

RESPONSIBLE PROCUREMENT POLICY

Marcegaglia Steel S.p.A., the holding company of the Marcegaglia Group for steel production and processing activities, and its directly and indirectly controlled operating companies (Marcegaglia Carbon Steel S.p.A., Marcegaglia Ravenna S.p.A., Marcegaglia Specialties S.p.A, Marcegaglia Gazoldo Inox S.p.A., Marcegaglia Plates S.p.A., Marcegaglia Buildtech S.r.l., Marcegaglia Stainless Sheffield Limited and their subsidiaries), consider the supply chain a starting point for operating in a sustainable and socially responsible manner.

This Policy is intended to share with the entire supply chain the guiding principles on ethical issues and human rights, health and safety in the workplace, the environment, energy efficiency and sustainable procurement, transferring their contents in order to promote the spread of a culture of sustainability.

The requirements below are also used to select and evaluate suppliers: activities that take into account the worldwide presence of various production sites and the Group's expansion vision, in order to identify a pool of suppliers capable of supporting the specific needs of different geographical areas.

All suppliers are encouraged to disseminate these principles through targeted training both to their employees and to their own suppliers.

An essential principle underlying the qualification as a "Marcegaglia supplier" is compliance with the regulations and standards in force in the countries where it operates, including local regulations, as well as adherence to the principles and conduct defined in this document and detailed below.

LABOUR AND HUMAN RIGHTS

Our policy on social responsibility, aligned with the Ten Principles on Human Rights as defined by the UN Global Compact, states our commitment to maintaining compliance with national laws and the resolutions of international bodies such as the ILO and the UN on human rights, ensuring respect for diversity, personal growth on equal opportunities and fair remuneration.

For this reason, suppliers are asked to keep their focus on:

- child labour and young workers
- wages and benefits
- working hours
- forced or compulsory labour, human trafficking
- ethical recruitment
- freedom of association and collective bargaining
- non-discrimination and harassment
- women's rights
- diversity, equity and inclusion
- rights of minorities and local communities
- land, forest, water and forced displacement rights

ETHICS

By publicly sharing its codes of conduct, Marcegaglia does not allow any form of corruption and is committed to complying with the laws in force in all the countries in which it operates. Likewise, it requires its suppliers to act with integrity and transparency by avoiding the following improper practices

- corruption, incitement to commit crimes, extortion and embezzlement
- actual or potential conflicts of interest
- money laundering

Suppliers are also required to base their activities on fair competition, in accordance with Antitrust and export regulations, ensuring that every economic and financial transaction is correctly traced and adopting a Code of Conduct that provides for periodic verification of its application. Suppliers must also respect the intellectual property rights of third parties and protect the information and personal data of their customers.

HEALTH AND SAFETY

According to the HSE Policy, Marcegaglia's attention to occupational health and safety issues has been at the heart of every decision/choice for years. Therefore, all suppliers are asked to define and maintain safe and healthy working conditions for their employees in compliance with applicable legal requirements, promoting the continuous improvement of their performance.

It also requires its suppliers to adopt responsible behaviour by spreading a culture of safety with the aim of reducing accidents at work to zero.

In particular, suppliers operating at our sites or entrusted with outsourced processes are asked not only to comply with applicable legislation, but also to adopt the Group's health and safety standards.

ENVIRONMENT AND ENERGY EFFICIENCY

In alignment with the HSE Policy and the Biodiversity Policy, Marcegaglia has adopted the principles of sustainable development by committing to minimise its environmental impacts: to pursue this objective, the contribution of the entire supply chain is required.

In particular, since the reduction of CO2 emissions related to the product life cycle is of strategic importance, suppliers are asked to be available and transparent with regard to the communication of the data necessary to define these emissions, both direct and indirect.

Equally relevant are the activities underway to monitor and, where possible, further reduce the impact on the environment with regard to the following issues:

- energy efficiency and renewable energy
- decarbonisation
- water quality, consumption and management
- air quality
- odour impact
- responsible management of chemicals
- sustainable resource management
- waste reduction
- promotion of reuse and recycling
- biodiversity, land use and deforestation, protection and welfare of fauna
- soil protection
- noise emissions

RESPONSIBLE SOURCING OF RAW MATERIALS

Marcegaglia is committed to purchasing raw materials and components from suppliers able to demonstrate respect for human rights in the conduct of activities along its supply chain, in line with CMRT requirements for the presence and sourcing of gold, tantalum, tin and tungsten and their derivatives such as coltan, cassiterite, wolframite, and EMRT for cobalt and mica.

In addition, by joining ResponsibleSteel and First Movers Coalition, Marcegaglia wants to contribute to the development of a sustainable supply chain that increasingly focuses on sourcing materials with a higher recycled content and reduced carbon footprint.

SECURITY OF INFORMATION

Marcegaglia has adopted a security system for company facilities, paper archives and computer equipment to protect the transmission, storage and disposal of information, guaranteeing access and authentication controls, as well as the segregation of confidential information received from customers and suppliers. This approach is also required from suppliers.

REPORTING VIOLATIONS

Suppliers are obliged to promptly report any violation of the principles set out in this document by their employees. Any reports should be sent to the following e-mail address: odv@marcegaglia.com. The confidentiality of the identity of the person making the report is guaranteed. This system must also be ensured at the suppliers' premises.

SUPPLIER'S COMMITMENT

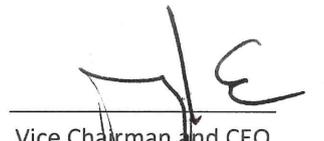
Suppliers are required to complete the qualification questionnaire and accept the clauses, included in the orders sent by any company belonging to Marcegaglia Steel S.p.A., relating to the acceptance of and compliance with this Policy, the Code of Ethics and the Organisational Model; the supplier acknowledges having read and accepted all the principles, terms and conditions contained in this Policy for the supply of goods and the performance of services for Marcegaglia Group companies.

This Policy enshrines our commitment to the principles described; it is intended to direct our suppliers to promote the requirements within their supply chain and will be regularly updated to ensure its continued validity.

Gazoldo degli Ippoliti, 19/12/2022



Chairman and CEO
Dott. Antonio Marcegaglia



Vice Chairman and CEO
Dott.ssa Emma Marcegaglia