



INCLUSION POLICY

Contents

1. INCLUSION POLICY	2
1.1. Purpose	2
1.2. Internal and external references	2
1.3. Target audience and scope of application	3
2. PRINCIPLES AND COMMITMENTS	3
2.1. Diversity and inclusion in the workplace.....	3
2.2. Fairness and equal opportunities.....	4
2.3. Inclusive working environment	4
2.4. Accessibility and reasonable accommodation	5
2.5. Professional development and career progression	5
2.6. Work-life balance and inclusive welfare	6
3. AREAS OF ACTION	6
3.1. Inclusive recruitment and selection	6
3.2. Training and awareness-raising	7
3.3. Assessment and meritocracy	8
3.4. Representation and participation	8
3.5. Business partners, suppliers and the value chain	8
4. IMPLEMENTATION, CONTROL AND MONITORING	9
4.1. Governance and accountability	9
4.2. Stakeholder engagement	9
4.3. Indicators and measurement.....	10
4.4. Reporting of breaches	10
4.5. Disciplinary system	11
5. APPROVAL, DISSEMINATION AND MONITORING OF THE POLICY	11
6. GLOSSARY	12



INCLUSION POLICY

ORI MARTIN recognises that people are its most important resource for carrying out its activities and is committed to ensuring an inclusive, fair and respectful working environment, in which everyone can fulfil their potential, contribute to the company's success and feel valued, regardless of gender, age, ethnicity, sexual orientation, disability, religion, national origin or any other personal characteristic.

1. INCLUSION POLICY

1.1. Purpose

ORI MARTIN S.p.A. ("ORI MARTIN" or the "Company") recognises that diversity and inclusion are fundamental values and strategic drivers for the organisation's sustainable development and success. In this context, this Inclusion Policy (the "Policy") sets out the principles, commitments and operational procedures to promote and ensure an inclusive, fair and diversity-respecting working environment.

ORI MARTIN is committed to valuing individual differences as a source of enrichment, innovation and competitive advantage, promoting an organisational culture that fosters a sense of belonging, active participation and the full development of each person's potential.

The Company aims to create and maintain a working environment free from all forms of discrimination, harassment, prejudice and stereotyping, ensuring equal opportunities for access, growth and professional development for all individuals, regardless of their personal characteristics.

ORI MARTIN encourages the adoption of the principles of this Policy by anyone who has dealings with the Company, extending the values of inclusion and diversity throughout the entire value chain.

1.2. Internal and external references

This Policy applies, together with all 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"), in the Organisation, Management and Control Model pursuant to Legislative Decree No. 231/2001 ("Model 231"), in the Anti-Corruption Policy, in the Human Rights Policy and in other applicable company policies and procedures.

The Policy is inspired by the main international standards and best practices regarding diversity, equity and inclusion, including:

- the United Nations Universal Declaration of Human Rights;
- the fundamental Conventions of the International Labour Organisation (ILO), with particular reference to Convention No. 111 on discrimination in respect of employment and occupation and Convention No. 100 on equal remuneration;
- the United Nations Guiding Principles on Business and Human Rights;
- the Principles of the United Nations Global Compact;



INCLUSION POLICY

- the United Nations Sustainable Development Goals (SDGs), in particular Goal 5 (Gender Equality), Goal 8 (Decent Work and Economic Growth) and Goal 10 (Reduced Inequalities);
- the GRI Standards (Global Reporting Initiative), with particular reference to GRI 405 – Diversity and Equal Opportunity and the new standards on Diversity and Inclusion;
- the European Strategy for Gender Equality 2020–2025;
- national and international guidelines on Diversity, Equity & Inclusion (DEI).

1.3. Recipients and scope of application

This Policy applies to ORI MARTIN S.p.A.; in particular, the following are identified as “Recipients”: members of the Board of Directors and other corporate bodies, employees, collaborators, consultants (including any commercial intermediaries), suppliers (including subcontractors) and the Company’s business partners with whom business relationships have been established or who, in any capacity and regardless of the type of contractual relationship, operate in the name of or on behalf of the Company (the “Recipients”).

The Policy applies at all the Company’s operational sites, both in Italy and abroad, and constitutes a binding reference for all stages of the employment relationship and business dealings, from recruitment to the termination of the relationship.

2. PRINCIPLES AND COMMITMENTS

2.1. Diversity and inclusion in the corporate context

ORI MARTIN recognises that diversity represents a source of strength and added value for the organisation. The Company values and respects all aspects of diversity, including but not limited to:

- gender and gender identity;
- age and generational background;
- ethnicity, race and skin colour;
- national origin, citizenship and cultural background;
- religion, beliefs and personal convictions;
- sexual and romantic orientation;
- physical, sensory and intellectual disabilities, and neurodiversity;
- marital status and family composition;
- health status and pregnancy or parenthood;
- political views and trade union membership;



INCLUSION POLICY

- socio-economic status and educational background;
- physical characteristics and appearance;
- thinking style and working methods;
- life experiences and career paths.

Inclusion is understood as the organisation's ability to create an environment in which everyone feels welcomed, respected, valued and empowered to contribute fully to the company's success. ORI MARTIN is committed to promoting an inclusive culture that fosters a sense of belonging, collaboration and authentic self-expression for everyone.

In the context of the steel industry, traditionally characterised by a strong male presence, ORI MARTIN is particularly committed to promoting gender equality and encouraging women's access to all roles and levels within the organisation, including operational and production areas, by overcoming stereotypes and cultural barriers.

2.2. Fairness and equal opportunities

ORI MARTIN is committed to ensuring fairness and equal opportunities at all stages of the employment relationship, recognising that fairness does not mean treating everyone the same, but providing everyone with the resources, support and conditions necessary to achieve equivalent results, taking into account different starting points and specific needs.

In particular, the Company guarantees:

- **Equal access to employment opportunities:** recruitment and selection processes based exclusively on merit, skills and potential, free from prejudice and stereotypes;
- **Pay equity:** transparent and objective remuneration policies that ensure equal pay for equal roles, responsibilities, skills and experience, regardless of gender or other personal characteristics. ORI MARTIN is committed to monitoring and eliminating any unjustified pay gaps;
- **Equal opportunities for professional growth:** fair access to training programmes, skills development, career paths and positions of responsibility for all individuals, removing systemic barriers and promoting everyone's potential;
- **Merit-based assessment:** objective, transparent performance appraisal systems based on measurable criteria, which take into account results achieved, skills demonstrated and contributions made, regardless of personal characteristics;
- **Fair distribution of opportunities:** allocation of projects, responsibilities and company benefits according to transparent and non-discriminatory criteria, ensuring that everyone has access to the same opportunities for visibility and recognition.

2.3. Inclusive working environment

ORI MARTIN is committed to creating and maintaining an inclusive, safe and respectful working environment, in which everyone can freely express their identity, contribute their ideas and feel an integral part of the corporate community.



INCLUSION POLICY

To this end, the Company:

- **Promotes a culture of respect:** encourages inclusive behaviour, active listening, empathy and the celebration of differences as a source of mutual enrichment;
- **Combats all forms of discrimination:** condemns and prevents any discriminatory behaviour, act or decision based on personal characteristics, ensuring zero tolerance towards direct, indirect, multiple or intersectional discrimination;
- **Prevents harassment and inappropriate behaviour:** adopts measures to prevent and combat sexual and psychological harassment, mobbing, bullying and any form of violence, intimidation or behaviour that undermines a person's dignity;
- **Promotes inclusive communication:** uses respectful, neutral and inclusive language in all corporate communications, avoiding stereotypes, generalisations and terms that are potentially offensive or exclusionary;
- **Promotes cognitive diversity:** values different styles of thinking, approaches to problem-solving and ways of working, recognising that diverse teams generate greater innovation and better decisions.

2.4. Accessibility and reasonable accommodation

ORI MARTIN is committed to ensuring the accessibility of workplaces, tools, technologies and information, by removing physical, sensory, cognitive and organisational barriers that may limit the full participation of all individuals.

In particular, the Company:

- **Ensures physical accessibility:** designs and adapts workspaces, production facilities and communal areas to make them accessible to people with mobility and sensory impairments, in accordance with current legislation and best practice;
- **Provides reasonable accommodation:** assesses and implements, on an individual basis, organisational changes, support tools and job adjustments that enable people with disabilities or specific needs to perform their roles effectively, without this constituting a disproportionate burden on the company;
- **Ensures information accessibility:** ensures that documents, communications, training and company resources are available in formats that are accessible and understandable to all;
- **Supports neurodiversity:** recognises and values neurodivergent people (autism, ADHD, dyslexia, etc.), adopting flexible working practices that take into account different ways of processing information and interacting.

2.5. Professional development and career progression

ORI MARTIN recognises the importance of investing in the development of everyone's potential and is committed to ensuring equal opportunities for professional growth, regardless of personal characteristics.

To this end, the Company:



INCLUSION POLICY

- **Promotes inclusive development programmes:** designs and implements training, mentoring, coaching and skills development programmes that are accessible to all and aimed at promoting diversity;
- **Ensures fairness in career paths:** ensures that decisions regarding promotions, career progression and the assignment of roles of responsibility are based exclusively on meritocratic criteria, results achieved and demonstrated potential;
- **Supports inclusive leadership:** promotes leadership models based on inclusion, empathy and the celebration of differences, training managers to manage diverse teams and create equitable working environments;
- **Promotes representation at senior levels:** is committed to increasing the presence of under-represented groups (particularly women in the steel sector) in managerial positions, specialist technical roles and governance bodies;

2.6. Work-life balance and inclusive welfare

ORI MARTIN recognises the importance of supporting people's overall well-being and is committed to promoting work-life balance policies that take into account diverse individual and family needs.

In particular, the Company:

- **It promotes organisational flexibility:** where compatible with production and operational requirements, it encourages flexible working arrangements in terms of working hours and the organisation of tasks, taking into account the specific needs of each individual;
- **Supports parenthood:** ensures full respect for maternity and paternity rights, promoting the sharing of care responsibilities and supporting a return to work after periods of leave, without any detriment to career progression;
- **Offers inclusive benefits:** designs corporate welfare packages that meet the diverse needs of individuals and their families, taking into account the diversity of family structures and personal circumstances;
- **Promotes physical and mental wellbeing:** implements programmes and services focused on physical and mental health, the prevention of work-related stress and psychological support, recognising the importance of mental health as much as physical health.

3. AREAS OF ACTION

3.1. Inclusive recruitment and selection

ORI MARTIN is committed to adopting inclusive recruitment and selection practices that guarantee equal opportunities for access to the organisation and prevent all forms of discrimination or prejudice.

In particular, the Company:



INCLUSION POLICY

- **Uses inclusive language in job advertisements:** drafts job postings using gender-neutral terminology, avoiding expressions that might discourage applications from specific groups;
- **Diversifies its recruitment channels:** collaborates with universities, vocational schools, associations and networks that promote the inclusion of under-represented groups, thereby broadening the pool of diverse candidates;
- **Adopts structured selection processes:** uses objective assessment criteria, standardised evaluation grids and methodologies that reduce unconscious bias, ensuring that decisions are based solely on skills, experience and potential;
- **Train recruiters on diversity:** ensure that those involved in recruitment and selection processes are trained to recognise and mitigate unconscious bias;
- **Ensures diverse selection panels:** where possible, ensures that selection teams are composed of people from diverse backgrounds, promoting more balanced assessments;
- **Eliminates unnecessary requirements:** reviews the requirements to remove barriers that are not strictly necessary (e.g. rigid academic qualifications, overly specific experience) which could exclude qualified candidates;

3.2. Training and awareness-raising

ORI MARTIN recognises that building an inclusive culture requires a constant commitment to training and awareness-raising at all levels of the organisation.

To this end, the Company:

- **Implements diversity and inclusion training programmes:** designs and delivers mandatory, ongoing training courses for all employees, with content tailored to each organisational level;
- **Trains managers and leaders:** pays particular attention to leadership training on topics such as managing diverse teams, inclusive leadership, recognising and mitigating bias, and creating psychologically safe environments;
- **Raising awareness of unconscious bias:** promotes awareness of unconscious biases that may influence hiring, appraisal, promotion decisions and day-to-day interactions;
- **Provides specific training on critical issues:** offers modules dedicated to the prevention of harassment and discrimination, inclusive communication, accessibility, managing neurodiversity and valuing generational diversity;
- **Organises engagement initiatives:** promotes events and awareness campaigns to foster a culture of inclusion;
- **Facilitates dialogue and sharing:** creates spaces for discussion, listening and sharing experiences among people, fostering mutual understanding and breaking down stereotypes.



INCLUSION POLICY

3.3. Assessment and meritocracy

ORI MARTIN is committed to ensuring that its systems for assessing performance, professional development and rewards are fair, transparent and based solely on merit.

In particular, the Company:

- **Adopts objective and transparent assessment criteria:** defines clear, measurable performance indicators that are communicated in advance, avoiding subjective criteria that may be influenced by bias;
- **Trains assessors:** ensures that managers and those involved in the assessment processes are trained to recognise and prevent assessment bias and to ensure fairness in judgements;
- **Monitors the outcomes of assessments:** periodically analyses assessment data broken down by gender, age and other relevant characteristics, to identify and correct any unjustified disparities;
- **Ensures fairness in promotions:** ensures that decisions regarding promotions and career progression are based on meritocratic and documented criteria, preventing favouritism or discrimination;
- **Promotes pay transparency:** shares the rationale and criteria underpinning pay policies and regularly monitors pay equity, taking prompt action in the event of unjustified pay gaps.

3.4. Representation and participation

ORI MARTIN recognises the importance of giving a voice to everyone and ensuring that different groups are adequately represented in decision-making structures and participatory processes.

To this end, the Company:

- **Promotes diversity in governance bodies:** is committed to fostering the representation of under-represented groups (gender, age, background) on the Board of Directors and in other corporate bodies;
- **Involves people in decision-making processes:** ensures mechanisms for listening, consultation and participation that enable everyone to contribute to decisions that affect them, particularly on issues related to work organisation, welfare and inclusion policies;
- **Ensures representation in cross-functional projects and teams:** ensures that project teams, committees and working groups reflect the diversity of the organisation, avoiding the concentration of opportunities within homogeneous groups.

3.5. Business partners, suppliers and the value chain

ORI MARTIN extends its commitments regarding inclusion and diversity to its relationships with business partners, suppliers and other stakeholders in the value chain.

In particular, the Company:



INCLUSION POLICY

- **Promotes the adoption of inclusive policies:** encourages its business partners and suppliers to adopt principles and practices consistent with this Policy, particularly in relation to non-discrimination, equal opportunities and respect for diversity;
 - **Collaborates to promote best practice:** participates in networks, sector-specific initiatives and working groups to share experiences and promote high standards of inclusion within the steel industry and the supply chain;
-

4. IMPLEMENTATION, CONTROL AND MONITORING

4.1. Governance and accountability

ORI MARTIN assigns clear responsibilities for the implementation, control and monitoring of this Policy, ensuring accountability at all levels of the organisation.

In particular:

- The **Board of Directors** approves the Policy and oversees its implementation, receiving regular updates on progress and performance indicators;
- The **Sustainability Department**, in collaboration with the **Human Resources Department**, coordinates the implementation of the Policy, develops action plans, monitors indicators and proposes any updates;
- A **role or manager dedicated to Diversity, Equity, Inclusion & Welfare** is appointed, with the task of designing, implementing and coordinating DEI initiatives, acting as a point of reference for inclusion-related issues and facilitating dialogue between the various parts of the organisation;
- A **disability manager** is appointed with the task of designing, implementing and coordinating DEI initiatives and acting as a point of contact for issues relating to vulnerability and disability
- A **manager dedicated to Diversity, Equity, Inclusion & Welfare** has been appointed, with the task of designing, implementing and coordinating DEI initiatives, acting as a point of contact and handling any reports.
- All **managers** are responsible for applying the principles of the Policy within their areas of responsibility, promoting inclusive behaviour within teams, and taking prompt action in the event of discriminatory or non-inclusive behaviour.

4.2. Stakeholder engagement

The Inclusion Policy is communicated to all internal and external stakeholders through appropriate communication channels.

Furthermore, ORI MARTIN reports annually on activities carried out in the field of diversity and inclusion in **the Sustainability Report**, to inform and raise awareness among its stakeholders and communicate the results achieved and future objectives.



INCLUSION POLICY

This Policy is the subject of dedicated training programmes, with the aim of ensuring its proper understanding and compliance by all Recipients.

ORI MARTIN promotes dialogue with trade unions, employee representatives and local communities on inclusion issues, gathering feedback and involving stakeholders in defining objectives and initiatives.

4.3. Indicators and measurement

ORI MARTIN is committed to measuring and monitoring progress on diversity and inclusion through a structured system of quantitative and qualitative indicators, in line with international reporting standards (GRI Standards, ESRS) and best practice.

Performance indicators include, but are not limited to:

- **Workforce composition:** percentage of women and men by organisational level, function, geographical area and employee category; distribution by age group; presence of people with disabilities; diversity among new hires;
- **Representation on governance bodies:** composition of the Board of Directors and corporate bodies by gender, age and background;
- **Pay equity:** gender pay gap for equivalent roles and levels; analysis of pay disparities across other dimensions of diversity;
- **Access to growth opportunities:** percentage of women and other under-represented groups accessing training programmes, development pathways, promotions and positions of responsibility;
- **Turnover and retention rates:** analysis of turnover rates broken down by gender, age and other characteristics, with particular attention to the first few years of employment and post-parental leave periods;
- **DEI training:** hours of training provided on diversity and inclusion topics; percentage of employees trained; coverage of unconscious bias training programmes;
- **Reports and incidents:** number of reports relating to discrimination, harassment or non-inclusive behaviour; response times and corrective actions taken;

The indicators are monitored at least annually and the results are used to identify areas for improvement, define corrective action plans and communicate progress to stakeholders through the Sustainability Report.

4.4. Reporting of violations

All Recipients are required to report to the Head of Human Resources any breaches of this Policy, discriminatory behaviour, harassment or any other conduct that does not comply with the principles of inclusion and respect for diversity of which they become aware in the course of their work.

To this end, dedicated communication channels have also been established in accordance with the whistleblowing procedure adopted by the Company, which can be found on the company website.



INCLUSION POLICY

The Company will assess the reports received and handle them whilst ensuring the utmost confidentiality of the whistleblowers. Whistleblowers acting in good faith are protected against any form of retaliation, discrimination or penalisation, and in all cases the confidentiality of the whistleblower's identity is guaranteed, subject to legal obligations and the protection of the rights of the Company or of persons accused erroneously and/or in bad faith.

ORI MARTIN undertakes to deal with every report promptly, to initiate the necessary investigations and to take appropriate corrective and disciplinary measures against those who have engaged in conduct contrary to the Policy.

4.5. Disciplinary system

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

Any breaches of the Policy, including discriminatory behaviour, harassment, prejudice or any conduct that does not comply with the principles of inclusion and respect for diversity, will result in the application of the measures provided for by applicable legislation, collective bargaining agreements, the Code of Ethics, the 231 Model and current company procedures.

Sanctions will be proportionate to the seriousness of the breach and may include, depending on the circumstances, formal warnings, suspensions, financial penalties, up to and including dismissal for just cause in the most serious cases.

5. APPROVAL, DISTRIBUTION AND MONITORING OF THE POLICY

ORI MARTIN approves this Policy by resolution of the Board of Directors and encourages the adoption of a similar Policy by all its subsidiaries, which shall adopt this document independently by resolution of their own governing bodies and shall encourage its timely adoption by their respective subsidiaries.

ORI MARTIN and its subsidiaries shall endeavour to facilitate 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 should national and international regulations be amended or supplemented, following judicial rulings or interpretations, as a result of changes in international reporting standards, or in any case where there is a need in relation to organisational changes or changes in the relevant context.

ORI MARTIN therefore undertakes to monitor any developments, both internal and external, in all countries in which it operates, that may affect the Policy.



INCLUSION POLICY

6. GLOSSARY

Diversity

Diversity refers to the presence and recognition of individual and group differences within the organisation, including but not limited to gender, age, ethnicity, national origin, disability, sexual orientation, religion, cultural background, life experiences and ways of thinking. Diversity is a factual condition that reflects the variety of the organisation's workforce.

Inclusion

Inclusion is the creation of an organisational environment in which all people feel welcomed, respected, valued and empowered to contribute fully, realise their potential and feel an integral part of the corporate community. Inclusion does not happen spontaneously but requires intentional and systematic action.

Equity

Equity refers to fairness in the treatment of people, recognising that different individuals have different needs, circumstances and starting points. Unlike equality (treating everyone the same), equity means providing everyone with the resources, tools and opportunities necessary to achieve equivalent outcomes, tailoring support to specific needs.

Equal opportunities

The principle that all people must have access to the same opportunities for employment, career progression, training and development, regardless of their personal characteristics, with decisions based solely on merit, skills and results.

Discrimination

Any distinction, exclusion, restriction or preference based on personal characteristics (gender, age, ethnicity, disability, sexual orientation, religion, etc.) that has the effect of nullifying or undermining the recognition, enjoyment or exercise of rights and opportunities. Discrimination can be direct (explicit) or indirect (apparently neutral but with discriminatory effects on certain groups).

Unconscious Bias

Stereotypes, attitudes or preferences that unconsciously influence our decisions, perceptions and behaviour towards certain people or groups. Unconscious biases can influence selection, assessment and promotion processes, as well as everyday interactions, even when there is an intention to be inclusive.

Reasonable Accommodations

Necessary and appropriate modifications or adjustments to the workplace, tools, organisation or tasks that enable people with disabilities or specific needs to perform their roles effectively, without imposing a disproportionate burden on the organisation.



INCLUSION POLICY

Employee Resource Groups (ERG)

Voluntary groups of employees united by shared characteristics (e.g. gender, sexual orientation, disability, generation) or an interest in inclusion issues, which are formed to promote initiatives, offer mutual support, provide feedback to the organisation and contribute to the creation of a more inclusive culture.

Gender Pay Gap

The percentage difference between the average pay of men and women in roles of equal status, level of responsibility, skills and experience. An unjustified gender pay gap indicates the presence of gender-based pay discrimination.

Neurodiversity

A term describing individuals whose neurological functioning differs from what is considered typical or dominant, including conditions such as autism, ADHD (attention deficit hyperactivity disorder), dyslexia, dyscalculia and other neurological variations. Neurodiversity is recognised as a form of diversity to be valued.

Intersectionality

The recognition that different dimensions of identity (gender, ethnicity, age, disability, sexual orientation, etc.) intersect and interact, creating unique experiences of privilege or discrimination. A person may be subject to multiple and overlapping forms of discrimination.

Inclusive leadership

A leadership style that values differences, promotes the participation of all team members, creates a psychologically safe environment in which people feel free to express themselves, and recognises and mitigates its own biases in order to make fair decisions.

Approved by resolution of the Board of Directors on 30

April 2026 Brescia, 30 April 2026

The Chief Executive Officer or the Chairman of ORI MARTIN S.p.A.

A handwritten signature in black ink, consisting of several large, overlapping loops and a long vertical stroke at the bottom.