

Acciai Speciali Terni S.p.A.

Sede Legale:

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di **Finarvedi S.p.A.**

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POLICY FOR THE PREVENTION OF CORRUPTION

Acciai Speciali Terni S.p.A. (hereinafter referred to “Arvedi AST” or the “Company”) is committed to prevent corruption in all forms to avoid all the negative impacts both in business and social and economic environment.

In particular, it is not allowed any wrong doing that consists in offering, promising, paying, receiving, claiming, authorizing - directly or indirectly - undue advantages of any kind (such as, for example, goods, money or other benefits) which could facilitate preferential treatment in the award of contract or of any other kind.

In daily business, Arvedi AST constantly strives in preventing active and passive corruption and in enhancing awareness and corporate culture that, for each and everyone, is based on the values of integrity, honesty, transparency, fairness, reliability and compliance with national and international laws.



Arvedi AST's vision in the fight against corruption is based on three pillars.

Lead by example



Arvedi AST promotes with all stakeholders values of integrity, transparency and sustainability

Arvedi AST's Board and Top Management are constantly committed in preventing and fighting corruption acting as a virtuous example for all people, internally and in the community.

Zero Tolerance



Arvedi AST does not justify any misalignment from its compliance rules.

Arvedi AST also stands for clear consequences of any rules' violation, from loss of respect, credibility and work, up to loss of rights and freedom.

Balance



For Arvedi AST there is no trade-off between performance and control, results and rules, business and values.

Results and profit target must be reached within a framework of ethics and compliance, always with common-sense limits, with an holistic business approach vision.

Arvedi AST implemented the following elements for an effective corruption prevention in daily business:

1. **Value system:** by adopting the OECD recommendations, Arvedi AST stands for a culture of integrity, adopting the principle of transparency in the relations with business partners.
2. **Clear rules and perception of consequences:** Arvedi AST has defined clear and objective rules whose infringements are sanctioned according to the Labour National Contract.

Arvedi AST carry on regular training programs, including corporate values, compliance rules, awareness of consequences from illegal behaviour.
3. **“Lines of defence”:** Arvedi AST’s Top Management promotes a constant focus on internal controls, supported by governance and internal audit in alignment with organisation, management and control model, pursuant to Legislative Decree 231/2001.
4. **Grievances:** Arvedi AST supports the “Speak-up Culture”, providing the Arvedi Group whistleblowing web-based system (<https://digitalplatform.unionefiduciaria.it/whistleblowing/>¹ – entering the following required “token”: GRUPPOFINARVEDIWB). This allows stakeholders to report potentially illegal behaviours, granting, at the same time, whistleblower protection, confidentiality and non-retaliation, according to EU regulation and Italian law.

¹ Do not open whistleblowing link from this documents but copy paste link into browser address bar

The recipients of this Corruption Prevention Policy are the personnel employed by Arvedi AST and all the Company's stakeholders.

Terni, March 2023

The Managing Director

Mr. Dimitri Menecali

