

SOCIAL RESPONSIBILITY POLICY

The Marcegaglia Group¹ recognizes the Social Responsibility as a fundamental value of its business model and as an integral part of its sustainable development strategy, based on the belief that economic growth must be achieved in full respect of people, human rights, communities and all the environments in which the Group operates. This Policy, which integrates with the documents already promoted by the Group for the same purpose, such as, for example, the Code of Ethics, the Anti-Corruption Policy, and the whistleblowing procedure, applies to all companies within the Marcegaglia Group and is addressed to employees, collaborators, suppliers and business partners, who are required to share and comply with the same principles, actively contributing to the diffusion of a corporate culture based on responsibility, transparency, fairness and continuous improvement.

Our commitment

The commitment is combined with the following principles:

- safeguarding human rights and employees' rights, by fully and impartially applying the local labour legislation;
- commitment to respecting the principles of the SA8000 Standard, rejecting child labor, forced or compulsory labor, ensuring the health and safety of workers, recognizing the rights of employees and the country's laws regarding freedom of association and collective bargaining, maintaining proper disciplinary practices, complying with working hour regulations in accordance with the living wage, and ensuring fair compensation that includes overtime calculated based on the premium rates provided for by current regulations. The maintenance of the objective of 100% coverage of direct employees and temporary agency workers with a living wage is ensured;
- opposition to any forms of discrimination and unequal treatment based on sex, race, nationality, religion, disability, sexual preferences, age, trade union membership and political affiliation, both during the hiring process and in career development and promotion;
- compliance with the laws and regulations in force, applying the Code of Ethics and the Anti-Corruption Policy at all company levels, and including clear procedures, such as that envisaged for whistleblowing, for reporting and managing violations;
- adoption of the necessary prevention and protection measures to control the risks associated with specific production activities;
- health and safety at work as the primary and priority objective, alongside with the protection of individuals' right to work in a healthy and safe environment, consistent with all the other company objectives;
- maintenance of a respectful work environment, free from any form of harassment, intimidation or inappropriate behavior;
- respect for workers, including the commitment not to require, under any circumstances, the surrender of employees' identification documents as a guarantee of employment;
- a structured and ongoing HRDD (Human Rights Due Diligence) process aimed at identifying, preventing, mitigating, and reporting on actual or potential negative impacts on human rights arising from its activities, business relationships and operations throughout the supply chain, with particular attention to the most vulnerable individuals and groups. These activities are also considered in the evaluation of new projects and acquisitions to ensure that human rights are always integrated into strategic decision-making processes;

¹For 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.

Companies with SA8000 certification are highlighted in bold.

- promotion of employee participation and consultation, including the periodic monitoring of the workplace environment via internal audits, interviews, and other structured employee feedback mechanisms;
- employee training and verification of the effectiveness of the activities carried out, supporting professional development and growth through continuous training programs, including those offered by the Marcegaglia Academy;
- protection of customers' rights by ensuring the safety, quality, and compliance of the products offered, as well as the availability of clear, accurate, and transparent information;
- temporary workers hiring policies, adopted strictly on the basis of operational needs and not as a strategy to prevent collective work stoppages or to circumvent good-faith bargaining;
- in the case of employment of migrant workers, recognition of their vulnerability by guaranteeing equal rights and working conditions, including access to transparent employment contracts, equal treatment and protection against any form of discrimination, abuse, or exploitation;
- promotion of diversity, equity, and inclusion, ensuring equal opportunities for all employees and collaborators;
- consideration of diversity, equity and inclusion principles when appointing members of the board of companies belonging to the Group;
- evaluation of suppliers based on environmental, social and governance (ESG) criteria, working closely to ensure compliance with Marcegaglia Group standards;
- regular engagement of stakeholders through consultations;
- minimization of the negative impact of its operations and maximization of social and economic benefits, opposing any form of non-consensual land expropriation or which violates the rights of local communities in the areas where Marcegaglia operates, with a particular focus on local, indigenous, and vulnerable communities.

Our initiatives

These principles are implemented by a series of concrete actions, including:

- commitment to maintaining compliance with national laws and with the resolutions of international bodies such as the ILO, the UN, and the OECD regarding human rights (such as the Universal Declaration of Human Rights, the Declaration of the International Labor Organization on the Principles and Fundamental Rights at Work, the Rio Declaration on Environment and Development, the United Nations Convention against Corruption, the OECD Guidelines for Multinational Enterprises, and the United Nations Guiding Principles on Business and Human Rights), ensuring respect for diversity, personal growth, fair opportunities and fair remuneration;
- adherence to the Women's Empowerment Principles (WEPs), a set of seven principles promoted by UN Women and UN Global Compact to encourage companies to promote women's leadership and equality in terms of treatment, health, safety, and training;
- commitment to protecting the rights of children and young workers, in order to prevent child labor and the exploitation of minors;
- continuous improvement of social responsibility requirements and occupational health and safety conditions, risk reduction, and prevention of potential non-compliance;
- engagement and commitment of all stakeholders, including customers and suppliers, in ensuring compliance with social responsibility requirements and fostering a healthy and safe working environment.

In particular, within the context of the steel sector, the Group:

- participates in the UN Global Compact, endorsing its Ten Principles on human rights, high labor standards, environmental protection, and the fight against corruption, in accordance with the UN Guiding Principles on Business and Human Rights;
- adheres to the ResponsibleSteel™, contributing to the development of a sustainable supply chain.

The corporate Governance Bodies and the management oversee human rights issues, integrating these principles into strategic decision-making processes. The implementation of the provisions set out in this document is entrusted to the management and employee representatives at each site, with the aim of periodically monitoring performance through specific indicators, ensuring transparent communication of results, progress achieved, and any critical issues.

In order to ensure respect for human rights, whether directly or indirectly linked to the Company's activities, Marcegaglia is committed to cooperating to prevent and mitigate any related impacts, implementing appropriate remedial measures, including compensation or restoration mechanisms where necessary, and reassessing or suspending any relationships found to be incompatible with respect for human rights. Furthermore, all those who work with or on behalf of the Company are encouraged to familiarize themselves with these principles and to apply them, promoting inclusive practices and acting promptly in the event of any violations.

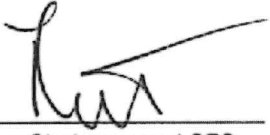
Marcegaglia Group has established specific procedures for complaints, reports and suggestions relating to Social Responsibility issues, thereby ensuring the existence of effective, accessible, confidential and retaliation-free complaint and reporting mechanisms, aimed not only at employees but also at external stakeholders such as suppliers, local communities and other potentially affected parties. Reports may be submitted, including on an anonymous basis, via the following channels, ensuring transparent and impartial handling:

- dedicated paper forms and boxes located in certified plants
- a dedicated e-mail: notification@marcegaglia.com
- ordinary postal mail, addressed to the Corporate Social Accountability Manager (CSAM)
- the Whistleblowing channel, available on the website www.marcegaglia.com

For Group companies holding SA8000 certification, the contact details for SAAS/SAI and the relevant Certification Body are provided below:

- SAAS - Social Accountability Accreditation Service - 15 West 44th Street, 6th Floor, New York, NY 10036
– Tel. (212) 684-1414 - Fax: (212) 684-1515 - e-mail: saas@saasaccreditation.org
- RINA Services S.p.A. - Via Corsica 12, 16128, Genoa, Italy – e-mail: SA8000@rina.org

Gazoldo degli Ippoliti, 27/03/2026


Chairman and CEO
Antonio Marcegaglia
Vice Chairman and CEO
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