



Stakeholder Engagement Management Policy

	STAKEHOLDER ENGAGEMENT MANAGEMENT POLICY	REV 0
		OF 29 APRIL 2024

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1. Overview

Cogne Acciai Speciali SpA (hereinafter also referred to as "Cogne") recognizes the importance of Stakeholder engagement within the scope of its activities. The Stakeholder Engagement Management Policy (hereinafter "SEM Policy"), approved by the Board of Directors of Cogne Acciai Speciali SPA on April 29th 2024, aims to define the strategic framework within which the company can meaningfully and cooperatively interact with relevant stakeholders in order to promote sustainability, social responsibility and risk management.

A stakeholder or interested party is defined as any individual or organization that can reasonably be expected to be significantly affected by Cogne's organization, activities, products and processes or whose actions can reasonably be expected to affect Cogne's ability to successfully implement its strategies and achieve its goals.

2. Recipients and scope

The SEM Policy is intended for all individuals who are involved in managing stakeholder relations and implementing stakeholder or stakeholder engagement activities.

This policy applies to all operations worldwide, including those carried out by all companies included in the scope of consolidation for financial reporting purposes, and focuses on stakeholder engagement in sustainability and social responsibility issues, including but not limited to:

- Occupational health and safety;
- Employee relations and relations with the local community;
- Management of environmental impacts;
- Sustainable use of natural resources;
- Protection of human rights.

3. Purpose

The purpose of this Policy is to:

- Establish a clear strategy and effective engagement process for stakeholders in relation to corporate sustainability and social responsibility.
- Identify key areas and determine specific engagement methods.
- Create a framework to ensure that stakeholder engagement is ethical, transparent and free from manipulation, interference, coercion or intimidation.
- Provide stakeholders with timely, understandable and complete information.
- Work to ensure that the opinions of stakeholders are taken into account in business process decisions.
- Offer stakeholders a feedback mechanism.

This SEM policy is a guideline for all stakeholder engagement activities and will serve as a basis for implementing specific engagement initiatives.

4. Definition of objectives and planning of stakeholder engagement activities

Stakeholder engagement identifies the set of actions carried out by Cogne to actively engage stakeholders in decisions and activities. This engagement takes place through an exchange of opinions

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and perspectives, with the goal of sharing different expectations, needs and possibilities. The objective of this policy is to foster mutual understanding, instill trust, and encourage cooperation between Cogne and stakeholders.

To ensure engagement effectiveness, it must be consistent and aligned with Cogne's overall strategy and stakeholder engagement objectives. Once the objective has been defined, the scope of consultation must be determined and, accordingly, the issues that will be discussed with stakeholders.

Every internal person involved in the planning, implementation and reporting of stakeholder engagement activities must be informed and trained on:

- Engagement objectives and expectations;
- Types of stakeholders engaged;
- Nature of the existing relationship between the stakeholder and Cogne;
- Degree of stakeholder dependence on the company;
- Influence the stakeholder has on Cogne;
- Social and cultural context in which the relationship between Cogne and the stakeholder takes place;
- The geographical target area.

5. Stakeholder identification

For the purpose of designing effective stakeholder engagement processes, the Sustainability and Corporate Affairs function periodically maps the categories of stakeholders with whom Cogne relates when conducting its business. It is responsible for identifying, with the involvement and support of the various corporate functions, those with whom a dialogue has been established or may be useful.

Updating the map may also be necessary during significant events such as extraordinary corporate transactions.

Cogne identifies stakeholders based on the following criteria:

1. **Dependence:** individuals who are directly or indirectly dependent on the company's activities and services or who play a crucial role for the company, such as employees, consultants, suppliers, customers and agents.
2. **Responsibilities:** parties to whom the company has or will have legal, commercial, operational or ethical/moral responsibilities, such as customers, business partners and suppliers.
3. **Tension:** parties that require immediate attention regarding financial, economic, social or environmental issues, such as local communities or financial partners.
4. **Influence:** parties who can impact the company or influence its strategic or operational decisions, such as institutions or governments.

Categories of Stakeholders relevant to Cogne include but are not limited to:

- Employees e contractors;
- Customers;
- Suppliers and Business Partners;
- Local, national and supranational governmental institutions;
- Banking Institutions;

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- Local Communities;
- Trade associations;
- Investors and Shareholders.

From this mapping of stakeholder categories, Cogne's Business Functions involved in stakeholder engagement activities identify and select stakeholders to engage based on the specific objectives of each activity.

6. Determining the levels and methods of stakeholder engagement

Once the engagement objectives, key issues and relevant stakeholders have been established, it is critical to carefully select the levels and methods of engagement in order to meet not only the engagement objectives, but also the needs and expectations of the stakeholders themselves.

The choice of levels and methods of engagement will depend on the specific needs of the engagement activity and the nature of the stakeholder relationships concerned.

Adopted engagement methods and channels may include, but are not limited to:

- **Questionnaires:** Use of online or paper questionnaires to collect feedback and opinions from stakeholders in a structured manner.
- **Interviews:** Conducting individual or group interviews to understand into stakeholders' opinions and perspectives.
- **Meeting:** Organizing face-to-face or virtual meetings with stakeholders to inform them about specific issues and gather comments on specific topics.
- **Website and Social Media Platforms:** Use of corporate website and Social Media platforms to provide information.

6.1. Accessibility and inclusion in stakeholder engagement

Cogne recognizes the importance of engaging stakeholders in an inclusive, accessible, and culturally appropriate manner in order to promote effective communication and meaningful participation. Adherence to this principle is reflected in the following points:

- **Accessible communication:** strive to provide documents and communications in accessible formats, such as screen-readable text or translations in different languages, to ensure that stakeholders can access information.
- **Accessible times:** Ensure that meetings and gatherings are scheduled in a way that allows a wide audience to participate, considering times that are accessible and convenient for stakeholders.
- **Removal of obstacles:** Identify and address obstacles that may prevent stakeholders from participating meaningfully. Obstacles may include physical access problems, cultural barriers, communication difficulties, or any other challenges that may hinder full and meaningful participation.
- **Virtual Participation:** Provide virtual participation options to enable anyone, regardless of their geographic location, to participate effectively in online meetings or consultations.
- **Privacy Protection:** Respect the privacy and personal data protection of stakeholders, ensuring the secure processing of information collected during engagement.

Cogne is committed to ensuring that stakeholder engagement takes place in an open, inclusive and accessible manner, respecting the diverse needs and perspectives of those who wish to participate.

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7. Analysis of results and updated communication

Following the stakeholder engagement process, results analysis assumes a key role in the process. The function responsible for engagement evaluates the effectiveness of the engagement activities. The goal is to ensure that results are properly documented and reflect stakeholder feedback and opinions. This process is essential for responding appropriately to attention points raised during stakeholder interactions.

7.1. Measuring the effectiveness of stakeholder engagement

To measure the effectiveness of stakeholder engagement, the Sustainability and Corporate Affairs function implements a set of Key Performance Indicators (KPIs). These are used to monitor progress, evaluate the effectiveness of engagement activities and guide continuous improvement.

Some of the key performance indicators include:

1. **Stakeholder satisfaction level:** Periodically and regularly measure the satisfaction of stakeholders through surveys, direct feedback and other means of communication. This allows for an assessment of how the parties perceive engagement and whether they feel heard and respected.
2. **Number of New Initiatives Based on Stakeholder Feedback:** Monitor how many new corporate projects, policies or initiatives have been launched based on stakeholder feedback and recommendations. This shows a commitment to translating engagement into concrete action.
3. **Participation and Active Engagement:** Measure the number of parties actively engaged in consultations, meetings or specific initiatives. This will give an indication of active participation and stakeholder interest.
4. **Timely communication:** Assess how quickly stakeholder requests and concerns are answered. This indicates the ability to be reactive and provide timely responses.
5. **Diversity of Engaged Stakeholders:** Examine the diversity of stakeholders involved in engagement activities. This will help ensure that a wide range of perspectives are represented.

Ongoing collection and analysis of these KPIs will enable the objective assessment of the effectiveness of stakeholder engagement and guide the definition of corrective or improvement actions.

Based on the results obtained from the analysis, the Sustainability and Corporate Affairs function evaluates, with top management and the functions responsible for various actions, whether to request other activities to be implemented in order to improve corporate performance with regard to issues of priority interest to stakeholders. These plans ensure that stakeholder concerns are pro-actively addressed and that Cogne continues to evolve responsibly.

7.2. Notices

Communication is critical to ensure transparency and effectiveness of stakeholder engagement.

Cogne is committed to communicating the stakeholder engagement plan effectively within the company. This will involve the dissemination of relevant information among employees, ensuring that everyone is aware of the stakeholder engagement process, through the following means:

- internal communication media, such as e-mails, to disseminate information about stakeholder engagement, including goals, programs and developments

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- Periodic company meetings during which an update on stakeholder engagement activities and results will be provided.

Cogne recognizes the importance of communicating the details of the Stakeholder Engagement plan in a transparent, accurate and timely manner, ensuring external stakeholders have a full understanding of the engagement process and opportunities for participation. To this end, Cogne undertakes to use various means of communication, including announcements, website, information documents, depending on the needs and preferences of stakeholders.

The Sustainability and Corporate Affairs function that initiated the stakeholder engagement process is responsible for communicating the results both internally and externally to the company with the support of the External Relations function. This is done to ensure transparency and sharing of engagement information with all stakeholders.

The Sustainability and Corporate Affairs function, with the involvement of AD and the support of DG, ensures that the Board of Directors is regularly informed on the development and significant contents of the dialogue that has taken place with all stakeholders. This aims to ensure that the BoD is aware of the results emerging from the consultations, fostering informed and accountable governance

7.3. Documentation

To ensure traceability and full documentation of stakeholder engagement activities, Cogne will implement the following practices:

1. **Documentation of activities:** Cogne tracks stakeholder engagement activities through paper and/or digital archives. Documentation of activities identifies a reliable source of information on past and present engagement, facilitating knowledge sharing and the analysis of progress.
2. **Sustainability Reports:** Cogne will use the information gathered during Stakeholder Engagement activities to enrich the company's sustainability reports. These reports will include details of stakeholder engagement, issues addressed, concerns raised, and actions taken or planned in response to stakeholder feedback. This practice ensures that information on stakeholder engagement is meaningfully integrated into company reports and that the company demonstrates its commitment to responsible and sustainable management.

Accurate documentation and integration into sustainability reports help build the company's credibility and transparency.

7.4. Management of information requests and reports

Cogne is committed to handling stakeholder requests for information and reports in a respectful, responsible and timely manner, promoting open and effective communication. Handling requests for information and reports is an essential part of the commitment to responsible governance.

Provide stakeholders with a specific point of contact and a means of communication, such as an e-mail address or phone number, to report concerns or complaints. These details will be clearly communicated on the Cogne website and in other appropriate media.

If a request for information or a significant report are received, the management process provides for the matter to be assigned to a dedicated team. This team consists of representatives from relevant business functions and is responsible for examining the issue in detail. The team assesses the issue, identifying the underlying causes and developing an action plan to address it appropriately.

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Cogne is committed to handling requests for information and reports in a timely manner; it undertakes to notify the person who made the request for information or report of the approximate time for handling, taking into account the complexity and severity of the issue raised.

Once the activity is completed, it undertakes to inform the stakeholder by providing clear and transparent information.

8. Policy update

The Company is committed to updating the contents should needs dictated by changing context, emerging best practices and regulatory or business organization developments make it appropriate and necessary. The Board of Directors of Cogne Acciai Speciali SPA is responsible for any amendments and/or additions to this SEM Policy.

The adoption and implementation of this policy is disclosed to the public via the company website to ensure the transparency and sharing of stakeholder engagement practices with external stakeholders.