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ASI CERTIFICATION  
PERFORMANCE  
STANDARD



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PRESENTED TO

**METRA S.P.A. –  
FOALL S.R.L.**

CERTIFICATE  
NUMBER

205

ASI  
STANDARD

PERFORMANCE  
STANDARD  
(V2 2017)

CERTIFICATION  
LEVEL

FULL  
CERTIFICATION

ASI ACCREDITED  
AUDITOR

BUREAU  
VERITAS  
CERTIFICATION

DATE OF ISSUE

1 JUNE 2022

DATE OF EXPIRY

31 MAY 2025

CERTIFIED SINCE

1 JUNE 2022

AUTHORISED BY

A handwritten signature in black ink, appearing to be 'J. Hall', written over a horizontal line.

Aluminium Stewardship Initiative Ltd  
ACN 606 661 125, Australia  
info@aluminium-stewardship.org

*Validity of this Certificate is subject to continued  
conformance with the applicable ASI Standard  
and can be verified at  
[www.aluminium-stewardship.org](http://www.aluminium-stewardship.org)*

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CERTIFICATION SCOPE

Re-melting of primary and secondary Aluminum and  
manufacture of Aluminum alloy extruded sections in  
Rodengo Saiano, Italy.

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# SUMMARY AUDIT REPORT

## PERFORMANCE

## STANDARD

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### OVERVIEW

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MEMBER NAME            Metra Holding S.p.A.

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ENTITY NAME            Metra S.p.A. - Foall S.r.l.

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CERTIFICATION SCOPE            Re-melting of primary and secondary Aluminum and manufacture of Aluminum alloy extruded sections in Rodengo Saiano, Italy.

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SUPPLY CHAIN ACTIVITIES            

- Aluminium Re-melting/Refining
- Casthouses
- Semi-Fabrication
- Material Conversion (Production and Transformation)

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ASI STANDARD            

- Performance Standard V2

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AUDIT TYPE            

- Initial Certification Audit

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AUDIT FIRM            Bureau Veritas Certification

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AUDIT DATE            

- 20 – 21 April 2022

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AUDIT REPORT SUBMISSION            

- 9 May 2022

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AUDIT SCOPE            The audit scope included the re-melting of primary and secondary Aluminum (Foall S.r.l.) and manufacture of Aluminum alloy extruded sections (Metra S.p.A.) in Rodengo Saiano, Italy.

Supply chain activities included in the Audit Scope:

- Aluminium Re-melting/Refining
- Casthouses
- Semi-Fabrication
- Material Conversion (Production and Transformation)

All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.

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AUDIT OUTCOME            

- Certification

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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.

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CERTIFICATION  
PERIOD

1 June 2022 –31 May 2025

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NEXT AUDIT  
TYPE

Surveillance Audit

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NEXT AUDIT  
DUE DATE

31 November 2023

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CERTIFICATE  
NUMBER

205

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## SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity operates a management system, based on local law which ensures compliance with Applicable Law. The Entity has implemented a procedure to review and update the legal requirements related to environment, health and safety, work-related law and financial matters. Internal audits have been performed by a specialized consultant for health and safety and environmental matters. External consultants have provided updates on legal requirements.
1.2 Anti-Corruption	Conformance	The Entity operates a management system, based on local law which ensures compliance with Applicable Law and includes anti-Corruption. The Entity's Code of Ethics is publicly available: <a href="https://www.metra.eu/pdf/Metra_CodiceEtico-en.pdf">https://www.metra.eu/pdf/Metra_CodiceEtico-en.pdf</a> There is no evidence of sanctions related to Bribery and Corruption.
1.3 Code of Conduct	Conformance	The Entity operates a management system, based on local law which ensures compliance with Applicable Law. The Entity has implemented a Code of Conduct and prepared a Sustainability Report, both available at the following links: <a href="https://www.metra.eu/pdf/Metra_CodiceEtico-en.pdf">https://www.metra.eu/pdf/Metra_CodiceEtico-en.pdf</a> <a href="https://www.metra.eu/pdf/rendicontazione-non-finanziaria-asi-gruppo-metra-2021.pdf">https://www.metra.eu/pdf/rendicontazione-non-finanziaria-asi-gruppo-metra-2021.pdf</a> Training on the Code of Conduct is delivered to all Workers and information is available for all interested parties.
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	The Entity has an integrated Policy consistent with the environmental, social and governance practices of the ASI Performance Standard: <a href="https://www.metra.eu/pdf/politica-integrata-rev-03-del-01-07-2021.pdf">https://www.metra.eu/pdf/politica-integrata-rev-03-del-01-07-2021.pdf</a>
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	The Entity has an integrated Policy consistent with the environmental, social and governance practices of the ASI Performance Standard and signed by the Chief Executive Officer (CEO): <a href="https://www.metra.eu/pdf/politica-integrata-rev-03-del-01-07-2021.pdf">https://www.metra.eu/pdf/politica-integrata-rev-03-del-01-07-2021.pdf</a>

CRITERION	RATING	COMMENT
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	The Entity's has an integrated Policy that is publicly available: <a href="https://www.metra.eu/pdf/politica-integrata-rev-03-del-01-07-2021.pdf">https://www.metra.eu/pdf/politica-integrata-rev-03-del-01-07-2021.pdf</a> The Policy is provided directly to Suppliers.
2.2 Leadership	Conformance	The Entity has appointed the senior managers as Management Representatives to ensure conformance with the ASI Performance Standard.
2.3a Environmental and Social Management Systems (environmental)	Conformance	The Entity is operated by two legal entities, Metra S.p.A. (producing extruded profiles) and Foall S.r.l. (re-melter producing billets and ingots), and implements Environmental Management Systems (EMS). Metra has an EMS certified in accordance with ISO 14001: <a href="https://www.metra.eu/gruppo/qualita-certificata.html#2">https://www.metra.eu/gruppo/qualita-certificata.html#2</a> Foall operates an EMS (not certified to date) and has its own environmental analysis and undergoes internal audits.
2.3b Environmental and Social Management Systems (social)	Conformance	The Entity has implemented a Social Management System consistent with but not certified to SA 8000. The Entity's integrated Policy includes social responsibility: <a href="https://www.metra.eu/pdf/politica-integrata-rev-03-del-01-07-2021.pdf">https://www.metra.eu/pdf/politica-integrata-rev-03-del-01-07-2021.pdf</a> A Social Responsibility Manual has been implemented and management reviews are undertaken. Sustainability reporting includes information on the performance of the Social Management System.
2.4 Responsible Sourcing	Conformance	The Entity has implemented procedures for the qualification of suppliers for management systems including ISO 9001, ISO 14001; ISO 45001 and ASI. The Entity has undertaken a supplier risk assessment. Suppliers are communicated with regarding the integrated Policy and Code of Ethics and are required to complete Supplier Evaluation Forms. The Entity has a Conflict Minerals Reporting questionnaire which is sent to the main customers of Metra and the risk assessment identified that there are no minerals from Conflict-Affected and High-Risk Areas used.
2.5 Impact Assessments	Conformance	The Entity has implemented procedures which address environmental, social, cultural, gender and overall Human Rights Impact Assessments. There are no major changes planned for the next years.
2.6 Emergency Response Plan	Conformance	The Entity has Emergency Response Plans in accordance with its Environmental Management Systems.

CRITERION	RATING	COMMENT
2.7 Mergers and Acquisitions	Conformance	The Entity has developed a procedure that addresses environmental, social, cultural, gender and overall human rights impact assessment associated with major changes, which covers mergers and acquisitions.
2.8 Closure, Decommissioning and Divestment	Conformance	The Entity has developed a procedure that addresses environmental, social, cultural, gender and overall human rights impact assessment associated with major changes, which covers closure, decommissioning and divestment.
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	The Entity has produced a publicly available Sustainability Report and discloses its environmental, social and health and safety impacts: <a href="https://www.metra.eu/pdf/rendicontazione-non-finanziaria-asi-gruppo-metra-2021.pdf">https://www.metra.eu/pdf/rendicontazione-non-finanziaria-asi-gruppo-metra-2021.pdf</a> The economic impacts and accountability statement, as required by Italian law, has been communicated to the local Chamber of Commerce and is publicly available on request: <a href="https://bs.camcom.it">https://bs.camcom.it</a>
3.2 Non-compliance and liabilities	Conformance	The Entity has produced a publicly available Sustainability Report and discloses its environmental, social and health and safety impacts: <a href="https://www.metra.eu/pdf/rendicontazione-non-finanziaria-asi-gruppo-metra-2021.pdf">https://www.metra.eu/pdf/rendicontazione-non-finanziaria-asi-gruppo-metra-2021.pdf</a> The report discloses information on non-compliance and liabilities, please refer Paragraph 5.2. There have been no fines or sanctions over the previous two years.
3.3a Payments to governments (legal and contractual)	Conformance	Italian law forbids payments to the public administration outside a legal or contractual basis. The Entity has a management system to ensure compliance with local law. There is no evidence of a violation on this matter.
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 Metra operation (producing extruded profiles) is certified to ISO 14001: <a href="https://www.metra.eu/gruppo/qualita-certificata.html#2">https://www.metra.eu/gruppo/qualita-certificata.html#2</a> The Entity's complaints mechanism is described in the Code of Ethics, please refer to Chapter 10: <a href="https://www.metra.eu/pdf/Metra_CodiceEtico.pdf">https://www.metra.eu/pdf/Metra_CodiceEtico.pdf</a> A complaints form is publicly available: <a href="https://www.metra.eu/pdf/mod-segnalazione-reclami.pdf">https://www.metra.eu/pdf/mod-segnalazione-reclami.pdf</a>
PRINCIPLE 4 MATERIAL STEWARDSHIP		

CRITERION	RATING	COMMENT
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	The Entity's Life Cycle Assessment (LCA) for the five main products is publicly available on request and can be download at the following link: <a href="https://www.epditaly.it/ricerca-epd/?wpv_view_count=100003484&amp;wpv-tipologia-epd=0&amp;wpv_post_search=Metra&amp;wpv_filter_submit=Cerca">https://www.epditaly.it/ricerca-epd/?wpv_view_count=100003484&amp;wpv-tipologia-epd=0&amp;wpv_post_search=Metra&amp;wpv_filter_submit=Cerca</a>
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	The Entity's Life Cycle Assessment (LCA) for the five main products is publicly available on request and can be download at the following link: <a href="https://www.epditaly.it/ricerca-epd/?wpv_view_count=100003484&amp;wpv-tipologia-epd=0&amp;wpv_post_search=Metra&amp;wpv_filter_submit=Cerca">https://www.epditaly.it/ricerca-epd/?wpv_view_count=100003484&amp;wpv-tipologia-epd=0&amp;wpv_post_search=Metra&amp;wpv_filter_submit=Cerca</a>
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	The Entity's Life Cycle Assessment (LCA) for the five main products is publicly available on request and can be download at the following link: <a href="https://www.epditaly.it/ricerca-epd/?wpv_view_count=100003484&amp;wpv-tipologia-epd=0&amp;wpv_post_search=Metra&amp;wpv_filter_submit=Cerca">https://www.epditaly.it/ricerca-epd/?wpv_view_count=100003484&amp;wpv-tipologia-epd=0&amp;wpv_post_search=Metra&amp;wpv_filter_submit=Cerca</a>
4.2 Product design	Conformance	The Entity is not engaged in design and development of products as the work is exclusively based on the customer's design, however, objectives on environmental impacts of the product coincide with environmental objectives of the company in reducing energy consumption and use of raw materials.
4.3a Aluminium Process Scrap (targets)	Conformance	The Entity generates a low level of Process Scrap and the data, extrapolated from customized software for production management, indicates a downward trend. Scrap that is not recycled at the Entity is sent to waste treatment plants that recycle the filings and shavings.
4.3b Aluminium Process Scrap (alloy separation)	Conformance	The Entity separates its scrap materials including raw aluminium alloys and other materials to be added for realization of alloys as finished product.
4.4a Collection and recycling of products at end-of-life (strategy)	Conformance	The Entity complies with relevant environmental authorizations covering waste management and include a recycling strategy. Recycling is close to 100% and the Entity's target is to maintain this performance. The Entity communicates its production of waste and final destination of waste to the public administration on an annual basis.

CRITERION	RATING	COMMENT
4.4b Collection and recycling of products at end-of-life (engagement)	Conformance	The Entity complies with relevant environmental authorizations covering waste management and include a recycling strategy. Recycling is close to 100% and the Entity's target is to maintain this performance. The Entity communicates its production of waste and final destination of waste to the public administration on an annual basis to support accurate measurement and efforts to increase recycling rates.
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		
5.1 Disclosure of GHG emissions and energy use	Conformance	The Entity discloses its GHG emissions and energy use in the publicly available Sustainability Report: <a href="https://www.metra.eu/pdf/rendicontazione-non-finanziaria-asi-gruppo-metra-2021.pdf">https://www.metra.eu/pdf/rendicontazione-non-finanziaria-asi-gruppo-metra-2021.pdf</a>
5.2 GHG emissions reductions	Conformance	The Entity discloses its GHG emissions reduction target and the projects for implementation to achieve the target in the publicly available Sustainability Report: <a href="https://www.metra.eu/pdf/rendicontazione-non-finanziaria-asi-gruppo-metra-2021.pdf">https://www.metra.eu/pdf/rendicontazione-non-finanziaria-asi-gruppo-metra-2021.pdf</a>
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	The Entity complies with relevant environmental authorizations under local law and communicates the data required to the authorities. All findings are compliant with legal limits.
6.2 Discharges to Water	Conformance	The Entity complies with relevant environmental authorizations under local law and communicates the data required to the authorities. All reports are under legal limits.
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	The Entity has an Environmental Management System conforming to ISO 14001 and has undertaken a risk assessment which includes Spills and Leakages.
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	The environmental risk assessment indicates a very low risk of Spills and Leakage. The Entity has procedures to ensure Spills and Leakage are managed as an emergency response and a non-conformance is raised



CRITERION	RATING	COMMENT
		under the Environmental Management System. Any spill incident is disclosed in the Sustainability Report: <a href="https://www.metra.eu/pdf/rendicontazione-non-finanziaria-asi-gruppo-metra-2021.pdf">https://www.metra.eu/pdf/rendicontazione-non-finanziaria-asi-gruppo-metra-2021.pdf</a>
6.4a Reporting of Spills (immediate disclosure)	Conformance	The environmental risk assessment indicates a very low risk of Spills and Leakage. The Entity has procedures to ensure Spills and Leakage are reported and as an emergency, a non-conformance is raised under the Environmental Management System. Any spill incident is disclosed in the Sustainability Report: <a href="https://www.metra.eu/pdf/rendicontazione-non-finanziaria-asi-gruppo-metra-2021.pdf">https://www.metra.eu/pdf/rendicontazione-non-finanziaria-asi-gruppo-metra-2021.pdf</a>
6.4b Reporting of Spills (regular reporting)	Conformance	The environmental risk assessment indicates a very low risk of Spills and Leakage. The Entity has procedures to ensure Spills and Leakage are reported and as an emergency, a non-conformance is raised under the Environmental Management System. Any spill incident is disclosed in the Sustainability Report: <a href="https://www.metra.eu/pdf/rendicontazione-non-finanziaria-asi-gruppo-metra-2021.pdf">https://www.metra.eu/pdf/rendicontazione-non-finanziaria-asi-gruppo-metra-2021.pdf</a>
6.5a Waste management and reporting (strategy)	Conformance	The Entity has developed and implemented procedures for dealing with waste and the Waste Mitigation Hierarchy is followed.
6.5b Waste management and reporting (disclosure)	Conformance	The Entity complies with relevant environmental authorizations under local law and communicates its production of waste and final destination of waste to the public administration on an annual basis. The MUD declaration (Modello Unico di Dichiarazione: Unique Form of Declaration) for Foall are available on the local Chamber of Commerce website: <a href="https://www.bs.camcom.it">https://www.bs.camcom.it</a>
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.
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.

CRITERION	RATING	COMMENT
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)	Conformance	Raw aluminium scrap produced in the Metra operations is re-melted in the Foall foundry, minimizing the Entity's quantity of scrap. Dross is treated as a waste under the European Waste Code and sent to a specialised processor for recovery.
6.8b Dross (recycling)	Conformance	Raw aluminium scrap produced in the Metra operations is re-melted in the Foall foundry, minimizing the Entity's quantity of scrap. Dross is treated as a waste under the European Waste Code and sent to a specialised processor for recovery.
6.8c Dross (review of alternatives)	Conformance	Raw aluminium scrap produced in the Metra operations is re-melted in the Foall foundry, minimizing the Entity's quantity of scrap. Dross is treated as a waste under the European Waste Code and sent to a specialised processor for recovery.
PRINCIPLE 7 WATER STEWARDSHIP		
7.1a Water assessment (mapping)	Conformance	Water supply for industrial use is via authorized wells. Water supply for hygienic and sanitary use, the canteen and fire prevention network is via the local aqueduct.
7.1b Water assessment (risk assessment)	Conformance	Water-related risks are included in environmental risk assessment where no significant risk has been identified. The Entity's water consumption is lower than the permissible limits within its permits.
7.2a Water management (management plans)	Not Applicable	This Criterion is not applicable as there have been no significant water-related risks identified.
7.2b Water management (monitoring)	Not Applicable	This Criterion is not applicable as there have been no significant water-related risks identified.

CRITERION	RATING	COMMENT
7.3 Disclosure of water usage and risks	Conformance	The Entity's water usage data is disclosed in the Sustainability Report: <a href="https://www.metra.eu/pdf/rendicontazione-non-finanziaria-asi-gruppo-metra-2021.pdf">https://www.metra.eu/pdf/rendicontazione-non-finanziaria-asi-gruppo-metra-2021.pdf</a>
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	The Entity has conducted a biodiversity risk assessment as part of general environmental risk assessment. There are no significant impacts on biodiversity identified.
8.2a Biodiversity management (biodiversity action plans)	Not Applicable	This Criterion is not applicable as there has been no significant impact on biodiversity identified.
8.2b Biodiversity management (consultation and mitigation hierarchy)	Not Applicable	This Criterion is not applicable as there has been no significant impact on biodiversity identified.
8.2c Biodiversity management (reporting)	Not Applicable	This Criterion is not applicable as there has been no significant impact on biodiversity identified.
8.3 Alien Species	Conformance	The Entity has conducted a biodiversity risk assessment as part of general environmental risk assessment. There are no significant impacts on biodiversity identified. The introduction of Alien Species is a risk mitigated by internal processes including instructions for suppliers to treat wooden pallets according to international standards, such as the International Standard for Phytosanitary Measures (ISPM 15).
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	The Entity has an integrated Policy which includes a statement on Human Rights: <a href="https://www.metrabuilding.com/wp-content/uploads/2022/02/integrated-policy-rev-03-of-01-07-2021.pdf">https://www.metrabuilding.com/wp-content/uploads/2022/02/integrated-policy-rev-03-of-01-07-2021.pdf</a>

CRITERION	RATING	COMMENT
9.1b Human Rights Due Diligence (process)	Conformance	The Entity has undertaken an annual risk assessment which includes the supply chain. All suppliers are required to comply with the Entity's Code of Ethics, available at the following link: <a href="https://www.metra.eu/pdf/Metra_CodiceEtico-en.pdf">https://www.metra.eu/pdf/Metra_CodiceEtico-en.pdf</a>
9.1c Human Rights Due Diligence (remediation)	Conformance	The Entity has undertaken an annual risk assessment and there is no evidence of adverse Human Rights impacts in the supply chain or internal management.
9.2 Women's Rights	Conformance	The has undertaken an annual risk assessment which includes the women's rights. The Entity has developed a procedure to address gender equality and Discrimination.
9.3 Indigenous Peoples	Not Applicable	The Criterion is not applicable as there are no Indigenous Peoples in the Entity's Area of Influence. A risk assessment was undertaken which included the supply chain. All suppliers are required to comply with the Entity's Code of Ethics.
9.4 Free, Prior, and Informed Consent (FPIC)	Not Applicable	The Criterion is not applicable as there are no Indigenous Peoples in the Entity's Area of Influence. However, the Entity has developed a procedure that addresses environmental, social, cultural, gender and overall Human Rights impacts including Indigenous Peoples rights associated with major changes.
9.5 Cultural and sacred heritage	Conformance	The Entity has undertaken an annual risk assessment. There are no sacred or cultural heritage sites in the Entity's Area of Influence.
9.6a Resettlements (avoid or minimise)	Not Applicable	This Criterion is not applicable as there have been no Resettlements.
9.6b Resettlements (where unavoidable)	Not Applicable	This Criterion is not applicable as there have been no Resettlements.
9.7a Local Communities (rights and interests)	Conformance	The Entity has undertaken an annual risk assessment. The Entity has developed a procedure that addresses environmental, social, cultural, gender and overall Human Rights impacts associated with major changes. Local Communities are included as relevant interested parties as per ISO 14001 certification.
9.7b Local Communities (impacts)	Conformance	The Entity has undertaken an annual risk assessment. The Entity has developed a procedure that addresses environmental, social, cultural, gender and overall Human Rights impacts associated with major changes. Local Communities are included as relevant interested parties as per ISO 14001 certification.

CRITERION	RATING	COMMENT
9.7c Local Communities (livelihoods)	Conformance	The Entity has undertaken an annual risk assessment. The Entity has developed a procedure that addresses environmental, social, cultural, gender and overall Human Rights impacts associated with major changes. The Entity supports development of local Community, for additional information please refer to the Sustainability Report: <a href="https://www.metra.eu/pdf/rendicontazione-non-finanziaria-asi-gruppo-metra-2021.pdf">https://www.metra.eu/pdf/rendicontazione-non-finanziaria-asi-gruppo-metra-2021.pdf</a>
9.8 Conflict-Affected and High-Risk Areas	Conformance	The Conflict Minerals Reporting Template questionnaire completed the risk assessment for conflict minerals has resulted in that no minerals from Conflict Affected High Risk Areas are used.
9.9 Security practice	Conformance	The Entity does not engage private security providers. The only security provider is the police who are committed to respecting Human Rights as per local law.
PRINCIPLE 10 LABOUR RIGHTS		
10.1a Freedom of Association and Right to Collective Bargaining (freedom of association)	Conformance	The Entity respects the right to Freedom of Association and this outlines this in their Integrated Policy and Code of Ethics: <a href="https://www.metra.eu/pdf/politica-integrata-rev-03-del-01-07-2021.pdf">https://www.metra.eu/pdf/politica-integrata-rev-03-del-01-07-2021.pdf</a> and: <a href="https://www.metra.eu/pdf/Metra_CodiceEtico.pdf">https://www.metra.eu/pdf/Metra_CodiceEtico.pdf</a> Workers are free to contact Trade Unions and have elected Trade Union representatives.
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Conformance	The Entity operates a National Collective Bargaining Agreement (CBA) agreed by industry representatives and Trade Union representatives. In addition, there is a CBA at Group level which includes production bonuses and shift details.
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Not Applicable	This Criterion is not applicable as in Italy there are no restrictions to Freedom of Association and Collective Bargaining and as such no alternative means of association are needed.
10.2a Child Labour (minimum age)	Conformance	The Entity has implemented procedures to address Child Labour and there is no evidence of the use or support of Child Labour. A supply chain Due Diligence was undertaken and suppliers agree to the Entity's Code of Ethics and Integrated Policy.
10.2b Child Labour (hazardous)	Conformance	The Entity has implemented procedures to address Child Labour and there is no evidence of the use or support of Child Labour. A supply chain Due Diligence

CRITERION	RATING	COMMENT
		was undertaken and suppliers agree to the Entity's Code of Ethics and Integrated Policy.
10.2c Child Labour (worst forms)	Conformance	The Entity has implemented procedures to address Child Labour and there is no evidence of the use or support of Child Labour. A supply chain Due Diligence was undertaken and suppliers agree to the Entity's Code of Ethics and Integrated Policy.
10.3a Forced Labour (human trafficking)	Conformance	The Entity has implemented procedures to address Forced Labour and there is no evidence of the use or support of Forced Labour. A supply chain Due Diligence was undertaken and suppliers agree to the Entity's Code of Ethics and Integrated Policy.
10.3b Forced Labour (deposits, fees, advances)	Conformance	The Entity has implemented procedures to address Forced Labour and there is no evidence of the use or support of Forced Labour. The Entity does not require fees from Workers.
10.3c Forced Labour (migrant workers)	Conformance	The Entity has implemented procedures to address Forced Labour and there is no evidence of the use or support of Forced Labour. The Entity does not require fees from Workers.
10.3d Forced Labour (debt bondage)	Conformance	The Entity has implemented procedures to address Forced Labour and there is no evidence of the use or support of Forced Labour. There is no evidence of debt bondage.
10.3e Forced Labour (freedom of movement)	Conformance	The Entity has implemented procedures to address Forced Labour and there is no evidence of the use or support of Forced Labour. There are no restrictions to movement, unless for safety issues and Workers are free to leave their workplace at the end of working hours or in case of immediate danger.
10.3f Forced Labour (retention of identity papers, permits, certificates)	Conformance	The Entity has implemented procedures to address Forced Labour and there is no evidence of the use or support of Forced Labour. There is no evidence of the retention of original documents.
10.3g Forced Labour (freedom to terminate employment)	Conformance	The Entity has implemented procedures to address Forced Labour and there is no evidence of the use or support of Forced Labour. Workers can terminate their employment freely, in conformance to the rules of Collective Bargaining Agreement, with a pre-advice period.
10.4 Non-Discrimination	Conformance	The Entity addresses Discrimination in its Code of Ethics and the Integrated Policy. There is no evidence Discrimination.

CRITERION	RATING	COMMENT
		Promotion, advancement and salary are based on a Management By Objectives (MBO) system, the 'Metra Group annual incentive plan'. For Workers not involved in MBO there is a process of salary/position review based on formal communications among managers and supervisors.
10.5 Communication and engagement	Conformance	Workers' representatives have free access to the Human Resources Department. Meetings are held every three months and the safety meeting for managers and Workers representatives is held as per local law, once per year.
10.6 Disciplinary practices	Conformance	Disciplinary measures are outlined in the national Collective Bargaining Agreement (CBA) and the Entity's procedure on discipline is consistent with the CBA and local law.
10.7a Remuneration (living wage)	Conformance	Wage levels are defined by the national Collective Bargaining Agreement (CBA). There is also a CBA at company level that takes wages above the minimum legal wage. The lowest wage at the Entity is higher than the poverty level as defined by the national statistics institute (ISTAT).
10.7b Remuneration (method of payment)	Conformance	All Workers are provided with clearly readable pay slips. Wages are paid in accordance with the Collective Bargaining Agreement (CBA) on a monthly basis, on the 15th of each month by bank transfer.
10.8 Working Time	Conformance	Each Worker has an electronic badge to record start and end Working Time and these data are used to produce payslips. Leave entitlements and Overtime are defined by the Collective Bargaining Agreement (CBA). The normal working time is 40 hours per week, Monday to Friday. Workers in production areas have different shift schemes as defined by the CBA at company level. Overtime is present and regularly paid with extra allowances in accordance with the national CBA.
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	The Entity has an Integrated Policy, signed by the CEO and approved by the Board of Directors: <a href="https://www.metra.eu/pdf/politica-integrata-rev-03-del-01-07-2021.pdf">https://www.metra.eu/pdf/politica-integrata-rev-03-del-01-07-2021.pdf</a>
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	The Entity has an Integrated Policy, signed by the CEO and approved by the Board of Directors:

CRITERION	RATING	COMMENT
		<a href="https://www.metra.eu/pdf/politica-integrata-rev-03-del-01-07-2021.pdf">https://www.metra.eu/pdf/politica-integrata-rev-03-del-01-07-2021.pdf</a> The Policy is applicable to all Workers and Visitors and is available at the Entity's premises.
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Conformance	The Entity has an Integrated Policy, signed by the CEO and approved by the Board of Directors: <a href="https://www.metra.eu/pdf/politica-integrata-rev-03-del-01-07-2021.pdf">https://www.metra.eu/pdf/politica-integrata-rev-03-del-01-07-2021.pdf</a> The Policy includes a commitment to comply with Applicable Law.
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	The Entity has an Integrated Policy, signed by the CEO and approved by the Board of Directors: <a href="https://www.metra.eu/pdf/politica-integrata-rev-03-del-01-07-2021.pdf">https://www.metra.eu/pdf/politica-integrata-rev-03-del-01-07-2021.pdf</a> The Policy includes a statement, consistent also with local law, on the right of Workers to refuse and stop unsafe work and to be informed about risks and hazards.
11.2 OH&S Management System	Conformance	The Entity has a documented Management System including the key elements of risk assessment, training and management review. The latest management review addressed the performance indicators and improvement plan. The Entity also holds monthly meetings to monitor and update the improvement plan.
11.3 Employee engagement on health and safety	Conformance	Workers' representatives for health and safety are freely elected by Workers. In accordance with local law, Workers' representatives participate in annual meetings with management. Workers can also access the complaints mechanism via a reporting and complaint form: <a href="https://www.metra.eu/pdf/mod-segnalazione-reclami.pdf">https://www.metra.eu/pdf/mod-segnalazione-reclami.pdf</a>
11.4 OH&S performance	Minor Non-Conformance	The Entity evaluates its Occupational Health and Safety performance and performance indicators are evaluated during the annual meeting. However, a number of issues were identified during the audit including an invalid fire prevention certificate, an incomplete risk assessment and an inadequate first aid box.

#### **Document Control and Version History**

Revision	Date	Notes
0	1 June 2022	Initial Certification Audit – Full Certification