



HUMAN RIGHTS POLICY

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HUMAN RIGHTS POLICY

ORI MARTIN requires the utmost respect for people and applicable labour regulations and strongly condemns irregular, forced and child labour, making it one of its objectives to create a working relationship in which respect for the person, his or her dignity and values is expressly and constantly taken into account, avoiding any discrimination.

1. HUMAN RIGHTS POLICY

1.1 Purpose

ORI MARTIN S.p.A. ("ORI MARTIN" or the "Company") is committed to respecting, protecting and promoting Human Rights in the conduct of its business activities. In this context, this Human Rights Policy (the "Policy") establishes the principles and rules of conduct for ORI MARTIN employees and collaborators in relation to Human Rights.

ORI MARTIN aims to avoid, in the exercise of its activities, any behaviour, act or decision that may cause, or contribute to causing, a negative impact on Human Rights, and promotes respect for these rights in relations with employees, contractors, business partners and suppliers.

ORI MARTIN promotes adherence to the principles of this Policy by all those who have relations with the Company, paying particular attention to the contexts that present greater risks in the field of human rights.

1.2. Internal and external references

This Policy applies, together with all the regulations in force, in the countries where ORI MARTIN operates, to supplement all the principles set out in the Code of Ethics and Conduct (the 'Code of Ethics') and in the Organisation, Management and Control Model pursuant to Legislative Decree No. 231/2001 ('Model 231') adopted by the Company and in the current corporate policies and procedures.

The Policy is inspired by international standards such as the Universal Declaration of Human Rights and the Fundamental Conventions ('Conventions') of the International Labour Organisation (ILO), the ILO Declaration on Fundamental Principles and Rights at Work and its sequels¹, the United Nations Guiding Principles on Business and Human Rights, the United Nations Global Compact Principles.

1.3. Addressees and scope

¹ In particular, ILO Recommendation No. 203 "RECOMMENDATION ON COMPLEMENTARY MEASURES FOR THE EFFECTIVE SUPPRESSION OF FORCED LABOUR 2

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This Policy applies to ORI MARTIN S.p.A.; in particular, "Addressees" are identified as the members of the Board of Directors and other Corporate Bodies, employees, collaborators, consultants (including any commercial intermediaries), suppliers (including subcontractors) and commercial partners of the Company with whom business relations or relationships are established or who, for any reason and regardless of the type of contractual relationship, operate in the name of or on behalf of the Company (the "Addressees").

2. PRINCIPLES

2.1. Human Resources

Selection and recruitment of personnel and management of the employment relationship

ORI MARTIN condemns any form of discrimination and the use of coercion, deception or lack of transparency in the employee selection and recruitment process.

ORI MARTIN undertakes to manage the employment relationship with employees while ensuring respect for their dignity and rights as individuals, not to request, at any stage of the selection and recruitment process, contributions of any kind, and not to hold employees' identity documents for the purpose of holding them against their will.

Irregular, child, forced and compulsory labour

ORI MARTIN requires the utmost respect for people and applicable labour laws and strongly condemns human trafficking, irregular, child, forced and compulsory labour. ORI MARTIN is committed to full compliance with the specific ILO Conventions or, where more stringent, with the labour laws applicable in each of the countries in which the Company operates.

Health and safety in the workplace

Health, safety and well-being of employees are of utmost importance to the company.

ORI MARTIN is therefore committed to maintaining a safe working environment free from all forms of violence, harassment or intimidation and to promoting high standards of worker health and safety, minimising the risk of accidents, injuries and exposure to hazards.

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ORI MARTIN is committed to ensuring that all operating sites comply with the health and safety legislation of the countries in which they are located, and in any case meet standards in accordance with international regulations and best practice.

The Company promotes the dissemination of a culture of safety at work by encouraging responsible behaviour on the part of employees and collaborators, including through training and information activities.

ORI MARTIN is committed to working with its employees to improve health and safety conditions in the workplace, including identifying hazards and solving health and safety problems and taking all necessary precautionary measures.

Diversity and Inclusion

The Company recognises that people are the most important resource for the performance of its activities and is committed to guaranteeing, at every stage of the employment relationship, from the selection process to the assignment of roles, from professional growth to the termination of the relationship, equal opportunities, avoiding any form of discrimination in employment or occupation and promoting a culture in which people recognise the value that a diverse and inclusive workforce entails.

No form of discrimination is tolerated on the basis of ethnicity, race, colour, gender, sexual orientation, religion, nationality, age, disability, political opinion, trade union affiliation, marital status, health status or any other social status or personal characteristic.

Working hours, salary conditions and benefits

ORI MARTIN operates in full compliance with local laws and international industry standards with regard to working hours, wage, insurance and social security conditions, overtime work and employee benefits.

Working hours are established in accordance with local legislation and in full compliance with the relevant ILO Conventions and with particular regard to the provisions of national collective labour agreements and their supplements as well as company collective agreements. Employees and collaborators have at least one day off per week and paid holidays, leave and sick leave.

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Freedom of association and collective bargaining

ORI MARTIN guarantees all its employees, without distinction, the right to form associations and to join organisations of their choice without prior authorisation.

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It is also ensured, where workers so choose, that terms and conditions of employment are set by voluntary collective bargaining, in accordance with the ILO conventions and local legislation of the countries in which the Company operates and, where applicable, national collective bargaining agreements and their supplements.

Privacy

ORI MARTIN is committed to respecting the privacy of its employees, refraining from disclosing personal data and information to third parties, except within the limits and for the purposes permitted by the applicable regulations, and committing itself to the correct use of the data and information provided to it, in accordance with the regulations in force in this regard.

2.2. Business partners and suppliers

ORI MARTIN undertakes not to establish business relationships with suppliers who employ irregular, forced or child labour or, in general, who do not meet the requirements set out in this Policy.

2.3. Community

Stakeholder engagement

Recognising its role in the communities in which it operates, ORI MARTIN is committed to involving its stakeholders to ensure that their concerns are heard in the conduct of its business.

Significant influence is exerted on ORI Martin by the local community (citizens, associations and local foundations), towards which the Company is committed in a relationship of transparent dialogue, marked by coexistence and mutual respect. The privileged channel of engagement is the ORI Martin Observatory, set up on the initiative of the Municipality of Brescia as an instrument of communication with citizens.

The company is committed to maintaining an open and constructive dialogue with its stakeholders on a regular basis.

ORI MARTIN is also committed to creating economic opportunities and promoting the well-being of the communities in which it operates through locally relevant initiatives, with a focus on vulnerable or disadvantaged groups.

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3. IMPLEMENTATION, CONTROL AND MONITORING

3.1 Stakeholder Involvement

The Human Rights Policy is brought to the attention of all internal and external stakeholders through appropriate communication tools.

ORI MARTIN also reports annually on its activities in the field of Human Rights promotion in the Sustainability Report, in order to inform and raise awareness among its stakeholders and to communicate its achievements in this field.

Finally, this Policy is the subject of dedicated training plans to ensure that it is properly understood and complied with, and ORI MARTIN is committed to adopting transparent contracts that clearly define employment and working conditions.

3.2. Reporting violations

All Addressees are required to report any alleged or actual violations of Human Rights that they become aware of in the course of their work and any other violation, or suspected violation, of the Policy and the Code of Ethics.

To this end, dedicated channels of communication are set up as defined in PSQ Procedure 105 Whistleblowing Management (ethical escalation policy) available on the Company's website, to which reference should be made.

The Company will assess the reports received and handle them, guaranteeing the utmost confidentiality of the whistleblowers. Bona fide whistleblowers shall be guaranteed against any form of retaliation, discrimination or penalisation and in any case the confidentiality of the whistleblower's identity shall be ensured, without prejudice to legal obligations and the protection of the rights of the Company or of persons wrongly accused and/or in bad faith.

3.3. Disciplinary system

ORI MARTIN is committed to the identification, assessment, prevention and mitigation of risks of Human Rights violations, promptly putting in place appropriate remedial actions, should such events occur.

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Compliance with this Policy is an integral part of the contractual obligations of employees, collaborators and, more generally, of all Addressees.

Any violations will then lead to the application of the measures provided for in the applicable legislation and collective bargaining agreements.

Failure to comply with the Policy on the part of external persons may result in the termination of the contract, assignment or, in general, the existing relationship with the Company, as well as - where there are grounds - compensation for damages.

4. APPROVAL, DISSEMINATION AND MONITORING OF THE POLICY

ORI MARTIN approves this Policy and promotes its adoption by all its subsidiaries, which will independently adopt this document by resolution of their administrative bodies and promote its timely adoption by their respective subsidiaries.

ORI MARTIN and its subsidiaries will endeavour to encourage the implementation of this document by companies in which a non-controlling interest is held (including Joint Ventures).

This Policy is subject to periodic review when national and international regulations are amended or supplemented, or as a result of court rulings or interpretations, or when the need arises.

ORI MARTIN therefore undertakes to monitor any development, both internal and external, in all the countries in which it operates that may affect the Policy, and to implement any appropriate action, as well as to constantly evaluate its performance against the Policy and best practices with a view to continuous improvement.

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5. GLOSSARY

Irregular employment

Irregular work (or 'undeclared work') is work that is carried out, in whole or in part, without contractual or fiscal regularisation (and, therefore, pension and insurance contributions) or in violation of the law in that it involves, for example, working hours that do not comply with the regulations.

Child labour

O.R.I. Martin
Acciaieria e Ferriera di Brescia S.p.A.

Single-member company

Registered office and factory in Brescia:
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Reg. Imprese di Brescia 07617260158
Fiscal Code and VAT No.
IT07617260158
Capital stock € 20,000,000.00 fully paid up.
C.C.I.A.A. Brescia n.324325

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In particular, in accordance with ILO Convention No. 138, the term 'minors' is defined as individuals below the age of completion of compulsory schooling and, in any case, all individuals under the age of 15.

Forced or compulsory labour

According to ILO Convention No. 29, 'forced or compulsory labour' is defined as any work or service which is extorted from a person under threat of punishment or for which that person has not offered himself voluntarily.

Brescia, 06 March 2024

The Managing Director of ORI MARTIN S.p.A.


