

Environmental Policy

The general principles and purpose of the Environmental Management System of **Arvedi Acciai Speciali Terni S.p.A. (Arvedi AST)** are dictated by the Environmental Policy set forth in this document.

Arvedi AST's Environmental Policy forms the basis on which our Organization defines its commitments and goals for improving environmental performance and organizational development, including improving performance in order to minimize environmental impact, conserve energy and resources, and protect the diversity of natural resources in an ecologically, economically, and socially appropriate manner.

Arvedi AST **considers** the proper management of environmental issues and the assessment of the needs and expectations of its stakeholders a strategic and primary objective for its development. Declaring its commitment to their management, our Organization identifies the following **general commitments** to the environment:

1. Compliance with legal requirements

Arvedi AST manages all activities in compliance with current legislation, signed voluntary regulations, prescriptions and corporate provisions, ensuring appropriate tools for continuous updating.

2. The principle of *risk-based thinking*

Arvedi AST conducts environmental and organizational context analysis and pursues the principle of *risk-based thinking* as a tool to ensure the identification of potential environmental risks, the coordination of preventive measures, and the achievement of environmental management system objectives.

3. Environmental protection and climate protection

Through the assessment and monitoring of all environmental aspects and their impacts, as well as through the periodic collection and analysis of environmental performance monitoring data, Arvedi AST is committed to developing continuous improvement programs to achieve ever-higher environmental standards.

The adoption of management and control tools is ensured in order to mitigate risk factors having a negative environmental impact and harmful consequences to third parties involved and to Arvedi AST itself.

4. The reduction of atmospheric emissions

Arvedi AST is committed, through active corporate policies, to the reduction of harmful air emissions, with particular attention to the reduction of greenhouse gas emissions, through actions and programs aimed at decarbonization. Arvedi AST, is also committed, at the local impact level, to reducing both point and diffuse atmospheric emissions. The company policy places technology at the service of prevention and environmental sustainability.

5. The prevention and reduction of pollution, spills, leaks, noise and vibration

Arvedi AST takes all measures to effectively detect, prevent, mitigate, and remediate spills and leaks that may harm communities or the environment. Arvedi AST avoids uncontrolled discharge of production residues/hazardous substances that may cause damage to soil, groundwater, vegetation, rivers, lakes and marine environments.

Arvedi AST is committed to the prevention and reduction of negative impacts due to noise and vibration.

6. Circular Economy

Starting from the strategic directions contained in the 2018 European Directives on sustainable development and the subsequent developments contained in the European Plan of Action for the Circular Economy approved by the European Parliament in 2021, Arvedi AST is committed to and focuses on the prevention of waste production and consumption of resources and energy, reuse, reuse and recovery. Arvedi AST introduces, in the company's production processes, structural, organizational and managerial criteria marked

by the *circular line* (reuse - production - recovery - reuse - residual disposal), referring to a global vision and implementing solutions with lower environmental impact.

7. Sustainable development

Production activities, as well as the design of new products, are planned and managed from a life-cycle perspective, ensuring that the impact on the environment and the use of energy and natural resources are always minimized. To this end, the best available plant engineering techniques and technologies are used, relative to the achievable benefits.

Arvedi AST is aware of the strategic importance of the water resource in its area of influence and is committed to its sustainable and responsible management.

8. Competence and awareness

The involvement of human resources is fundamental to ensure effective planning and implementation of the environmental management system. To this end, Arvedi AST ensures the enhancement and development of environmental skills, in relation to the task performed, and the empowerment and awareness regarding the effect of its activities on the environment and the Organization.

Suppliers and contractors are appropriately qualified with a view to continuous improvement of environmental performance.

9. Continuous Improvement

Arvedi AST promotes continuous improvement actions in order to pursue the effectiveness and efficiency of the Environmental Management System on the basis of data collected and analyzed at regular intervals, as well as on the basis of the outcomes of audits, operational control activities, and risk assessment activities.

10. Communication

To ensure transparency and common perception of environmental issues, effective management of communications to all stakeholders is ensured.

These principles are the company's framework for defining, programming and planning, at varying intervals, specific quantified and measurable objectives at each level, business function and process deemed strategic by Arvedi AST.

This Policy is made public for all stakeholders and is available on the company's online site and bulletin boards for consultation and sharing.

The Environmental Manager

Arvedi AST

Stefano Cardinali

