

## RESPONSIBLE PROCUREMENT AND SOURCING POLICY

COGNE ACCIAI SPECIALI is a leader in the production of stainless steels and nickel alloys and to continue to maintain this position it must continue to act in a sustainable and responsible manner.

To pursue this goal:

- we carry out our activities with responsibility, integrity and respect, maintaining a high level of ethical standards;
- we provide a safe, healthy and fair workplace;
- we generate economic value for our stakeholders, customers and communities;
- we respect the environment, working with our customers and suppliers to improve the environmental profile of our products throughout their entire life cycle.

To achieve maximum benefit, we must apply these principles throughout our supply chain.

### Responsible procurement and sourcing

Responsible procurement and sourcing are an important element in achieving the goals of Cogne Acciai Speciali SpA (hereinafter COGNE).

Our responsible procurement and sourcing policy explains how we work with our suppliers to ensure that our supply chains share our values.

This Policy is an integral part of our procurement processes and represents, together with our Code of Ethics, the guideline for transparency, compliance with laws, regulations, minimum standards and continuous improvement and to ensure that our purchases of raw materials, goods and services are carried out responsibly and in line with our Values.

Responsible procurement and sourcing is systematically considered along with factors such as price and quality when evaluating suppliers. We encourage our suppliers to partner with us and continually improve.

This policy applies to all goods and services supplied by all of our suppliers and their supply chains.

Our responsible procurement and sourcing policy is developed according to the following principles:

- Health and safety: we expect our suppliers to adopt management practices that comply with all workplace health and safety regulations and ensure a high level of protection for their workers;
- Environmental protection: we expect suppliers to maintain effective policies, processes and procedures to manage their environmental impact;
- Trade Practices: the COGNE Code of Ethics outlines the ethical standards and the use of fair business practices with which COGNE does business and we expect our suppliers to adopt similar principles.
- Human Rights: We expect our suppliers to develop and implement policies and procedures to ensure all human rights in their business and to encourage their suppliers to do likewise.

COGNE requires its suppliers to comply with all applicable laws and regulations and expects its suppliers to adhere to the specific requirements of this Responsible Procurement and Sourcing Policy and to apply these expectations and / or principles in relationships within their respective supply chains.

Supplier personnel working at COGNE sites must comply with all relevant laws and regulations and applicable standards.

COGNE will not knowingly purchase so-called "conflict minerals" products or services that originate in conditions of armed conflict and human rights violations.

## Health & Safety

We expect our suppliers to adopt Occupational Health and Safety management practices that guarantee a high level of protection for their workers.

COGNE is committed to not voluntarily allow practices within our supply chain that we believe could cause harm to workers and contractors.

To meet our health and safety requirements, we require our suppliers to adopt adequate and sound management practices for health and safety and suppliers who have adopted ISO 45001 accredited management systems or equivalent will be deemed to meet this requirement.

We recommend that our suppliers' policies and practices follow the following principles:

- Prevention of accidents - business activities must be conducted with the aim of preventing all injuries and work-related diseases;
- Continuing training - all employees must receive adequate training on the risks they face and on safe working systems;
- Protective equipment - the supplier must ensure that protective equipment that is adequate to the activities to be undertaken is available to employees

## Environmental Protection

COGNE is committed to meeting the requirements of current legislation, the efficient use of natural resources and energy and the continuous reduction of the environmental impact of its operations through the adoption of sustainable practices. These principles are integrated into the way COGNE does business and we expect our suppliers to share our commitment.

We require suppliers to maintain effective policies, processes and procedures to manage their environmental impact. To meet our environmental requirements, we require our suppliers to adopt management practices that are appropriate to protect the environment and suppliers who have adopted ISO 14001 accredited management systems or equivalent will be deemed to meet this requirement.

We recommend that environmental protection policies and practices of our suppliers follow the following principles:

- Climate change - adoption of practices to monitor and minimize greenhouse gas emissions;
- Responsible use of resources - make efficient use of energy, raw materials and water.
- Circular Economy - take into account the reuse and recycling and environmental effects of products during their life cycle.
- Biodiversity - every activity must respect the wildlife habitats in and around the company sites.

## Fair Business Practices

COGNE's Code of Ethics outlines the ethical standards with which COGNE conducts its business and we expect our suppliers to adopt similar principles.

Our goal is that our supply chains operate according to the following principles:

- Competition - to desist from unfair commercial practices against competitors.
- Gifts and donations - do not offer or accept or make illegal payments, gifts, donations or other benefits to obtain business favors. In particular, all COGNE suppliers must make every effort to eliminate all forms of bribery, fraud and corruption.

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- Public Officials - Donations should not be made to public officials, public service agents or government agencies, directly or through intermediaries, in order to obtain favorable performance.
- Ethical Conduct : Conducting business fairly and transparently, showing honesty, integrity and high moral and ethical standards.
- Conflict of Interest - do not take advantage of family, social or political ties to gain advantage in business relationships and promptly notify COGNE of any potential conflicts of interest.
- Confidential Information - Do not disclose any confidential information

COGNE conducts its business with suppliers in a fair, objective and transparent manner. Employees of suppliers who work at our locations must abide by our principles of conduct.

If a supplier suspects that a COGNE employee or another supplier is not abiding by these principles, they must inform COGNE through existing whistleblowing tools (including anonymously), details of which are available on the company's website.

### Human rights

We expect our suppliers to develop and implement policies and procedures to ensure all human rights in their business and encourage their suppliers to do the same.

COGNE respects the human rights of employees and the communities in which it operates and we are committed to promoting these principles among our suppliers, requiring them to develop and implement policies and procedures to ensure respect for human rights in their activities and those of their suppliers. and suppliers who have adopted SA8000 accredited management systems or equivalent will be deemed to meet this requirement.

We recommend that our suppliers' human rights policies and practices follow the following principles:

- Child Labor - No workers under the age of 16.
- Forced Labor - No forced labor, including prison or debt bonded labor; no delivery of cash deposits or identity documents by workers to employers or external recruiters.
- Health and safety - Provide a safe and healthy work environment; take steps to prevent injuries; regular training of workers in health and safety matters; system for detecting threats to health and safety; access to bathrooms and drinking water.
- Freedom of association and right to collective bargaining - Respect the right to form and join trade unions and collective bargaining; where the law forbids them, freedom to use alternative ways of association and bargaining.
- Discrimination - No discrimination based on race, caste, origin, religion, disability, gender, sexual orientation, trade union or political affiliation, or age; no tolerance for sexual harassment.
- Discipline - No corporal punishment, mental or physical coercion or verbal abuse.
- Compensation - Wages paid must meet legal and industry standard requirements and be sufficient to meet the basic needs of workers and their families.
- Management systems : Suppliers must seek to obtain and maintain certification to go beyond simple compliance with COGNE requirements and to integrate the standard into their way of doing business.

Where local laws prohibit the supplier from supporting certain aspects of the Responsible Procurement and Sourcing Policy, the supplier must comply with local laws while trying to respect human rights