
ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

LAMINAZIONE SOTTILE GROUP

CERTIFICATE
NUMBER

124

ASI
STANDARD

PERFORMANCE
STANDARD
(V2 2017)

CERTIFICATION
LEVEL

FULL
CERTIFICATION

ASI ACCREDITED
AUDITOR

BUREAU
VERITAS
CERTIFICATION

DATE OF ISSUE

29 MARCH 2021

DATE OF EXPIRY

28 MARCH 2024

CERTIFIED SINCE

29 MARCH 2021

AUTHORISED BY

A handwritten signature in black ink, appearing to be 'J. Hall'.

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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

CERTIFICATION SCOPE

Manufacturing of semi-finished aluminium coils and sheets at Laminazione Sottile plant (Italy), coil coating at Italcot plant (Italy) and coating/printing at IPS Industrial Packaging Solution plant (Italy).

SUMMARY AUDIT REPORT

PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Laminazione Sottile S.p.A.
ENTITY NAME	Laminazione Sottile Group
CERTIFICATION SCOPE	Manufacturing of semi-finished aluminium coils and sheets at Laminazione Sottile plant (Italy), coil coating at Italcot Plant (Italy) and coating/printing at IPS Industrial Packaging Solution Plant (Italy).
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">• Semi-Fabrication• Material Conversion (Production and Transformation)
ASI STANDARD	<ul style="list-style-type: none">• Performance Standard V2
AUDIT TYPE	<ul style="list-style-type: none">• Initial Certification Audit (21 – 29 January 2021)• Surveillance Audit (2 – 5 May 2022)
AUDIT FIRM	Bureau Veritas Certification
AUDIT DATE	<ul style="list-style-type: none">• 21 – 29 January 2021 (Initial Certification Audit)• 2 – 5 May 2022 (Surveillance Audit)
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">• 27 February 2021 (Initial Certification Audit)• 30 June 2022 (Surveillance Audit)
AUDIT SCOPE	<p><u>Initial Certification Audit (21 – 29 January 2021)</u></p> <p>The audit scope included the activities at the Laminazione Sottile, Italcot and IPS Industrial Packaging Solution plants in Italy.</p> <p>Supply chain activities included in the audit scope:</p> <ul style="list-style-type: none">• Semi-Fabrication• Material Conversion (Production and Transformation) <p>All relevant Criteria in the ASI Performance Standard were included in the audit scope.</p> <p><u>Surveillance Audit (2 – 5 May 2022)</u></p> <p>The audit scope included the activities at the Laminazione Sottile, Italcot and IPS Industrial Packaging Solution plants in Italy.</p>

Supply chain activities included in the audit scope:

- Semi-Fabrication
- Material Conversion (Production and Transformation)

All relevant Criteria in the ASI Performance Standard were included in the audit scope.

AUDIT
OUTCOME

- Certification

AUDIT
METHODOLOGY
DECLARATION

The Auditors confirm that:

- The information provided by the Entity is true and accurate to the best knowledge of the Auditor(s) preparing this report.
- 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.

CERTIFICATION
PERIOD

29 March 2021 – 28 March 2024

NEXT AUDIT
TYPE

Re-Certification Audit

NEXT AUDIT
DUE DATE

28 March 2024

CERTIFICATE
NUMBER

124

SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	<p>The Entity has planned, established, implemented and maintained an adequate process of assessing compliance with legal and other requirements. A procedure is implemented which provides for the frequency and method for periodic assessment of compliance with legislative requirements. Records on compliance with legislative requirements are maintained.</p> <p>The Facilities are certified to ISO 14001 and ISO 45001, and in conforming to these Standards, maintain a list of Applicable Law and conduct legal compliance internal audits.</p>
1.2 Anti-Corruption	Conformance	<p>The Entity has implemented a Management System, compliant with Legislative Decree 231/01, which requires a Code of Ethics and internal anti-corruption controls. The Supervisory Body (ODV) periodically undertakes internal audits to assess compliance with the requirements of the Decree and to update as necessary.</p>
1.3 Code of Conduct	Conformance	<p>The Entity has developed and implemented a Code of Ethics that includes the principles, values and rules of conduct:</p> <p>https://www.laminazioniestile.com/it/codice-etico</p>
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	<p>The Entity has a documented Policy which is endorsed by senior management:</p> <p>https://www.laminazioniestile.com/it/sostenibilit%C3%A0</p> <p>https://www.italcoat.com/it/sostenibilita/hse</p> <p>The Policy expresses the organisation's commitments regarding the environment, health and safety and social responsibility and constitutes a reference point for determining strategic objectives in both the short and medium term.</p>
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	<p>The Entity has a documented Policy which is endorsed by senior management. The Policy is shared with all staff by posting on the bulletin board and/or provision during training and information meetings. The Entity conducts periodic checks and reviews of the Policy.</p>

CRITERION	RATING	COMMENT
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	The Entity has a documented Policy which is endorsed by senior management. The Policy is shared with all staff by posting on the bulletin board and/or provision during training and information meetings.
2.2 Leadership	Conformance	All company functions contribute to the application of the system with senior management formally ensuring compliance with the requirements of the ASI Performance Standard through an Inter-functional Team that has an adequate level of preparation and knowledge of the Standard (after appropriate training).
2.3a Environmental and Social Management Systems (environmental)	Conformance	The Entity has adopted Environmental Management Systems certified by accredited bodies and conforming with ISO 14001. The certificates are available on the following websites: Laminazione Sottile: https://www.laminazionesottile.com/it/sostenibilit%C3%A0/certificazioni Italcoat and IPS: https://www.italcoat.com/it/sostenibilita/certificazioni
2.3b Environmental and Social Management Systems (social)	Conformance	The Laminazione Sottile site is SA8000 certified: https://www.laminazionesottile.com/it/sostenibilit%C3%A0/certificazioni The IPS and Italcoat sites do not currently have a certified social responsibility Management System; however the social responsibility requirements do apply. The Code of Ethics and Organizational Model are consistent with the requirements of a social Management System with statements and policies on recruitment, human resources management and health and safety. The Human Resources Department has its own procedures to continuously deliver conformity to the national Collective Bargaining Agreement for work-related matters including wages and working hours. The Code of Ethics is available at: https://www.italcoat.com/it/codice-etico
2.4 Responsible Sourcing	Conformance	The Entity has implemented a procedure to manage the procurement and assignment of outsourced activities. The procedure describes the assessment and review required for external products and services.
2.5 Impact Assessments	Conformance	The Entity has documented Impact Assessments. In assessing the importance of the environmental impacts of its activities, the Entity considers the normal operating conditions, start-up and shutdown phases and emergency situations; and also considers past, present and planned activities.

CRITERION	RATING	COMMENT
		The methods and criteria for the assessment of direct and indirect environmental aspects are described in specific procedures.
2.6 Emergency Response Plan	Conformance	The Entity has prepared specific procedures for the prediction and management of emergencies having an impact on both environmental and safety systems. The Entity has developed and implemented site-specific Emergency Response Plans.
2.7 Mergers and Acquisitions	Conformance	The Entity has no current merger or acquisition plans. The Entity has implemented an ESG Due Diligence policy which contains the governance, environmental and social parameters for review in the event of new mergers or acquisitions.
2.8 Closure, Decommissioning and Divestment	Conformance	The Entity has implemented an ESG Due Diligence policy which contains the governance, environmental and social parameters for review in the event of closure, decommissioning and divestment.
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	The Entity annually communicates its performance and approach to governance, environmental and social issues in the Laminazione Sottile Group Sustainability Report: https://www.laminazionecottile.com/it/sostenibilit%C3%A0
3.2 Non-compliance and liabilities	Conformance	The Entity annually communicates its performance and approach to governance, environmental and social issues in the Laminazione Sottile Group Sustainability Report. The Sustainability Report states there are no disputes or sanctions for non-compliance with Applicable Law: https://www.laminazionecottile.com/it/sostenibilit%C3%A0
3.3a Payments to governments (legal and contractual)	Conformance	The Entity has a Management System compliant with Legislative Decree 231/01 which requires both a Code of Ethics and internal anti-corruption controls. The Code of Ethics is available at: https://www.laminazionecottile.com/it/codice-etico All payments made to the government and public administration are on a legal basis. The organizational models adopted by the Entity describe the principles, rules of conduct, operating procedures and disciplinary sanctions aimed at preventing corruption and ensuring ethical behaviour.

CRITERION	RATING	COMMENT
3.3b Payments to governments (disclosure - bauxite mining)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
3.4 Stakeholder complaints, grievances and requests for information	Conformance	The Entity has effective mechanisms for receiving complaints and suggestions from Stakeholders, including letterboxes, dedicated email addresses and periodic meetings between Workers and their representatives. External stakeholders are instructed on making a report, request or complaint on the Entity's websites.
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	A Life Cycle Perspective Evaluation was developed taking into account life cycle impacts of major products and processes. The Entity has conducted two Life Cycle Assessment (LCA) studies in accordance with ISO 14040:2006 and ISO14044:2006/Amd 1:2017 on the final products manufactured by the Contital Company (part of the Laminazione Sottile Group).
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	A Life Cycle Perspective Evaluation was developed taking into account cycle impacts of major products and processes. The Entity has conducted two LCA studies in accordance with ISO 14040:2006 and ISO14044:2006/Amd 1:2017 on the final products manufactured by the Contital Company (part of the Laminazione Sottile Group). General information on the life cycle (in particular on end of life) is available in company brochures and via the website: https://www.laminazione sottile.com/it/search/node/ciclo%20di%20vita%20language%3Ait%2Cund
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	The Entity's LCA documents are not available on the website but are shared with customers and suppliers on request. General information on the life cycle (in particular on end of life) is available in company brochures and via the website: https://www.laminazione sottile.com/it/search/node/ciclo%20di%20vita%20language%3Ait%2Cund
4.2 Product design	Conformance	The Research and Development area, centralized at Group level, performs the function of promoting product innovation and seeking solutions to meet customer needs. The Entity's project on disposable (coated and uncoated) aluminium plates, which underwent LCA, is an example of aluminium packaging being part of the circular economy. The associated LCA study was certified in August 2020.

CRITERION	RATING	COMMENT
4.3a Aluminium Process Scrap (targets)	Conformance	In accordance with the ISO 14001 Management System, the Entity has developed its own improvement plan with environmental objectives, management review processes and measurable targets. Data is monitored and available on a monthly basis with details for department, product and plant. Scrap derived from various treatments are recovered via an internal recycling mechanism or returned to the foundry.
4.3b Aluminium Process Scrap (alloy separation)	Conformance	The minimization of waste is achieved through the recycling of scrap. The technique can be applied in existing and new plants and is currently applied in all the Group's European plants. The scrap returned from the manufacturing processes, segregated by type of internal alloy is stored in a dedicated storage area and entirely recovered in the smelting processes.
4.4a Collection and recycling of products at end-of-life (strategy)	Conformance	The Entity recovers Aluminium scrap derived from industrial processing. Semi-finished products are supplied to customers who transform them into finished products; the resulting processing scraps are returned to the factory to be remelted and re-transformed into laminates. The Entity is engaged in a project that in the future will allow for the recycling of post-consumer materials.
4.4b Collection and recycling of products at end-of-life (engagement)	Conformance	At present a process for recycling Post-Consumer Aluminium (urban waste) is not implemented. However, a collaboration with the Italian consortium responsible for the collection of Aluminium waste (CIAL) is being planned for the near future. Also, the Aluminium sold by Laminazione Sottile and Italcot to large industrial customers is re-collected and transformed into new raw material. The expansion to other customers is planned for the near future.
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		
5.1 Disclosure of GHG emissions and energy use	Conformance	The Entity complies with the Emission Trading System (ETS) regulation and targets a reduction in Greenhouse Gas (GHG) emissions. In 2021, CO ₂ emissions increased by 3,659 tonnes, equal to a 7% increase related to a 14% increase in production. Volatile Organic Compounds (VOC) emissions, related to the smoke extraction systems of cold rolling mills, have reduced by 50% since 2014. GHG data is disclosed in the Environmental Declaration, page 38 - 39:

CRITERION	RATING	COMMENT
		https://www.laminazionesottile.com/blog/wp-content/uploads/2022/05/DA-2021-Laminazione-Sottile-CONVALIDATA.pdf
5.2 GHG emissions reductions	Conformance	The Entity has established GHG emissions reduction targets are disclosed these targets in the improvement plan of the Environmental Declaration, page 62: https://www.laminazionesottile.com/sites/default/files/download/DA%202020.pdf The Entity has implemented improvement plans including the installation of air-water heat exchangers in the foundry area, which has provided significant reduction in energy and methane gas consumption.
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	All three Facilities have site-specific environmental authorizations (Autorizzazione Integrata Ambientale: Environmental Integrated Authorization) conforming to Italian law, Decree 152/2006. Following the principles of the authorization, each Facility must communicate air emissions annually to the public administrations.
6.2 Discharges to Water	Conformance	All three Facilities have site-specific environmental authorizations compliant with Legislative Decree 152/2006 that cover the management of Discharges to Water. Verification of this communication is part of ISO 14001 certification audit, and audits have found discharges to water conform.
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	The Entity has an ISO 14001 certified Management System and has conducted a risk assessment including Spills and Leakages. Practical training in the management of environmental emergencies are undertaken at least annually. There was no evidence of Spills or Leakages outside the Facilities' premises.
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	The Entity's HSE Department coordinates annual training drills for environmental emergencies. All Workers in charge of emergency and waste management participate in training. There was no

CRITERION	RATING	COMMENT
		evidence of Spills or Leakages outside the Facilities' premises.
6.4a Reporting of Spills (immediate disclosure)	Conformance	The communication of significant environmental accidents or emergency situations by the Entity are managed as required by the control bodies.
6.4b Reporting of Spills (regular reporting)	Conformance	The Entity communicates externally on significant impacts and emergency situations via publication of the Sustainability Report: https://www.laminazione sottile.com/it/rapporto-sostenibilit%C3%A0-2020 There are no environmental emergency incidents reported during the period of January 2021 to May 2022.
6.5a Waste management and reporting (strategy)	Conformance	Waste management is regulated by internal procedures compliant with ISO14001:2015. These procedures govern the operational and legislative management of the waste produced. The Facilities, in accordance with Legislative Decree 152/2006, declare the quantities of Non-Hazardous and Hazardous Waste produced. Waste disposal is via third parties with relevant authorizations for the transport and final disposal or recovery of material. Internal movement of the waste is monitored using the WinWaste software.
6.5b Waste management and reporting (disclosure)	Conformance	Information on Waste production is published in the Sustainability Report, page 61: https://www.laminazione sottile.com/it/rapporto-sostenibilit%C3%A0-2020 Each plant reports Waste data within its Environmental Declaration: Laminazione Sottile, refer page 61: https://www.laminazione sottile.com/blog/wp-content/uploads/2022/05/DA-2021-Laminazione-Sottile-CONVALIDATA.pdf Italcoat, refer page 47–50: https://www.italcoat.com/it/sostenibilita/hse IPS, refer page 25–28: https://www.italcoat.com/it/sostenibilita/hse
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.

CRITERION	RATING	COMMENT
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 (state 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.
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)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8b Dross (recycling)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8c Dross (review of alternatives)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

PRINCIPLE 7 WATER STEWARDSHIP

7.1a Water assessment (mapping)	Conformance	The water supply is considered according to use: potable, civil (water for non-potable human use) or use in the production process (non-potable water). Potable (drinking) water is supplied by the municipal aqueduct and consumption is monitored through the sealed meter. The Facilities have wells that guarantee the entire technological water needs of the plants with regular authorization for extraction. Each Facility has its own environmental authorization (AIA) compliant with Legislative Decree 152/2006 which requires annual declaration of water withdrawn.
7.1b Water assessment (risk assessment)	Not Applicable	There are no Watersheds in the Entity's Area of Influence.
7.2a Water management (management plans)	Conformance	The Entity is ISO 14001:2015 certified. The environmental review required by this Standard includes a mapping of water sources and water

CRITERION	RATING	COMMENT
		consumption. Internal audits and operational control measures are established to monitor water use. The Entity monitors the water consumption data for each plant on a monthly basis and data are disclosed in the Environmental Declaration for each Facility.
7.2b Water management (monitoring)	Conformance	The Entity is ISO 14001:2015 certified. The environmental review required by this standard includes a mapping of water sources and water usage. The latest analysis is updated to 2020 and a risk assessment for water use is documented. Internal audits and operational control measures are implemented to monitor water use. The use of water is an environmental aspect that is periodically monitored. Indicators for monitoring have been established.
7.3 Disclosure of water usage and risks	Conformance	The Entity monitors the water consumption data for the three plants on a monthly basis and data are disclosed in the Environmental Declaration for each Facility: Laminazione Sottile, refer page 60-63: https://www.laminazione sottile.com/blog/wp-content/uploads/2022/05/DA-2021-Laminazione-Sottile-CONVALIDATA.pdf Italcoat, refer page 40-41: https://www.italcoat.com/it/sostenibilita/hse IPS, refer page 19-20: https://www.italcoat.com/it/sostenibilita/hse The data show consumption in absolute terms and indexed on the basis of production data. Water consumption in general is included in the Sustainability Report, refer section 6.5: https://www.laminazione sottile.com/it/rapporto-sostenibilit%C3%A0-2020
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	The Entity does not operate in protected areas and there are no key areas of biodiversity or threatened species that may be affected by the Group's activities. No significant risk to biodiversity was found.
8.2a Biodiversity management (biodiversity action plans)	Not Applicable	This Criterion is not applicable as the Entity does not operate in protected areas and there are no key areas of biodiversity or threatened species that may be affected by the Entity's activities. No significant risk to Biodiversity was found.
8.2b Biodiversity management (consultation and mitigation hierarchy)	Not Applicable	This Criterion is not applicable as the Entity does not operate in protected areas and there are no key areas of biodiversity or threatened species that may be

CRITERION	RATING	COMMENT
		affected by the Entity's activities. No significant risk to Biodiversity was found.
8.2c Biodiversity management (reporting)	Not Applicable	This Criterion is not applicable as the Entity does not operate in protected areas and there are no key areas of biodiversity or threatened species that may be affected by the Entity's activities. No significant risk to Biodiversity was found.
8.3 Alien Species	Conformance	The Entity does not operate in protected areas and there are no key areas of biodiversity or threatened species that may be affected by the Entity's activities. No significant risk to biodiversity was found. The introduction of Alien Species is a risk mitigated by internal processes such as instructions for suppliers to treat wooden pallets according to international standards, such as the International Standards for Phytosanitary Measures (ISPM).
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 mines)	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	<p>The Entity's commitment to respect Human Rights is expressed in the Social Responsibility Policy and the Code of Ethics. The Social Responsibility Policy is available at the following link: https://www.laminazioneottile.com/it/sostenibilit%C3%A0/responsabilit%C3%A0-sociale</p> <p>The Policy includes the mechanisms for Stakeholder complaints including direct reporting, email and dedicated mailbox.</p> <p>The Code of Ethics is available on the website: https://www.laminazioneottile.com/it/codice-etico</p>
9.1b Human Rights Due Diligence (process)	Conformance	The Entity has implemented a Policy on Human Rights Due Diligence and developed an internal process to analyse the actual and potential impacts on Human Rights. The Entity has identified the areas of activity potentially exposed to the risk of violation of Human

CRITERION	RATING	COMMENT
		Rights, reviewed existing measures to mitigate the risk, identified improvement plans required and established a monitoring process.
9.1c Human Rights Due Diligence (remediation)	Conformance	The documents analysed and interviews undertaken have provided evidence that there have been no Human Rights violations.
9.2 Women's Rights	Conformance	The Entity has implemented policies and processes to ensure respect for the rights and interests of women, consistent with international standards. This principle is respected from the commencement of the recruitment process. The Entity has increased the presence of female personnel in historically male-dominated areas, such as technical roles. The adoption of an Organizational Model pursuant to Legislative Decree 231/2001 and a confidential reporting system represent a tool for communicating any crimes and violations to the Supervisory Body in charge.
9.3 Indigenous Peoples	Not Applicable	This Criterion is not applicable as the Entity does not operate on sites occupied by Indigenous Peoples.
9.4 Free, Prior, and Informed Consent (FPIC)	Not Applicable	This Criterion is not applicable as the Entity does not operate on sites occupied by Indigenous Peoples. An assessment of the consent of Indigenous Peoples is foreseen in the event of new establishments or substantial changes.
9.5 Cultural and sacred heritage	Not Applicable	This Criterion is not applicable as there are no sites of value to cultural and/or sacred heritage within the Entity's Area of Influence.
9.6a Resettlements (avoid or minimise)	Not Applicable	This Criterion is not applicable as Resettlement has not been required. An assessment of social risks would be expected in the event of Resettlement.
9.6b Resettlements (where unavoidable)	Not Applicable	This Criterion is not applicable as Resettlement has not been required. An assessment of social risks would be expected in the event of Resettlement.
9.7a Local Communities (rights and interests)	Conformance	The Entity has conducted a risk assessment that identified there are no issues concerning Local Communities. Various communication channels are available to all interested parties.
9.7b Local Communities (impacts)	Conformance	The Entity has conducted a risk assessment that identified there are no issues concerning Local Communities. Various communication channels are available to all interested parties.

CRITERION	RATING	COMMENT
9.7c Local Communities (livelihoods)	Conformance	The Entity has conducted a risk assessment that identified there are no issues concerning Local Communities. Various communication channels are available to all interested parties.
9.8 Conflict-Affected and High-Risk Areas	Not Applicable	This Criterion is not applicable as the Entity does not operate in Conflict-Affected and High-Risk Areas.
9.9 Security practice	Conformance	The Entity has a night surveillance service. A concierge service is carried out by internal staff. Supervision and access control is carried out in compliance with the law. At the entrance to the plants, an identity document is requested by external staff.
PRINCIPLE 10 LABOUR RIGHTS		
10.1a Freedom of Association and Right to Collective Bargaining (freedom of association)	Conformance	In Italy, all Workers are covered by a national Collective Labour Agreement (CCNL) agreed at a national level between trade unions and sector representatives. Currently 31% of Workers are members of the Trade Union. Union representatives regularly meet with the Entity's senior management.
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Conformance	The Entity respects the right to Collective Bargaining and informs Workers of the freedom to join any organization of their choice and guarantees that such choices do not lead to negative consequences such as victimisation, harassment, intimidation or retaliation. Trade Union representatives have been elected for Workers and the Entity provides provision for meetings.
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Not Applicable	This Criterion is not applicable as in Italy, Applicable Law does not restrict the right to Freedom of Association and Collective Bargaining.
10.2a Child Labour (minimum age)	Conformance	Child Labour is illegal in Italy. During the hiring process, every Worker must show an identity document with date of birth, and a copy is retained in the Worker's personnel file. The Entity's recruitment procedure and checking of identity documents ensures no incidences of Child Labour.
10.2b Child Labour (hazardous)	Conformance	The Entity does not use nor support the use of Child Labour. Evidence of the commitment is described in the Social Responsibility Policy and in the Code of Ethics.
10.2c Child Labour (worst forms)	Conformance	The Entity does not use nor support the use of Child Labour. Evidence of this commitment is described in the Social Responsibility Policy and in the Code of Ethics.

CRITERION	RATING	COMMENT
10.3a Forced Labour (human trafficking)	Conformance	The Entity has signed a commitment on Forced Labour and does not participate in or support Human Trafficking either directly or through any employment or recruiting agency. This commitment is expressed in the Code of Ethics and the Social Responsibility Policy and is managed through implementation of internal procedures. All Workers have a regular employment contract.
10.3b Forced Labour (deposits, fees, advances)	Conformance	The Entity has signed a commitment on Forced Labour and does not request any form of deposit, employment tax or advance on equipment from Workers directly or through employment or recruitment agencies. This commitment is expressed in the Code of Ethics and the Social Responsibility Policy.
10.3c Forced Labour (migrant workers)	Conformance	The Entity has signed a commitment on Forced Labour and does not require Migrant Workers to provide fees or deposits. This commitment is expressed in the Code of Ethics and the Social Responsibility Policy. Interviewed Migrant Workers indicated that deposits or payments have not been required.
10.3d Forced Labour (debt bondage)	Conformance	The Entity has signed a commitment on Forced Labour and does not hold Workers in Debt Bondage or force them to work to pay off a debt. This commitment is expressed in the Code of Ethics and the Social Responsibility Policy.
10.3e Forced Labour (freedom of movement)	Conformance	The Entity has signed a commitment on Forced Labour and does not unreasonably restrict the freedom of movement of Workers and breaks are guaranteed. This commitment is expressed in the Code of Ethics and the Social Responsibility Policy.
10.3f Forced Labour (retention of identity papers, permits, certificates)	Conformance	The Entity has signed a commitment on Forced Labour and does not keep original copies of identity documents, work permits, travel documents or employee training certificates. This commitment is expressed in the Code of Ethics and the Social Responsibility Policy. Interviewed Workers and a review of Worker's files determined that original documents were not retained by the Entity.
10.3g Forced Labour (freedom to terminate employment)	Conformance	Workers are free to resign with a notice period as required by the national Collective Agreement. The notice period changes according to the professional category and the duration of the employment contract.

CRITERION	RATING	COMMENT
		Workers are not forced to accept work or keep it and are free to bargain and to terminate the employment relationship in accordance with Italian regulations.
10.4 Non-Discrimination	Conformance	<p>The Entity implements a Code of Ethics which establishes equal opportunities for all Workers. The Collective Bargaining agreement regulates a production bonus for all Workers. The Social Responsibility Policy guarantees equal opportunities and non-discrimination in the hiring, remuneration, promotion, training, opportunities for advancement or dismissal of any worker based on sex, race, national or social origin, religion or any other condition that may give rise to discrimination.</p> <p>An annual performance management system is implemented, based on the assignment of area and personal objectives with any professional development paths evaluated.</p>
10.5 Communication and engagement	Conformance	<p>The Entity has implemented various methods of communication and engagement including:</p> <ul style="list-style-type: none"> - Regular meetings between staff and management. - Social performance team meetings. - Meetings with Workers' safety representatives. - Periodic meetings on health and safety between the Employer, Occupational Doctor, Head of the Prevention and Protection Service, Head of Workers for Safety (as mandated in Article 35 of Decree 81/2008). - Union meetings of Workers who are union members.
10.6 Disciplinary practices	Conformance	Disciplinary practices are applied in compliance with the national collective agreement. The most serious disciplinary practices expected are suspensions, fines or warnings. Any disciplinary practices are facilitated with the involvement of the union representative.
10.7a Remuneration (living wage)	Conformance	The remuneration levels are applied in compliance with the sector collective agreement. According to national statistics, the living wage is 758.68 euros per month. The lowest level of the holding is higher than the minimum subsistence level. Payslips comply with the standard forms approved by the public administration. Workers understand the contents of payslips.
10.7b Remuneration (method of payment)	Conformance	Salaries are paid on time every 10 th day of the month by bank transfer. Access for internal payroll processing takes place via a badge detection system. All employees are issued meal vouchers for each working day.

CRITERION	RATING	COMMENT
10.8 Working Time	Conformance	The Entity complies with Applicable Law and industry standards for working hours (including Overtime). There is a correct process for registering Working Time using magnetic badges. The Overtime worked by employees is always voluntary and paid with a surcharge as required by the sector collective agreement. Payslips include records of attendance, absence, leave and illness.
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	The Entity has implemented an Occupational Health and Safety (OH&S) Policy which is periodically reviewed and shared with Workers and other Stakeholders through the website, company intranet and notice boards inside the plants. The Policy is communicated via the following links: Laminazione Sottile Thin: https://www.laminazione sottile.com/blog/wp-content/uploads/2022/04/Policy-QSA-2021-2023-LS-2.pdf Italcoat: https://www.italcoat.com/wp-content/uploads/2022/05/Politica-Integrata-2022-2024-ITC.pdf IPS: https://www.italcoat.com/wp-content/uploads/2022/05/Politica-Integrata-2022-2024-IPS.pdf
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	The Entity has implemented an Occupational Health and Safety (OH&S) Policy which is periodically reviewed and shared with Workers and other Stakeholders, including visitors, through the website, company intranet and notice boards inside the plants.
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Conformance	A commitment to comply with applicable health and safety law is included in the OH&S Policy. It should be noted that Italy adheres to ILO Conventions and therefore, compliance with Italian law means being compliant with the ILO Conventions.
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	The right of Workers to understand the dangers and safe practices for work, and their authority to refuse or stop unsafe work are enshrined in the Italian law on Occupational Health and Safety (OH&S) at work. The Entity's safety Policy includes commitment to comply with OH&S laws.

CRITERION	RATING	COMMENT
11.2 OH&S Management System	Conformance	The Entity has a centralized Health, Safety and Environment (HSE) Group. The HSE Management System is partially integrated and consists of a management manual, operating procedures, instructions, a register of legal requirements and a schedule of legal requirements. A legal compliance audit is undertaken annually by an external consultant.
11.3 Employee engagement on health and safety	Conformance	The Entity has appointed a Health and Safety Committee to promote the continuous improvement of the health and safety conditions of Workers, conduct periodic and formal risk assessments, and investigate the causes of accidents and their management. The Committee is made up of senior managers, executive managers and Worker representatives. The HSE Department holds regular meetings.
11.4 OH&S performance	Conformance	The HSE Department has the responsibility to undertake periodic audits and to comply with staff training programs. The HSE Department also presents the progress of safety activities to the various social parties through dashboards at various meetings. Safety improvement objectives are set every six months and are updated every six months and shared with social partners to provide evidence of continuous improvement.

Document Control and Version History

Revision	Date	Notes
0	29 March 2021	Initial Certification Audit (Full Certification)
1	3 August 2022	Surveillance Audit