ANTI SLAVERY & HUMAN TRAFFICKING POLICY

COMMITMENT

Aluphoenix S.r.l. recognizes that modern slavery constitutes a serious violation of fundamental human rights and is committed to preventing and combating it within its own operations and throughout the entire value chain.
For Aluphoenix, respect for human rights is a fundamental principle that guides business decisions, relationships with employees, and interactions with suppliers and business partners.
This Statement is prepared in accordance with the requirements of version 3.1 of the Aluminium Stewardship Initiative (ASI) Performance Standard and also constitutes a voluntary disclosure inspired by the principles of key international legislation on modern slavery, including the UK Modern Slavery Act (2015), the Australian Modern Slavery Act (2018), and Canadian legislation on the prevention of forced labor and child labor in supply chains, and is consistent with the United Nations Guiding Principles on Business and Human Rights (UNGP) and the OECD Guidelines for Responsible Business Conduct.

WHAT WE MEAN BY MODERN SLAVERY

Modern slavery refers to all forms of exploitation that a person cannot refuse or is forced to accept due to coercion, threats, deception, or abuse of power.

This definition includes:

- forced or compulsory labor
- human trafficking
- debt bondage
- labor exploitation
- the worst forms of child labor

WHO WE ARE

Aluphoenix is headquartered in Riese Pio X (Treviso) and is a foundry specializing in the refining and production of aluminum alloys of high metallurgical purity through the recovery of aluminum-based scrap and waste, particularly for the automotive and aerospace sector.
Operations are carried out by eterogenous workforce, in compliance with current labor, immigration, and safety regulations.

OUR SUPPLY CHAIN

Aluphoenix relies on a network of suppliers for the procurement of raw materials, technologies, and services.
The supply chain extends internationally and includes suppliers located in various countries, some of which may present higher levels of risk regarding human rights.
For this reason, we adopt a risk-based approach to supplier management.

OUR APPROACH

Aluphoenix has developed a management system that integrates the principles of the leading international standards on human rights and responsible business conduct.

Specifically:

- we have adopted a Code of Ethics that explicitly prohibits all forms of forced labor and exploitation;
- we require suppliers to comply with a Responsible Sourcing Standard;

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- we promote ethical and transparent labor practices;
- we ensure compliance with legal requirements for the employment of all staff.

DUE DILIGENCE AND RISK MANAGEMENT

Aluphoenix applies a risk-based due diligence approach to identify and prevent potential situations of modern slavery.

Key activities include:
- preliminary assessment of suppliers;
- requirement to adhere to company principles;
- documentary checks and, where necessary, audits;
- continuous monitoring of high-risk suppliers.

Particular attention is paid to:
- migrant workers;
- work through temporary staffing agencies;
- geographical areas at risk.

REPORTING AND REMEDIES

Aluphoenix provides reporting channels that are also accessible anonymously:
- by mail to the ASI Manager, Aluphoenix S.r.l., Via Monte Santo 33/a – 31039 Riese Pio X (TV);
- by email to: asi@aluphoenix.com

All reports are analyzed through a structured procedure and, where necessary, lead to the adoption of corrective actions.

The company commits to:
- promptly investigating reports;
- adopting appropriate corrective measures;
- contributing to any remedies in the event of negative impacts.

TRAINING AND AWARENESS

Aluphoenix promotes awareness of human rights and modern slavery through training activities for employees.
The Code of Ethics includes concrete examples to help identify risk situations and non-compliant behavior.

GOVERNANCE

Responsibility for managing risks related to modern slavery is integrated into corporate governance.

Specifically:
- the Board of Directors oversees ESG issues;
- the ASI Manager coordinates monitoring and control activities;
- the Procurement and HR departments support operational implementation.

CONTINUOUS IMPROVEMENT

Aluphoenix is committed to the continuous improvement of its processes for the prevention of modern slavery.

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Any reports will be included in the sustainability report published annually.

CONCLUSION

Aluphoenix reaffirms its commitment to operating in an ethical, responsible, and transparent manner, contributing to the protection of human rights and the fight against modern slavery.

Riese Pio X, 2026-04-20

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