

Responsible Procurement Policy

Arvedi Acciai Speciali Terni (Arvedi AST) recognizes the importance of responsible sourcing as a key contribution to sustainable steel production, in line with the ResponsibleSteel™ criteria and Environmental, Social and Governance (ESG) principles.

The company's goal is to promote and support responsible sourcing of goods and services, including raw materials. To this end, Arvedi AST commitment is to buy from suppliers who follow policies and practices consistent with commitments to environmental protection, respect for human and worker rights, health and safety, and business integrity.

This Policy transfers both the principles of the Group Conduct Code and the commitments of Arvedi AST, as by ResponsibleSteel™ ethical compliance Policy into the supply relationships; it defines the expected behaviors from suppliers and is the main reference for spreading ESG commitments along the entire supply chain. Based on these principles, Arvedi AST makes the following responsible sourcing commitments:

1. Occupational Health and Safety

Arvedi AST is committed to preventing risks and protecting the health and safety of workers. The Company requires its suppliers to provide safe and healthy working conditions in compliance with applicable laws and regulations.

2. Human Rights

Arvedi AST respects internationally recognized human rights and requires its suppliers to do the same. It rejects all forms of forced labour and child labour. The Company recognizes freedom of association and representation, fair salary, and opportunities for training and professional development. It follows the rules on working hours, vacations, and parental leave and protects the workers' privacy. Arvedi AST also ensures that no threats are used and that disciplinary practices that undermine workers' dignity are not tolerated. Suppliers are asked to uphold the same commitment to their own workers. Arvedi AST is committed to explicitly including this ban in contracts with employment and recruitment agencies and with other external suppliers of workers.

3. Protection of Environment and Local Communities

Arvedi AST is committed to an efficient use of energy, water and raw materials, reducing waste, preventing pollution and ensuring the proper management of hazardous substances in compliance with applicable regulations. Suppliers are expected to uphold the same commitment. The Company promotes products and packaging with a low environmental impact and encourages the use of renewable energy sources. It is committed in reducing both direct and indirect CO₂ emissions, in line with the Paris Agreement (2015) and promotes transparency regarding emissions and supply chain activities. Arvedi AST is also committed in respecting the rights and interests of local communities and in protecting the environment and biodiversity. Suppliers are required to adopt the same commitments, preventing and mitigating any adverse impacts of their activities on the environment and on the living conditions of affected communities.

4. Behavior in business

Arvedi AST complies with applicable laws and upholds principles of integrity and fair competition, requiring the same from its suppliers. The Company does not tolerate corruption or violations of antitrust laws. Arvedi AST requires suppliers to provide information regarding the origin of raw materials. For raw materials identified as high risk, including those originating from conflict-affected areas, the Company is committed to tracing the supply chain back to its source and making the collected information available.

5. Expectations for Suppliers

Arvedi AST requires suppliers to comply with the commitments set out in this Policy insofar as they are applicable to the supply relationship and to formally acknowledge their acceptance. Suppliers shall communicate the relevant commitments to any contractors and subcontractors involved in the supply and verify their implementation within their sphere of responsibility. In the event of non-compliance, suppliers shall implement corrective actions and any improvement plans agreed upon with the Company. Responsibilities, deadlines, and methods for verifying results shall be jointly defined. Should a supplier fail to implement the agreed measures or fail to provide the sustainability information required for the supply, Arvedi AST reserves the right to take the actions provided for under the applicable contractual conditions, up to and including termination of the business relationship.

6. Communication, Implementation and Monitoring of the Policy

The Procurement Department communicates this Policy to suppliers and translates its commitments into supplier selection, evaluation, and purchasing criteria. With the support of the relevant functions, compliance with these criteria is verified through controls proportionate to the significance of the supplies and the related ESG risks. The Procurement Department defines and monitors performance indicators for the teams responsible for sourcing raw materials at the site, ensuring consistency with the commitments set out in this Policy. The results are used to identify areas requiring improvement. This Policy is published on the Company website. Suppliers are also required to read and share the following reference documents:

- [Arvedi Group Code of Conduct](#)
- [ResponsibleSteel™ Ethical Compliance Policy](#)

**Director of Procurement,
Logistic and Shipping
Arvedi Acciai Speciali Terni**

Michele Magistretti

Firmato digitalmente da:
Magistretti Michele
Firmato il 12/10/2026 09:55
Seriale Certificato: 5110103
Valido dal 20/11/2025 al 20/11/2028
InfoCamere Qualified Electronic Signature CA