

GROUP QHSE POLICY

– QUALITY, HEALTH, SAFETY AND ENVIRONMENT –

Policy

Finarvedi S.p.A. is the parent holding company of the Arvedi Group (the Group). This Group Policy applies to all its companies and takes precedence over any existing QHSE policies within each organisation, which are to be aligned with this document.

The Double Materiality assessment highlights two key macro-topics of utmost importance for the Group and its stakeholders: Business Ethics and HSE matters.

The new Code of Conduct has been developed to address the first topic.

To implement the second, the Group has chosen to enhance the integrated management systems already in place within its companies, incorporating quality aspects alongside health, safety, and environmental ones, and to adopt a first Group-wide QHSE Policy, based on the following principles:

1. Compliance with applicable legal requirements in the countries where the Group operates.
2. Technical and organisational choices aligned with international best practices, ensuring that such decisions are not driven solely by economic convenience.
3. Awareness that the example set by management is fundamental and must be evident in daily decisions, through leadership and a precautionary approach.
4. Risk assessment, behaviour evaluation, and prevention and protection measures, reinforced by a control system involving all workers, especially their representatives.
5. Training activities designed to promote a QHSE culture, not merely legislative compliance, with a view to continuous improvement.
6. Root Cause Analysis to be applied following any event (e.g. accident, near miss, environmental spill) to identify its underlying causes and define actions to mitigate risks and negative impacts, preventing recurrence.
7. Recognition of third-party certifications (e.g. ISO 9001, IATF 16949, ISO 14001, EMAS, ISO 45001, ISO 50001) and global initiatives (e.g. UNGC, SBTi) and no deforestation commitment as tools supporting the implementation of the Policy, aimed at customer satisfaction, continuous improvement, and stakeholder engagement.
8. Decarbonisation of production processes, including energy efficiency, use of electricity exclusively from renewable sources with guarantees of origin, and commitment to achieving near-zero emissions – net zero target – by 2050, in line with the goals of the Paris Agreement (December 2015).
9. Traceability and environmental footprint (energy, water, materials, waste) of all products manufactured by the Group (LCA/EPD).
10. Waste reduction and maximum use of scrap and ferroalloys as recycled content in products (circular economy).

Scope

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

Risks and Opportunities

- Environmental impact: any negative event related to quality, health, safety and/or environment may have direct consequences for the individuals involved and their families and may cause potential harm to ecosystems and product quality. Conversely, positive end-of-life impact of products is linked to the ability to recover and recycle raw materials.
- Impact on the Group: the application of Double Materiality concepts has highlighted a series of risks related to production continuity, employee and customer retention, and rising insurance/pension costs. In particular, physical damage to facilities due to climate change, energy cost and availability, exceeding atmospheric emission limits, availability of raw materials and water, biodiversity loss, waste generation, noise, and workplace accidents are the most significant QHSE risks.
- Stakeholder relevance: as a Group composed of manufacturing companies with potentially significant impacts, QHSE aspects (e.g. material/energy consumption, recycled content, emissions, workplace safety) are highly relevant to all our employees, customers, and suppliers.

Roles and Responsibilities

- The Chief Executive Officer of Finarvedi S.p.A. is the person appointed by the Board of Directors to approve the QHSE Policy, within the framework of the Board's existing role in overseeing the implementation and improvement of Group governance.
- The Group management is responsible for setting an example and acting in accordance with the QHSE Policy guidelines.
- All Group personnel are responsible for improving our QHSE performance.

Reporting

All Group representatives, employees, collaborators, consultants, and business partners may report any situations they become aware of that show evidence of potential negative impacts from Group activities through our reporting channels (e.g. whistleblowing procedure).

Review

The QHSE Policy is updated based on Double Materiality, changes in context, progress towards our 2030 ESG Targets, and to remain aligned with international best practices.

Approved by the Chief Executive Officer of Finarvedi S.p.A.

July 2025