

Letter of commitment on Environmental and Social Responsibility

in accordance with the SA8000 (Social Accountability) standard in order to make its commitment on an environmental and social level transparent.

The undersigned Alexey Gerdt,

as Legal Representative of the Company Italia Syntesalloys Spa,

considering the importance of developing a path of responsibility, which identifies good behavior as a key to sustainable development and to make a positive contribution in economic, environmental and social terms

declares

that the Italia Syntesalloys Spa company is committed to pursuing the principles set out in the company policies relating to WORKING PRACTICES, HUMAN RIGHTS, ETHICS, SUSTAINABLE PURCHASES and the ENVIRONMENT.

Yours faithfully,


ITALIA SYNTESALLOYS SPA
Managing Director
Alexey Gerdt

Biella, 08/09/2022.

[Doc. SA_RESP_L01-00_ENG]

Environmental Policy

We want to **create value** for our shareholders, by fully satisfying the needs of our customers, employees and the communities in which we conduct our business, **aiming to reduce the impact that our business can have on the environment.**

Environmental policy is therefore an **integral part of Syntesalloys' commitment** to sustainability and is integrated into our strategies, processes and activities.

Environmental management is one of our top priorities, therefore we are committed to pursuing the following **objectives**:

- Conducting operations in an **environmentally conscious manner**, through the application of good environmental management practices in all our operations, such as the commitment to continuous improvement, the periodic verification of compliance with the law and the training and awareness of our employees.
- Carry out **periodic checks** on the environmental performance of our activities, also in relation to developments in our production processes and declare our environmental performance by publishing environmental declarations on the basis of periodically collected data.
- **Promote environmental responsibility** in the value creation chain, encouraging suppliers, sub-contractors and customers to develop their environmental performance. This policy will also be **shared through the publication on our website** on the occasion of its launch and any updates.
- Develop and market **reliable and efficient products**, to increase their life cycle and therefore reduce their environmental impact.
- Develop **production processes** with particular attention to energy efficiency and excellent resource management.
- Always take environmental aspects into consideration when **evaluating projects** under development, as well as our customers' requests for new products.

Syntesalloys carefully considers energy and water consumption. He also believes that hazardous chemicals, waste generation and atmospheric emissions - including greenhouse gases - are crucial to good environmental management. For this reason, the company draws up and periodically updates **specific improvement plans** on these important issues.

The Management undertakes to review this policy annually to ensure that it is updated.

Biella, 08th.09.2022.

[Doc. SA_ AMB_P01_00_ENG]

Ethics Policy

Labor Practices, Human Rights and Sustainable Purchasing

The company is committed to **protecting human, child and worker rights** and aims to promote compliance with the following requirements:

- control of the absence of discrimination of any kind;
- safety and healthiness of the work environment;
- definition of the right working hours;
- adequacy of wages and salaries;
- application of the principles for Social Responsibility;
- participation in company monitoring and results monitoring activities, in relation to the defined policy;
- implement any improvement plans that may be necessary;
- promptly undertake remedial and corrective actions, with regard to any non-compliance.

For these reasons, the company guarantees to engage in the following areas as follows:

Role in society

Contribute, insofar as it falls within our abilities, to economic, environmental and social improvement through an open dialogue with internal and external interlocutors.

Human rights

Support and respect the defense of internationally recognized human rights.

Children and child labor

Not to resort to or support the use of child labor and forced labor. Ensure adequate protection for minors; as a fundamental principle, do not hire children or encourage the use of child labor, except as part of youth training programs approved by government authorities.

Freedom of employment

Require that all employees be hired by the company of their own free will; do not apply any form of coercion to the hiring of staff and do not support any type of forced or compulsory labor.

Health and safety and hygiene

Provide a healthy and safe work environment and arrange adequate preventive measures to reduce the risk of accidents and injuries caused by work activities, minimizing the causes of risks associated with the work environment.

Respect the national legislation on safety in the workplace with the designation of the person in charge of the safety protection and prevention service (RSPP) and the election of the safety representative (RLS), ensuring adequate and documented training for personnel on health and safety.

Ensure the use of clean bathrooms for all staff and constantly ensure the hygiene and cleanliness of all rooms available to employees, as well as the free use of drinking water.

Equal opportunities

Offer equal opportunities to all employees and not implement or encourage discrimination in hiring, remuneration, access to training, career development, exit from work and retirement based on ethnic origin, nationality, status social, religion, physical disability, sex, age, sexual orientation, trade union membership or political affiliation.

Mobbing and disciplinary practices

Do not implement or sustain any kind of physical or mental coercion, any verbal abuse, any form of corporal punishment or by assigning hard work; do not allow behavior, including gestures, language and physical contact, that involves coercion, threat, abuse or exploitation. Do not use and support coercive disciplinary practices.

Working hours

Respect current legislation and industry standards in terms of ordinary and overtime working hours.

Remuneration

Ensure that wages are equal to or higher than the legal or contractual minimum and that they are always sufficient to meet the basic needs of the person. Ensure that the composition of wages and extra benefits is regulated, clearly detailed and that the compensation is paid in full compliance with applicable laws and in a manner convenient for the worker.

Suppliers

Establish and maintain appropriate procedures for evaluating and selecting key suppliers and subcontractors, based on their ability to meet social policy and principles standards

Business ethics and supply chains

Maintain the highest standards regarding business ethics and integrity with particular attention to anti-money laundering, the fight against the financing of terrorism, the fight against corruption, and the non-involvement of the sources of precious metals in conflicts. Support national and international authorities who are working to create and implement high ethical standards in all business areas.

The email address italiasyntesalloysspa@legalmail.it is available to facilitate each employee, actor in the supply chain and interested party, the opportunity to express any concerns relating to the supply chain.

Employees consultation and communication

Facilitate regular consultations with all employees to address critical issues.

Respect the right of all staff to form trade union organizations of their choice, to join and to bargain collectively.

Ensure the freedom of trade union association for employees.

Ensure that staff representatives are not subject to discrimination and that they have access to their members in the workplace.

Ensure that, in the event of major corporate-business restructuring, social safety nets and the related implementation plans are prepared and that they are promptly disclosed to the official employee representatives.

Do not withhold identity documents or cash deposits from workers to cover any errors at work.

Make the CCNL and the disciplinary code available and easily accessible to workers.

Do not engage in discriminatory behavior based on race, class, religion, sex, sexual orientation, age, political affiliation, disability and trade union membership.

Biella, 08th.09.2022.

[Doc. SA_ETHIC-P01_00_ENG]