

COMPANY POLICY

Pontirolo Nuovo, 01 July 2021

As of 09 March 2021, the company changed its name; Alta Metal S.r.l. will now operate under the new name of

Metallum Metal Trading S.r.l.

Visibly emphasizing the connection with the group's "Metallum" brand for international trading and recycling activities. What does it change? Nothing at all! You will continue to benefit from our expertise and knowledge, high-quality service in every area, and access to the competence and commitment of over 600 employees of the entire Thommen Group. In addition to Metallum, the group also includes the Thommen and Immark brands - an efficiently developed infrastructure that continuously improves our services, always taking into account the needs of our customers and suppliers.

In confirming the above, the General Management of Metallum Metal Trading S.r.l., defines the Company Policy in the following aspects:

1. Customer focus and meeting stakeholder requirements

The Management is committed to applying a policy appropriate to the purposes of the organization, aimed at satisfying the needs and expectations of stakeholders, respecting the timing of service delivery and continuous optimization of the operation of the Management System implemented in the company.

2. Short-term management objectives

In the short term, the company aims to pay greater attention to hedging contracts for currency exchange rate fluctuations in order to stabilize speculation and consolidate its market presence, also by diversifying the geographical distribution of the countries in which it operates.

From the implementation of the SGI, the company expects to obtain a better management of business activities with streamlined procedures, documentation tailored to business needs, and greater collaboration, involvement and participation by all staff. In particular, the Management, through the elected Workers' Safety Representative, promotes the involvement of workers and their consultation, even in advance, on choices that have an impact on their health and safety at work.

3. Medium and long-term management objectives

In the medium/long term the company pursues the objective of increasing the profit and the quantity of marketing and to expand the variety of products for a greater satisfaction of customer demands.

The company also aims to train, motivate, enhance and improve the skills of its staff and employees.

4. Management's commitment to stakeholders

The Management keeps a high attention to the needs and expectations of the identified stakeholders, in particular towards workers and their families, customers, suppliers, the territory and the community, the Institutions of the State, of the European Union and international in general, also with a view to sustainability and protection for future generations, as attested by the commitment in the environmental field and health and safety at work. The company takes into account the needs and expectations of interested parties, in particular the obligations of compliance that may be expressed.

Metallum Metal Trading S.r.l.

5. Management's commitment to the integrated management system

The implementation of the Integrated Management System is a commitment fully shared and approved by the Executive Board, which is committed to ensuring that the Company Policy is communicated, understood, implemented, available, maintained and supported at all levels of the company and that it is shared with all stakeholders.

The organization is committed to meeting all requirements applicable to it arising from contracts, regulations and the expectations and needs of relevant internal and external stakeholders.

6. Management's commitment to worker involvement and participation

The company is committed to the involvement and dissemination of the Integrated Management System to its entire staff, in order to work in an environment open to discussion and based on respect for the person for the growth of the company itself. In particular, the Management, through the elected Workers' Safety Representative, promotes the involvement of workers and their consultation, even in advance, on choices that have an impact on their health and safety at work.

7. Management's commitment to safety

The General Management is committed to providing workers with safe and healthy working conditions, in order to avoid the occurrence of accidents, injuries and occupational diseases, starting from the compliance with current regulations.

In particular, as far as Safety aspects are concerned the management:

- ensures the reliability and good condition of the work environment, vehicles, equipment and facilities;
- is responsible for informing, training and sensitizing the staff on safety issues related to the risks of the work activity, the proper use of means, equipment and how to manage emergencies;
- prevents risks at source, i.e. at the creation stage, choice of materials, identification of methods and technologies;
- protects worker's health through continuous health monitoring and evaluation to reduce occupational injuries and illnesses
- promotes the constant improvement of health and safety conditions at work, keeping abreast of updates in the knowledge of hazards and risks and of new technologies that become available for their reduction or elimination;

8. Management's commitment to the environment

With regard to environmental aspects, the Management:

- guarantees the respect and protection of the environment with a commitment to continuous improvement, prevention of pollution and the control and reduction of emissions into the environment;
- ensures compliance with current environmental regulations, fulfilling the mandatory obligations and additional obligations identified by the parties concerned and committing to training, information and continuous awareness of this issue;
- is committed to researching solutions that allow energy saving and the production of energy from renewable sources.

9. Management's commitment to continuous improvement

The goal of the implementation of the SGI is the improvement of the whole organization. The Management, by analyzing and constantly monitoring its processes, assessing the risks associated with them, examining the context in which it operates and its changes, verifying the evolution of standards and laws, promotes and implements actions aimed at continuous improvement of the company.

10. Management's commitment to the preservation and transmission of the company know-how, knowledge and specific in-house skills specific to the organization

The Management is committed to preserving its knowledge and skills, and the growth of the latter in order to achieve continuous improvement of all processes through the promotion of training activities and moments of transmission of knowledge between the various levels of the organization.

The General Management