



Cogne Acciai Speciali

COGNE ACCIAI SPECIALI S.p.a.

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Sustainable Sourcing Policy

Introduction

Our core values of safety, health, protection of the environment, quality and transparency guide our daily activity and they are reflected in our Code of Business Conduct and our Quality, Health, Environment, Energy, Safety at Work and Major Accidents Prevention Policy, as well as other internal policies, procedures and guidelines. Cogne considers the health and safety of all workers and of the neighbouring populations, the environmental protection, the sustainable energy management and the satisfaction of its customers an absolute priority that is integrated in all its activities.

The value of our Supply Chain

Our supply chain is a key element to our sustainable development. For many years, Cogne has worked closely with its suppliers to build strategic, long-term, and healthy relationships, supporting suppliers, sharing know-how where possible. As a result, we have developed a supply chain that includes local suppliers and leading global providers of goods and services of advanced technology machinery, raw materials, industrial and professional services.

We carry out a selection process following a risk-based approach, to ensure that our suppliers meet the standards enshrined in our Code of Business Conduct, and comply with applicable laws and regulations. We expect all our partners in business to observe the same high standards we follow internally governing ethical behavior, legal compliance, and health, safety and environmental responsibilities, as well as efficient energy management. Additionally, for suppliers of “Conflict Minerals” as defined by OECD guidance and by EU in its Conflict Mineral Regulation, we ensure that these minerals and metals are coming from responsible and conflict-free sources only.

To assist us in our due diligence processes, we use a variety of tools, which may include: on-site inspections, third party verification, obtaining information from third party sources including authorities, international organisations and civil society.

We aim to achieve a sustainably integrated value chain for our production. We are committed to working with our suppliers to improve sustainable business practices, assisting them to identify risks and opportunities, providing training, sharing knowledge and raising awareness, and, in general, working together to improve the sustainability of our supply chain and our business.

What we expect from our Suppliers

Our suppliers are required, following a risk-based approach, to accept and comply with the standards and rules contemplated in Cogne’s Code of Business Conduct. In addition, Cogne recognizes the value of applying its Quality, Health, Environment, Energy, Safety at Work and Major Accidents Prevention Policy throughout its quality, health, safety and environment management systems, covering the entire supply chain. Therefore, as a basis for sustainable development, all suppliers are expected to abide by the following principles:

1. Comply with applicable laws, rules and regulations, knowing that, because of the global nature of Cogne’s operations, suppliers may be asked to follow local and/or international regulations or specific policies or procedures to ensure Cogne’s own compliance with legal requirements in the several jurisdictions where we operate;
2. Build an organizational culture of transparency and integrity, based on ethical behavior and compliance with law, aimed at helping employees maintain their quality of life, health and personal well-being;



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3. Implement policies and procedures to ensure all human rights in their business, to fight, avoid ed explicitly prohibits forced or compulsory labour, minor and juvenile labour, any type of discrimination, the use or threat of using undignified disciplinary practices and to promote diversity and reject any type of discrimination;
4. Protect the environment, minimizing environmental impacts throughout our value chain, maximizing efficiency in the use of resources, and collaborating to proactively address climate change and emissions reduction;
5. Provide a safe and healthy work environment, through a system for detecting threats to health and safety and to prevent injuries and illness;
6. Adopt appropriate governance policies, procedures and practices to monitor and manage ethical risks;
7. Implement appropriate technical and organizational measures to protect information, assets, communications, and personal data, and prevent security incidents that may result in loss or damage to information of Cogne or of its employees, customers, business partners or related parties;
8. Commit to ensuring that supplier personnel working at COGNE sites receive the applicable legal minimum wage or, where there is no legal minimum wage, the prevailing industry standard, plus any benefits required by law, in monetary means only, in full and on time
9. Commit to communicate the terms of employment to workers at the beginning of the working relationship and when changes are made to the terms, using languages, methods and channels that are understood and are easily accessible to workers.
10. To implement these principles within their respective supply chains.

Monitoring

To facilitate the implementation of this policy and monitor its application among our suppliers, as well as to ensure compliance with relevant reporting standards, we may, from time to time, request certain suppliers to provide us with information related to their sustainability practices and/or specific information required for reporting purposes. The analysis of this information, or the failure to provide it, would be taken into account in supplier qualification and selection, among other factors.

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Massimiliano Burelli
Chief Executive Officer
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