

HSE POLICY

The Marcegaglia Group¹, aware of the strategic importance of issues relating to health, safety, the environment and energy, is committed to operating its business in full compliance with applicable legislation, safeguarding the physical and mental well-being of its employees, protecting the environment, promoting the efficient use of resources and striving for the continuous improvement of its HSE and energy performance. The present Policy sets out the principles that guide the Group in integrating HSE aspects into the company's decision-making, management and operational processes, and in creating sustainable value for all stakeholders.

Our commitment

To ensure the effective implementation of the present Policy, the Marcegaglia Group adopts a systematic approach in managing HSE aspects, setting out objectives, responsibilities and monitoring tools, promoting a culture based on prevention, enhancing transparency and encouraging the involvement and active participation of its internal and external stakeholders. Dialogue with individuals, communities, institutions, customers, suppliers, contractors and other stakeholders is essential for identifying expectations, seizing opportunities for improvement and effectively addressing emerging risks and challenges. In particular, the Group is committed to:

- complying with applicable legislation and other signed agreements relating to the environment, energy, health and safety at work;
- recognise health and safety at work as an absolute priority, to be taken into account in every organisational, technical and managerial decision;
- prevent accidents, occupational diseases, unsafe working conditions and situations that may have a negative impact on people and the environment;
- encourage consultation, participation and the active engagement of employees, their representatives and the relevant departments, so that everyone contributes to strengthening the HSE culture;
- provide human, technological and financial resources to safeguard the employees' health and safety, the environment and energy, whilst verifying improvements in KPIs and effectiveness through monitoring performances, activities carried out and training programmes;
- promote structured and continuous stakeholder engagement activities, aimed at listening to and taking into account the expectations of stakeholders, sharing objectives and results, preventing potential issues and fostering a transparent and collaborative relationship with the local area, local communities, authorities, customers, suppliers, contractors and other interested parties;
- gradually reduce environmental impacts, prevent pollution, use energy and natural resources efficiently, and promote improvements in energy performance;
- identify and address risks and opportunities that may affect product compliance or the Group's performance in relation to the environment, safety and energy;
- ensure that contractors, suppliers and third parties acting on behalf of the Group are aware of and comply with HSE standards consistent with those of the Group.

¹ For the purposes of this Policy, 'Marcegaglia Group' means Marcegaglia Holding Srl, which includes all the Companies directly and indirectly controlled by it:

- Marcegaglia Steel SpA, core business related to the production and processing of steel, and which includes Marcegaglia Buildtech Srl, Marcegaglia Carbon Steel SpA, Marcegaglia Gazoldo Inox SpA, Marcegaglia Plates SpA, Marcegaglia Ravenna SpA, Marcegaglia Specialties SpA, Marcegaglia Stainless Sheffield Ltd, Marcegaglia Fos sur Mer Sas and their subsidiaries;
- Marcegaglia Investments Srl which oversees and develops diversified activities and includes EuroEnergy Group Srl, CO.GE.AM Srl, Imat SpA, Oskar Srl, ELET.CA Srl, Made HSE Srl, Albarella Srl.

Environmental awareness

The Marcegaglia Group's environmental initiatives align with the strategy set out in the Sustainability Report and the Sustainability and Transition Plan, with the aim of progressively reducing environmental impacts, contributing to climate change mitigation and adaptation, promoting resource efficiency, strengthening the circular economy, and integrating environmental and energy criteria into industrial, design, maintenance and investment decisions. To support these objectives, the Group regularly monitors, measures, analyses and reviews its environmental and energy performances, setting targets, improvement programmes and actions consistent with the risks and opportunities identified, by using management systems, audits, performance indicators, compliance assessments, life-cycle studies, environmental product certifications and the engagement of corporate functions and the supply chain. The main topics addressed are:

1. **Climate change and GHG emissions.** Contribute to the mitigation of climate change by reducing direct and indirect greenhouse gas emissions, by monitoring emissions inventories, by developing decarbonisation initiatives, by increasing the use of energy from renewable sources, and progressively integrating climate-related risks and opportunities into decision-making processes and investments;
2. **Air.** Reduce and control atmospheric emissions by complying with authorization limits, carrying out continuous and periodic monitoring, improving suction systems, conveyance and abatement systems, optimising production processes and adopting lower-impact technologies, with particular attention to pollutants arising from industrial and logistics activities;
3. **Odours and diffuse emissions.** Preventing and containing diffuse emissions, particulate matter and odours through source control, the adoption of technical and organisational measures, and the monitoring of potential impacts on the surrounding environment;
4. **Energy.** Improving the energy efficiency of plant and processes, reducing specific energy consumption, developing energy recovery projects, installing photovoltaic systems for self-consumption, increasing the supply of electricity from renewable sources – including through dedicated contractual arrangements and Guarantees of Origin – and ensuring the assessment, design and procurement of energy-efficient products aimed at improving energy performances;
5. **Raw materials and circular economy.** Promote the efficient use of raw and auxiliary materials, the recovery of scrap and secondary materials, the reduction of process waste, the use of by-products where applicable, and the development of solutions geared towards circularity, industrial symbiosis and the reduction of impacts throughout the product life cycle;
6. **Water supply.** Manage water abstraction responsibly, with particular attention to sites located in areas subjected to water stress, by pursuing the reduction of specific consumption, the improvement of metering, the recirculation of cooling water, the reuse of water in production processes and the evaluation of alternative and resilient water supply solutions;
7. **Water discharges.** Ensure compliance with applicable authorisations and limits; periodically monitor the quality of water discharges and the efficiency of treatment and purification plants; implement measures aimed at reducing the pollutant load and, where possible, promoting the reuse of treated water;
8. **Soil and subsoil.** Prevent contamination of soil and subsoil through the proper management of storage areas, tanks, substances, waste and potentially contaminated water; the adoption of containment systems; the maintenance of infrastructure; the prevention and management of accidental spills; and the implementation of groundwater monitoring and any necessary safety measures or remediation works, where required;
9. **Chemicals and auxiliary materials.** Manage chemicals and auxiliary materials safely and responsibly, ensuring correct classification, labelling, storage, handling and use, preventing leaks and spills, and promoting, where technically feasible, the replacement or reduction of the most critical substances with alternatives that are less hazardous and have a lower environmental impact;
10. **Waste.** prevent and reduce waste generation; increase the quantities of waste sent for recovery, recycling and reuse; reduce the amount of waste disposed of in landfill; and progressively reduce the hazardous nature of the waste generated also through process improvements, waste material recovery, pursuit of industrial symbiosis solutions, and development of projects aligned with the principles of the circular economy;
11. **Noise.** Prevent and mitigate the noise impact generated by plant, production activities, internal handling and induced traffic, through periodic assessments, technical and maintenance measures at the sources, monitoring at

the plant boundaries, and improvement measures consistent with the local context and the presence of any sensitive receptors;

12. **Vibrations.** Pay attention to the potential contribution of vibrations arising from plant, internal handling operations and induced traffic, assessing their significance in individual production contexts and taking action should any elements of potential impact on workers, the local population or the surrounding environment emerge, although this is an aspect which, in general, is not particularly relevant to the Group's activities;
13. **Induced traffic.** Reduce the environmental impacts associated with logistics and transport by promoting the use of intermodal and rail transport, optimising inbound and outbound flows, automating and improving the efficiency of internal handling, and reducing fuel consumption and potential interference with the local area;
14. **Land consumption and land use.** Take into account land consumption, soil sealing, integration into the landscape and land use in assessments relating to new investments, expansions, infrastructure and plant changes, prioritising, where possible, the reuse of areas that have already been sealed and the adoption of design solutions appropriate to the surrounding context;
15. **Environmental emergencies.** Prevent, prepare for and manage environmental emergency scenarios, such as accidental spills, fires with potential environmental consequences, malfunctions of treatment plants, extreme weather events or accidental contamination, through procedures, clearly defined responsibilities, adequate equipment, training, regular drills and measures to restore the environment and prevent the recurrence of such events;
16. **Biodiversity.** Protecting ecosystems and natural heritage; taking biodiversity into account in strategic, planning and operational assessments; monitoring potential impacts on natural or protected areas near the Group's sites; promoting initiatives for environmental restoration and enhancement; and encouraging the involvement of employees, communities and stakeholders in fostering a culture focused on the protection of biodiversity.

Health and Safety awareness

The Marcegaglia Group's health and safety initiatives align with its pursuit of strengthening HSE culture and are aimed at preventing accidents, occupational illnesses and unsafe working conditions, whilst promoting healthy, inclusive workplaces that foster people's physical, psychological and social wellbeing. Health and safety are integrated into industrial, design, maintenance, organisational and operational decisions, with the aim of fostering safe behaviour, shared responsibility, active participation and continuous performance improvement. Structured management systems are adopted, consistent with international standards and the applicable regulatory framework, based on risk assessment, the setting of objectives and improvement programmes, the monitoring of performance through preventive and reactive indicators, the conduct of periodic audits and reviews, the clear allocation of responsibilities and the involvement of the relevant company departments. For sites subjected to regulations on the control of major accident hazards, these principles are implemented through specific safety management systems aimed at preventing major accidents, limiting their potential consequences for people, the environment, property and neighbouring communities, and continuously improving safety performances. In line with this approach, the Marcegaglia Group is committed to the following areas:

1. **A culture of prevention and a people-centred approach.** Placing health and safety at the heart of operational and decision-making activities, so that everyone can carry out their work in safe conditions and return home in good health, by promoting responsible behaviour, mutual care, trust, open communication and awareness of each person's role in prevention;
2. **Risk Assessment.** Systematically identify, assess, and manage hazards and risks for health and safety, taking into account routine and non-routine activities, organizational and facility changes, operational interferences, and the specific features of different production scenarios, including major accident risks where applicable, in order to define effective prevention and protection measures;
3. **Change management.** Assess in advance the health and safety impacts arising from new production lines, plant modifications, the introduction of new equipment, substances or processes, organisational changes, production layouts and investments, ensuring the involvement of relevant departments and the updating of prevention and protection measures, with particular attention to the effects that such changes may have on the prevention of major accidents and on maintaining plant safety levels.

4. **Safety of machinery, plant and equipment.** Ensure compliance, suitability and safe maintenance of machinery, plant and work equipment through protective devices, interlocks, periodic inspections, maintenance, functional checks, change management and attention to conditions of use, access, cleaning and maintenance;
5. **Hierarchy of preventive measures.** Eliminate hazards and reduce risks at source wherever possible, giving priority to technical and organisational measures over administrative measures and personal protective equipment, which must in any case be guaranteed, appropriate to the risk assessments and accompanied by proper information, education and training;
6. **Materials handling and internal traffic.** Prevent risks associated with mechanical and manual handling of materials, lifting equipment, forklift trucks, cranes, overhead cranes, conveyors and interferences between vehicles and pedestrians, through traffic regulations, separation of routes, signage, operational checks, maintenance and specific training;
7. **High-risk work and work permits.** Manage high-risk activities, such as work at height, work in confined spaces, hot work, electrical work, extraordinary maintenance, complex lifting operations and work involving hazardous energy sources, through dedicated procedures, work permits, isolation and securing, preventive checks, supervision and appropriate expertise;
8. **Fire safety, explosion prevention and the prevention of major accidents.** Prevent and mitigate the risks of fire and explosion through specific assessments, control of ignition sources, management of hazardous substances and high-risk areas, maintenance of fire-fighting equipment, detection and suppression systems, fire compartments, training of emergency teams and periodic testing;
9. **Accidents, near misses and safety observations.** Record, analyse and manage accidents, injuries, near misses, hazardous conditions and behaviours, safety observations and good practices, identifying causes, corrective and preventive actions, and ways of sharing lessons learnt to prevent the recurrence of similar events;
10. **Indicators, targets and continuous improvement.** Regularly monitor, measure, analyse and review health and safety performances using preventive and reactive indicators, setting targets, programmes, action plans and measures consistent with the risks, opportunities, results achieved and priorities identified at the various production sites;
11. **Leadership and shared responsibility.** Promote visible and consistent leadership, based on managerial example, individual responsibility and cross-functional collaboration, so that everyone contributes to fostering the HSE culture and feels empowered to report hazardous situations, suggest improvements and stop unsafe activities when necessary;
12. **Consultation, participation and stakeholder engagement.** Involve workers, representatives, supervisors, managers, relevant departments, contractors and other stakeholders through consultation, participation, committees, forums for discussion and reporting channels, valuing people's contributions to setting priorities, managing risks and developing improvement measures;
13. **Information, training and skills.** Strengthen skills, awareness and operational capabilities of employees, supervisors, managers, contractors and third parties, through information, training, instruction and awareness-raising programmes, ensuring the development of the HSE culture as an integral part of professional and organisational development;
14. **Occupational health, hazardous substances and industrial hygiene.** Prevent occupational diseases and protect workers' health through health surveillance, industrial hygiene, monitoring of physical, chemical and biological agents, exposure control, the correct management of hazardous substances, safety data sheets, labelling, PPE, the substitution where possible of the most critical substances, and collaboration between HSE functions, occupational health practitioners, human resources and relevant company representatives;
15. **Ergonomics, wellbeing and psychosocial factors.** Take into account ergonomic, organisational and psychosocial aspects when designing workstations, managing activities and developing processes, with the aim of reducing physical strain, work-related stress and conditions that may adversely affect people's physical and psychological wellbeing;
16. **Working in isolation, shift work and fatigue.** Assess and manage the risks associated with working in isolation, shift work, night work, business travel, on-call duty and fatigue, through organisational measures, communication and monitoring procedures, appropriate planning, training and attention to factors that may affect vigilance, wellbeing and the ability to respond in an emergency;
17. **Contractors, service providers, visitors and neighbouring communities.** Manage interference risks and ensure that contractors, service providers, transport operators and visitors operate in compliance with the Group's HSE

rules, whilst also protecting neighbouring communities from potential effects arising from industrial activities, including major accident scenarios where applicable, through qualification criteria, advance information, coordination, operational control and shared responsibility;

18. **Health promotion and healthy lifestyles.** Support initiatives aimed at health promotion, prevention and raising awareness, including through information campaigns, welfare programmes, a focus on healthy lifestyles and projects geared towards people's overall wellbeing, in line with the Company's role in promoting healthy and inclusive workplaces;
19. **Emergency preparedness and response.** Preparing for, managing and testing emergency scenarios, including the management of fire risks and events that may involve people, facilities, contractors, visitors and neighbouring communities, including, at sites subject to applicable legislation, major accident scenarios and the related civil protection measures and coordination with the competent authorities, through up-to-date procedures, clear communications, defined roles, adequate equipment, training, periodic testing and the capacity for a prompt response.

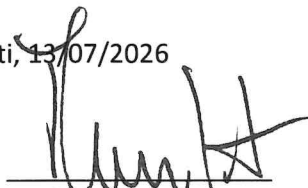
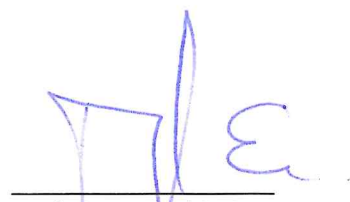
Artificial Intelligence and Innovation

The Marcegaglia Group promotes the responsible, safe and ethical use of Artificial Intelligence systems to support business activities, safeguard employees' health and safety, environmental protection and continuous improvement. Its commitment includes:

- assessing in advance the risks arising from the introduction and use of Artificial Intelligence systems in business processes, with particular reference to their impact on health, safety, environment, human rights and data protection;
- ensuring adequate levels of human oversight in decisions that may affect workers' safety, environmental performance or regulatory compliance;
- ensuring that AI systems are used transparently, reliably and in line with the principles of the Code of Ethics, the 231 Model and Company policies;
- promoting personnel training and awareness regarding the correct and informed use of Artificial Intelligence technologies.

Through the present Policy, the Marcegaglia Group sets out the principles, guidelines and general objectives that guide the management of health, safety, environment and energy, in compliance with applicable legislation, voluntarily undertaken commitments and the expectations of internal and external stakeholders. Its implementation is entrusted, within their respective areas of responsibility, to site Departments and the relevant corporate functions, which ensure its integration into management systems, operational planning, resource allocation, the setting of objectives and programmes, the management of risks and opportunities, and the monitoring of specific performances. Periodic review is a fundamental tool for verifying the effectiveness of the actions undertaken, identifying priorities for improvement, strengthening the involvement of people and relevant stakeholders, and ensuring visible, accountable and consistent leadership across all production sites. The Group is committed to promoting the application of the present Policy in a systematic and consistent approach, fostering the spreading of the HSE culture, the prevention of impacts and risks, transparency in dialogue, and the continuous improvement of its performances.

Gazoldo degli Ippoliti, 13/07/2026


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