

Communication to Stakeholders  
June 2025

# Sustainability





## ESG PRINCIPLES OUR COMMITMENT

We have always been committed to producing high-quality steel. But today, that's no longer enough. In a rapidly changing world, marked by global challenges and political and social shifts, we know that social responsibility and the protection of the environment and communities are not optional — they are our duty. Arvedi AST, too, has chosen to face this challenge with determination, by adopting a Human Rights Policy that guides our commitment to ESG principles — environmental, social, and governance.

I invite you to download it from our website, <https://www.acciaiterni.it/en/services-and-solutions/quality-system/#policy-statement> and read it as a tool for reflection and dialogue. Our commitment cannot be measured by numbers and certifications alone: it is a conscious choice that calls for determination and consistency.

Everyone's contribution can truly make a difference.

Enjoy the read,

**Gian Luca Gigli**

*Chief Technology Officer*



# ESG





## **HUMAN RIGHTS POLICY**

### **OUR VISION**

Every company is made of people, choices, and responsibilities.

Each day, we build our future together, with dedication. Today, AST's story gains a new chapter: the Human Rights Policy developed in line with the ResponsibleSteel™ certification. This document is more than just a statement of intent, it's a practical guide for those who, like us, believe that respecting human and workers' rights and protecting the environment are non-negotiable values. It is a collective commitment that involves everyone: employees, suppliers and subcontractors, local communities, and customers, all working together to create a lasting, positive impact. We're making this Policy public because we want everyone who works with us to know our principles, aligned with the Arvedi Group's Code of Conduct, and to respect and embrace them. You can download the Policy from the Quality System section of our website and join us on this journey of improvement through feedback, suggestions, and constructive proposals.

Thank you,

**Giovanni Scordo**

*Human Resources Director*





## BEYOND WORDS CONCRETE ACTIONS

At Arvedi AST, respect for human rights, workers, the environment, and the community is not just an abstract principle; it is a concrete value that shapes every decision we make. It is the foundation on which we aim to build our relationships with customers, suppliers, and the broader community. It is at the heart of our corporate culture, rooted in transparency and mutual respect.

### OUR PRINCIPLES

For us, every action matters, every choice makes a difference. That's why we've defined, in our **Human Rights Policy**, the values that embody the essence of our commitment:

1. **Rejection of child, forced, or compulsory labor:** zero tolerance. We are committed to ensuring free and dignified working conditions within our company and across our suppliers and subcontractors.
2. **Protection of health and safety in the workplace:** every day, we work to safeguard the well-being of our workers, complying with laws, international standards, and best practices in the steel industry.
3. **Working conditions, hours, pay, and welfare:** we respect every person working at AST by ensuring fair and transparent treatment and by promoting a healthy work-life balance.
4. **Freedom of association and collective bargaining:** we are committed to listening and dialogue, aware that every voice matters and every right must be protected.
5. **Combating discrimination, harassment, and violence:** we believe in mutual respect. We foster inclusive workspaces where everyone can feel safe and valued.
6. **Training and development of human capital:** we invest in talent, encouraging personal and professional growth to build a sustainable future in the steel industry.
7. **Protection of the environment and local communities:** respecting people also means respecting the environment they live in. We monitor our impact, protect natural resources, and engage in open dialogue with institutions and local communities.
8. **Right to privacy and protection of personal data:** even in the age of artificial intelligence, trust is built by safeguarding information with transparency and accountability.
9. **Ethics, transparency, and anti-corruption:** we are committed to acting with integrity, aligning our governance with the highest ethical standards and the Arvedi Group Code of Conduct.

## HOW TO SUBMIT A REPORT

### Arvedi AST'S LISTENING AND FEEDBACK SYSTEM

Listening to the voices of our stakeholders is a core principle. That's why we've developed a reporting and grievance management system designed to collect, assess, and respond promptly to concerns raised by all interested parties.

Our goal is to foster open and constructive dialogue, ensuring that every report whether related to environmental issues, safety, or workers' well-being addressed in a structured and responsible manner.

To submit a report, Arvedi AST provides the following communication channels, always ensuring the confidentiality for those who have reported:

**SWITCHBOARD - 0744 4901**

Available Monday to Friday, from 8:00 AM to 1:00 PM and from 2:00 PM to 5:00 PM.

**TOLL-FREE NUMBER - 800 063 966**

Available Monday to Saturday, from 9:00 AM to 1:00 PM and from 2:00 PM to 5:00 PM.

**EXTERNAL RELATIONS - [relazioni.esterne@acciaiterni.it](mailto:relazioni.esterne@acciaiterni.it)**

and anonymously by accessing the dedicated page on the company website:

**WHISTLEBLOWING - <https://www acciaiterni.it/en/segnalazioni/>**

Every report helps us improve our environmental, social, and governance performance.