

ENVIRONMENTAL, ENERGY AND SAFETY MANAGEMENT SYSTEM POLICY

Marcegaglia Ravenna SpA and *Marcegaglia Carbon Steel SpA*, operating in the site of Via Baiona respectively for the metallurgical transformation of steel and intermodal logistics at the most important plant for all industrial and commercial activities of the Marcegaglia Group's production chain, fully aware of the importance of issues related to health, safety, environment and energy, commit to carry out their activities in full compliance with the principles of safeguarding the psycho-physical integrity of workers and with care to reduce their environmental impacts and to pursue the improvement of their energy performances.

In line with the Group Policy, the Board of Directors, acting as a single body for *Marcegaglia Ravenna SpA* and *Marcegaglia Carbon Steel SpA*, commits to maintaining certification of the Environmental, Energy and Safety Management System respectively in accordance with ISO 14001 for the environment, ISO 50001 for the energy and ISO 45001 for the occupational health and safety, taking responsibility for fully embracing the following principles:

- respecting the signed agreements and the applicable legal requirements and other requirements relating to matters of environment, occupational health and safety, as well as energy in terms of its use, consumption and efficiency;
- recognizing occupational safety as a primary and priority objective;
- promoting training, participation and consultation of workers as a basis for achieving the established objectives of reducing accidents, eliminating hazards, reducing risks and preventing injuries and illnesses;
- providing safe and healthy working conditions for the prevention of injuries and illnesses;
- continuously reducing environmental impacts, promoting environmental protection and pollution prevention;
- using energy in a rational manner in order to improve energy efficiency;
- pursuing the continual improvement, applicable to processes, to management systems, and to environmental, energy and occupational health and safety performances;
- ensuring that risks related to climate change are taken into consideration in the development, maintenance and effectiveness of the integrated management system, based on the analysis of stakeholders' requirements;
- ensuring that the biodiversity component is an integral part of the Company's strategic decisions;
- maintaining excellent relationships, based on mutual trust, with public authorities and local communities.

The above-mentioned principles represent the reference framework for the definition of action plans at the basis of the management of the organisation, among which the following are recalled:

- monitoring the development of new activities, which are analysed in order to reduce environmental impacts and risks by adopting the best available technologies on the market that are economically feasible, as well as to pursue energy efficiency objectives;
- supporting the design and procurement of energy-efficient products and services aimed at improving energy and environmental performances, also through life cycle costing tools;
- reducing induced traffic, within the management of raw material supply and semi-finished product shipments, in synergy with the port activity;
- risk prevention both in the field of occupational health and safety and in the environmental field, paying particular attention to the management of chemical products and hazardous substances, as well as to machine safety;
- reducing accident rates through the maintenance of the awareness programme named "zero accidents";
- maintaining the safeguarding of workers' health by continuing the "smoke-free company" programme;
- assessment and distribution to all workers of personal protective equipment according to the needs highlighted in the risk assessment, including attention to ergonomic risk;
- assessment and testing of possible emergency scenarios, including fire risk management;
- reducing emissions through optimisation of logistics and internal transport, modernisation of extraction and abatement systems for atmospheric emissions, including carbon capture systems;
- reducing risks through the modernisation of machinery parts and/or plants;
- minimisation of water consumption, favouring reuse and optimising purification processes;
- development of projects to encourage the reduction of waste or its initiation into recovery rather than disposal, also by promoting circular economy processes and industrial symbiosis;
- promoting a sustainable supply chain through LCA studies, EPD certifications and carbon footprint analysis;
- assessment of the prevention of environmental disturbances such as odours, noise, vibrations and induced traffic;
- reduction of specific natural gas consumption through the waste heat recovery in certain plants and optimisation of the steam generation system and the energy consumption monitoring system;
- raising awareness of external companies on possible interference risks, environmental or energy impacts, also through specific audits.

For the implementation of the Policy set out herein and for the achievement of the stated objectives, the Company commits to ensuring the involvement of leadership and to allocating adequate human and financial resources, as well as to keeping the policy itself and the resulting objectives, targets and programmes under control through regular review.

Ravenna, 12/06/2024

The Board of Directors