



CORPORATE SUSTAINABILITY REPORT

2025







We do not inherit the world from our ancestors;
we borrow it from our children

~ Navajo proverb ~





SUMMARY

| | |
|--|-----------|
| SUMMARY | 5 |
| 1. LETTER TO STAKEHOLDERS | 7 |
| 2. OUR HISTORY | 8 |
| 2.1. COMPANY PROFILE AND INDUSTRIAL DEVELOPMENT | 8 |
| 2.2. OPERATIONAL DEVELOPMENT | 8 |
| 2.3. TECHNOLOGICAL STRUCTURE AND INDUSTRIAL ORGANISATION | 8 |
| 2.4. METALLURGICAL PERFORMANCE AND PRODUCTION PROCESS | 9 |
| 2.5. MARKET POSITIONING AND INTERNATIONALISATION | 9 |
| 3. VISION AND MISSION | 10 |
| 3.1. MISSION AND VISION | 10 |
| 3.2. OPERATIONAL IMPLEMENTATION OF THE VISION | 10 |
| 4. PRODUCT AND MANUFACTURING PROCESS | 14 |
| 4.1. INGOT DESIGN AND METALLURGICAL STANDARDS | 14 |
| 4.2. CASTING PROCESS AND METALLURGICAL CONTROL | 14 |
| 4.3. SURFACE QUALITY AND MARKET BENCHMARKS | 15 |
| 4.4. AREAS OF APPLICATION FOR ALUMINIUM ALLOYS | 15 |
| 4.5. STRATEGIC SECTORS AND SPECIALISATION | 16 |
| 4.6. STACKING AND PACKAGING | 18 |
| 4.7. SPECIFICATIONS | 18 |
| 4.8. RELEVANT STANDARDS | 18 |
| 4.9. PRODUCT CHARACTERISTICS | 19 |
| 4.10. THE MANUFACTURING PROCESS | 21 |
| 5. CERTIFICATIONS | 23 |
| 6. ALUMINIUM AND ITS RECYCLING | 24 |
| 7. TRANSPARENCY | 26 |
| 8. CODE OF ETHICS | 27 |
| 8.1. REPORTS | 27 |
| 9. CORPORATE GOVERNANCE | 28 |
| 10. THE ENVIRONMENT | 30 |
| 10.1. ENVIRONMENTAL IMPACT | 31 |
| 10.2. ELECTRICITY CONSUMPTION | 32 |
| 10.3. ATMOSPHERIC EMISSIONS | 32 |
| 10.4. WATER CONSUMPTION | 32 |
| 10.5. WASTE | 33 |



| | |
|---|-----------|
| 11. STAKEHOLDERS | 35 |
| 11.1. STAFF | 35 |
| 11.2. CUSTOMERS | 37 |
| 11.3. SUPPLIERS..... | 37 |
| 11.4. EXTERNAL PARTNERS | 38 |
| 11.5. SUPPORT FOR THE LOCAL COMMUNITY | 38 |
| 11.6. CORPORATE SOCIAL RESPONSIBILITY | 39 |
| 12. HEALTH AND SAFETY | 41 |
| 12.1. SECURITY | 41 |
| 12.2. ACCIDENTS..... | 42 |
| Figure 1: Quality, Environmental and ASI Policy of Aluphoenix S..... | 13 |
| Figure 2: Aluphoenix standard staple | 19 |
| Figure 3: Aluphoenix double vertical staple | 19 |
| Figure 4: Aluphoenix standard pallet. | 19 |
| Figure 5: Aluphoenix pallet on request | 19 |
| Figure 6: Declaration of conformity with EU Directive 2018/852 | 20 |
| Figure 7: Corporate organisation chart showing coordination and communication..... | 29 |
| lines | |
| Figure 8: 4-year comparison of electricity consumption at the Aluphoenix plant..... | 30 |
| Figure 9: 4-year comparison of water consumption at the | 31 |
| Aluphoenix plant | |
| Figure 10: 4-year comparison of tonnes of waste produced per tonne of..... | 31 |
| alloys | |
| Figure 11: Percentage of Employees | 31 |
| Figure 12: Percentage of Workers | 36 |
| Figure 13: Ages of Workers | 36 |
| Figure 14: Nationality of Workers | 36 |
| Figure 15: Average training hours by gender | 37 |
| Figure 16: Employee participation in the 2025 Fire-Fighting | 42 |
| courses | |
| Figure 17: Employee participation in the 2025 first aid | 42 |
| courses | |



1. LETTER TO STAKEHOLDERS

With this Non-Financial Reporting Document, Aluphoenix aims to share with its stakeholders the growth trajectory undertaken in recent years, the progressive strengthening of its focus on sustainability, and the challenges that the future holds for us.

The company considers sustainability – for present and future generations – to be a fundamental strategic element for competing in an increasingly global market, one that is simultaneously characterised by growing geopolitical polarisation. In this scenario, the ability to combine industrial development, environmental protection and social responsibility represents a distinctive and essential factor.

For these reasons, we at Aluphoenix are committed to managing our operations in accordance with the highest standards of safety, environmental sustainability and social responsibility.

We are fully aware of the crucial role our plant plays in the aluminium industry cycle. We therefore adopt a proactive approach aimed at ensuring that all operational activities are carried out in strict compliance with current regulations, with particular attention to environmental protection, the health and safety of workers, and the well-being of local communities.

Our key commitments are focused on the following areas:

Health and Safety at Work

We ensure safe and healthy working environments by promoting a strong culture of prevention, continuous staff training, and the constant improvement of HSE processes and performance.

Environmental sustainability

We are committed to reducing the environmental impact of our operations through improved energy efficiency, the monitoring and reduction of emissions, responsible waste management, and the optimisation of natural resource use.

Social responsibility and transparency

We operate with integrity and responsibility, fostering dialogue with stakeholders and local communities, and ensuring transparency in our activities and the results achieved.

Innovation and continuous improvement

We invest in clean technologies and innovative solutions, promoting research and development to continuously improve the refinery's environmental, economic and operational performance.

With this statement, we at Aluphoenix confirm our commitment to integrating these principles into all strategic and operational decisions, with the aim of creating sustainable value for all our stakeholders.



[Riese Pio X \(TV\) site, 2017](#)

2. OUR HISTORY

2.1. COMPANY PROFILE AND INDUSTRIAL DEVELOPMENT

Founded in 2009, Aluphoenix S.r.l. is an Italian company specialising in the refining and production of high-purity primary aluminium alloys through the recovery of aluminium-based scrap and waste. The business venture stems from the experience of a group of founders with over forty years' experience in the light alloys sector. The management and technical team are made up of highly qualified professionals in the fields of aluminium and casting technologies (shell, sand and die casting), with proven expertise in metallurgy applied to the automotive and aerospace sectors.

2.2. 'S OPERATIONAL DEVELOPMENT

Industrial operations began in 2011 at an existing plant in Galliera Veneta (PD), with initially modest volumes and a primary focus on the domestic market.

Since its inception, the company's strategy has been based on two key priorities:

- expanding its commercial presence in the European and international markets;
- the construction of a new plant dedicated to the production of high-purity primary alloys.

In 2017, the new plant in Riese Pio X (TV) became operational, designed as a technologically advanced hub for the production of primary, hyper-pure and structural aluminium alloys for foundries.

2.3. 'S TECHNOLOGICAL INFRASTRUCTURE AND INDUSTRIAL ORGANISATION

The plant incorporates:

- advanced automation systems;
- full computerisation of the process stages;
- application of lean manufacturing, just-in-time and kanban principles.

Aluphoenix has certified its management system in accordance with the following standards:

- UNI EN ISO 9001:2015 (Quality);
- UNI EN ISO 14001:2015 (Environment);
- IATF 16949:2016 (Automotive);
- EU CERTIFICATE 333/2011 (Waste Recovery)
- ASI – Aluminium Stewardship Initiative Performance Standard V2:2017.



The company develops proprietary management software and digital integration systems in-house, ensuring full interconnection between the company's ERP and production machinery, in line with Industry 4.0 principles.

Production planning, alloy sequencing and raw material load management are controlled digitally, enabling:

- standardisation of processes across shifts;
- high repeatability of chemical analyses;
- optimisation of melting yields;
- complete traceability of production batches.

2.4. METALLURGICAL PERFORMANCE AND PRODUCTION PROCESS

The automated casting line enables the production of various types of ingot stacks and completes the production cycle for a 30-tonne casting (from the casting phase to the packed stack) in approximately 2.5 hours.

Particular attention is paid to the critical phases of alloying and metallurgical treatment.

The use of stirrers in the furnaces ensures high chemical uniformity of the metal bath, with process capability (Cp) values exceeding 1.33, a parameter of particular importance for automotive applications.

The in-line degassing and filtration system reduces porosity caused by gases and inclusions, improving the final metallurgical quality.

The ingots produced by Aluphoenix are characterised by:

- high metallurgical purity;
- absence of lumpy surface oxides;
- excellent remeltability;
- reduced production scrap at the customer's site;
- lower maintenance costs for foundry equipment.

These characteristics have consolidated the company's position as a qualified supplier to the European automotive and aerospace sectors, including for high-purity alloys.

2.5. 'S MARKET POSITION AND INTERNATIONALISATION

Throughout 2025, the market share outside Italy remained predominant, indicating that the company's level of internationalisation remained largely stable.

Interest in the structural alloys produced by Aluphoenix, combined with the growing demand for recycled content and low CFP, makes Aluphoenix's offering particularly competitive in these expanding markets as well.

The corporate management system constantly monitors a series of ongoing operational KPIs.

The main internal KPIs have recorded very positive results:

- **No customer complaints whatsoever,**
- **Extremely high level of customer satisfaction,**
- **Process stability and control,** with very high CP cross values,
- **Delivery punctuality** at the highest levels,
- **High energy efficiency,**
- **Excellent production quality indices**

By 2025, all set targets had been fully achieved



3. VISION AND MISSION

3.1. MISSION AND VISION

The mission of Aluphoenix S.r.l. is based on a commitment to contribute, through its industrial activities, to environmental protection and the creation of sustainable value for present and future generations.

The company operates by seeking a balance between economic performance, environmental responsibility and social development, promoting:

- the personal and professional growth of its employees;
- the consolidation of ethical and transparent relationships with customers, suppliers and partners;
- fair and sustainable returns on investment in the medium to long term.

The company's mission draws inspiration from a humanistic vision that places the individual at the heart of the business system. An approach that is summed up in the words of Adriano Olivetti:

*"The factory cannot look solely at the profit margin.
It must distribute wealth, culture, services and democracy.
I conceive of the factory for the sake of man, not man for the sake of the factory."*

The founders of Aluphoenix share and interpret this vision as the organisation's concrete responsibility to place the individual at the centre of its strategic and operational decisions.

From this perspective, the focus is on:

- **the people of today** – employees, suppliers, partners and stakeholders involved in the value chain, valuing their skills, safety, growth and inclusion;
- **the people of tomorrow** – the younger generations, towards whom the company recognises its duty to contribute to a fairer, more resilient and environmentally sustainable economic system

3.2. OPERATIONAL TRANSLATION OF THE ' ' VISION

The Vision translates into a structured commitment to a sustainable natural, social and economic environment, based on: environmental protection and the responsible use of resources;

- promoting health and safety in the workplace;



- valuing diversity and equal opportunities;
- constructive dialogue with communities and stakeholders;
- respect for ethical principles and good governance.

This approach is put into practice through the Company Policy on Quality, the Environment and Social Responsibility (ASI), which serves as the guiding framework for:

- the definition of strategic objectives;
- the integration of ESG criteria into decision-making processes;
- continuous performance improvement;
- the promotion of a culture of sustainability at all organisational levels.

The Company Policy is publicly available on the company's website and serves as the framework for all operational, innovation and organisational development activities ([Figure 1](#)).



Politica per la Qualità, per l'Ambiente e ASI ®

La Politica per la Qualità e per l'Ambiente di Aluphoenix Srl si basa sull'analisi del contesto di mercato e di settore caratterizzati da una dimensione "globale" e dove il successo di una iniziativa imprenditoriale è sempre più veicolata dall'offerta di prodotti di elevata purezza metallurgica e, dall'utilizzo di impianti e processi efficaci ed efficienti nel soddisfare le necessità dei Clienti e nel contenere l'impatto delle attività aziendali sui diversi aspetti ambientali.

La Politica per la Qualità e per l'Ambiente di Aluphoenix dichiara pertanto l'impegno esplicito e attivo dell'azienda nel:

- garantire una elevata purezza metallurgica dei prodotti forniti, caratterizzati da una struttura metallurgica esente da ossidi e inclusioni di gas, e da superfici esenti da ossidi piatti o granulosi o altre impurezze
- contenere l'impatto dell'attività aziendale sui diversi aspetti ambientali entro i limiti autorizzati e secondo principi etici avvisati alla soddisfacente convivenza con la collettività locale
- rispettare i requisiti cogenti previsti dalla normativa comunitaria, nazionale e locale applicabile, nonché dalle associazioni e/o gruppi di settore ai quali l'azienda abbia scelto di aderire
- garantire la massima trasparenza nella gestione dei rapporti commerciali con soggetti pubblici e privati, agire in conformità alle norme previste contro ogni forma di corruzione ed evitare ogni attività di riciclaggio di denaro di provenienza illecita o criminale
- rispettare le norme in materia di salute e salvaguardia della sicurezza sul Lavoro, in ottica della prevenzione e riduzione degli infortuni e delle malattie professionali sul luogo di lavoro
- promuovere una politica basata sul rispetto dei diritti umani e del lavoro, per la valorizzazione e la tutela delle risorse umane
- impegnarsi ad ottimizzare l'utilizzo delle risorse naturali favorendo l'utilizzo di risorse energetiche rinnovabili
- impegnarsi nel contenimento degli impatti della propria attività aziendale sugli aspetti ambientali, in particolare nella riduzione delle emissioni di gas ad effetto serra,
- promuovere un'economia circolare.

lavoriamo per:

Migliorare la soddisfazione dei nostri Clienti e Fornitori, ridurre l'impatto Ambientale del fine ciclo di vita dei prodotti industriali a base metallica non ferrosa, nel pieno rispetto della legislazione vigente, dei requisiti cogenti e della convivenza civile con la collettività locale, per ottenere il giusto riconoscimento sociale ed economico dei nostri investimenti

Il miglioramento viene perseguito:

- ricercando ed adottando le migliori tecnologie disponibili in modo da rendere i processi operativi interni sempre più efficaci ed efficienti
- individuando regolazioni di processo atte a migliorare la qualità metallurgica del prodotto fornito
- automatizzando il processo in modo da renderlo sempre più efficace e ripetibile
- adottando estensivamente strumenti software e hardware in modo da diminuire le occasioni di errore e da rendere il servizio offerto sempre più efficace ed efficiente
- anticipando le esigenze future dei Clienti e degli stakeholders esterni ed interni l'azienda
- definendo prassi di processo atte a minimizzare l'impatto delle attività aziendali sugli aspetti ambientali
- adottando un modello organizzativo che vigili sull'attività aziendale in modo da evitare di intrattenere rapporti commerciali con individui o aziende di provenienza illecita o criminosa
- coinvolgendo attivamente le risorse umane e farsi promotore di proposte nell'ottica di miglioramento continuo, valutando e monitorando i rischi e le criticità associate tramite il DVR, verificando l'idoneità delle condizioni dei locali, macchinari e attrezzature di lavoro
- adottando un codice etico dove vengono elencati i principi deontologici aziendali, favorendo un modello partecipativo di dialogo con il personale nell'ottica del lavoro di squadra, dove ogni elemento è indispensabile per raggiungere il successo aziendale
- ottimizzando il processo produttivo al fine di ridurre l'emissione di gas serra per unità di massa di prodotto, scegliendo di contenere l'utilizzo delle risorse idriche e favorendo l'utilizzo di energie rinnovabili.
- utilizzando il Tool CFP per calcolare l'emissione di gas serra per ogni processo produttivo (lega prodotta), indagando sulle risorse energetiche utilizzate nella propria catena di fornitura e incrementando l'acquisto di materia prima a basso impatto ambientale

- adottando un'economia circolare, con l'incremento dell'utilizzo di materiale riciclato nel processo produttivo e la riduzione degli scarti di produzione

La riduzione dell'impatto ambientale del fine ciclo di vita dei prodotti industriali a base metallica non ferrosa viene perseguita attraverso la raccolta, il trattamento e la trasformazione in materia prima per la filiera industriale, tramite impianti e processi a impatto ambientale contenuto e controllato, nel pieno rispetto della normativa ambientale vigente.

La "Qualità" è per Aluphoenix anzitutto, l'attitudine di fondo di individuare i processi, le procedure e i comportamenti migliori per il raggiungimento degli obiettivi aziendali e per soddisfare le esigenze dei nostri Clienti, dell'Ambiente e degli Stakeholders interni ed esterni, ivi compresa la collettività locale.

Aluphoenix ha definito un proprio Codice Etico dove definisce i principi etici ispiratori della cultura aziendale e dove orienta il lavoro, i comportamenti e condotte di ciascun collaboratore interno ed esterno al rispetto dei principi di qualità e professionalità, limitando comportamenti estemporanei individualistici o comunque slegati dal contesto di universalità aziendale o comunque non avvisati alla soddisfazione delle esigenze dei ns Clienti, Fornitori, dell'Ambiente e di tutti gli stakeholders esterni.

Nell'ottica di un miglioramento continuo, l'osservanza delle regole di comportamento e dei principi sanciti nel Codice Etico aziendale, la gestione e circolazione delle informazioni e l'interconnessione tra tutte le funzioni aziendali, sono alla base di una effettiva qualità dei prodotti e dei servizi forniti.

Qualità è:

**dare ai nostri Clienti motivo di sceglierci
tutti i giorni come Fornitore**

Policy for Quality, Environment and ASI ®

The Quality and Environment Policy of Aluphoenix is based on the analyse of the markets and sectors characterised by a "global" dimension and where the success of a business venture is controlled by the offer of high metallurgical purity and by the use of efficient facilities and processes system in order to meet customer's needs and to limit the impact of company activities on the different environmental aspects.

The Quality and Environment Policy of Aluphoenix states therefore the explicit and active commitment of the company to:

- *Guarantee a high metallurgical purity of the provided products, marked by a metallurgical structure free from oxides and gas inclusions and by surfaces free from flat or clumpy oxides or other impurities*
- *Contain the impact of the company activities on the different environmental aspects within the authorised limits according to ethical principles addressed to a satisfying coexistence with the local community*
- *Respect the mandatory requirements laid down by EU-, national and local legislation, as well as by industry groups or associations to which the company has chosen to join*
- *ensure maximum transparency in the management of business relations with public and private entities, act in accordance with the rules provided against all forms of corruption and avoid any illegal or criminal money laundering*
- *respect the rules on health and safety at work, with a view to preventing and reducing occupational accidents and diseases at the workplace*
- *promoting a policy based on respect for human rights and labour, for the enhancement and protection of human resources*
- *commit to optimising the use of natural resources by promoting the use of renewable energy resources.*
- *commit to reducing the environmental impact of its business activities, particularly in reducing greenhouse gas emissions*
- *promote a circular economy*

We want to:

improve the satisfaction of our Customers and Suppliers, reduce the environmental impact of the end-of-life of non-ferrous products, according to the current legislation, mandatory requirements and civil coexistence with the local community, in order to obtain the appropriate social and economical recognition of our investments.



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QEP_Rev.6.0_Politica per la Qualità, per l'Ambiente e ASI ® del 12/03/25

ALUPHOENIX®

High Quality Aluminium Alloys

The improvement is pursued by:

- Researching and adopting the best available technologies in order to make the internal business processes more and more effective and efficient
- Identifying process adjustments to improve the metallurgical quality of the supplied product
- Automatizing the process to make it effective and repeatable
- Adopting extensively software and hardware tools to reduce the mistakes and to make the provided service more effective and efficient
- Anticipating the future requirements of customers as well as of external and internal stakeholders of the company
- Establishing process practices addressed to minimise the impact of the company activities on the environmental aspects
- by adopting an organizational model that monitors business activity in order to avoid engaging in business relations with individuals or companies of illicit or criminal origin
- actively involving human resources to be promoter of proposals with a view to continuous improvement, evaluating and monitoring the associated risks and criticalities through the DVR, verifying the suitability of the conditions of the premises, machinery and work equipment
- adopting a code of ethics listing the company's deontological principles, encouraging a participatory model of dialogue with staff in the perspective of teamwork, where every element is essential to achieve business success
- optimizing the production process in order to reduce greenhouse gas emissions per unit mass of product, choosing to limit the use of water resources and encouraging the use of renewable energy,
- using the CFP Tool Aluphoenix to calculate greenhouse gas emissions for each production process (produced alloy), investigating the energy resources used in the supply chain and increasing the purchase of raw materials with low environmental impact.
- adopting a circular economy, by increasing the use of recycled materials in the production process and reducing production waste.

The reduction of the environmental impact of the end-of-life cycle of non-ferrous metals industrial products is pursued through the collection, processing and transformation of raw material for the industrial chain, using facilities and processes with a low and controlled environmental impact, according to the current environmental legislation.

The "Quality" is first of all the basic attitude to identify the processes, the procedures and the best practices to reach the company' objectives and to meet the needs of our Customers, of the Environment and of the internal and external stakeholders, including the local community.

Aluphoenix has defined its own Code of Ethics in which are established the inspiring ethical principles of the corporate culture and where it guides the work, the behaviours and conduct of each internal and external collaborator according to the quality and professional principles, reducing sudden individual behaviour disjoined from the universality business or not referred to the satisfaction of our customers, Suppliers, Environment of all external stakeholders.

With a view to a continuous improvement, the compliance with the rules of behaviour and with the principles enshrined in the Company's Code of Ethics, the management and the flow of information and the interconnection between all company functions, are the basis of an effective quality of the products and of the provided services.

Quality is:

Every day give to our Customers the reason
to choose us as Supplier

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Firma

Data 12/03/2025



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QEP_Rev.6.0_Político per la Qualità, per l'Ambiente e ASI® del 12/03/25

Figure 1: Quality, Environmental, ASI Policy of Aluphoenix S.r.l.



4. PRODUCT AND MANUFACTURING PROCESS

4.1. INGOT DESIGN AND METALLURGICAL STANDARDS

The design of the Aluphoenix ingot, produced at the Riese Pio X plant (Italy), is the result of a structured technical benchmarking exercise that compared the requirements of European customers with the best solutions available on the market. Ingot Design and Metallurgical Standards

The design took into account functional, logistical and ergonomic parameters, with particular reference to:

- unit weight optimised for manual and mechanised handling;
- dimensions compatible with standard transport and storage systems;
- geometry designed to ensure stack stability.



The ingot's ergonomic design helps to preserve the integrity of the stacks during transport and storage, reducing the risk of instability and improving the health and safety conditions of the personnel involved in handling.

4.2. CASTING PROCESS AND METALLURGICAL CONTROL

The ingot is produced by gravity casting on a line specifically designed to meet the highest technological and metallurgical standards in the sector.

The process involves:

- in-line degassing of the molten aluminium;
- continuous filtration to remove non-metallic inclusions;
- control of thermal and fluid dynamic parameters during metal transfer.

The stage involving the pouring of the liquid aluminium, which has been previously filtered and degassed, into the moulding line has been engineered to minimise:

- intra-crystalline oxidation;
- gas inclusions;
- undesirable turbulence in the metal flow.



Particular attention is paid to managing the free solidification surface, in order to ensure a compact and homogeneous structure.

4.3. SURFACE QUALITY AND MARKET BENCHMARKS

The free solidification surface of Aluphoenix ingots is characterised by:

- high metallurgical purity;
- absence of surface oxidation;
- the absence of spongy skins and visible discontinuities.

These characteristics represent a quality benchmark in the market for primary foundry alloys, helping to improve remeltability, reduce metal losses and optimise casting performance for the end customer.

4.4. APPLICATION AREAS OF A ALUMINIUM ALLOYS

The aluminium alloys produced by Aluphoenix are used in the main metallurgical processing methods, including:

- shell mould casting;
- sand casting;
- low-pressure casting;
- die casting;
- lost-wax casting.

They are also used in the production of:

- sheets and plates;
- plates and billets;
- extruded profiles;
- high-performance foils and thin strips.

Thanks to their high metallurgical purity and compositional stability, Aluphoenix alloys are used in a wide range of strategic industrial sectors:

Transport

- private, commercial, public and military land transport;
- civil and military air transport;
- civil and military maritime transport.

Industry and plant engineering

- machine tools and industrial components;
- energy transmission networks (electric, geothermal and fossil fuel);
- renewable energy plants.

Rolled and extruded products

- sheets for aesthetic cladding and architecture;
- deep-drawing sheets for various industrial sectors;
- extruded profiles for structural and technical applications.

Packaging and food contact

- foil converters for food and pharmaceutical packaging;
- HHF (Household Foil) for food storage;



- container strips for food delivery solutions.

4.5. STRATEGIC SECTORS AND SPECIALISATION

Over time, Aluphoenix has developed a **targeted specialisation in the production of alloys for four strategic sectors at a global level**, for which a dedicated selection of alloys with specific metallurgical characteristics has been defined, in terms of:

- control of residual elements (Fe, Na, Ca, etc.);
- reduction of non-metallic inclusions;
- chemical stability and process repeatability;
- compliance with international industry standards.

This focus enables the company to offer high-performance solutions that meet the technical, regulatory and quality requirements of its target markets.

Aerospace Sector

The aerospace sector requires high-performance aluminium alloys, characterised by mechanical and metallurgical properties suitable for ensuring structural reliability, lightness and durability under particularly demanding operating conditions.

Depending on the application (structural components, casings, brackets, parts subject to thermal and mechanical stresses), the alloys must ensure that the casting has:

- **high elongation at break**, to ensure ductility and the ability to absorb stresses;
- **high corrosion resistance**, even in aggressive environments, combined with structural lightness and good weldability;
- **microstructural stability and consistent mechanical behaviour at high temperatures**, with limited loss of mechanical properties over time



Marine Sector

The shipbuilding industry requires aluminium alloys which, depending on the application, ensure the castings have the following characteristics:

- **High tensile strength and good elongation**, to ensure structural strength and the ability to absorb deformation without sudden fracture.
- **High corrosion resistance, combined with lightness, good weldability and suitability for riveting and die-forming**, to facilitate construction and increase durability in a marine environment.
- **Effective cathodic protection**, to prevent galvanic corrosion and extend the service life of the structures.



Automotive sector

The automotive industry requires high-performance aluminium alloys which, depending on the application, ensure that castings possess the following characteristics:

- **High elongation**, to ensure deformability, energy absorption and impact resistance, which are fundamental for structural safety.
- **Lightweight and good weldability**, to reduce the vehicle's overall weight, improve energy efficiency and facilitate assembly processes.
- **Stability of mechanical behaviour in high-temperature environments**, to maintain strength and reliability even under severe operating conditions, such as in engine or exhaust system components.



Semi-finished products sector

The alloys are produced in full compliance with the technical specifications required by the customer. Aluphoenix ingots represent both a technical and strategic solution, capable of delivering tangible benefits in terms of quality, efficiency and sustainability.

High metallurgical quality

The ingots undergo in-line degassing and filtration processes, reducing the content of gases and non-metallic inclusions. This ensures high metal yield during melting, greater structural homogeneity and improved performance in subsequent processing stages.

Chemical compliance

The chemical composition of the ingots is strictly aligned with the customer's specifications. This allows for reduced process costs, minimised adjustments during smelting and minimised risk of non-conformity, both from a chemical and metallurgical perspective.

Certified sustainability data

Thanks to a dedicated production process, highly efficient facilities and an innovative proprietary tool for calculating the carbon footprint, Aluphoenix is able to provide precise data expressed in kg of CO₂e per kg of product, relating to each individual melt, ensuring transparency and environmental traceability.





4.6. STACKING AND PACKAGING

The stack forming line has been designed and developed according to **lean manufacturing** principles, with the aim of maximising operational efficiency, production flexibility and waste reduction.

The plant is fully integrated with the company's ERP system, enabling computerised management of flows and automatic identification of stacks based on the technical specifications requested by the customer.

Each stack is:

- secured with **high-strength plastic strapping** to ensure **stability and safety during handling**;
- **identified by a weather-resistant yellow label**, bearing all the information necessary for product traceability, in accordance with the customer's requirements.



On request, the stacks can be further protected with **heat-shrinkable nylon film**, providing additional protection against moisture, dust and external agents during storage and transport.

4.7. SPECIFICATIONS

Aluphoenix produces aluminium alloys that comply with the main international technical specifications and, on request, with the customer's specific requirements.

The product consists of **stacks of aluminium ingots, with certified chemical analysis compliant with the main industry standards, or developed according to custom specifications provided by the customer.**

4.8. RELEVANT STANDARDS

Alloys may comply with the following standards:

- EN 1676 – European standard for aluminium ingots intended for remelting to produce castings in accordance with EN 1706.
- EN 601 – Standard specifying the chemical composition of castings intended for contact with food.
- ISO 17615 – International standard for aluminium ingots for remelting used in the production of castings conforming to ISO 3522.
- ASTM B179-14 – American standard for remelting aluminium ingots intended for the production of castings using all major casting processes.
- JIS H 2211 – Japanese standard for aluminium remelting ingots used in the production of castings conforming to JIS H 2502.

On request, alloys compliant with superseded standards are also produced, including:

- Italian UNI standards (e.g. UNI 3039, 3040, 3041, 3042, 3043, 3044, 3045, 3046, 3048, 3050, 3051, 3052, 3054, 3055, 3056, 3057, 3058, 3059, 3599, 3600, 3601, 3602, 4513, 5073, 5074, 5075, 5076, 5077, 5079, 5080, 6250, 6251, 6252, 6253, 7363, 7369, 7963, 7964, 8024, 10430);
- German standards DIN 1725;
- French standards NF A57-702;
- British standards BS 1490.

4.9. PRODUCT FEATURES

Stacks of ingots can be produced in various heights and geometric configurations, depending on the customer's logistical and production requirements. (Figures 2 to 5)

They are strapped in-line with heat-resistant plastic strapping and identified using indelible, water-repellent adhesive labels, bearing all the information necessary for traceability.

On request, stacks can be customised with coloured markings and/or barcodes for even more efficient management throughout the supply chain.

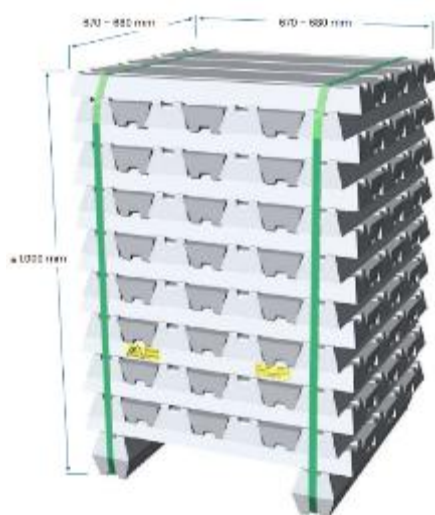


Figure 2: Aluphoenix standard staple

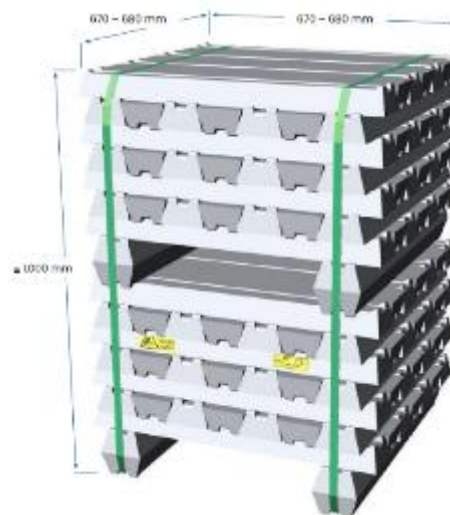


Figure 3 Aluphoenix double vertical staple

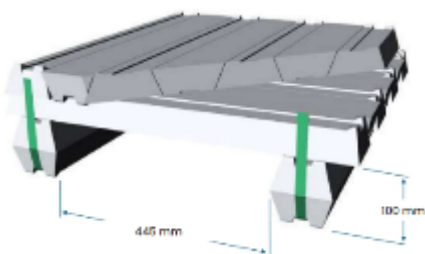


Figure 4: Aluphoenix standard pallet

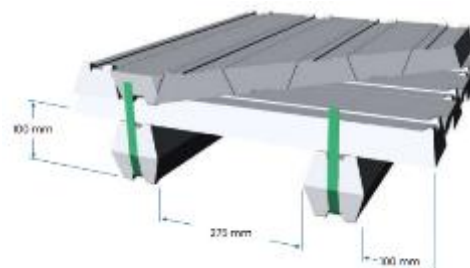


Figure 5: Aluphoenix pallet on request

In order to respect and protect the environment, Aluphoenix has decided to comply with European Directive 2018/852 on packaging (Figure 6).

All information regarding the type of packaging, alphanumeric coding and collection instructions can be downloaded from our website www.aluphoenix.com at the page <http://www.aluphoenix.com/prodotti/> in the section "Stacks and packaging" Packaging – EU Directive 852/2018



ALUPHOENIX®

High Quality Aluminium Alloys

Dichiarazione di conformità imballaggi alla (EU) Directive 2018/852

In conformità alla Direttiva (UE) 852/2018, la scrivente dichiara di utilizzare nei propri prodotti gli imballi di seguito elencati:



- Reggette in poliestere
- (opzionale) Cappuccio in polietilene termoretraibile
- Etichette plastiche termoadesive

| Tipi di imballaggio | Codifica alfanumerica | Indicazioni per la raccolta |
|---|-----------------------|-----------------------------|
| Cappucci in polietilene termoretraibili | LDPE 4 | Plastica |
| Reggetta in poliestere | PET I | Raccolta differenziata |
| Etichette plastiche termoadesive | PP5 | Raccolta differenziata |

Riese Pio X, 01.02.2023

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Figure 6: Declaration of conformity with EU Directive 2018/852

4.10. 'S PRODUCTION PROCESS

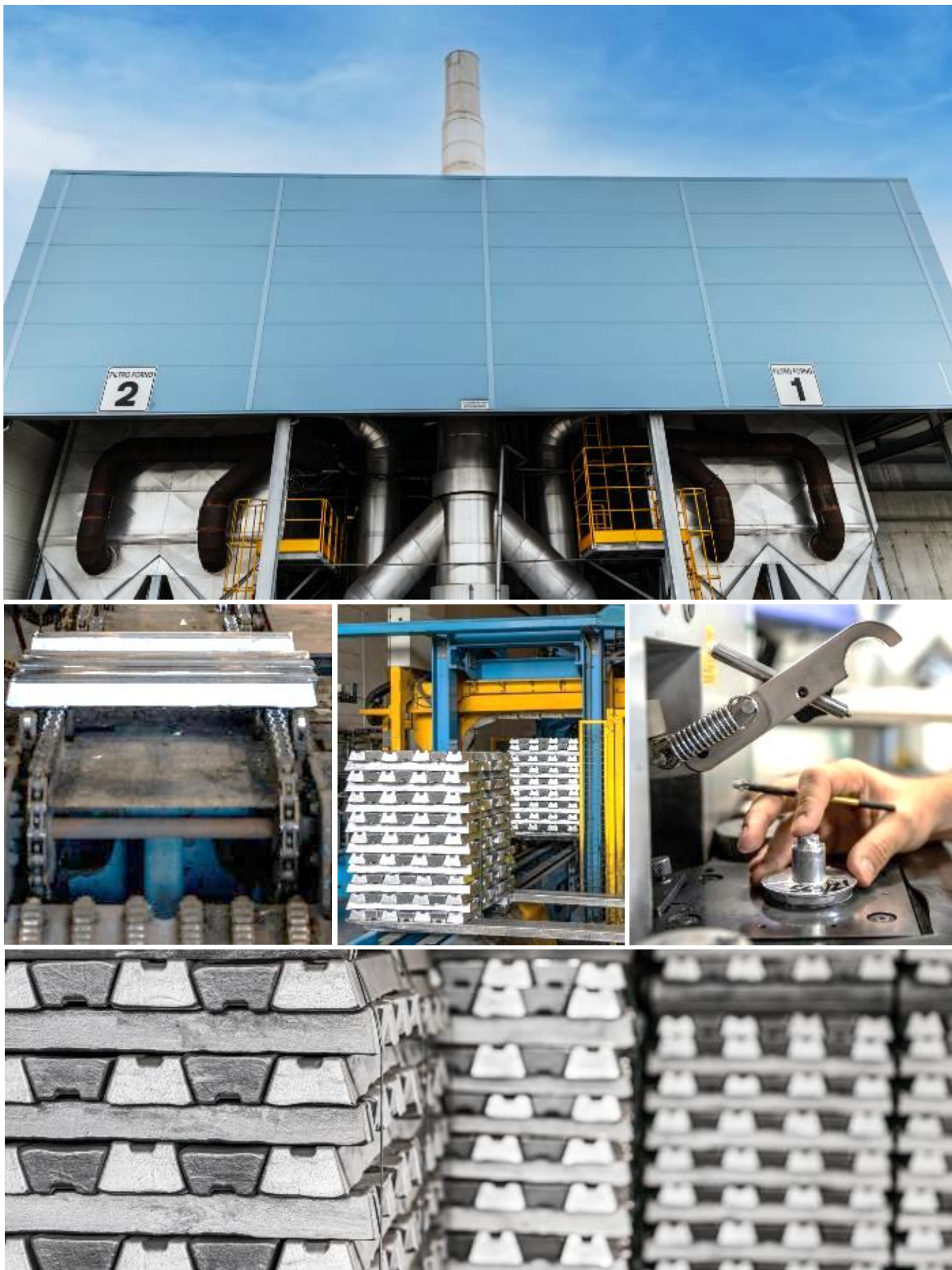
On the one hand, the decision was made to adopt **oxygen-fed burners** in place of air-fed ones. This technology enables better performance in the melting process, increasing energy efficiency, optimising metallurgical quality and raising the material recycling rate.

On the other hand, although reverberatory furnaces are normally intended, according to the latest BATs, for the production of primary foundry alloys from raw material free of VOCs (Volatile Organic Compounds), the plant has been equipped with an advanced system for capturing and filtering atmospheric emissions, similar to that used in sodium chloride rotary furnaces.

This strategic decision gives Aluphoenix greater flexibility in the selection of raw materials, making it possible to use materials containing VOCs whilst fully complying with the emission limits set out in the Monitoring Plan provided for under the company's Integrated Environmental Authorisation (IPPC).

As mentioned, the casting line has also been designed to operate in fully automated mode, enabling the production of various types of ingot stacks. The entire process — from pouring the liquid aluminium into the moulds to solidification, and from cooling to labelling, marking and packaging — is completed in approximately 2.5 hours for each 30-tonne pour, ensuring efficiency, repeatability and traceability throughout the entire production chain





5. CERTIFICATIONS

Aluphoenix S.r.l. has always been focused on achieving its strategic objectives, placing **the quality, health and safety of its employees, social responsibility and environmental protection** at the centre of its operations, whilst acting in line with the principles of sustainable development.

Through the development of human resources, the adoption of the best technologies for the precise control of all production phases, and the widespread use of computerised systems for the management and traceability of process data, the company has built an organisational model based on efficiency, transparency and continuous improvement.

Sound management, the active involvement of employees and constant investment in innovation have enabled Aluphoenix S.r.l. to establish itself first as a leading player in the local area, and then to consolidate its presence on the European stage in the production of aluminium alloys for foundry castings.

The company's management system, organised across various areas of expertise, has evolved progressively over time, thanks in part to the achievement of significant milestones and accolades .

- Quality certification in accordance with the **ISO 9001:2015** standard,
- Environmental certification to the **ISO 14001:2015** standard,
- Quality certification for the automotive sector, in accordance with the **IATF 16949:2016** standard
- Management system certification in accordance with **EU Regulation 333:2011**
- **Organisational Model** in accordance with **Legislative Decree 231:2001**
- **ASI (Aluminium Stewardship Initiative) Performance Standard V2:2017** certification
- Validation of the Aluphoenix CFP Tool in accordance with the principles of **ISO 14067, ISO 14040 and ISO 14044**
- Adoption of a **personal data protection policy** governing the processing of personal data by the Company or by third parties on its behalf.





6. ALUMINIUM AND ITS RECYCLING

Aluminium is, without doubt, the youngest metal in the industrial sector: its large-scale production dates back just under two centuries. Despite its 'youth' compared to metals historically used such as lead, tin and iron, it has rapidly taken on a central role in industries worldwide, becoming one of the strategic materials of modern engineering.

In nature, aluminium is not found in its pure form, but is always combined with other elements — in particular oxygen, silicon and sulphur. The main mineral from which it is extracted is **bauxite**, a rock ranging in colour from reddish-brown to yellow, with an aluminium content of between 45% and 60%. It is from bauxite that primary aluminium is extracted.

Today, aluminium is one of the most widely used metals thanks to a combination of properties that make it extremely versatile:

- **A high strength-to-weight ratio**, superior to that of steel in many applications, making it ideal where lightness is required without compromising strength.
- **Excellent thermal and electrical conductivity**, making it essential in the electronics and energy sectors.
- **Excellent formability**, allowing the production of complex components in a wide range of shapes and sizes.
- **High corrosion resistance**, thanks to the natural formation of a protective surface oxide layer.
- **High reflectivity of light and heat**, useful in numerous industrial and architectural applications.
- **Non-toxic and fire-retardant properties**, making it suitable for use in sensitive environments.
- **Low maintenance**, resulting in reduced running costs over the product's lifecycle.
- **Non-magnetic material**, an important characteristic in specific technological applications.
- **Simple and cost-effective recyclability**, a key factor in a context of growing focus on sustainability.

It is precisely this recyclability that is one of aluminium's most remarkable qualities. The material can be remelted an infinite number of times without losing its properties, making it a key player in the circular economy.

The Italian aluminium recycling industry occupies a prominent position internationally, ranking among the world's leading players alongside countries such as Germany, the United States and Japan. This achievement is the result of continuous investment in research and innovation, focused on developing advanced technologies for both pre-consumer and post-consumer recovery and recycling.

Compared to the production of primary aluminium from bauxite, **recycling enables a drastic reduction in environmental impact: it requires up to 95% less energy and contributes significantly to reducing CO₂ emissions. Producing 1 kg of primary aluminium requires approximately 14 kWh, whilst obtaining the same amount from recycled material requires only around 0.7 kWh.**

From this perspective, aluminium recycling is not merely an environmental benefit, but a strategic choice for an industry that is increasingly efficient, competitive and sustainable.



In 2025, Aluphoenix used **41.05% recycled material** out of the total raw materials for the production of its aluminium alloys, avoiding greenhouse gas emissions equivalent to 14,987 tonnes of CO₂.



7. TRANSPARENCY

The adoption of the Organisation, Management and Control Model (MOG231) represented a fundamental step for Aluphoenix S.r.l., strengthening corporate governance and promoting transparency, legality and business ethics. In accordance with Legislative Decree 231/2001, the MOG231 aims to prevent corporate offences and improve internal management, with a particular focus on safeguarding corporate integrity and social responsibility.

The model was developed through an in-depth analysis of risks and business processes and is structured around internal protocols, policies and procedures that govern the company's activities, identifying potential risks of corporate offences. At the same time, the Supervisory Body (SB) was appointed, which has been operational for over two years and is responsible for constantly monitoring the model's implementation and effectiveness.

The Supervisory Body, composed of members with legal and control expertise, oversees the functioning of the model, with activities including: periodic risk assessment, analysis of corporate procedures, management of internal reports and formulation of recommendations for the continuous improvement of risk management. The SB reports directly to the Board of Directors and has a direct line of communication with the decision-making and control bodies.

Transparency is a cornerstone of corporate governance.

Thanks to MOG231, Aluphoenix has developed secure and clear channels for reporting unlawful or irregular conduct. Decisions regarding the application of the model are taken transparently and communicated regularly to all stakeholders, including employees, suppliers and shareholders.

MOG231 is subject to **periodic review** to ensure alignment with evolving regulations and an effective response to changes in business risks. The updating process is supported by ongoing communication and dedicated training sessions for all employees. The adoption of MOG231 marked a decisive step towards more ethical and responsible corporate management, promoting a culture of legality and transparency. The company maintains a constant commitment to monitoring and improving the effectiveness of the model, confirming its focus on responsibility and good governance.

An extract from the 231 Organisational Model is available and can be freely downloaded from the company website www.aluphoenix.com, in the Sustainability – Social and Ethical Sustainability section, at the following link: <http://www.aluphoenix.com/sostenibilita/>.

During 2025, the Supervisory Board, which had already been operational for two years, amended its membership by appointing two external members, in order to ensure greater impartiality in decision-making.

During 2025, no instances of regulatory breaches or sanctions were recorded, confirming the effectiveness of MOG231 and the company's ongoing commitment to ensuring compliance with internal and external rules.

The only payments made to public entities are those required by law. Aluphoenix has not directly or indirectly financed any political party



8. CODE OF ETHICS

The Code of Ethics of Aluphoenix S.r.l. is based on the values of transparency, integrity, fairness and respect for people. The company is committed to ensuring that every decision, operation or interaction complies with the law, human rights and the dignity of all, promoting an **inclusive and sustainable environment**.

All those working for the company are required to adhere to the principles set out in the Code of Ethics.

Aluphoenix S.r.l. actively undertakes to:

- Disseminating the Code of Ethics to all stakeholders, with sanctions applied in the event of non-compliance;
- Monitoring and periodically reviewing the Code, ensuring it remains aligned with regulatory developments and new ethical challenges.

The **current Code of Ethics** is available and can be freely downloaded from the company website www.aluphoenix.com on the **Sustainability – Social and Ethical Sustainability** page at the following link: <http://www.aluphoenix.com/sostenibilita/>.

8.1. REPORTS

In accordance with human rights and the principles of environmental sustainability and respect for the local community, **Aluphoenix S.r.l.** has implemented a structured reporting system relating to work activities, working conditions, the environment and safety.

This tool enables the timely identification of any critical issues throughout the entire company supply chain and allows them to be addressed effectively, promoting a process of continuous and responsible improvement.

The **"Social Responsibility Reports and Complaints"** form is available on the company noticeboard and can be freely downloaded from the official website www.aluphoenix.com, in the **Sustainability – Social and Ethical Sustainability** section, at the following link: <http://www.aluphoenix.com/sostenibilita/>. It is also accessible and usable by the external community.

Aluphoenix S.r.l. places great value on its employees and actively promotes open, transparent and trust-based communication both internally and externally with the community. The company encourages employees to freely express ideas, observations and concerns, thereby contributing to the creation of an inclusive, participatory working environment geared towards the continuous improvement of operational and organisational conditions.

Furthermore, it undertakes to protect anyone who makes a report from any form of retaliation.

No incidents of non-compliance relating to Social and Ethical Responsibility were reported during 2025

This confirms the company's ongoing commitment to promoting conduct that is correct, responsible and fully consistent with ethical principles and corporate values.



9. CORPORATE GOVERNANCE

The corporate governance structure of Aluphoenix S.r.l., in terms of decision-making and supervisory bodies, is based on a traditional model, which includes a Shareholders' Meeting and a Board of Directors.

As a small-scale organisation, the company also employs an **external auditor, who ensures transparency and sound financial management.**

From an organisational perspective, there is no separation between ownership and control, as the members of the Board of Directors are the same as the company's shareholders. This arrangement ensures that corporate management is perfectly aligned with the interests of the owners, whilst remaining highly effective and efficient.

The Shareholders' Meeting convenes primarily to approve the annual financial statements and to endorse strategic decisions of particular importance to the company.

The Board of Directors, on the other hand, is responsible for the day-to-day and special management of the company, defining corporate strategies across multiple areas: economic, social, safety and environmental sustainability.

The directors monitor the company's results on a daily basis through a reporting system integrated into the ERP software, with every business process recorded and monthly reporting of final figures.

Sustainability is integrated into the company's policies and activities relating to quality and the environment, forming an intrinsic part of overall management, without any clear distinction from other operational areas.

The company's organisational structure, illustrated in the organisation chart ([Figure 7](#)), is not based on a traditional top-down hierarchy, but on a model that emphasises **areas of responsibility** and **individual leadership**. This approach, inspired by **systems theory**, highlights the interdependence between different functions and promotes continuous communication. Every member of the organisation is aware of the importance of their role, receiving constant feedback on the impact of their activities within the company's system.

Introduced in 2022, this model has contributed significantly to creating a **positive and collaborative corporate culture**, characterised by employees who are motivated and passionate about their work, all committed to the company's sustainability and long-term success.

| | | | | | | |
|--|---|--|---------------|------------|--------------------------|--|
| | COMMUNICATION LINES ORGANIZATION CHART | | ORBO00 | | EMISSION DATE 05/05/2025 | |
| | | | Rev 15 | 05/05/2025 | APPROVAL - BO | |
| | | | Mod 00 | 05/05/2025 | | |



Figure 7: Corporate organisation chart for coordination and communication lines



10. THE ENVIRONMENT

The technologies and systems adopted by Aluphoenix S.r.l. at the Riese Pio X plant are designed to ensure effective management and precise control of environmental impacts, far exceeding the requirements of the sector's Best Available Techniques (BAT), as well as European, national and local regulations. All company processes with a potential impact on the environment are governed by specific internal procedures, which are subject to periodic reviews with a view to continuous improvement.

Since its foundation, Aluphoenix S.r.l. has made the protection of biodiversity and the reduction of environmental impact a strategic priority. The company is subject to the European IPPC Directive and, prior to the issue of the Integrated Environmental Authorisation, conducted an Environmental Impact Assessment for an area of particular natural interest situated to the north of the plant.

In line with its commitment to sustainability, the company adopts practices focused on the responsible use of water and electricity, aimed at reducing consumption.

At the Riese Pio X plant, for example, an innovative solution for water conservation has been implemented, using air cyclones to cool the ingot moulds and stacks of aluminium produced. Furthermore, the plant utilises the photovoltaic energy it generates, which is capable of covering up to 30% of its daily energy requirements.

All business processes are designed and managed in accordance with ISO 14001:2015, under which Aluphoenix S.r.l. has certified its environmental management system since its establishment. With a view to reducing greenhouse gas emissions per unit of product, the company selects suppliers of raw materials and services that use renewable energy in their production processes.

During 2025, no breaches of environmental regulations were recorded, either for air emissions or for water discharges, and no penalties were imposed by the authorities, confirming the effectiveness of the strategies adopted and the company's ongoing commitment to the sustainable management of its operations.



10.1. ENVIRONMENTAL IMPACT

From the Carbon Footprint (CFP) study conducted in 2025, Aluphoenix found that for every kilogram of aluminium alloy produced, **3.63 kg of CO₂** equivalent were emitted.

The annual target set for 2025 was not fully achieved, as the figure is heavily influenced by the type of product requested by customers.

For the production of pure primary alloys, in fact, it is not possible to use scrap, but only primary aluminium and master alloys. In these cases, the predominant component of emissions is **Scope 3**, which is no longer under the company's direct control, but depends instead on the energy sources used by primary aluminium suppliers in their production processes; however, Aluphoenix is committed to continuing its search for partners with a low environmental impact.

During 2025, no environmental incidents were recorded, confirming the effectiveness of the sustainable management practices adopted by the company.

In line with the objectives of the 2030 Agenda, Aluphoenix S.r.l. reaffirms its commitment to the continuous improvement of production processes, with the aim of limiting and progressively reducing greenhouse gas emissions per unit of product. The company also promotes the responsible use of water resources and encourages the use of renewable energy, integrating environmental sustainability and operational efficiency into all its activities.

In this regard, the company has decided to appoint an environmental consultant specialising in LCA to its organisational structure, whose role is to validate and update the CFP data in our CFP Tool database annually, and also on request.

Target for 2026: Aluphoenix aims to reduce its carbon footprint by 1%



10.2. ELECTRICITY CONSUMPTION

The electricity used at the Riese Pio X plant is used to power production machinery, lighting systems, and the heating and air-conditioning systems for the premises.

In line with its commitment to the responsible use of energy resources and the continuous improvement of its Carbon Footprint (CFP), the photovoltaic system installed by Aluphoenix is capable of covering up to 30% of the production site's daily energy requirements, making a tangible contribution to the reduction of indirect greenhouse gas emissions.

The 2025 annual target has been fully achieved, with a significant reduction in energy consumption confirming the effectiveness of the energy efficiency strategies adopted.

The company's total energy consumption in 2025 stood at 34.07 kWh per tonne of alloy produced (Figure 8), highlighting an improvement in energy performance compared to the previous year.

Target for 2026: Aluphoenix aims to further reduce energy consumption per tonne of alloy produced by 2% compared to the previous year

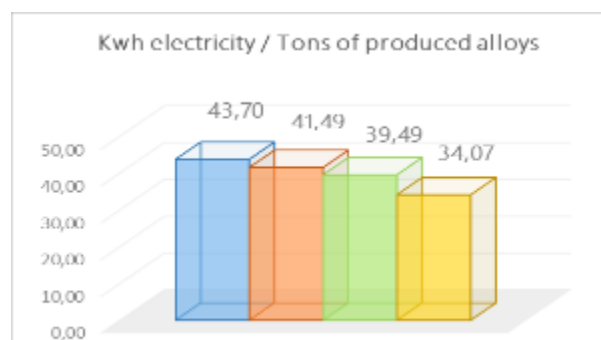


Figure 8: 4-year comparison of electrical energy consumption

10.3. ATMOSPHERIC EMISSIONS

Aluphoenix S.r.l. has equipped its production lines with localised extraction systems, positioned at the plants that generate gaseous emissions, in order to ensure effective capture of pollutants right from the production stage.

Emissions from the combustion chambers and those channelled from the plants are collected via a dedicated extraction network and directed to a centralised flue gas treatment and filtration system.

Only after appropriate treatment are the emissions released into the atmosphere, in full compliance with the requirements set out in the Integrated Environmental Authorisation (AIA).

In accordance with the Monitoring and Control Plan established by the authorisation, the company carries out periodic analyses of the channelled emissions to verify their continued compliance with current regulatory limits.

During 2025, all atmospheric emissions were found to be fully compliant with the limits set out in the Monitoring and Control Plan of the company's Integrated Environmental Authorisation, confirming the effectiveness of the abatement systems and control measures adopted, as well as the company's constant commitment to environmental protection.

10.4. WATER CONSUMPTION

At its production site in Riese Pio X, Aluphoenix S.r.l. uses water from the mains supply exclusively for domestic purposes and fire-fighting, avoiding any use of water in the production cycle.

To protect this strategic resource, the company has in fact adopted an air-cooling system for the ingot moulds and ingot stacks, using cyclones, thereby eliminating water consumption in industrial

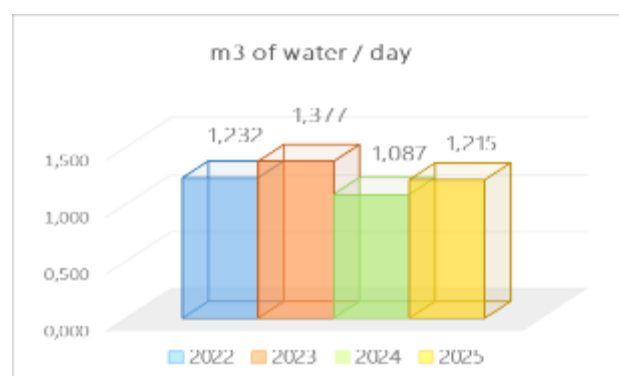


Figure 9: 4-year comparison of water consumption at the

processes and significantly reducing the overall environmental impact.

The 2025 annual target has been achieved, with the plant's overall average consumption standing at 1,215 m³/day (Figure 9).

All uncovered areas of the site are paved with concrete and equipped with a rainwater collection system, channelling the water to a first-flush treatment plant fitted with a treatment and purification system, in accordance with the provisions of the Integrated Environmental Authorisation.

The collected rainwater is subjected to periodic analysis, as set out in the Monitoring and Control Plan, in order to verify full compliance with current regulatory limits.

The analyses carried out during 2025 revealed no critical issues; the values are within current regulatory limits, confirming the effectiveness of the sustainable management practices adopted by the company

Target for 2026: Aluphoenix aims to maintain water consumption at a constant level of around 1.25 m³ per day, confirming its ongoing commitment to the sustainable management of water resources.

10.5. WASTE

Aluphoenix S.r.l. submits the Single Environmental Declaration Form (MUD) to the relevant authorities annually, ensuring full traceability of the waste produced and managed.

All waste movements, both incoming and outgoing, are accurately recorded in the relevant registers and via RENTRI, ensuring transparency and compliance with current legislation. Waste transport is entrusted exclusively to duly authorised operators, selected in accordance with legal requirements.

The company scrupulously monitors every entry to the site and every waste delivery operation, whilst also verifying compliance with the maximum daily delivery and treatment quantities set out in the Monitoring and Control Plan associated with the Integrated Environmental Authorisation.

This management system ensures constant control of the entire waste cycle, reducing environmental risks and ensuring full compliance with authorisation requirements.

The 2025 annual target was not met; there was a slight increase in the quantity of waste produced compared to the previous year, bringing the plant's overall consumption to 0.065 tonnes of waste per tonne of alloy produced. (Figure 10).

Waste generation is primarily linked to the company's commitment to using recycled materials in the production process, in line with the principles of a circular economy.

The majority of the waste generated consists of slag, which is recovered through sale and subsequent processing by third-party companies.

Target for 2026: Aluphoenix aims to reduce waste generation per tonne of alloy produced by 1% compared to the previous year

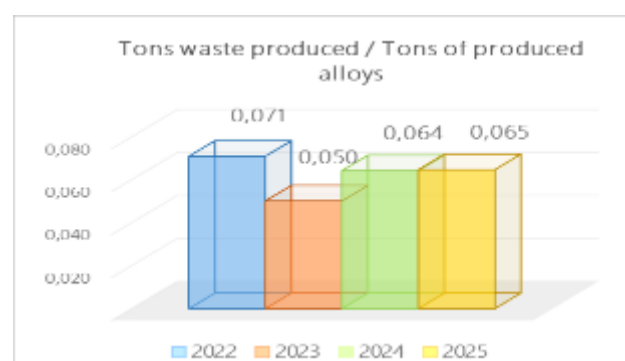


Figure 10. 4-year comparison: tons of waste produced per tons of Alloys



11. STAKEHOLDERS

Stakeholders represent the group of parties with whom Aluphoenix S.r.l. maintains a constant and transparent dialogue, sharing the path it has undertaken in terms of sustainability and social responsibility.

Through these partners, the company promotes and strengthens its commitment to respecting human rights, fostering a culture of health and safety throughout the entire production chain, adopting ethical and responsible behaviour, and protecting natural resources.

Stakeholder engagement is a central element of the company's strategy, which is geared towards creating sustainable value in the long term.



11.1. STAFF

As expressed in its Vision, Aluphoenix S.r.l. places people at the centre of all its decisions and activities.

Aluphoenix recognises the value of human dignity and is committed to promoting the personal growth of its employees, ensuring optimal health and safety conditions. Aluphoenix S.r.l. is aware that a peaceful and inclusive working environment fosters the development of each individual's professional and interpersonal skills.

With this in mind, the company is committed to:

- Promote respect for human rights throughout the entire supply chain;
- Ensure a working environment free from prejudice, intimidation, hostile behaviour, isolation, undue interference, coercion or sexual harassment;
- Encourage values such as loyalty, fairness, respect and trust in relationships between colleagues;



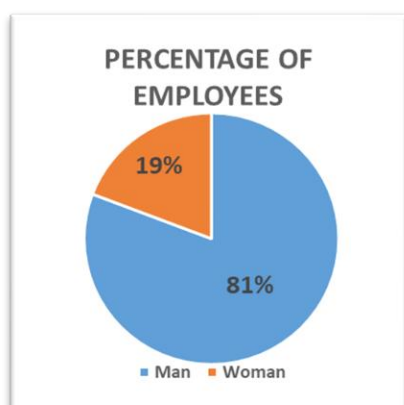
- Valuing every employee through the development of shared leadership, based on the principles of 'knowing how to be, knowing and knowing how to do';
- To foster internal communication, considered an essential element for the smooth running of the organisation;
- Support personal growth, also understood as a strategic lever for the company's overall development.

Aluphoenix S.r.l. pays particular attention to the needs and requirements of its employees, adopting policies aimed at recognising individual contributions and achieving collective results.

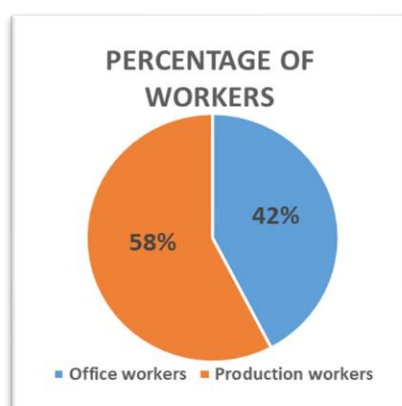
With this in mind, the internal training programme dedicated to developing staff's soft skills and interpersonal abilities continued in 2025, with the aim of improving interpersonal communication and collaboration within the organisation.

The company's workforce currently consists of 26 employees, characterised by low staff turnover and a high level of loyalty. The majority of employees live in the areas surrounding the operational headquarters, fostering a strong connection with the local community.

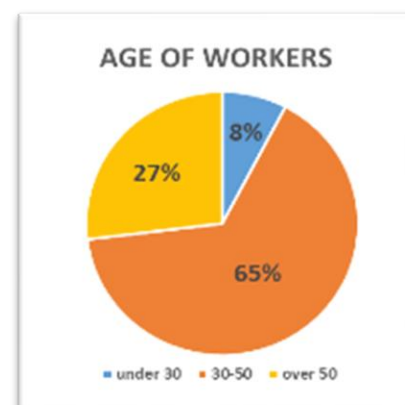
Below are some key figures relating to the staff working within the company: ([Figures 11 to 14](#)).



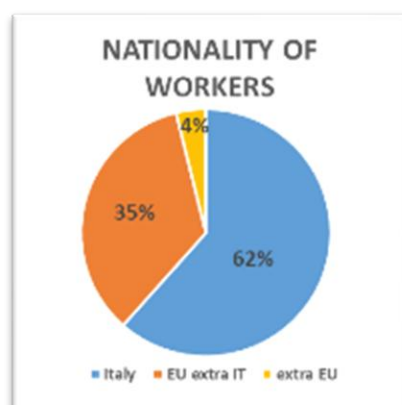
[Figure 11: Percentage of Employees](#)



[Figure 12: Percentage of Workers](#)



[Figure 13: Age s of Workers](#)



[Figure 14: Nationality of Workers](#)

As regards 2025, staff costs remained essentially unchanged compared with the previous year.

There is no pay gap between the sexes for the same roles.

The proportion of female staff stands at 19%, a figure influenced by the particularly physically demanding nature of work in the foundry.

The working hours for operational staff are eight hours a day, divided into three shifts, whilst office staff work a single shift: from 08:00 to 12:00 and from 13:30 to 17:30.

In 2025, the average number of training hours per employee was 16.20 hours

The average number of training hours provided, broken down by gender, is shown below ([Figure 15](#)).



[Figure 15: Average training hours by gender](#)

The company provides production bonuses and also offers corporate welfare schemes.

Employees are regularly updated on workplace safety and supplementary pension opportunities and encouraged to participate actively in company life, fostering personal initiative and the sharing of proposals for the continuous improvement of production and organisational processes.

11.2. CUSTOMERS

The customer has always been at the heart of Aluphoenix S.r.l.'s business. Their expectations, needs and requirements – even those not explicitly stated – form the fundamental pillars upon which the company has built its identity and operations.

Aluphoenix S.r.l. is committed to establishing solid and lasting relationships with its customers, based on reliability, credibility and responsiveness, in full compliance with the principles of contractual good faith and the proper fulfilment of obligations undertaken.

The focus on fairness and transparency in our dealings is further reinforced by the adoption of the Organisation, Management and Control Model pursuant to Legislative Decree 231/2001. In this context, the company has defined specific rules of conduct and precise prohibitions, including:

- the prohibition on pursuing Aluphoenix's interests through the promise or provision of money or other assets to any person;
- the prohibition on disseminating communications that are deceptive, misleading or inconsistent with the principles of transparency and fairness.

Customer expectations are now increasingly focused on environmental sustainability, with particular attention to reducing the environmental impact of products and greenhouse gas emissions. Aluphoenix has responded effectively to these needs by developing its own CFP (Carbon Footprint Product) Tool, a tool that enables the environmental footprint of the company's products to be quantified in an accurate and manner and, at the same time, identifies effective strategies for reducing emissions throughout the entire value chain.

In this way, the company not only ensures transparency and measurability of its environmental performance but also actively supports its customers in achieving their sustainability goals.

11.3. SUPPLIERS

Aluphoenix S.r.l. maintains relationships exclusively with partners who, following thorough preliminary checks, demonstrate a solid reputation, economic and financial reliability, and full compliance with the principles of legality. Collaboration is also



conditional upon the sharing and signing of the company's Code of Ethics, as an essential prerequisite for the commencement and maintenance of the contractual relationship.

The supplier monitoring process does not end with the initial selection phase, but continues in a structured and ongoing manner over time. In the first phase, potential partners are asked to complete an ASI self-assessment form on social responsibility, aimed at verifying alignment with the ethical principles and sustainability standards adopted by the company, as well as financial stability and certification status.

Subsequently, spot checks are carried out on all deliveries to assess compliance with quality and operational standards.

In particular, Aluphoenix S.r.l. employs three different levels of assessment:

- **Initial assessment**, which analyses the supplier's certification status, organisational strength and economic and financial stability;
- **Ongoing assessment**, which monitors performance over time in terms of punctuality, delivery quality and compliance of the materials supplied;
- **Ethical and social assessment**, focusing on the supplier's ethical and social responsibility, with particular attention to respect for human rights, working conditions and human dignity.

Any breaches of the principles of legality, fairness, transparency, confidentiality and the protection of human dignity are considered particularly serious breaches and may result in the unilateral termination of the contract for just cause by Aluphoenix S.r.l., in order to protect its values and corporate integrity.

11.4. EXTERNAL PARTNERS

Aluphoenix S.r.l. engages, where necessary, external professionals to carry out specific activities related to its operations.

The selection of consultants, collaborators and agents takes place in full compliance with the principles of impartiality, autonomy and independence, based on objective, exclusively professional criteria founded on proven competence, experience and reliability.

All external parties involved are required to be familiar with and comply with the principles and provisions contained in the Company's Code of Ethics and the Organisation, Management and Control Model, which are provided to them at the start of the professional relationship and form an integral part of the assignment.

Strict compliance with confidentiality obligations and the proper management of personal data processed in the course of the work carried out is also required. These obligations must be fulfilled in accordance with the information provided at the start of the collaboration, the company's data protection policy and current legislation, in compliance with the provisions issued by the Italian Data Protection Authority.

Any failure to comply with these obligations may constitute a serious breach of the duties of fairness, loyalty and contractual good faith and entitle Aluphoenix S.r.l. to unilaterally terminate the relationship for just cause, in order to protect its values and organisational integrity.

11.5. SUPPORT FOR THE LOCAL COMMUNITY AND

Ongoing support for various initiatives that have a positive impact on the local community – and beyond – represents, for Aluphoenix S.r.l., a fundamental pillar of its vision of Corporate Social Responsibility

Ongoing support for initiatives capable of generating a positive impact on the local community – and beyond – represents a central element of Aluphoenix S.r.l.'s vision of Corporate Social Responsibility. The company considers its roots in the local area and the creation of shared value to be essential components of its social role.

In relation to its relationship with the local community, Aluphoenix S.r.l. puts this commitment into practice through:

- **Active collaboration with the Municipality of Riese Pio X**, within the framework of initiatives and projects sponsored by the local council;
- **Partnerships with local organisations and associations**, aimed at supporting cultural, social and sporting projects designed to promote community growth and cohesion;
- **Initiatives dedicated to inclusion and collective well-being**, with particular attention to people and sections of the population in the most vulnerable circumstances.



Through these actions, Aluphoenix S.r.l. reaffirms its commitment to contributing responsibly and continuously to the social and cultural development of the local area, promoting values of solidarity, participation and sustainability.

11.6. CORPORATE SOCIAL RESPONSIBILITY

Aluphoenix S.r.l. strongly believes in the social role of business and has chosen to share its vision and the way in which it interprets and lives out this responsibility by publishing it on its website www.aluphoenix.com, which:

~

Aluphoenix S.r.l. is deeply aware of the social responsibility inherent in its business activities.

This responsibility encompasses a wide range of areas, including environmental, legal and, above all, social aspects.

In the social sphere, the activities promoted involve various internal stakeholders, employees and collaborators, as well as external ones such as local residents, but not only... In an increasingly connected world, the 'other', even if 'far away', is ultimately 'very close' [...]

~

The way in which Aluphoenix S.r.l. perceives the social role of its business is admirably expressed in a succinct manner by John Donne (1572–1631) in the slogan:

~

No man is an island, complete in himself

~

Aluphoenix S.r.l.'s social commitment is also demonstrated through its ongoing support for organisations operating at national and international level, which are active in areas of particular social significance.

In particular, the company supports organisations working in the field of disability, in the protection of minors against all forms of exploitation, and in initiatives aimed at combating situations of hardship and social exclusion.

Through these partnerships, Aluphoenix S.r.l. aims to make a tangible contribution to promoting human dignity, inclusion and social equity, thereby strengthening its role as a responsible business that is mindful of the impact it can have on the community, both locally and on a wider scale.

<http://www.aluphoenix.com/responsabilita-sociale-dimpresa/>



I BAMBINI DELLE FATE

per l'inclusione sociale

I Bambini delle Fate

I Bambini delle Fate S.p.A. è un'impresa sociale che dal 2005 si occupa di assicurare sostegno economico a progetti e percorsi di inclusione sociale gestiti da partner locali a beneficio di famiglie con autismo e altre disabilità.

I Bambini delle Fate è impegnata nel creare gruppi di sostenitori e nel coinvolgere imprenditori e cittadini perché accompagnino nel tempo, con continuità e possibilità di programmazione dei servizi, progetti di inclusione e autonomia volti a migliorare la vita delle famiglie che vivono la sfida dell'autismo e della disabilità. Lavora inoltre per sostenere finanziariamente i progetti di: associazioni, fondazioni, cooperative e altre organizzazioni non profit.



Protection4kids

Protection4kids è un'associazione no profit che si impegna a livello nazionale e internazionale per assistere i minori vittime di tratta di esseri umani e di pedo pornografia.

La priorità di Protection4kids è quella di prevenire tali fenomeni attraverso un uso sapiente delle nuove tecnologie: grazie ad un team di esperti che offrono consulenze professionali altamente qualificate, forniscono assistenza diretta sia online che in loco, lavorando per reintegrare le vittime all'interno della società.

Protection4kids supporta una struttura anti tratta di ragazze strappate dal traffico di esseri umani e del mercato del sesso in Nepal e un'accademia in Gambia che lotta contro la tratta di baby calciatori.

Protection4kids è impegnata nell'organizzazione di numerose missioni umanitarie lungo la rotta balcanica, lungo la quale interveniamo nelle situazioni di grave miseria, disagio ed emergenza umanitaria.

Protection4kids si occupa inoltre di combattere le violenze di genere e i reati che si perpetuano soprattutto online (revenge porn, victim blaming, rape culture, slut shaming e hate speech).



F.A.R.C.E.L.A. Onlus

Tra i progetti sostenuti da I Bambini delle Fate, Aluphoenix Srl ha scelto il progetto di autonomia "Io so fare da solo" dell'Associazione F.A.R.C.E.L.A. Onlus.

Il progetto ha la finalità di integrazione sociale dei ragazzi e giovani adulti con disabilità, coinvolti attraverso la costruzione di forme diverse di autonomia: Arteterapia, basket, musicoterapia, nuoto, laboratorio di teatro.



12. HEALTH AND SAFETY

For Aluphoenix S.r.l., safeguarding the health and safety of its employees – both internal and external – who access company premises is a core value and an essential element of its organisational culture.

This commitment stems, first and foremost, from the desire to protect the people working within the organisation, who are recognised as a fundamental resource for the company's success. At the same time, safeguarding health and safety is an essential condition for ensuring operational continuity and long-term business stability.

The company adopts a systematic and proactive approach to safety management, based on constant monitoring of the working environment and careful risk assessment. This activity is aimed at the timely identification of potential hazards and the implementation of appropriate preventive and protective measures, with a view to continuous improvement and full compliance with current legislation.

Through this structured commitment, Aluphoenix S.r.l. promotes a safe, responsible and prevention-oriented working environment, reinforcing the safety culture at all levels of the organisation.

12.1. SAFETY

Aluphoenix S.r.l., with a view to continuous improvement, promotes the development and constant updating of all employees' skills in the field of occupational health and safety. In this context, the company also actively encourages the reporting of near misses, considering it a fundamental tool for preventive risk analysis, process improvement and the reduction of the likelihood of accidents.

Particular attention is paid to training in first aid and fire safety. The company actively involves all staff, with the aim of providing the necessary knowledge and skills to:

- promptly recognise potential hazardous situations;
- respond correctly and effectively in the event of an emergency;
- contribute to the timely reporting of hazardous conditions.

Confirming the company's concrete commitment in this area, in 2025 the percentage of employees holding a valid certificate of attendance for fire-fighting and first-aid courses stood at a particularly high level relative to the total workforce ([Figures 16 and 17](#)), highlighting the widespread adoption of a culture of prevention within the organisation.

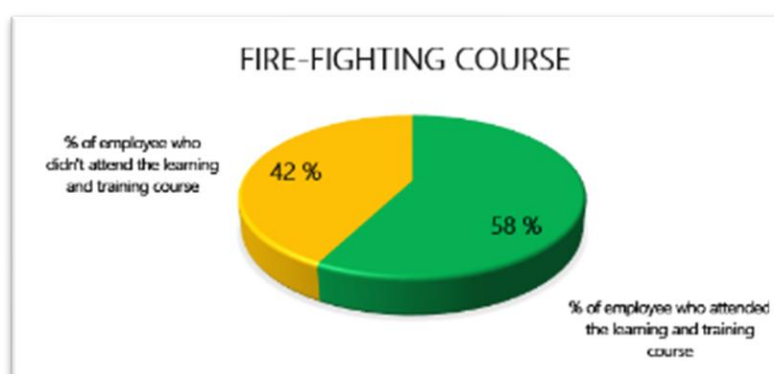




Figure 16: Employee share at the 2025 Fire-Fighting courses

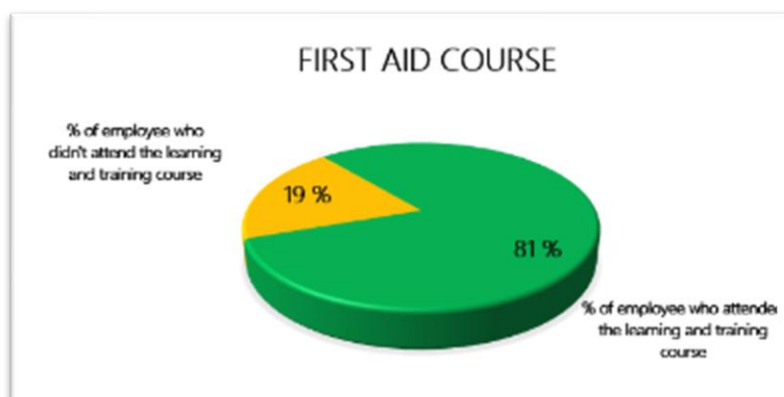


Figure 17: Employee share at the 2025 First aid courses

The company has established clear and structured procedures and operational instructions, designed to guide the behaviour to be adopted in potentially hazardous situations, both to protect one's own health and that of colleagues. These tools are complemented by annual training sessions, aimed at reinforcing risk awareness and emergency management skills.

An information leaflet containing the main rules of conduct and safety is also available on the company premises, made available to all staff and anyone accessing the company's premises, as further support for the promotion of a culture of prevention.

Employees are regularly updated on health and safety issues and are actively involved in the process of continuous improvement, by sharing observations, proposals and suggestions that help to adopt increasingly effective solutions.

A concrete example of this participatory approach occurred at the end of 2025, when an operator suggested that the company should acquire a defibrillator as an additional health safety measure in emergency situations.

Accepting the proposal, and with the aim of further enhancing staff safety, the company is taking steps to purchase the device, recognising its importance in situations of cardiac arrest or other critical incidents.

At the same time, in view of the upcoming expiry of the first aid course scheduled for July 2026, the company has taken steps to include a module specifically dedicated to the correct use of the defibrillator within the training session.

This integration will enable the training programme to be optimised, ensuring that staff have the necessary skills to respond promptly and effectively in emergency situations, thereby further strengthening the company's health and safety system.

The initiative confirms the effectiveness of a prevention system based on active listening, collaboration and the direct involvement of workers in the continuous improvement of health and safety conditions within the company.

Target for 2026: Aluphoenix to record at least one near miss or one improvement proposal per year.

12.2. ACCIDENTS

Risk analysis, training and prevention activities have so far enabled Aluphoenix S.r.l. to maintain a very low number of annual weeks of absence due to accidents.

During 2025, the accidents recorded were minor; however, the set target was not fully achieved. In fact, at the end of the year, an operator suffered a minor injury due to a lapse in concentration, sustaining a cut whilst retrieving material from a shelf, which required medical attention.



Following the incident, management, together with the Health and Safety Manager (RSPP), took immediate action, installing appropriate safety signs near the shelving to reduce the risk of similar accidents.

Target for 2026: Aluphoenix S.r.l. aims to confirm the target set for 2025, namely to limit accidents to incidents lasting less than three (3) days and to maintain an accident frequency rate of no more than four (4) cases per year, by strengthening preventive measures and providing ongoing staff training.




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