



Annex 2a-1 Company Policy

Operating in the steel industry for over a century, Metallurgica Marcora has always been synonymous with quality and innovation in the production of hot rolled steel for use in various sectors on the domestic and international markets.

Metallurgica Marcora's goal is to make quality a competitive factor for success, by converting the customers' needs, such as

- the need for small batches;*
- fast delivery times;*
- assistance in creating products with particular technical and qualitative specifications, into solutions that meet their expectations.*

Metallurgica Marcora is committed to meeting all of its stakeholders' needs through a thorough analysis of the context, with the aim of reducing the risks and seizing the opportunities associated with all of its processes, while at the same time continuously improving its performance.

In addition to consolidating its presence on the markets where it traditionally operates, Metallurgica Marcora is also constantly on the lookout for any new potential sectors of use for its products.

The Company considers its staff's expertise and experience, as well as the suitability of its facilities, to be essential means for ensuring its customers' satisfaction.

It's important for the training to be extended to all levels of the company, in order to provide the workers with the best techniques for implementing the necessary improvement measures for every activity, and in every situation.

The process managers are therefore tasked with conveying the value of quality to all the employees.

Metallurgica Marcora dedicates the utmost attention to the continuous upgrading of its plants' resources, and thoroughly evaluates every possible product and process innovation applicable to its activities.

The workers' awareness and respect for the company's procedures and operating instructions, which have been developed with the utmost attention to "health and safety", ensure that the company's various activities are carried out in compliance with the workplace safety and accident prevention regulations.

In light of the above, and in order to meet the demands of its customers in the "automotive" sector, Metallurgica Marcora has long maintained a Quality Management System compliant with the ISO 9001:2015 and IATF 16949:2016 standards.

Lately, to ensure the customer satisfaction, the Company has obtained the certificate of conformity of the factory production control according to attachment ZA requirements – EN 10025-1:2004 for building products (CE marking).

The company conducts Internal Audits in order to ensure constant control over its Quality Management System and to identify any situations and/or areas in need of immediate intervention.

The basic principles of the Metallurgica Marcora Quality Policy are laid out in the following points:

- quality is a success factor;*
- quality is Customer satisfaction, and Customer satisfaction means competitiveness;*
- quality is staff engagement and participation;*



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- *quality is the ability to prevent or reduce risks and seize opportunities;*
- *quality is improvement, and there is no limit to improvement.*

The effectiveness of these principles is attested by Metallurgica Marcora' consolidation of its market position and income capacity in recent years, thanks to the attention paid to strategic objectives that have long been considered essential, including the following:

- *guarantee of increasingly high quality standards;*
- *maintenance of production flexibility, which has always been a fundamental characteristic of the company;*
- *active collaboration with customers and maximum willingness to address any contingent problems that may arise.*

The company therefore believes that its strategies must be focused on the continued pursuit these objectives in the future.

Through its Code of Ethics, Metallurgica Marcora has adopted and disseminates an anti-corruption policy in order to ensure compliance with the laws in force at the local, national, and international level on the part of its managers, employees, suppliers, agents and other commercial partners, encouraging appropriate conduct through clear instructions.

Under penalty of the legal consequences envisaged for unlawful conduct, Metallurgica Marcora does not tolerate any unfair or unethical business practices.

Metallurgica Marcora operates in compliance with the provisions on whistleblowing.

All employees are required to report any conduct or activities that they believe to be unlawful, abusive, and/or inconsistent with the applicable legislation, with the procedures and regulations adopted by the Company, and/or with the provisions of the Code of Ethics. In order to implement an appropriate escalation policy, an internal committee in charge of collecting and evaluating these reports has been established.

This company policy has been created to assure the Company plays a constructive role in the global effort against climate change.

With regard to the current scenarios and future challenges, Metallurgica Marcora considers the containment of its environmental impacts, both in normal working conditions and in emergency conditions, as a primary objective.

The company is actively engaged in the constant adjustment of its production site, aware that its conduct can contribute to a sustainable growth with respect to the natural environment.

The monitoring of environmental aspects of reference, with particular attention to the emissions into the air and water, to the protection of the soil and subsoil, to the maximizing of the recovery, to the effective and sustainable use of raw materials, ensures compliance and the improving environmental performance.

The certification according to ISO 14001:2015 obtained in June 2023 and the recent definition of the profile relating to the Carbon Footprint, are a natural consequence of the path implemented by the company.

Metallurgica Marcora has defined the individual phases of its production process, together with the support activities, as the scope of application of the environmental management system

Cuggiono, 17.02.2025

The President