

SUSTAINABLE PROCUREMENT POLICY

Purpose of the policy and introduction

The EXA MP Group believes that corporate social responsibility is not limited to direct activities, but must extend throughout the entire value chain, actively involving suppliers, subcontractors and business partners.

This Sustainable Procurement Policy, together with the Supplier Code of Conduct and our Minimum Sustainability Requirements, represents the Group's commitment to conducting its activities in compliance with human rights, decent work, environmental protection and the highest standards of ethics, integrity and transparency.

Quality objectives identified by the EXA MP Group:

- Promotion of a level of sustainability awareness among supply chain partners.
- Purchase of materials, goods and services that comply with recognised environmental, social and ethical standards (including, but not limited to: ISO 14001, ISO 14025, ISO 14067, REACH, etc.).
- Continuous improvement among suppliers through dialogue, support and information.

Scope of application

This policy applies to all the EXA MP Group's companies, operating Business Units and all the Departments involved in procurement processes (Purchasing, Tender, Design, Operations, Site Management, Project Management), as well as suppliers, subcontractors and consultants located in Italy and abroad.

Key sustainability issues in the supply chain:

- Environmental aspects: suppliers are encouraged to monitor and reduce their environmental impact, including greenhouse gas emissions, waste production and consumption of natural resources. The selection of materials with a high recycled content, recyclable or with low environmental impact is also promoted, as well as the minimisation of the use of hazardous substances, in accordance with REACH regulations and industry best practices, wherever possible.
- Social aspects: suppliers must comply with the fundamental principles of labour defined by the International Labour Organisation (ILO), ensuring safe, fair, inclusive and dignified working conditions. Any form of labour exploitation, child labour, forced or coercive labour, as well as any form of discrimination based on age, gender, ethnic origin, religion, sexual orientation or disability is expressly prohibited.

Sustainable sourcing of wood and wood products

EXA MP recognises that wood is an essential material for maintaining biodiversity and is therefore committed to prioritising the use of wood raw materials from sustainably managed sources that are FSC and/or PEFC certified.

EXA MP is committed to raising awareness among and choosing suppliers who operate in accordance with the above requirements. Suppliers are encouraged to deliver a percentage of certified wood as close to 100%

as possible. This requirement is included in the supplier selection process and in the performance evaluation processes of EXA MP.

Procurement of chemicals

The EXA MP Group recognises the importance of limiting the use of hazardous chemicals on construction sites and in supplies, replacing hazardous products with less risky or non-hazardous alternatives wherever possible, in order to protect the health of workers, ensure safe working environments and protect the environment.

In this perspective, the Group is committed to:

- select non-polluting, non-radioactive and environmentally friendly construction materials, favouring products with low VOC (Volatile Organic Compounds) content and, where applicable, free of SVHC (Substances of Very High Concern).
- requesting all suppliers of materials and chemical products to provide up-to-date Safety Data Sheets (SDS) written in understandable language, easily accessible online, and compliant with current legislation. The SDS received are filed together with the construction site documentation.
- promoting, wherever possible, the adoption of less hazardous alternatives, including by using recognised environmental labels (e.g. Ecolabel, GREENGUARD, Cradle to Cradle).

The adoption of these criteria is part of the EXA MP Group's broader commitment to minimising the toxicological and environmental impact of the materials used, favouring the use of safe, traceable products that comply with European and international regulations.

Governance and allocation of responsibilities

The ESG Committee (a multidisciplinary working group consisting of representatives from the ESG, Legal, HR, Purchasing and QHSE departments) defines and updates this policy, ensuring the strategic oversight of sustainability issues.

The Purchasing and Operations Departments, in collaboration with the Sustainability and QHSE Department, are responsible for the operational implementation of the policy, data collection and monitoring of supplier performance.

General Management approves the objectives annually and supervises the progress of the results.

The above responsibilities are formalised in the company's organisational documents (job descriptions, operational delegations, internal procedures).

Review mechanisms

This Policy is reviewed periodically with the ESG Committee, taking into account regulatory updates and industry best practices, the results of ESG assessments of suppliers and new priorities or emerging risks in the supply chain, and in any case whenever there are significant regulatory changes or significant changes in the operating environment.

Sustainable procurement criteria

The EXA MP Group is committed to defining ESG criteria in the qualification, selection and monitoring of suppliers, giving preference to local suppliers or those with low logistical impact. It is committed to working with suppliers who actively manage their social and environmental impacts and with suppliers who adopt specific requirements for high-impact materials (e.g. FSC/PEFC certifications).

Complaint mechanisms

The EXA MP Group promotes the use of secure and confidential channels for reporting non-compliant behaviour by suppliers or personnel involved in purchasing processes.

Reports are handled in accordance with current legislation (including the whistleblowing legislation – Italian Legislative Decree No.24/2023) and company whistleblowing policies, thus guaranteeing anonymity and protection from any form of retaliation for individuals who make reports in good faith.

Monitoring, reporting and transparency

The EXA MP Group undertakes to periodically monitor the ESG performance of its supply chain and to report KPIs relating to sustainable procurement in its annual Sustainability Report and through other appropriate channels. It also undertakes to regularly monitor its suppliers by conducting audits, document checks or improvement plans in the event of significant non-compliance.

Communication and training/information

This policy complements the other policies and guidelines adopted by the EXA MP Group, is disseminated internally to all employees, and shared with suppliers via digital tools. Company staff and strategic partners who request it are involved in continuous training and updating on supply chain sustainability issues, including through digital tools or dedicated sessions.

This policy may also be shared with external stakeholders (e.g.: clients, certification bodies, investors) to promote transparency and the dissemination of a culture of sustainability.

Attachments and reference documentation:

- Supplier Code of Conduct
- Minimum Sustainability Requirements
- Sustainability Report

Giuseppe Polvani
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1st July 2025

