

SOCIAL ACCOUNTABILITY MANAGEMENT SYSTEM

- Social accountability policies -

Rev. 00

Introduction:

Eural Gnutti, a leader in the aluminum industry, recognizes the fundamental importance of Social Governance in ensuring sustainable and responsible growth. This policy is aligned to the international standards and the guidelines of the Aluminum Stewardship Initiative (ASI), which promotes ethical and sustainable practices in the aluminum industry.

1. Human and labor rights

- Respect for Human Rights: Eural Gnutti is committed to respecting and promoting human rights in all its operations, according to the United Nations guidelines on human rights and the ILO conventions.
- Decent Working conditions: to provide safe and healthy working conditions, and to avoid every form of exploitation, forced labor, and child labor.
- Non-Discrimination: to promote an inclusive work environment, prohibiting any form
 of discrimination based on race, gender, ethnicity, religion, sexual orientation,
 disability, or other personal characteristics.
- Freedom of Association: to recognize and respect workers' right to free association and collective bargaining.

2. Relations with the Community

- Involvement of Local Communities: to establish an ongoing dialogue and constructive relationship with the local community, involving them in decisions that could have an impact on them.
- Sustainable development of Communities: to support initiatives that promote economic and social welfare of the communities in which we operate, through local development projects and philanthropic initiative.

3. Business ethics and Integrity

- Integrity in the Operations: to conduct business with integrity, honesty, and transparency, adhering to all applicable laws and regulations.
- Anti-Corruption: to implement strict measures to prevent and combat corruption in all forms, both inside the company and in relation with business partners and suppliers.



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4. Environmental Responsibility

- Sustainable management of Resources: to promote the efficient use of natural resources and the reduction of the environmental impact of our operations, in line with the standards of the ASI.
- Innovation and Continuous Improvement: to invest in innovative technologies and processes to continually improve the environmental performance and to reduce carbon emissions.

5. Stakeholder involvement

- Dialogue and Transparency: to maintain an open and transparent dialogue with all stakeholders, including employees, customers, suppliers, local communities and investors.
- Reporting and Communication: to regularly publish sustainability reports and updates on social, environmental and governance performance of the company, according to the international standards.

6. Training and Awareness

- Employee training: to provide training for employees on issues of social responsibility, business ethics, human rights and environmental sustainability.
- Raising the awareness of the Supply Chain: to work with suppliers and business partners to promote sustainable practices throughout the supply chain.

Conclusion

Eural Gnutti is committed to integrate the principles of Social Governance in all its
activities, operating in a responsible and sustainable manner for the benefit of its
stakeholders and the environment. This policy will be regularly reviewed and updated
to ensure its relevance and compliance with the standards of the ASI and international
best practices.

Rovato, July 15, 2024

The General Management «Raola Gnutti)

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