SUSTAINABLE PROCUREMENT POLICY

Application and Policy Scope

This Sustainable Procurement Policy (hereinafter also “Policy”) defines the approach and commitment of the Sesa Group (hereinafter also “Group” or “Sesa”) to safeguarding human rights, working conditions, health and safety, environmental management issues and corporate integrity along the supply chain.

Sesa respects the human rights of its resources and of the local communities and promotes these principles with its suppliers. It also identifies and manages the environmental, social and economic impacts within its supply chain, favouring sustainable, ethical and responsible materials, goods and services, in line with the provisions of the UNI ISO 20400:2017 standard.

The Group is also committed to doing business with suppliers, vendors, agents and partners (hereinafter also “Suppliers”) who share these values and undertake to comply with this Policy in the performance of their activities. Therefore, Sesa requires its Suppliers to ensure that their employees and parties involved in their supply chain of goods or services to the Company comply with the principles and guidelines set out in this document.

This Policy reflects Sesa's intention to improve its sustainability performance and, at the same time, to safeguard itself and mitigate risks arising from the supply chain, with particular reference to the procurement of products and services that are essential to the Company's operations.

The Policy applies to the parent Company Sesa S.p.A. and all its subsidiaries, as well as to company departments and individuals involved in any capacity in the procurement process. It is a mandatory reference point for ensuring consistency, transparency and uniformity in purchasing activities, regardless of the type of goods or services.

Reference values and standards

In order to guide the decision-making process, as well as to ensure and pursue the continuous improvement of the governance system and ensure compliance with national and international regulations and best practices, Sesa bases its activities on the most relevant standards issued by leading international organisations, including:

- the Universal Declaration of Human Rights;
- the United Nations Guiding Principles on Business and Human Rights;
- the International Covenant on Civil and Political Rights;
- the International Covenant on Economic, Social and Cultural Rights;
- the International Labour Organisation's (hereinafter also “ILO”) Declaration on Fundamental Principles and Rights at Work and its follow-ups;
- the Tripartite Declaration on Multinational Enterprises and Social Policy of the ILO;
- the ILO's International Labour Standards on occupational health and safety;
- the United Nations Convention against Corruption;

- the United Nations 2030 Agenda for Sustainable Development.

In addition, in recognition of its achievement of the previously mentioned standard values, Sesa has also obtained various certifications of compliance issued by accredited certification bodies. A complete list of these certifications is available on the website www.sesa.it.

For anything not expressly mentioned in this Policy and, specifically, with reference to anti-corruption, fraud, gifts and donations, Suppliers are required to strictly comply with the relevant policies (published on the Company's website), the Organisation, Management and Control Model pursuant to Legislative Decree 231/2001 and the Code of Ethics adopted by Sesa.

Sesa's commitment to sustainable purchasing

Sesa's mission is to enable sustainable growth, innovation – including digital innovation – and the ability to compete in the digital market for Group Companies, operating within a framework of fair competition with honesty, integrity, fairness and good faith, respecting the legitimate interests of the stakeholders with whom it interacts. To this end, the Company has embarked on a path of strengthening and developing ESG issues, within which the proper management of suppliers is fundamental: in fact, ethical and sustainable procurement is an effective means of promoting responsible values and practices throughout the supply chain and enables the creation of transparent and lasting relationships with its suppliers, resulting in the sharing of the principles that inspire Sesa.

For these reasons, Sesa has adopted an organisational, management and control model, together with policies and procedures, which enable the Group to guarantee and verify regulatory compliance in relevant areas (labour law, human rights, crimes against the person, etc.) in accordance with Legislative Decree 231/2001. The Company considers the adequacy of human resources, internal regulatory documentation and information systems to be fundamental elements in ensuring effective supplier monitoring and more sustainable procurement management.

With regard to human resources, it is essential to ensure continuous training on purchasing and supporting information systems, together with in-depth analysis of the corporate and personal risks resulting from the conduct of employees. Training in the area of purchasing also covers, the ESG aspects of supply chain management, among other topics.

Any need to adapt information systems and procedures is assessed on a case-by-case basis according to the results of checks carried out by the various parties responsible. In order to increase the value of internal information assets, procedures and systems must include, among other things, the collection of feedback on past supply relationships, with particular reference to internal customer satisfaction and the supplier's ability to meet commitments. Information relating to suppliers' ESG commitments must be progressively integrated and, where possible or relevant, measured.

Governance and Responsibilities

Responsibility for implementing this Policy lies with the corporate functions involved in the procurement processes of the Group companies, which ensure the integration of environmental, social, human rights and integrity criteria into supplier qualification, selection, assessment and management activities.

The Chief Sustainability Officer supports and coordinates, together with the Procurement functions and the other relevant corporate functions, the definition of ESG criteria applicable to the supply chain, the monitoring of sustainability indicators and the consolidation of results at Group level.

The Procurement functions ensure the collection and retention of evidence relating to supplier qualification and assessment activities and, where critical issues arise, coordinate with the relevant functions the definition of any corrective or mitigation actions.

The Sustainability Operating Committee periodically monitors the progress of initiatives and targets relating to sustainable procurement. The results of the monitoring activities are reported to the Sustainability Committee within the Group's ESG governance processes.

Business practices to promote sustainability through sustainable purchasing

Specifically, Sesa is committed to:

- prevent negative social and environmental impacts in its supply chain;
- limit the environmental impact of its operations by purchasing products that comply with recognized environmental standards.

Sesa adopts the following sustainable procurement practices across the entire organisation:

- Purchase goods and services that comply with international principles for the promotion and protection of human rights, as defined by the United Nations Global Compact (in line with the Universal Declaration of Human Rights) and the ILO Declaration on Fundamental Principles and Rights at Work, applicable to all parties involved in the supply chain;
- Include sustainability criteria as part of the evaluation process for suppliers and business partners;
- Ensure compliance with environmental and safety legislation, including international regulations on climate change and sustainable development, with a particular focus on reducing CO2 emissions and protecting biodiversity;
- Give emphasis to suppliers who adopt and promote ethical and sustainable practices, both internally and in their supply chain;
- Raise awareness among supply chain partners and encourage them to adopt sustainable practices;
- Purchase goods and services that comply with recognized environmental specifications or standards, contributing to the continuous improvement of internal procurement practices;
- Where possible, prefer products made from renewable or responsibly managed raw materials;
- Reduce the use of products that can damage the environment, opting for more sustainable solutions when alternative options exist;

- Where possible, prefer products that minimise local and global environmental impact. The assessment will include the sustainability of production processes, transport, energy consumption, use of raw materials, waste production and the proportion of recycled material or high recyclability;
- Limit the impact of deliveries and favour local supplies of materials, products and services, where possible;
- Where possible, adopt measures to reduce consumption and purchases, identifying and minimising wasteful practices in internal and external operations over which Sesa has the capacity to intervene.
- Promote the recycling of end-of-life materials; where this is not feasible, ensure disposal through environmentally sound and appropriate procedures.

Quantitative Sustainable Procurement Targets

As part of its ongoing commitment to strengthening the responsible management of its supply chain, the Sesa Group defines and monitors specific quantitative targets relating to the implementation of this Policy.

With regard to strategic suppliers classified as presenting a high sustainability risk, the Group has set the following target: to increase to 100% by April 30, 2028 the proportion of strategic suppliers classified as high sustainability risk that are subject to ESG assessment, compared with the baseline value of 90% recorded as of April 30, 2026. Depending on the nature and risk profile of the supplier relationship, the assessments take into account environmental and social matters, human rights, health and safety, and business integrity. The indicator is monitored annually based on the population of strategic suppliers classified as high sustainability risk and the assessments completed during the relevant reporting period. Any material changes to the scope or to the supplier classification and assessment methodology are documented in order to ensure transparency and comparability of results.

Commitment to the disclosure, implementation and review of the Policy

This Policy is communicated to the Group companies and to the functions involved in procurement processes and is made available to stakeholders through the Sesa Group's institutional website.

The level of implementation of the Policy and progress towards the quantitative targets are monitored at least annually. The review specifically takes into consideration the results of supplier assessment and verification activities, any critical issues identified, deviations from the established targets, developments in ESG risks across the supply chain, and changes in the applicable regulatory framework and relevant standards. The Chief Sustainability Officer, with the support of the Procurement functions and the other relevant corporate functions, coordinates the monitoring process and, where necessary, proposes appropriate updates.

The Policy is reviewed at least annually and, in any event, whenever significant changes occur in the corporate scope, procurement model, ESG risks associated with the supply chain, or applicable regulatory framework. Any updates to the Policy are submitted for approval in accordance with the governance system adopted by the Group and are subsequently communicated to the relevant functions and stakeholders.

Empoli (FI) - April 30, 2026

Sesa S.p.A.