

Group QHSE policy
- quality, health, safety and environment -



Finarvedi S.p.A. is the holding company of the Arvedi Group (the Group). This Group Policy applies to all Group companies and takes precedence over all existing company-level QHSE policies, which shall be aligned with this document.

The Double Materiality assessment identifies two overarching issues of paramount importance to the Group and its stakeholders: Business Ethics and HSE.

The new Group Code of Conduct is the instrument developed to address the first issue.

To address the second issue, the decision has been made to enhance the existing integrated management systems within the Group companies, including quality aspects alongside those relating to health, safety and the environment, and to adopt its first Group QHSE Policy, based on the following principles:

1. Compliance with the mandatory requirements laid down by the legislation in force in the countries in which the Group operates.
2. Technical and organisational choices in line with international best practices, ensuring that such choices are not influenced solely by considerations of economic convenience.
3. Awareness that the example set by management is fundamental and that it must be evident in day-to-day decisions, through leadership and a precautionary approach.
4. Assessment of risks, behaviours and prevention and protection measures, reinforced by a system of controls involving all workers and, in particular, their representatives.
5. Training activities designed to promote a QHSE culture, rather than merely knowledge of legislative requirements, with a view to continuous improvement.
6. Root Cause Analysis, to be carried out following significant events (e.g. accidents, near misses and environmental spills) in order to identify their root causes and define actions to mitigate risks and negative impacts, so as to prevent their recurrence.
7. Recognition of third-party certifications (e.g. ISO 9001, IATF 16949, ISO 14001, EMAS, ISO 45001 and ISO 50001), global initiatives (e.g. UNGC and SBTi) and the commitment to zero deforestation as means of supporting the implementation of the Policy, with a view to customer satisfaction, continuous improvement and raising stakeholder awareness.

The third-party certifications referred to above (e.g. ISO 14001, EMAS and ISO 50001) and global initiatives (e.g. UNGC and SBTi) are referred to exclusively as internal management support. Any external use of such certifications for commercial communication or environmental marketing purposes shall be accompanied by an indication of the specific scope of application of the certification, the measurable results achieved and its expiry or renewal date, so as to prevent the generic mention of sustainability labels

from constituting a generic environmental claim pursuant to Article 23(1)(d-bis) of the Italian Consumer Code, as amended by Italian Legislative Decree No. 30/2026.

8. Decarbonisation of its production processes, namely energy efficiency, electricity solely from renewable sources backed by guarantees of origin, and a commitment to achieving emissions reductions towards the net-zero target by 2050, on the basis of a detailed Decarbonisation Plan, with measurable interim targets and precise deadlines, allocation of resources and periodic verification by an independent third-party body, the results of which are made publicly available at least annually, in line with the objectives set by the Paris Agreement of December 2015.
 9. Traceability and environmental footprint (energy, water, materials and waste) of all products manufactured by the Group (LCA/EPD).
 10. The results of LCA/EPD analyses, once available, are made publicly accessible, specifying the methodology applied, the scope of the analysis and the verifying body, before any use in commercial communications addressed to consumers.
- Reduction of waste destined for disposal and use of recycled scrap and ferroalloys in products, within the limits permitted by the applicable technical, quality and regulatory requirements.
- The percentages of recycled content in products are quantified, certified by an accredited third-party body and communicated specifically for each product line, avoiding general statements about the circular economy that are not supported by measurable data. Every reference to the circular economy is accompanied by specific information clarifying its content and scope.

Scope

The QHSE Policy applies to all existing Group sites and future acquisitions; it covers all activities carried out and is intended to extend to the supply chain, in line with the principles of the Group Code of Conduct (applicable to employees, suppliers and other stakeholders).

The extension to the supply chain is communicated externally only to the extent that it is actually implemented through binding contractual clauses, periodic audits and documented verification mechanisms, so as to prevent references to the supply chain from constituting a generic environmental claim relating to the Group's activities as a whole pursuant to Article 23(1)(d-ter) of the Consumer Code.

Risks and Opportunities

- Impact on the environment: any adverse event related to quality, health, safety and/or the environment may have direct consequences for the people involved and their loved ones, and may cause negative impacts on ecosystems and product quality. Conversely, the recovery and recycling of raw materials at the end of their life cycle may contribute to reducing environmental impacts, depending on the characteristics of the products and the actual management methods adopted.
- Impact on the Group: the application of the concepts of Double Materiality has highlighted a series of risks relating to production continuity, employee and customer retention, and increased insurance/social security costs. In particular, physical damage to plants related to climate change, energy cost and availability, exceedance of atmospheric emission limits, availability of raw materials and water, biodiversity loss and habitat degradation, waste generation, noise and occupational accidents are the most significant QHSE risks.
- Importance to stakeholders: as a Group made up of manufacturing companies with potentially significant impacts, QHSE aspects (e.g. material/energy consumption, recycled content, emissions and occupational safety) are relevant matters for all our employees, customers and suppliers.

Roles and Responsibilities

- The Chief Executive Officer of Finarvedi S.p.A., already designated by the Board of Directors as responsible for implementing and improving Group governance, will be entrusted by the Board with approving the QHSE Policy.
- Group management is responsible for setting an example and acting in accordance with the provisions of the QHSE Policy.
- All Group personnel are responsible for improving our QHSE performance.

Reporting

Pursuant to Legislative Decree No. 24 of 10 March 2023, the Arvedi Group has adopted an internal reporting management system available to employees, collaborators and other stakeholders.

Through the channels indicated in Group Guideline LGG 009 "Management of Internal Reports (Whistleblowing)", published on the Group's website, substantially well-founded reports concerning potential breaches of

legislation on employment, health, safety and the environment, the Group Code of Conduct, and internal rules and procedures may be submitted, including anonymously. QHSE issues falling outside this scope are brought to the attention of the competent corporate functions.

Updates

The QHSE Policy is updated on the basis of the Double Materiality assessment, changes in the operating context, progress towards achieving our 2030 ESG targets and the need to remain aligned with international best practices.

Monitoring, Verification and Communication of Environmental Claims

The Group undertakes to ensure that all environmental claims communicated externally – in any form, including text, images, logos, certifications and future objectives – meet the requirements of specificity, verifiability and scientific substantiation laid down by Legislative Decree No. 30/2026 and Directive (EU) 2024/825.

- every environmental claim relating to future performance is accompanied by a detailed implementation plan containing measurable targets with precise deadlines, allocated resources and a mechanism for periodic verification by an accredited independent third-party body, the results of which are made publicly available;
- the use of claims which, on the basis of the offsetting of greenhouse gas emissions, state or imply that a product has a neutral, reduced or positive impact on the environment in terms of greenhouse gas emissions is excluded;
- the use of sustainability marks or labels is limited to cases in which such marks are based on an open, non-discriminatory certification scheme verified by an independent third party, in accordance with Article 23(1)(b-bis) of the Consumer Code;
- the environmental data (emissions, energy, water, waste and recycled content) underpinning the claims made in communications are updated annually and verified before each publication.

This section is updated annually when the QHSE Policy is reviewed.

Cremona, 24 settembre 2026

Finarvedi S.p.A.
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