



ORI MARTIN GROUP

SUPPLIER CODE OF CONDUCT

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1. Introduction

The Ori Martin Group (hereinafter also referred to as "the Group" or "Ori Martin") is one of the leading players in the European steel industry, standing out for the quality of its steel products, its constant innovation and its commitment to sustainability, people development and respect.

Founded in 1940, the Group operates internationally, promoting a strategy that combines environmental, economic and social responsibility in every area of its industrial activity.

Ethics, environmental protection, the promotion of human rights and safety are the pillars on which its relationships with stakeholders are based. The Group has defined a sustainability plan aimed at minimising its environmental impact, strengthening safety in the workplace and generating shared value in the territories in which it operates.

Supply chains play a key role in this process: Ori Martin is committed to working with partners who share its principles and values, operating in full compliance with ethical, environmental and social standards.

This Code of Conduct serves as a reference for all suppliers, clearly outlining expectations on fundamental issues such as human rights, safety, ethics and sustainability.

2. Scope

The Code is addressed to all parties involved in the Group's supply chain, including subcontractors, contractors and business partners. By signing this document, each supplier undertakes to comply with its contents and principles, sharing the standards promoted by Ori Martin.

The Supplier must ensure that all workers directly or indirectly involved in activities related to goods or services to be supplied to the Ori Martin Group are aware of the principles and values of the Code, using any means of communication that is appropriate and effective.

Ori Martin is aware that many Suppliers operate in different legal and cultural environments and that the implementation of some provisions of this Code may be difficult. Compliance with the provisions of this Code must therefore be assessed taking into account national and international laws and local regulations. In any case, the minimum requirements of the laws and regulations in force in the supplier's reference market must always be complied with.

3. Values, Mission and Vision

Ori Martin's mission is to generate sustainable value by combining technological innovation, product quality and attention to people and the environment.

The Group's vision is geared towards a responsible steel industry capable of protecting the well-being of present and future communities.

The value proposition is based on the integration of competitiveness and sustainability, for the benefit of the economic and social development of the territories served.

4. The Group's Code of Ethics

Ori Martin's Code of Ethics forms the basis of all the Group's activities. It sets out the principles that guide the company's conduct, promoting transparency, integrity and respect for human rights.

It is essential that suppliers align themselves with these values, contributing to the achievement of shared responsibility and sustainability objectives. Adherence to these principles is not only a contractual obligation, but a necessary condition for a continuous and trusting relationship.

5. General principles

Suppliers must adhere to the values of the Code of Ethics, which represents the reference framework for the entire value chain. The general principles expressed in the Code of Ethics are summarised as follows:

- **Respect:** Ori Martin considers respect to be a core value of its corporate culture, applying it across all relationships, both internal and external. Particular attention is paid to protecting the dignity of individuals, the rights of local communities and future generations. The protection of the personal data of employees, customers and suppliers is guaranteed in accordance with the most stringent regulatory standards, confirming our commitment to the dignity and privacy of those concerned. The company actively promotes human rights and fundamental freedoms, rejecting all forms of discrimination, whether based on age, gender, sexual orientation, health, ethnic origin, citizenship, political opinion, trade union membership or religion. These principles are integrated throughout the value chain, in the us awareness that respect is an essential condition for preventing behaviour that is harmful to personal identity and beliefs.
- **Transparency:** Ori Martin adopts the principle of transparency as an essential tool for building trusting relationships with stakeholders. This translates into the communication of clear, accurate, accessible and verifiable information, in order to

enable informed and responsible decisions. In contractual matters, the company guarantees clarity and completeness, while in terms of reporting, it promotes social and environmental reporting practices in line with the most advanced international standards, with the aim of making its commitment to sustainability assessable.

- **Truthfulness:** the principle of truth guides Ori Martin in the management of data and information, particularly of an accounting and administrative nature. The company goes beyond mere regulatory or certification requirements, considering the authenticity of information as a fundamental value for establishing relationships based on trust, both within the organisation and with external stakeholders.
- **Honesty:** Honesty is one of the cornerstones of Ori Martin's ethical identity and is considered an essential part of the company's reputation. It implies constant compliance with laws, regulations and the company's Code of Ethics, even in less structured regulatory contexts. No business objective can justify behaviour that does not comply with the principles of fairness, legality and integrity.
- **Loyalty and trust:** Ori Martin promotes a culture based on mutual trust and loyalty, understood as prerequisites for lasting and solid relationships. Internally, these values are reflected in the appreciation of commitment, the fundamental correctness of behaviour and collaboration between colleagues. In its external relations, the Group acts in compliance with the regulations in force on competition and fair commercial practices in the countries in which it operates.
- **Fairness:** The Group bases its relationships with its employees on principles of impartiality and recognition of merit. Similarly, in its relationships with stakeholders, management adopts criteria of balance and proportionality, ensuring that the interests at stake are given fair consideration.
- **Collaboration:** The value of collaboration is encouraged at every level of the organisation, in the belief that teamwork is crucial to the company's success. This spirit of cooperation is also extended to external relations, promoting constructive dialogue and actively listening to the needs of stakeholders.
- **Professionalism:** Ori Martin is committed to maintaining high quality standards in every area of its business, ensuring that contracts and assignments are carried out with the utmost care, competence and responsibility. The enhancement of individual and collective contributions is considered a strategic lever for the continuous improvement of the company's processes and . With this in mind, the company invests in training and professional development at all levels.
- **Environmental protection and sustainable development:** Fully aware of the environmental impact of its activities, Ori Martin adopts technological and organisational solutions aimed at sustainability. The company is committed to continuously improving its production processes, complying with environmental

regulations and promoting research and innovation to reduce the impact on the environment both inside and outside its facilities.

- **Health and safety:** Ori Martin recognises the central importance of people and is committed to ensuring safe working conditions that respect individual dignity. The aim is to ensure well-being in the workplace and prevent all risks through the adoption of advanced technologies, compliance with regulations and the continuous improvement of prevention and protection systems.

The Ori Martin Group's Code of Ethics and OMVP's Code of Ethics are available in full respectively on the company website at www.orimartin.it and www.omvp.it ; both are essential references for guiding all commercial relations.

6. General requirements for suppliers

6.1. Integrity and ethical conduct

The Ori Martin Group bases its operations on established values of ethics, transparency and fairness. In this context, it expects its supply chain partners to share and respect these principles, operating in compliance with applicable regulations and maintaining commercial relationships based on integrity, loyalty and a sense of responsibility.

Suppliers are required to act in full compliance with applicable laws, adopting high ethical standards and, where possible, referring to international best practices. Activities must be carried out with fairness and responsibility, avoiding any unlawful conduct. It is also essential to ensure compliance with regulations on international sanctions and trade restrictions, avoiding any involvement with sanctioned entities and promptly reporting any situations of risk.

The Ori Martin Group has a zero-tolerance policy towards corruption, fraud or other illegal behaviour. Suppliers must refrain from any attempt to improperly influence business decisions, whether in relations with public or private entities, and ensure full compliance with anti-money laundering and illegal financing prevention provisions. Compliance with antitrust legislation and the rules of fair competition is an essential requirement for promoting relationships based on trust and ensuring the proper functioning of the market . For further details on the approach adopted by the Ori Martin Group in the fight against corruption, please refer to the Anti-Corruption Policy available in the Download area of the Group's website

All suppliers are required to operate independently and impartially, avoiding any conflict of interest that could compromise the transparency of their relations with the Ori Martin Group. Any conditions that could interfere with objectivity in business decisions must be communicated promptly. Furthermore, it is essential to provide truthful and complete information during the selection and procurement processes.

The principle of confidentiality and the protection of personal data are an essential commitment for Ori Martin and its suppliers. All technical and organisational measures must be taken to protect sensitive data and information, ensuring its correct use in accordance with current legislation. Any incident that could compromise data security must be reported immediately in order to guarantee privacy protection and compliance with legal obligations.

6.2. Human rights and working conditions

The Ori Martin Group recognises the importance of fundamental human rights and is committed to promoting respect for them throughout its entire production chain. To this end, it requires its suppliers to adopt high ethical standards and working conditions based on dignity and respect for people. For further details on the approach adopted by the Ori Martin Group with regard to respect for human rights, please refer to the "Human Rights Policy" document adopted by the Group and available in the Download section of the Group's website.

Suppliers are required to prevent all forms of abuse, violence or degrading treatment by implementing adequate prevention and remedy mechanisms in the event of violations. It is essential to ensure inclusive work environments that exclude discrimination and harassment, valuing diversity and basing professional choices on criteria of competence and merit.

The use of forced or child labour is strictly prohibited. Suppliers must comply with the minimum legal age for employment and ensure adequate safety conditions for young workers. Every worker must have a clear and transparent employment contract, without restrictions on personal freedom or unjustified withholding of documents. In addition, suppliers are required to apply a national or regional collective agreement consistent with their business, thus ensuring compliance with the levels of remuneration established by regulatory or contractual sources.

Health and safety at work are a priority commitment. Suppliers must ensure safe environments by adopting preventive measures, training activities and improvement actions to reduce the risk of accidents and occupational diseases. They must also protect freedom of association and the right to collective bargaining, ensuring that no worker suffers retaliation or discrimination for exercising these rights.

The Ori Martin Group promotes a sustainable and responsible supply chain, requiring suppliers to pass on the same ethical and social principles to their subcontractors, so as to ensure compliance with fundamental values throughout the supply chain.

6.3. Environment

The Ori Martin Group requires its suppliers to make a concrete commitment to environmental sustainability through responsible behaviour and measures aimed at reducing the environmental impact of their production activities.

It is essential that all suppliers operate in full compliance with current environmental regulations, both nationally and internationally, adopting an approach of continuous

improvement of their environmental performance. The adoption of certified environmental management systems is strongly encouraged as a tool to ensure the systematic monitoring and effectiveness of the actions taken.

Suppliers must implement practices aimed at the efficient use of natural and energy resources, integrating environmental risk assessment into their decision-making processes. An active commitment to the prevention and mitigation of pollution is required, as well as the rapid and responsible management of any events that are harmful to the environment.

In resource management, the use of renewable or recycled raw materials and the adoption of production solutions that reduce waste and inefficiency are encouraged. Suppliers must promote effective material recovery and recycling systems, with particular attention to the safe and compliant management of waste, especially hazardous waste.

Ori Martin also invites its partners to adopt a responsible approach to water management through measures to optimise consumption and treat wastewater for reuse. Water must be released into the environment in conditions compatible with the balance of the local ecosystem, with priority given to areas at risk of water scarcity or of high natural value.

Finally, suppliers must actively contribute to the protection of biodiversity by preventing the overexploitation of natural resources and promoting measures aimed at restoring damaged ecosystems.

7. Control and reporting system

If you are aware of or become aware of a violation or suspected violation of this Code, applicable laws or the OMVP's Code of Ethics by Suppliers or any of its business partners and subcontractors, you can report such violation through the OMVP's reporting platform (digital 'WHISTLEBLOWING' platform). The channel and procedure used by OMVP to handle each report are available on the website www.omvp.it

OMVP has implemented a reporting system in accordance with Italian Legislative Decree 24/2023, which allows serious violations or unethical behaviour to be reported confidentially and anonymously.

Suppliers are required to have similar tools in place to enable reports from employees and third parties, ensuring confidentiality and protection for whistleblowers.

Compliance with the Code may be subject to documentary checks and requests for clarification.

In the event of violations, OMVP may take the following measures proportionate to the seriousness of the violation, including:

- temporary suspension of the relationship if the supplier demonstrates the ability to quickly resolve the non-compliance;
- exclusion from the Supplier Register;
- termination of the contract in the most serious cases.

8. Legal value of the Code

This Code is an integral part of the general terms and conditions of purchase and is automatically applied to all contractual relationships. Its acceptance implies the supplier's commitment to comply fully with its principles and provisions and to obtain from subcontractors and sub-contractors, may be used in relations with the Ori Martin Group, to sign a declaration of full acceptance of this Supplier Code of Conduct, which must in turn be sent to OMVP, , and to promote compliance with it by their own supply chain used in the service of the Ori Martin Group.

Approved by the Board of Directors of Ori Martin SpA on 30 July 2025

Signature

Date: 10/09/2025

Company OFFICINE MECCANICHE VILLAR PEROSA S.R.L

Signature of legal representative:

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