. This is achieved by providing suitable personal protective equipment, safe machinery that complies with current legislation and is maintained in accordance with relevant maintenance programmes, appropriately managing chemicals, implementing suitable fire protection measures, establishing appropriate emergency procedures, and informing and training workers so that they can implement the emergency measures.
- **provide** the necessary resources and information to ensure that workplaces, operational methods and organisational aspects are designed to safeguard the health and safety of workers, the environment, energy management, company assets, third parties and the community in which the company operates;
- **adopt** processes that guarantee the analysis and assessment of suppliers to ensure responsible procurement in compliance with applicable legislation. In particular, regarding the procurement of raw materials, ensure compliance with EU Regulation 2017/821 (conflict minerals), EC Regulation 1907/2006 (REACH) and EC Regulation 1272/2008 (CLP);
- **assess** suppliers' compliance with human rights, fundamental freedoms and environmental protection; require such suppliers to comply with S.A.V.'s code of ethics;
- **ensure**, through constant, open and ongoing dialogue, that contractors, service providers and suppliers act in accordance with this policy;
- **document**, communicate and share objectives, methods and results achieved;
- **develop** and maintain open and collaborative relationships with local authorities and all stakeholders;
- **promote**, disseminate and ensure that this Policy is known and shared by all parties who have dealings with S.A.V..

S.A.V. aims to identify the best procedures and practices for achieving its objectives and meeting the needs of customers and stakeholders. With a view to the continuous improvement of our organisation, it is worth noting that consistency and repeatability of behaviour, maintenance and circulation of information, and cross-functional teamwork form the basis of effective product quality and process safety. Each of us must therefore strive to transform ad hoc behaviour that is disconnected from the wider corporate context into coordinated actions carried out in accordance with the established rules, supplementing and/or replacing them with more up-to-date ones as stakeholders needs evolve. In order to continuously improve, S.A.V. is committed to analysing the causes of any accidents or near-misses and, more generally, all non-conformities that have occurred to achieve the following objective:

ZERO ACCIDENTS – 100% ENVIRONMENTAL PROTECTION – ZERO DEFECTS

100% ENERGY EFFICIENCY

as well as all other objectives set out in the sustainability report.

We recognise that the development of such important programmes can only succeed through a shared commitment to our objectives, and we continue this path, striving day after day for overall quality, mindful of the added value we bring to our product.

This Policy is reviewed at least annually as part of the management review.

Trebaseleghe, 08/05/2026

Legal Representative - Rossetto Valerio

