

ESG Sustainability Policy Declaration

Arvedi Acciai Speciali Terni (Arvedi AST) recognizes environmental protection, respect for people and integrity in management as the pillars of its corporate responsibility. These principles guide the company's decisions, relationships with stakeholders and continuous improvement of performance.

Since 2024, Arvedi AST has been certified according to the ResponsibleSteel™ standard. Through its implementation, the company confirms its commitment to responsible steel production and responsible sourcing of raw materials, contributing to the achievement of ResponsibleSteel™'s purpose and mission.

This Declaration provides Arvedi AST's general environmental, social and governance (ESG) commitments. It is aligned with **Arvedi Group Code of Conduct** and **ResponsibleSteel™ Ethical Compliance Policy**, which specifies commitments and rules of conduct applicable to the site.

These commitments are further developed through the company policies on human rights, responsible sourcing, anti-corruption, occupational health and safety, environment, energy and quality. These documents operate in a complementary manner and guide the implementation of commitments across business processes.

Arvedi AST Commitments

1. Climate and Energy

Reduce greenhouse gas emissions in line with the objectives of the Paris Agreement and improve energy performance through appropriate technologies, increased plant efficiency, reduction of losses and waste and process optimization.

2. Environment and natural resources

Prevent pollution and reduce the impacts of production activities while protecting natural resources and biodiversity. Minimize water and other resource consumption through efficient use, optimization of recycling systems and technological innovation.

3. Circular economy

Prevent and reduce waste generation and promote the recovery and valorization of materials and by-products, taking into account impacts throughout the life cycle.

4. People and working conditions

Respect and promote human and workers' rights; protect health and safety; prohibit discrimination in recruitment and other employment practices, harassment and the use or threat of disciplinary practices that undermine human dignity. Promote equal opportunities, inclusion, training and fair working conditions, in accordance with the commitments set out in company policies.

5. Integrity, ethics and responsible management

Comply with applicable legal and regulatory requirements, prevent corruption and manage conflicts of interest. Ensure clear accountability, controls and transparency of information.

6. Supply chain and stakeholders

Integrate ESG commitments into procurement processes, according to the significance of supplies and associated risks. Promote dialogue with workers, customers, suppliers, authorities and local communities through accessible information, listening and responses to needs and concerns.

Implementation and communication

Arvedi AST translates these commitments into objectives, action plans, responsibilities and performance indicators through its management systems. Implementation is verified through monitoring activities, audits and management reviews with definition of necessary actions to support continuous improvement.

This Declaration is made publicly available on the company website and communicated to workers through accessible and understandable means. The relevant functions promote its application and periodically verify its consistency with other company policies and with changes in the context.

**The Chief Executive Officer
Arvedi Acciai Speciali Terni**

Dimitri Menecali

