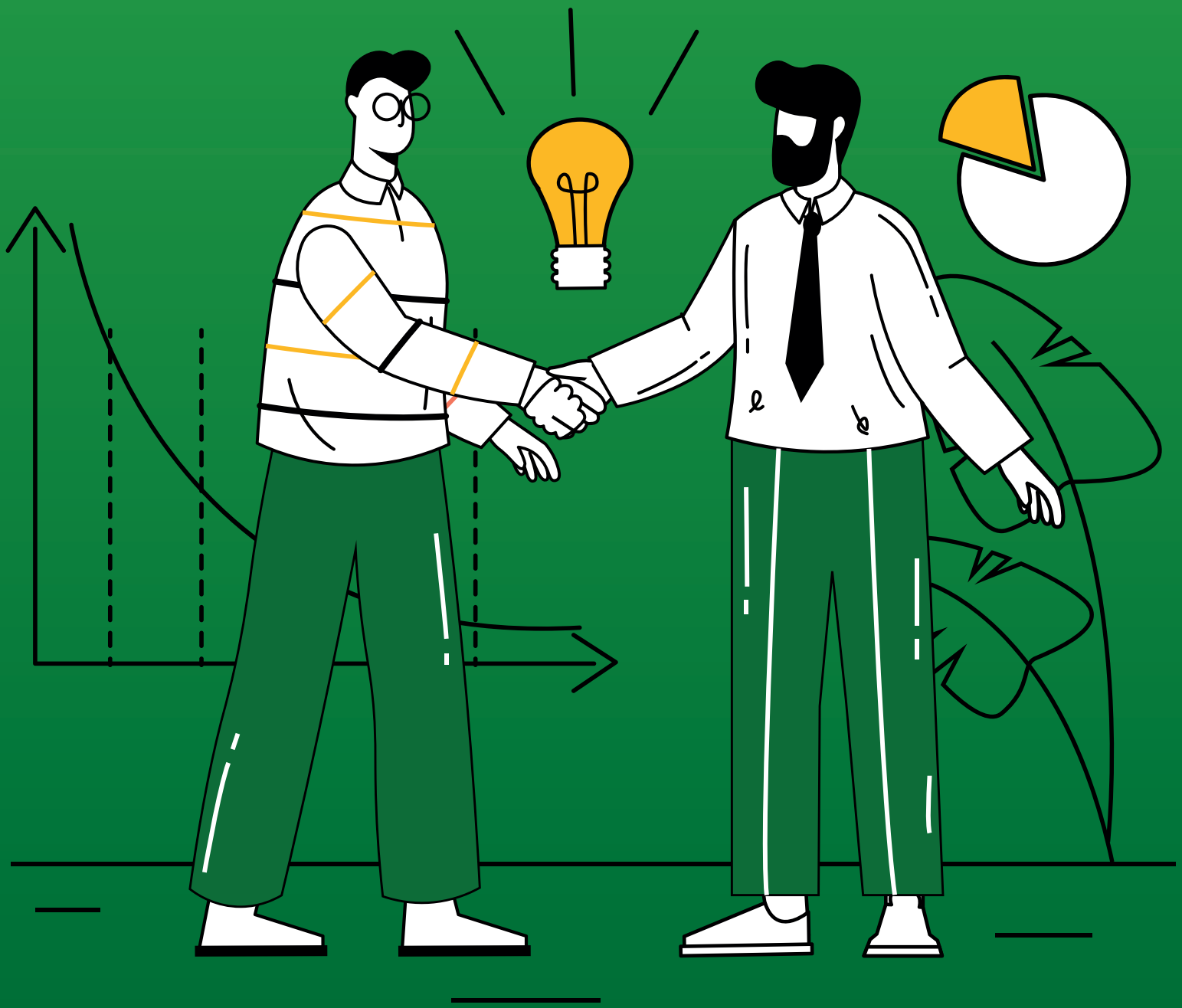
FERALPI GROUP®

SUPPLIER CODE OF CONDUCT



FERALPI GROUP

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Foreword

Feralpi Group is a leading player in the European steel industry, renowned for its excellence in high-quality steel production and its commitment to innovation, sustainability, and respect for people.

Founded in 1968, the Group has an international presence and pursues a strategy that integrates social, environmental, and economic responsibility into all its activities.

Feralpi's core values are based on integrity, respect for the environment, the promotion of human rights, workplace safety, and constructive dialogue with all stakeholders.

In line with these principles, the Group has developed a sustainability strategy focused on reducing its environmental impact, continuously improving safety, and creating shared value for the communities where it operates.

Supply chains play a crucial role in achieving these goals. Feralpi is committed to building relationships with suppliers who share its values and to ensuring that every stage of the production process is conducted in compliance with the highest environmental, social, and ethical standards.

This Code of Conduct provides clear guidance for our suppliers, outlining the principles that govern our partnership and setting clear expectations on key issues such as ethics, sustainability, safety, and human rights.

Recipients of the Code of Conduct

This Code of Conduct applies to all Feralpi Group suppliers, including subcontractors, contractors, and business partners operating within our supply chain. By signing this Code, these parties commit to fully complying with its contents and adhering to the ethical, social, and environmental principles and standards promoted by the Group.

<u>Mission, Vision and Value Proposition</u>

Feralpi Group's mission is to create sustainable value through innovation, quality, and respect for people and the environment.

Our vision is for a future where steel is produced responsibly, ensuring the well-being of current and future generations.

Our value proposition is based on combining competitiveness with sustainability, making a positive contribution to the economic and social progress of the regions where we operate.

Feralpi Group's Code of Ethics

Feralpi's Code of Ethics is the foundation upon which all our activities are built. It defines the guiding principles that govern the conduct of the Group and its stakeholders, promoting integrity, transparency, and respect for human rights.

Suppliers are required to share and uphold these principles, contributing to the sustainability and responsibility goals that define Feralpi Group's identity.

Compliance with this Code of Conduct is not merely a contractual obligation but a vital element for maintaining a relationship of trust and collaboration with the Group.

This document provides the guidelines to ensure that all suppliers activities alight with Feralpi's values and expectations, reinforcing our joint commitment to a responsible and sustainable supply chain.

General principles

This Supplier Code of Conduct should be read in conjunction with the Feralpi Group Code of Ethics, which is the primary reference document outlining the Group's core principles and values.

The Code of Ethics guides the decisions and behaviour of all our stakeholders, including suppliers, helping to create an ethical, sustainable, and compliant value chain.

Suppliers are expected to share and apply the general principles of the Code of Ethics, which are summarised below:

Respect: respect for people is a core value for Feralpi, guiding our relationships both internally and with external stakeholders. We pay special attention to the rights of local communities and future generations. The company ensures the proper handling of personal data of employees, customers, and suppliers, respecting the dignity of all individuals. We promote human rights and fundamental freedoms, prohibiting discrimination based on age, gender, sexual orientation, health, race, nationality, political opinions, trade union membership, or religion. Feralpi is committed to integrating these principles throughout its value chain and preventing any behaviour that disregards personal beliefs.

Transparency: Feralpi is committed to ensuring transparency in its relationships with stakeholders by providing complete, accurate, and understandable information to support informed decisions. This principle translates into clear contracts in bilateral relations and social and environmental

reporting initiatives to assess corporate sustainability, always striving for the highest international certifications.

Truthfulness: the principles of truthfulness highlights the importance of providing accurate accounting and administrative information, going beyond legal or certifications requirements. Alongside transparency and honesty, this principle is fundamental to building mutual trust among staff and ensuring the accuracy of information provided to external stakeholders.

Honesty: honesty is crucial to Feralpi's corporate reputation and is an integral part of its moral heritage. The company recognises that honesty requires constant compliance with the law and is committed to acting in accordance with the Code of Ethics, even in national contexts where legal compliance and the rule of law may be weak. The pursuit of the company's interests can never justify conduct that violates these principles.

Trust and loyalty: Feralpi places great importance on trust and loyalty, which are essential for building strong relationships, both internally and externally. Internal relationships are based on loyalty and a presumption of good faith, fostering an environment where employees work with commitment and strive for excellence beyond mere formal correctness. In its external relationships, Feralpi complies with fair competition laws in the countries where it operates.

Fairness: the company's relationship with its employees are based on principles of fairness, ensuring equal treatment and proper recognition of merit. Management is also committed to maintaining a fair balance of recognised interests in its dealings with stakeholders.

Collaboration: Feralpi values collaboration among all participants in its business activities and promotes a team spirit. This value also extends to external stakeholders by creating favourable conditions for dialogue and mutual listening.

Diligence and professionalism: Feralpi is committed to ensuring high-quality standards for its products and services. Contracts and assignments must be executed with dedication and expertise. Both individuals and group contributions are vital for improving business processes. THe company promotes professional growth through internal training programmes at all levels.

Environmental protection and sustainable development: Feralpi is committed to respecting the environment, both inside and outside its facilities, acknowledging the environmental impacts of its operations. The company promotes the continuous improvement of its technologies and production practices, ensuring regulatory compliance and adopting the most advanced solutions, including through research programmes.

Health and safety protection: Feralpi ensures working conditions that respect individual dignity, aiming for well-being in the workplace and compliance with safety regulations. The company is committed to the continuous improvement of occupational health and safety by adopting advanced technologies and seeking new solutions.

The full Feralpi Group Code of Ethics is available on our website at www.feralpigroup.com and is a key document for guiding all business relationships.

General standards of conduct for suppliers

4.1 Business ethics and integrity

Feralpi Group operates on principles of ethics, transparency, and fairness. We expect our suppliers to adopt these same values, comply with all applicable laws and regulations, and conduct business relationships with loyalty and responsibility.

Suppliers must operate in full compliance with current laws, uphold high ethical standards, and, where possible, follow international best practices. All activities must be conducted with honesty and responsibility, avoiding any illegal practices. It is essential to ensure compliance with regulations on sanctions and trade restrictions, avoid dealings with sanctioned parties, and promptly report any potential issues.

Feralpi Group has zero for any form of corruption, fraud, or illicit activity. Suppliers must reject any attempt to improperly influence business decisions, whether involving public or private individuals, and must always operate in compliance with anti-money laundering and illicit financing regulations.

Adherence to competition rules and fair business practices is essential for building trustworthy relationships and ensuring a fair and transparent market.

All suppliers are required to operate with independence and impartiality, avoiding conflicts of interest that could compromise the transparency of their relationship with Feralpi Group. It is crucial to promptly disclose any situation that could affect the objectivity of business decisions and to ensure the accuracy of information provided during selection and procurement processes.

Confidentiality and data protection are fundamental principles for Feralpi and its partners. Suppliers must take all necessary measures to protect confidential information and personal data, ensuring they are used correctly and in compliance with current regulations. Any information security breaches must be reported promptly to ensure the highest level of privacy and compliance with legal obligations.

4.2 Human rights and labour

Feralpi Group is committed to respecting and promoting fundamental human rights throughout its supply chain. We require our suppliers to adopt high ethical standards and ensure dignified working conditions.

Suppliers must guarantee respect for human rights, preventing any form of violence, abuse, or degrading treatment, and providing remedies for any violations. They must ensure an inclusive work environment, free from discrimination and harassment, that values diversity and bases employment decisions on skills and merit.

All forms of forced and child labour are prohibited. Suppliers must comply with legal age limits and ensure safe working conditions for young workers. All employees must receive clear and transparent contracts, and there shall be no unreasonable withholding of personal documents or restrictions on their freedom of movement. Wages must meet or exceed legal minimum standards, ensuring fair pay and decent working conditions. Working hours and overtime must comply with current regulations and ensure a proper work-life balance.

Occupational health and safety are key priorities. Suppliers must provide safe working environments, preventing accidents and occupational illnesses through appropriate measures, ongoing training, and continuous improvement actions. The right to freedom of association and collective bargaining must be respected, without retaliation or discrimination against workers.

Feralpi Group promotes a responsible supply chain, requiring its suppliers to extend the same ethical and social standards to their own subcontractors, thereby ensuring that these fundamental principles are upheld throughout the entire chain.

4.3 Environment

Suppliers must operate in an environmentally responsible manner, minimising their impact and promoting sustainability.

It is essential to comply with all applicable environmental regulations and to continuously improve environmental performance.

Suppliers are required to comply with national and international regulations and, where possible, adopt certified environmental management systems. They must commit to reducing their environmental footprint by optimising the use of natural and energy resources and actively participating in the assessment and management of environmental risks. A commitment to pollution prevention and mitigation is required, along with the prompt management of any environmental damage.

In resource management, suppliers should prioritise the use of renewable or recycled raw materials and optimise production processes to reduce waste and environmental impact. It is essential to

promote the recovery and recycling of materials and ensure the responsible management of waste, particularly hazardous waste, in accordance with current legislation.

Feralpi encourages its suppliers to manage water resources responsibly by optimising their use and reusing wastewater after appropriate treatment. Water must be returned to the environment at a quality compatible with the local ecosystem, with special attention to areas of water stress or high environmental value. Furthermore, suppliers must contribute to protecting biodiversity, prevent the over-exploitation of natural resources, and support ecosystem restoration.

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Adherence to these general principles is not only a prerequisite for partnering with Feralpi Group but also a tangible contribution to sustainable and responsible economic growth.

General standards of conduct for suppliers

Feralpi Group ensures maximum transparency and integrity in its supply chain. To this end, it has implemented a Whistleblowing system that complies with regulatory requirements, including Legislative Decree no. 24/2023. This channel allows for the confidential and, if necessary, anonymous reporting of legal violations, incidents of corruption, fraud, or other illicit conduct, as well as infringements related to human rights, the environment, and health and safety. Information on how to make a report is available on the Feralpi website.

Feralpi requires its suppliers to adopt their own appropriate tools to receive and manage reports from their employees and third parties, ensuring protection and confidentiality for whistleblowers.

Supplier compliance with this Code of Conduct will be subject to verification, which may include requests for clarification and documentation, self-assessments of environmental and social impacts, and audits at production sites, to be agreed upon with the supplier.

In the event of non-compliance with the provisions of this Code, Feralpi may take measures proportionate to the severity of the violation, including:

- exclusion from the Supplier Register,
- temporary suspension of the contract, if the supplier demonstrates the ability to quickly resolve the non-compliance,
- termination of the contract in the most serious cases.

Legal status of this Code of Conduct:

given the importance placed on the supplier's adherence to all the principles listed above and the progressive sanctions indicated, this Code of Conduct shall be legally considered as an explicit set of general purchasing conditions. It is immediately applicable to every order and contract with each supplier, directly integrating the specific obligations of the individual contractual relationship. Therefore, by delivering goods and/or services to us, you simultaneously accept the terms of this Code and their legal effect on our specific contractual relationship.

By accepting this Code of Conduct, the supplier commits to respecting its principles and provisions in all its activities.

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