

SUPPLY CHAIN POLICY

APPROVED BY THE CHIEF EXECUTIVE OFFICER OF THE MAIRE GROUP
ON 16 DECEMBER 2025





1 SCOPE

Guided by the principles of legality, integrity, fairness, transparency and loyalty that inspire the MAIRE Group's Code of Ethics and key Sustainability Policies, MAIRE considers the sustainable management of its value chain – and, in particular, of its supply chain – an essential lever for achieving its industrial purpose and long-term sustainability objectives.

The pursuit and responsible management of a sustainable supply chain programme – integrating ethical, environmental, social and governance practices within a competitive model and developing the resilience needed to ensure business continuity in complex contexts – represent strategic elements and priority areas on which MAIRE focuses its efforts and commitment.

In line with its commitment to excellence, MAIRE aims to ensure that operations along the entire supply chain are consistent with corporate principles and values; to foster stakeholder engagement and involvement; to ensure transparency of its operations and initiatives; and to build the capacity and competencies needed to anticipate and adequately respond to potential risks or opportunities.

Through collaborative initiatives and shared values, MAIRE is committed to building and maintaining a sustainable, responsible and resilient supply chain, founded on the highest levels of integrity, fairness and reliability. By integrating sustainability principles and ESG criteria into decision-making and operational processes, the Group promotes practices that contribute to value creation and long-term continuous improvement of its performance, while supporting the highest standards of respect for human rights, protection of health and safety, responsible management of natural resources and environmental stewardship.

This Policy, designed to support an increasingly sustainable and resilient supply chain, is consistent with the commitments defined in the Group Sustainability Policy, the Code of Ethics and the overall sustainability governance system of MAIRE.

1.1 Applicability and dissemination

This Policy applies to MAIRE and all Group companies, which are required to promote its principles among stakeholders involved throughout the various operational phases.

All employees, interns, collaborators, temporary workers and anyone performing work activities for a MAIRE Group company, acting in its name and on its behalf, must strictly observe and actively apply these principles in all interactions with colleagues, clients, suppliers, partners, local communities and any other individual or entity involved in their activities.

This Policy is communicated to all individuals working for the Group, including through dedicated training opportunities, and is made available on MAIRE's corporate website to all stakeholders, to ensure full awareness and enhance its dissemination.

1.2 Approval and Review

This Policy is approved by the Chief Executive Officer of the MAIRE Group.

The document is reviewed whenever regulatory updates, strategies or contextual changes require or recommend revisions, involving the competent corporate functions.

1.3 Governance

MAIRE is committed to effectively orienting its corporate purpose towards the integration of sustainability and stakeholder expectations within its business model, addressing both internal and external dimensions.

The MAIRE corporate governance system is structured to ensure an effective and transparent management and control model oriented towards sustainable success. In line with international best practices and with the principles and recommendations of the Corporate Governance Code of Borsa Italiana S.p.A., to which MAIRE adheres (the "Code"), the Company's approach to sustainability is integrated into its corporate strategy, with

the goal of generating long-term value for shareholders while considering the interests of relevant stakeholders.

MAIRE's sustainability governance is based on a system of roles, responsibilities and decision-making processes that ensure oversight of environmental, social, and governance topics across the organisational structure. The system promotes the effective integration of sustainability factors into strategic decisions and day-to-day management, contributing to shared value creation and to mitigating risks associated with the Group's environmental and social impacts.

MAIRE adopts a structured approach to sustainability management, involving the Board of Directors, the Risk and Sustainability Control Committee, management and operational functions, ensuring effective oversight of sustainability matters and continuous monitoring of sustainability performance in line with strategic objectives and commitments.

In particular, the Board of Directors is responsible for defining and approving, on an annual basis and with the support of the Risk and Sustainability Control Committee, the "Double Materiality Matrix" for identifying impacts, risks and opportunities that form the basis of the Group's long-term sustainability strategy and subsequent Sustainability Reporting.

In addition, the Board of Directors monitors progress against sustainability targets, ensuring alignment with the industrial strategy and relevant scenarios. With the support of the Risk and Sustainability Control Committee, it annually updates the Group Sustainability Plan, establishing the Group's medium- and long-term sustainability objectives. These objectives are integrated with the Group's long-term industrial strategies, also updated annually by the Board, taking into account geopolitical developments, markets and business sectors in which the Group operates globally.

Proposals submitted to the Board of Directors and the Risk and Sustainability Control Committee concerning the Double Materiality Matrix and related strategies are defined with the support of the Group Sustainability & Corporate Advocacy Function, based on the annual stakeholder engagement activities involving both internal and external stakeholders. This Function is also responsible for planning and monitoring sustainability initiatives at Group level, working in close coordination with the Sustainability Reporting, Performance and Disclosure Function, which oversees the preparation of the Group Sustainability Report.

The Board also periodically supervises, with the support of the Risk and Sustainability Control Committee and relevant Functions: i) the implementation status of strategic sustainability initiatives defined on the basis of the approved Double Materiality Matrix; and ii) updates relating to risk and opportunity assessments.

MAIRE has also implemented an internal control and risk management system comprising rules, procedures and organisational structures for the effective identification, measurement, management and monitoring of key risks, supporting sustainable success in line with corporate strategies, including sustainability strategies. The adequacy and effectiveness of this system are assessed on a semi-annual basis.

Entities within this system include, in addition to the Board of Directors and the Risk and Sustainability Control Committee: the Board of Statutory Auditors; the Chief Executive Officer of MAIRE; the Manager Responsible for Preparing Corporate Accounting Documents; and the Group Risk Management, In-Country Value and Special Initiatives Function, which supports the identification of impacts, risks and opportunities for updating the Group Sustainability Plan.

As part of its governance system, the Company has also established:

- an Internal Sustainability Committee, an advisory body supporting the Chief Executive Officer of MAIRE in defining policies and strategies for the sustainable management of the business, development programmes, guidelines and objectives (including Corporate Giving), monitoring progress and analysing stakeholder dynamics;
- an Internal Committee overseeing the Internal Control and Risk Management System, with advisory functions and participation of the main Functions comprising the System, supporting the Chief Executive Officer in ensuring effective oversight of risks, including those related to sustainability.

2 COMMITMENT

The MAIRE Group invests in long-term strategic collaborations aimed at maximising shared value with its stakeholders across the entire value chain. The Group therefore selects suppliers and subcontractors not only on the basis of economic and financial criteria, but also by carefully evaluating—without discrimination or prejudice—their technical and organisational suitability to perform required activities in compliance with national and international laws on health, safety, environmental protection and human rights.

In line with the Supplier Code of Conduct, the Group requires suppliers to commit—through a collaborative approach—to building a responsible and sustainable supply chain. This Policy reflects the ESG principles set out in the Group Sustainability Policy and is based on the values expressed in the Code of Ethics, the Human Rights Policy, the Diversity, Equity and Inclusion Policy, the Anti-harassment Policy and the Group HSE&SA Policy, which collectively shape MAIRE's identity and culture.

MAIRE is committed to protecting the environment by complying with applicable regulations and adopting technological solutions that minimise environmental impact. The Group also requires suppliers and subcontractors to adhere to the same principles, ensuring the promotion of a sustainable supply chain.

In line with the Quality Policy, MAIRE is committed to ensuring customer satisfaction and achieving the highest standards of quality excellence. The Group aims to provide products and services that meet contractual and legal requirements and exceed customer expectations, reflecting corporate values. The Group's commitment to Quality is synergistic with its core values and foundational principles, supporting a culture of continuous improvement and customer centrality. The Group promotes the consolidation of this commitment and the achievement and maintenance of high standards across the entire value chain.

3 OBJECTIVES AND STRATEGIES

MAIRE is committed to achieving excellence through a comprehensive approach to procurement management. The Group's objectives and strategies aim to ensure sustainable development, ethical practices, health, safety and social accountability across all activities of Group companies, as defined in the Code of Ethics, Supplier Code of Conduct, Sustainability Policy, HSE&SA Policy and Human Rights Policy.

By identifying and implementing rigorous supplier and subcontractor selection criteria, promoting Local Content, pursuing continuous improvement in environmental management and fostering fair working conditions, MAIRE aims to build a qualified, transparent and responsible supply chain.

The Group has defined its procurement process on the basis of the following objectives and strategies to:

- **ensure rigorous supplier and subcontractor selection and evaluation criteria**, guaranteeing compliance with the Code of Ethics, Supplier Code of Conduct, applicable laws, regulations and the Group's highest sustainability standards;
- **promote the social and economic development of territories** through employment, development of local skills, support for entrepreneurship, and dissemination of know-how and technologies, fostering education and capacity building;
- **ensure fair working conditions**, including health, safety and social accountability standards, and proper selection, management, development and training of personnel, in line with HSE&SA and Diversity, Equity and Inclusion Policies;
- **ensure respect for fundamental human rights**, condemning all forms of forced and child labour in accordance with ILO conventions and the principles of MAIRE's Human Rights, HSE&SA and Diversity, Equity and Inclusion Policies;
- **establish transparent, fair and collaborative relationships with suppliers and subcontractors**, based on clear mutual commitments governed by specific contractual clauses and in compliance with all applicable laws;

- **ensure high supplier and subcontractor performance in every area**, with particular attention to rigorous Quality control measures, through supplier evaluation and continuous improvement initiatives designed to meet or exceed customer expectations and industry benchmarks;
- **promote partnerships to pursue common objectives and build long-term strategic collaborations** to maximise value for all stakeholders;
- **contribute to reducing the Group's environmental impact** in relation to the procurement of materials, products and services, through initiatives promoting efficient use of natural resources, adoption of renewable energy and reduction of waste and greenhouse gas emissions across the value chain.

Consistent with the Group's ongoing commitment to sustainability, MAIRE has undertaken structured activities to integrate ESG principles into its supply chain, from supplier scouting to qualification and post-order management.

The Group encourages suppliers and subcontractors to apply the same criteria, including sustainability aspects, in their operations and procurement processes, in order to foster the adoption of the principles and values expressed in this Policy across the entire supply chain.

4 TRANSPARENCY AND REPORTING MECHANISMS

Stakeholders who become aware of any violation of the principles outlined in this Policy are encouraged to report it.

These reports can be made - even anonymously - through the following channels:

- Whistleblowing platform, available at the link: [MAIRE Group – Whistleblowing](#);
- Form SA 8000, available at the link [Human Rights and Social Accountability | MAIRE](#);
- Postal mail: MAIRE S.p.A., Group Corporate Affairs, Governance, Ethics & Compliance Department, Via Gaetano De Castillia 6/A, 20124, Milan, (Italy).

Reports are managed in accordance with the provisions of the Group's "Whistleblowing" Procedure and the Social Accountability 8000 management system for certified MAIRE group companies.

Any form of direct or indirect retaliation, discrimination or penalization against those who have made a report, for reasons directly or indirectly related to the report, is prohibited.

5 REFERENCES

This Policy is grounded in internationally recognised principles and standards and is aligned with the policies and regulatory instruments adopted by the Group.

The Policy is inspired by:

- The Ten Principles of the United Nations Global Compact
- The ILO Declaration on Fundamental Principles and Rights at Work
- UN Guiding Principles on Business and Human Rights
- OECD Guidelines for Multinational Enterprises

This Policy is integrated with the following strategic documents of the Group:

- Code of Ethics
- Supplier Code of Conduct
- Sustainability Policy
- Human Rights Policy
- Diversity, Equity and Inclusion Policy
- Anti-harassment Policy
- HSE&SA Policy

- Quality Policy

Furthermore, this Policy contributes to the implementation of management systems supporting sustainability reporting under Directive (EU) 2022/2464 (CSRD) for supply chain-related topics, and to commitments under Directive (EU) 2024/1760 (CSDDD), promoting due diligence practices across the Group's value chain.