





 **Sede Legale**
Viale Enrico Forlanini, 23
20134 Milano

 **Sede Amministrativa e Stabilimenti**
Via Acquaviva, 18
26100 Cremona - Italia

 +39 0372 4781
 +39 0372 478259

 Via di Servola, 1
34145 Trieste - Italia
 +39 040 89891

 sales@arvedi.it
 acciaieria-arvedi@pec.arvedi.it

 www.arvedi.it

Cap.Soc. € 112.900.000
interamente versato
Società soggetta all'attività di
direzione e coordinamento di
Finarvedi S.p.A.
Società con Socio Unico

Part.IVA IT 11852670154
Cod.fisc. 00910070192
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POLICY FOR THE PREVENTION OF CORRUPTION

Acciaieria Arvedi S.p.A. (hereinafter referred to "Acciaieria Arvedi" or the "Company") is committed to prevent corruption in all forms to avoid all the negative impacts both in business and social and economic environment.

In particular, it is not allowed any wrong doing that consists in offering, promising, paying, receiving, claiming, authorizing - directly or indirectly - undue advantages of any kind (such as, for example, goods, money or other benefits) which could facilitate preferential treatment in the award of contract or of any other kind.

In daily business, Acciaieria Arvedi constantly strives in preventing active and passive corruption and in enhancing awareness and corporate culture that, for each and every one, is based on the values of integrity, honesty, transparency, fairness, reliability and compliance with national and international laws.

Acciaieria Arvedi's vision in the fight against corruption is based on three pillars.

1. Lead by example

Acciaieria Arvedi promotes with all stakeholders values of integrity, transparency and sustainability.

Acciaieria Arvedi's Board and Top Management are constantly committed in preventing and fighting corruption acting as a virtuous example for all people, internally and in the community.

2. Zero Tolerance

Acciaieria Arvedi does not justify any misalignment from its compliance rules. The Company also stands for clear consequences of any rules' violation, from loss of respect, credibility and work, up to loss of rights and freedom.

3. Balance

For Acciaieria Arvedi there is no trade-off between performance and control, results and rules, business and values.

Results and profit target must be reached within a framework of ethics and compliance, always with common-sense limits, with a holistic business approach vision.

Arvedi AST implemented the following elements for an effective corruption prevention in daily business:

Value system

By adopting the OECD recommendations, Acciaieria Arvedi stands for a culture of integrity, adopting the principle of transparency in the relations with business partners.

Clear rules and perception of consequences

Acciaieria Arvedi has defined clear and objective rules whose infringements are sanctioned according to the Labour National Contract. Acciaieria Arvedi carry on regular training programs, including corporate values, compliance rules, awareness of consequences from illegal behaviour.

"Lines of defence"

Acciaieria Arvedi's Top Management promotes a constant focus on internal controls, supported by governance and internal audit in alignment with organisation, management and control model, pursuant to Legislative Decree 231/2001.

Grievances

Acciaieria Arvedi supports the "Speak-up Culture", providing the Arvedi Group whistleblowing web-based system (freely accessible from the web address www.arvedi.it – "Compliance" menu). This allows stakeholders to report potentially illegal behaviours, granting, at the same time, whistleblower protection, confidentiality and non-retaliation, according to EU regulation and Italian law.

The recipients of this Corruption Prevention Policy are the personnel employed by Acciaieria Arvedi and all the Company's stakeholders.

Cremona, April 2025

The Managing Director

Dott. Maurizio Calcinoni

ACCIAIERIA ARVEDI S.p.A.
L'AMMINISTRATORE DELEGATO
Maurizio Calcinoni

