



AUTOMOTIVE STEEL COMPONENTS

Sustainability Report

2023 • • • —




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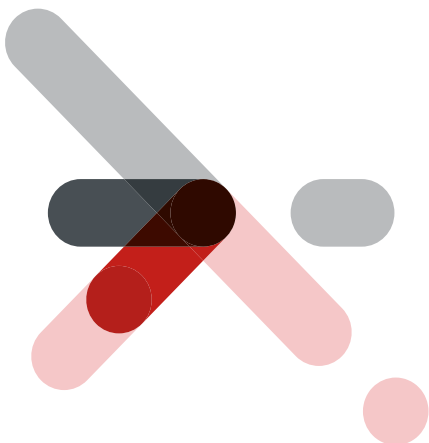




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Our **continued growth** in recent years is a result of implementing a **clear strategy** based on three fundamental pillars: **Quality, Sustainability and Competitiveness.**





Letter to the Stakeholders

Dear **Stakeholders**,

this year's 2023 Sustainability Report, we would like to illustrate, now for the third consecutive year, the challenges and activities that our company has faced in the last financial year according to impacts, risks and opportunities (IRO) identified through a dual materiality analysis in accordance with the guidelines established by the principles defined for a CSRD and GRI report.

Our continued growth in recent years is a result of implementing a clear strategy based on three fundamental pillars: **Quality, Sustainability and Competitiveness**.

We would also like to mention and thank our employees for their commitment and the support in the growth project of our company.

To this end, during 2023 we have also started constructing a new office building that will accommodate all indirect functions in such a way as to ensure greater coordination between them, adequate and welcoming space, and the possibility to accommodate new and future collaborators who will join our company in order to support our growth in the future.

Regarding future development, we would like to emphasise the effort and commitment that has led us to the creation of a major new automated line dedicated to the production of axles, in which OMR is involved in the Grenadier project, an off-

¹ Corporate Sustainability Reporting Directive

² Global Reporting Initiative

highway vehicle designed by the INEOS group, in which the company has invested significant financial resources.

It was decided to provide our new staff with the required skills to work on the new line, as well as to train our current employees. Therefore, on-the-job training programmes and a Welding Academy, with over 4,000 hours of training, have been set up and will be a wealth of knowledge for the future excellence of our company.

OMR has and will continue to operate in line with its sustainability strategy, improving both the environmental performance of its working site and preserving the human capital that has contributed to our success so far. Our continued commitment towards sustainability, however, is positioning us positively for the regulatory changes that are taking place.

In 2023, we began a review of our sustainability goals with a detailed plan for the years 2024-2030 (**Sustainability Plan 2024-2030**), the determination of which was based on OMR's analysis of impacts, risks and opportunities identified during the year.

We believe that these new objectives, though challenging, will be part of our future strategic actions and will contribute to making our company more sustainable as it pursues its goals in serving its customers with top-quality, price-competitive products.

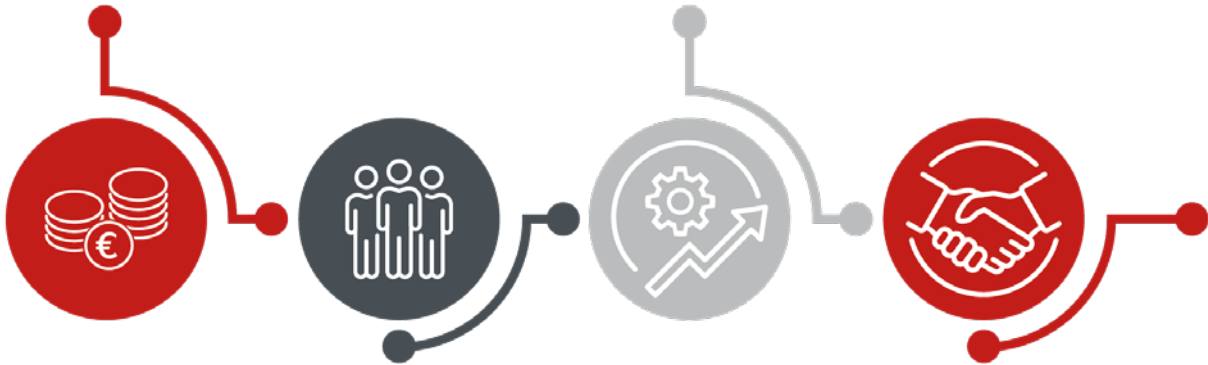
We would like to thank you for your continuous support and we are available for any information or clarification and would like to remind you that the full version is available on our company website at www.omrspa.com.

Yours sincerely,

Ruggero Ceriali



Highlights



185 mln€
Turnover 2023
(+12%)

15
Served Markets

22.609.635
Parts Produced
(+10%)

694
Numbers of
Co-Workers
(+19%)

Outcomes achieved in 2023

- ✔ **Reduction in all energy intensity and emission factors**, and particularly a **reduction in Emission Intensity as a proportion per weight of production of 12%**.
- ✔ Maintaining **100% of our purchased energy from renewable sources** and covering **27% of our electricity needs with our own photovoltaic power generation**.
- ✔ **Reaching** up to 13% of female employees in line with the target of 15% for 2024.
- ✔ **Increased** number of hours for general and specific training to 0.7h/year per employee and the creation of a Welding Academy for new and current employees.
- ✔ Over **300,000€** allocated to social and cultural initiatives in line with turnover increase.
- ✔ Completing of **Supplier Assurance** (SAQ 5.0) and **OpenES** evaluation questionnaires related to 2022.





Who we are

OMR S.p.a. is a metal carpentry company that was founded in 1972 in Remedello, in the province of Brescia, Italy, where it continues to operate today. The company specialises in the production of pressed and assembled steel components for local industries.

When the company was founded, there was a considerable economic boom for the metalworking industry in Brescia and Lombardy; moreover, there were large companies in the area, providing a strong incentive to a small company trying to grow.

Simultaneously, we cooperated with a multinational industrial vehicle company, which prompted us to take major decisions regarding our commercial strategy and steel components for the European automotive industry, proceeding with continuous improvement in both technical and technological terms. Through this cooperation, we were able to import laser cutting technology into Italy and have a cataphoresis and powder coating plant within our production cycle, thereby making us one of the first Italian companies to possess this type of technology.

Our continuous desire to innovate and improve has enabled us to achieve a complete verticalisation of the manufacturing cycle; in fact, over the years we have been able to strengthen our moulding, bending, welding, machining and tumbling departments, which have made us capable of starting from the sheet metal coil and performing all the necessary processes to give the customer a finished product. We are able to deliver our products all over Europe on a daily basis, since we rely on our integrated logistics, which not only significantly reduces picking and shipping times, but also

guarantees the traceability of the production cycle, thanks to a bar coding and radio frequency system.

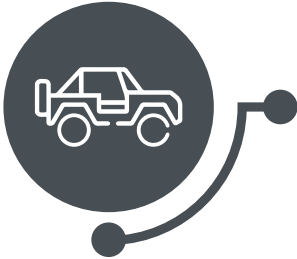
OMR now boasts of a portfolio of customers operating within Europe's leading industries: industrial handling equipment, agricultural machinery, earthmoving equipment, industrial vehicle production, commercial vehicles and off-road and special vehicles.

We are confident that, based on 50 years of manufacturing expertise, we can consider ourselves a partner with the appropriate know-how to fully satisfy our customers by offering them high quality, reliable products manufactured in a production plant equipped with the best machinery employing the best technologies available on the market.



INDUSTRIAL AND COMMERCIAL VEHICLES SECTOR
(75% of activities)

- DAIMLER TRUCK
- Mercedes-Benz
- IVECO
- VOLVO
- streparava
- FPT
- NIKOLA



OFF-ROAD AND SPECIAL VEHICLES SECTOR
(10% of activities)

- DAIMLER TRUCK
- IVECO
- INEOS GRENADIER
- CARRARO
- ASTRA
- TOYOTA CARRELLI ELEVATORI



AGRICULTURAL AND CONSTRUCTION VEHICLE SECTOR
(15% of activities)

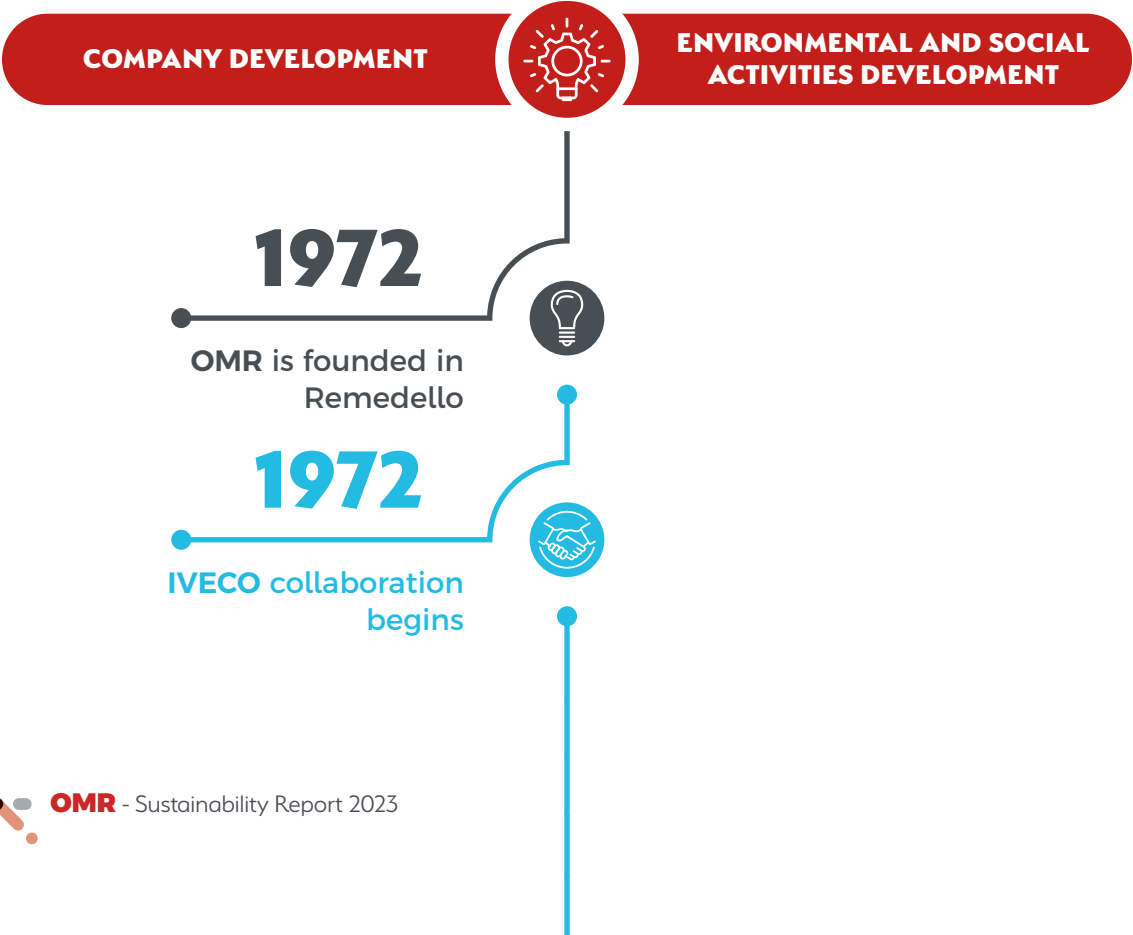
- CNH INDUSTRIAL
- CATERPILLAR
- KOMATSU
- TürkTraktör

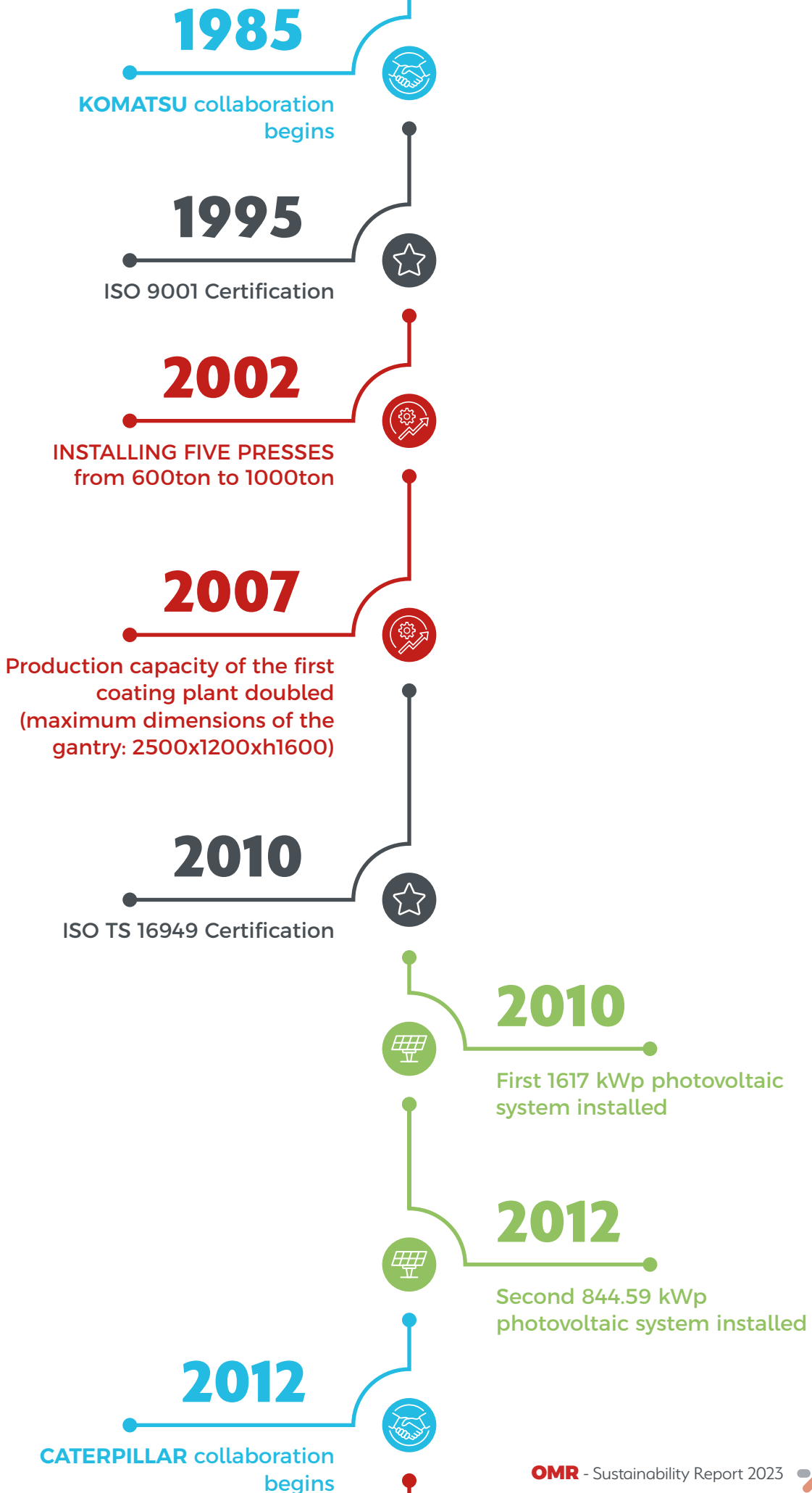
We produce per month, 3,000 automotive components for the automotive industry. Our range of products includes steel components for various applications, such as chassis, cabs, small cabs, seat support frames, engine support frames, anti-intrusion bars, tank support strips, hoods, handling booms and dedicated structures for storing batteries.

We work actively with our customers' design platforms to develop modifications and new products that bring significant improvements in both performance and cost. We continually invest in the growth of our engineering, prototyping and testing departments to ensure that our customers receive the appropriate trials, simulations and samples to develop new ideas and to improve product quality.

We are proud of our know-how, which has been consolidated throughout our history and makes us competitive in an increasingly demanding automotive market, where not only our production capacity, but also our innovation and quality are crucial. In a global automotive context, the design and production of efficient, high-performance and cost-effective components are decisive in the success of a car, a commercial vehicle or an agricultural machine.

Our mission is clear: to accompany our customers along their technical, technological and market evolution, and to make all our resources available to contribute towards finding and developing products of excellence. Thanks to this approach, we have experienced a steady growth over time and serve over 20 customers in more than 15 different countries.





2013

INSTALLATION OF TWO
2400-ton PRINTING
LINES (AIDA)



2014

Automated robotic
island system INSTALLED
for SUSPENSION
ASSEMBLY (KUKA)



2014

ISO 14001 Certification



2015

DAIMLER collaboration
begins



2017

Adoption of
Organisational Model
Legislative Decree 231/2001



2018

INSTALLATION OF
AUTOMATED WAREHOUSE
for FLAT METAL SHEET



2018

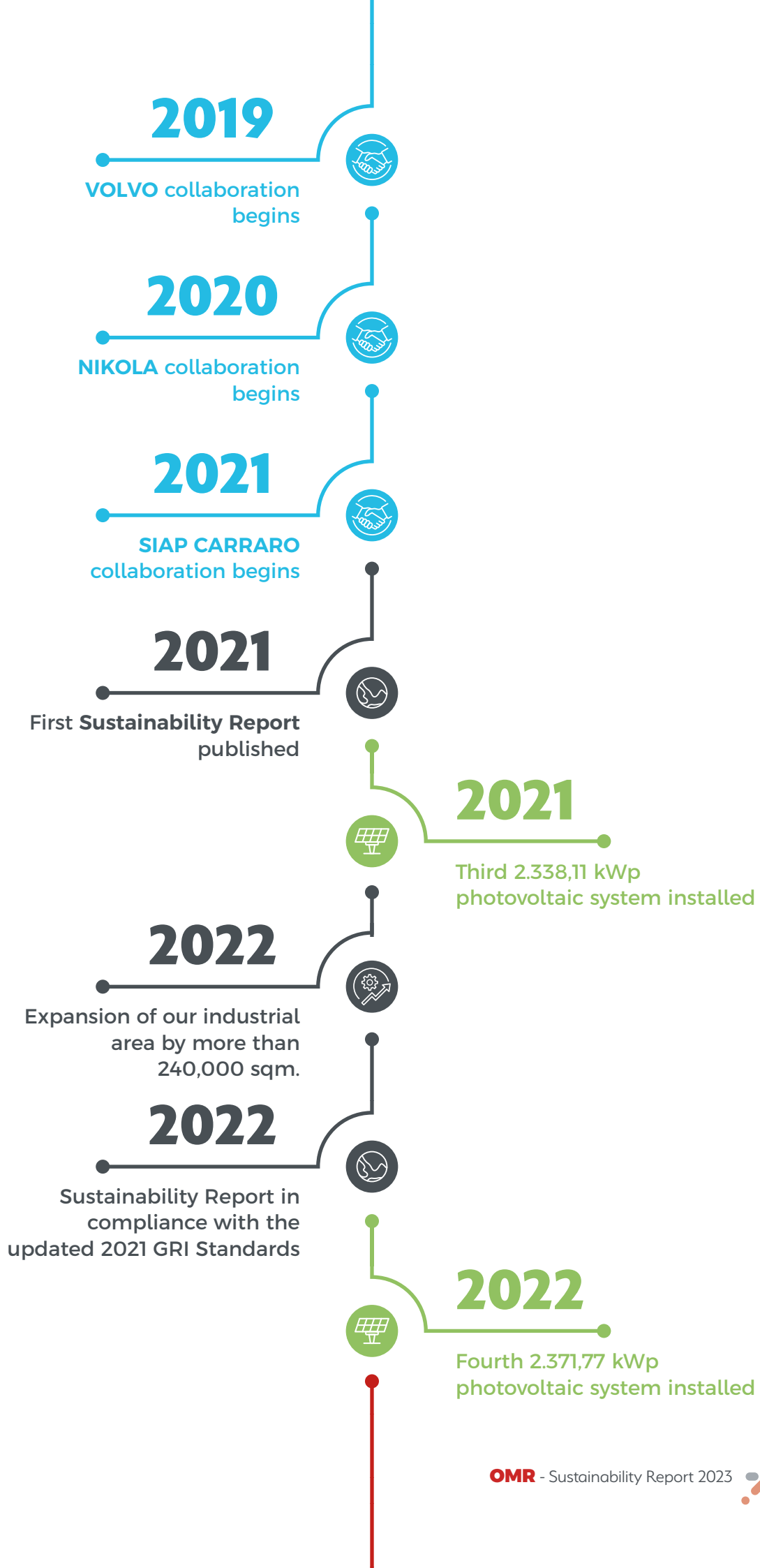
INSTALLATION OF A SECOND
VARNISHING PLANT

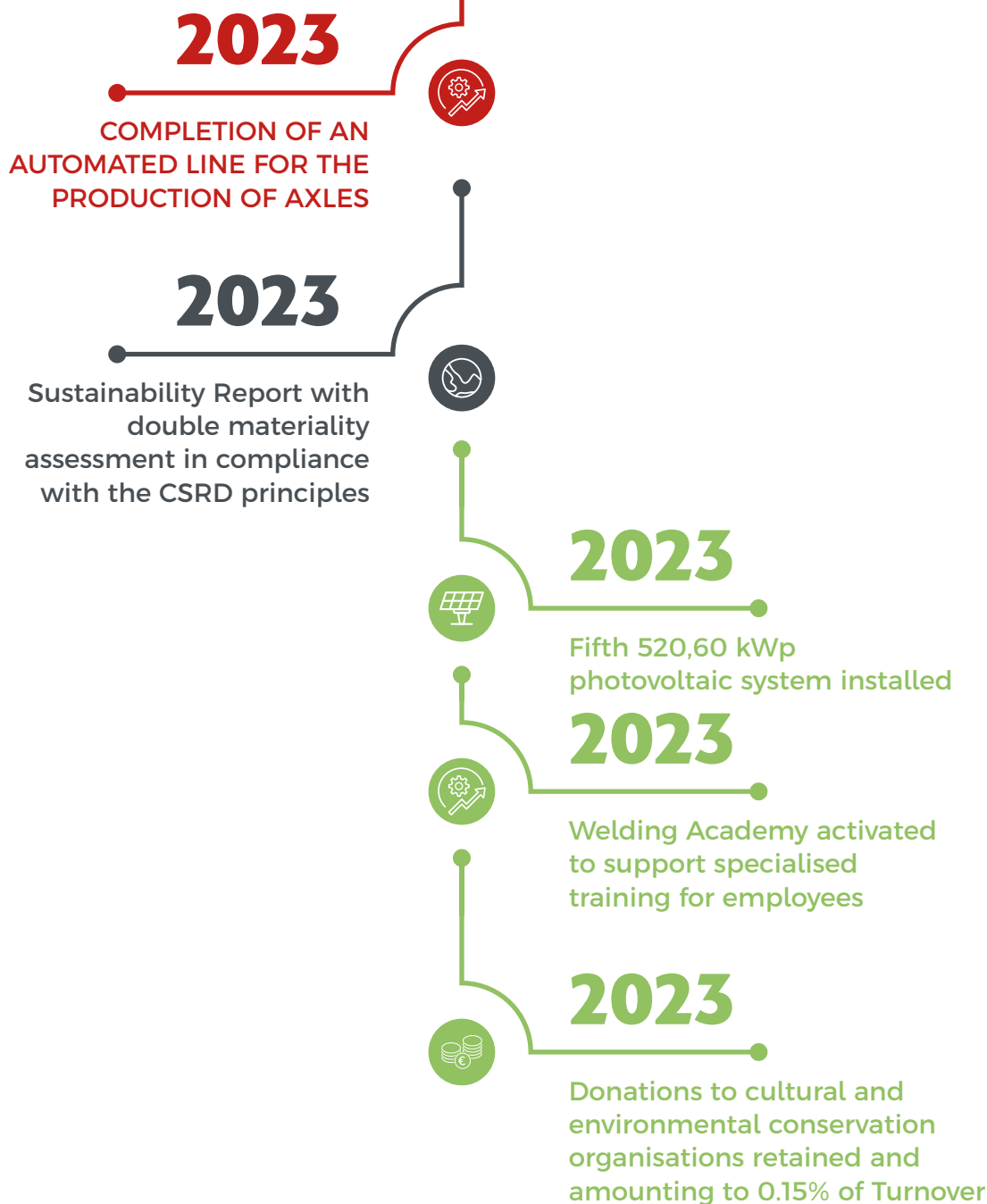


2018

IATF 16949 Certification







Our numbers	2022	2023
Turnover mln €	165	185
Profit for the financial year mln €	12.5	13.0
No. of employees	581	694
No. of pieces produced	20.521.356	22.609.635
Markets served (n)	15	15
Roof surface Area (sqm)	82.910	83.816
Total surface Area (sqm)	240.820	240.820

Associations we are involved in

We believe that participation and confrontation are important to achieve our goals. That is why we actively participate in territorial and trade associations.



Confindustria Brescia is the local organisation for the Province of Brescia of Confindustria, the main organisation represents Italian companies in the manufacturing industry and services. Confindustria Brescia is a free association that plays a representative and protective role with respect to local companies, entrepreneurs and their values in relation to institutions.

The shared aim is to create an integrated network in which there is a free sharing of knowledge, resources and services that can support the social and economic development of the area and those involved. To date, it has over 1,200 companies from the territory as members.



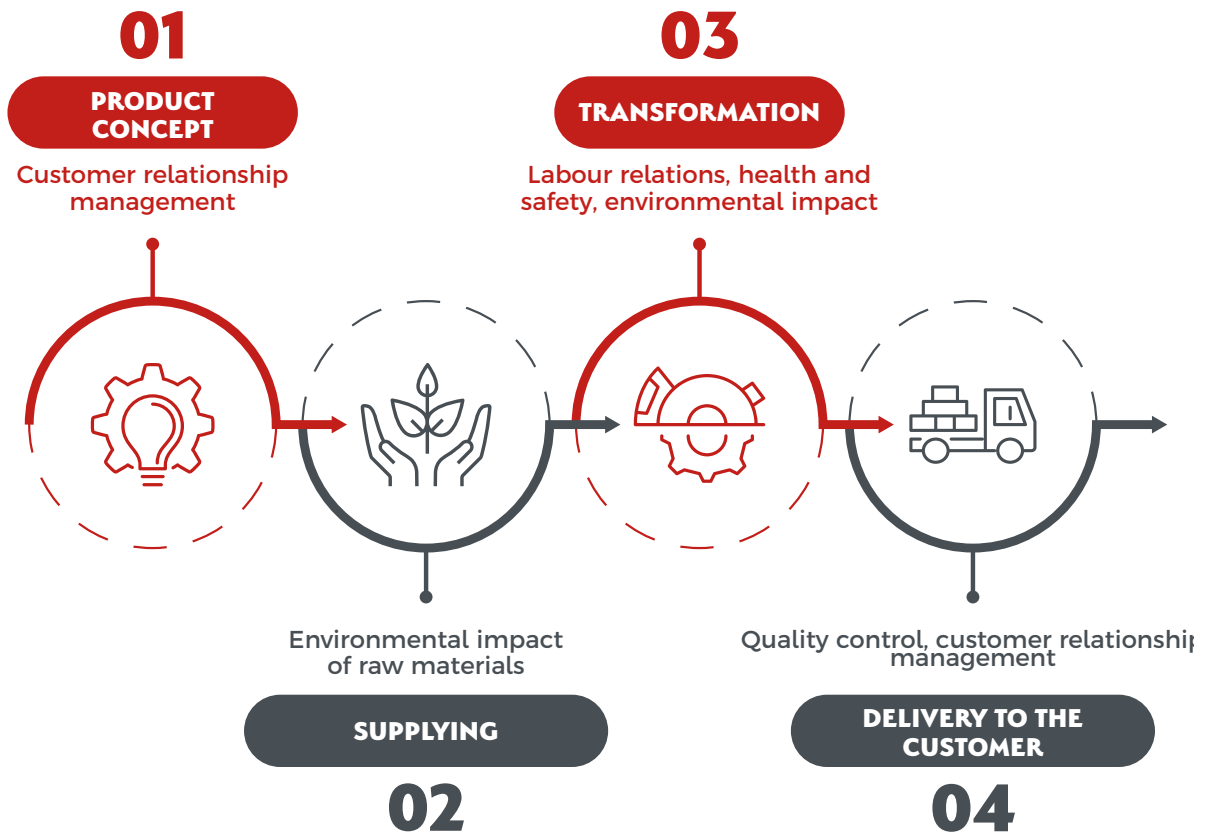
AQM Srl, is a non-profit company founded in 1982, headquartered in Provaglio d'Iseo - BS that works with thousands of national and international metallurgical and manufacturing companies, developing expertise in industrial materials in various fields of application, in their production processes, in the continual improvement of the organisation and in the implementation of integrated management systems according to international standards in various fields and applications.





CONAI is a private, non-profit consortium in Italy, the instrument through which producers and users of packaging ensure the achievement of the recycling and recovery targets for packaging waste set by law.

Chain value



Our value chain consists of four separate stages:



01. Product concept

We work in close contact with our customers through our engineering departments for the product development and design, defining the optimal strength and usage characteristics according to their needs. This involvement ensures that we translate the customer's needs into operational specifications in the production of the specific product. During this phase, we offer technical support to maximise the efficiency in the industrialisation of the product and consequently, minimisation of the production cost.

In addition, we actively participate in defining weight-saving solutions and the use of self-supporting materials, in response to the fluctuating price of steel and the increasing need to reduce fuel consumption, thereby reducing the environmental impact of our products throughout their life cycle.

The product conception process involves the following steps:

- We receive the customer's CAD drawing of the product and its technical specifications.
- We collaborate in the co-design process, providing the customer with technical reviews of the product along with suggestions for possible modifications.
- Once we have the customer's final approval on the design, we proceed with the production phase.

This method ensures a strict adherence to the customer's needs and enables us to provide high quality, competitive products.



02. Supplying

In 2023, we kept the number of suppliers virtually constant to around 690. The local supplier component continues to be significant, at 41%, up compared to the previous year (30%). We purchased 48,136 tonnes of materials, an increase over the previous year of 29%, partly in line with the increase in production but also due to a stock replenishment decision. Our main materials are steel, laser and welding gases, screws, varnishes, packaging and other components. Steel continues to be our predominant raw material, representing 89% of the total weight of materials purchased. Particular attention has always been paid to the procurement of this metal, focused on choosing suppliers whose production processes reduce the environmental impact of this material by increasing its circularity and maximising the use of

renewable energy.

We have therefore adopted, as one of the objectives of the new 2024-2030 Sustainability Plan, the development of a supplier selection procedure (Supplier Code of Ethics) that places special emphasis on compliance with ESG parameters, to be approved by 2025 and implemented in 2026 starting with OMR's key partners.

In terms of packaging and ancillary materials, we adhere to the packaging and technical specifications defined by customers, but we will engage in dialogue with these stakeholders to find solutions that will decrease the use of non-recycled plastics or any non-certified cardboard. In addition, in 2023, the purchasing department evaluated packaging alternatives of FSC-certified materials (paper and cardboard) and with PSV recycled plastics content (film and bubble wrap fillers) and, where possible, purchased packaging alternatives not subject to customer specifications.



03. General transformation and support services

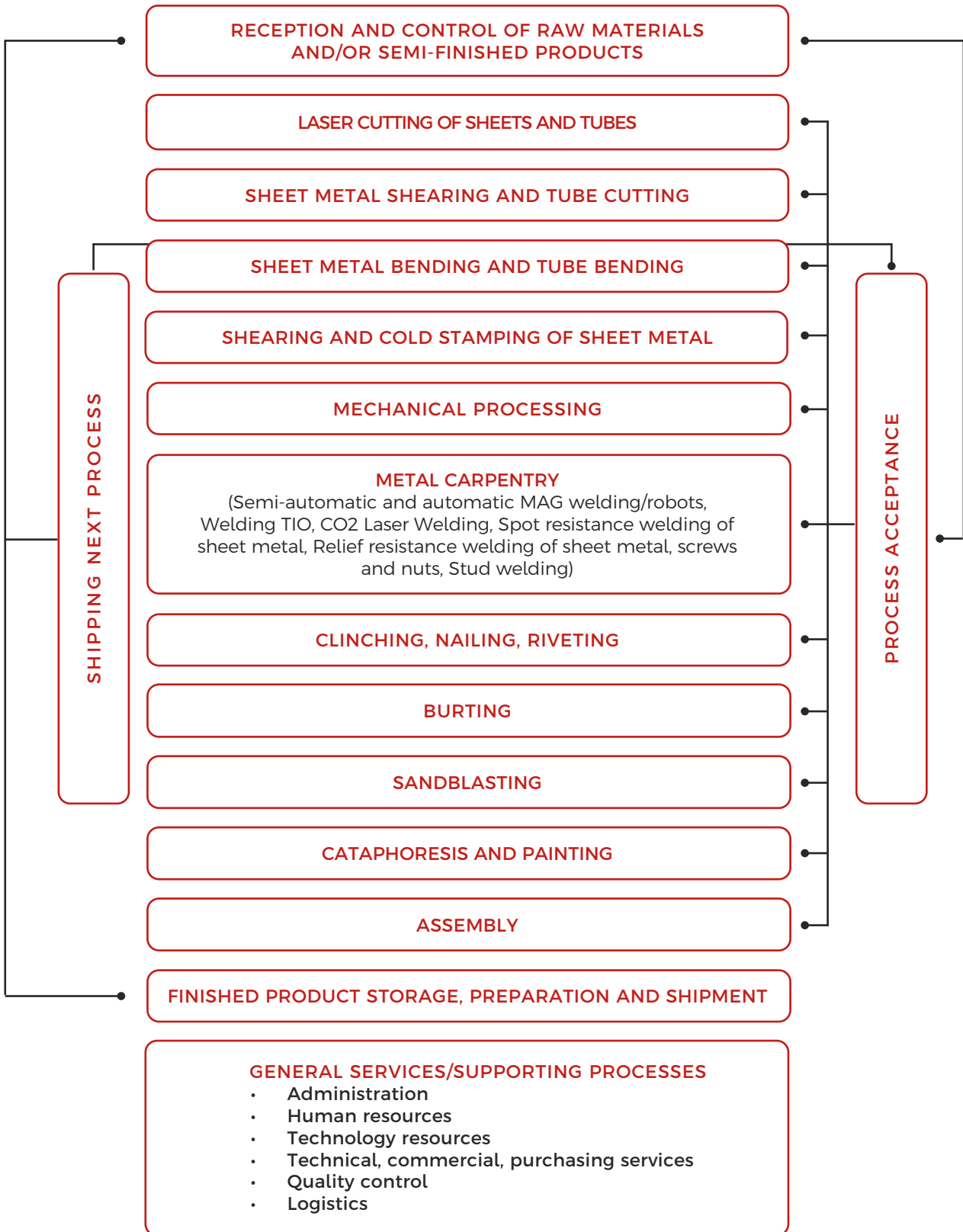
Our production process is characterised by a high degree of vertical integration, comprising 11 distinct processes outlined in the following chart, organised according to the principles of the certifications we hold and the best practices required by our customers. In addition to these stages, inbound and outbound logistics management, as well as general and support services, are of key importance to ensure an efficient production cycle and quality control geared towards excellence.

During all these phases, we actively involve our 694 employees, and we commit ourselves to implementing best practices to ensure a healthy and safe working environment. We generate our main environmental impacts during the production phase, mainly related to CO2 emissions both directly and indirectly through the energy we consume.



04. Customer Service Delivery

When purchasing delivery services, the logistics and transport of the products sold are mainly handled directly by the customer itself in about 90 per cent of cases. In the remaining cases and regarding the materials we purchase through contractual agreements with companies specialising in logistics to manage transport efficiency and limit environmental impact.





OMR's commitment

As OMR we acknowledge that sustainability is a fundamental pillar that impacts our future and that of the next generations. Therefore, we are actively committed to integrating sustainable principles into all our operations, decisions and strategic plans. We are committed to working together with partners, suppliers and customers to make sustainability a common goal and to find innovative solutions that enable us to meet sustainability challenges effectively.

This year, we took a significant step by analysing our impacts, risks and opportunities in detail through a dual materiality perspective, and updated our Sustainability Plan for the 2024-2030 period.





Sustainability for OMR

This report marks the publication of our **third sustainability report**, which is a particularly proud moment for us. The Sustainability Report gives us the opportunity to reflect on the evolution of our sustainability strategy and to share our progress with all our stakeholders.

Over the past three years, we have undertaken various initiatives to strengthen sustainability within our company. These include, for example, the expansion with our photovoltaic park and the increase in the female presence among our employees. While these important steps have been taken, we are aware that there are still many opportunities for improvement which we intend to explore and implement in order to continue our commitment to more sustainable and inclusive management.



Our mission

We aspire to be a leader in the sustainable transformation within the industry of heavy mobility components, providing our customers with a reliable and sustainable partner whose technical expertise offers state-of-the-art solutions for safe and eco-friendly mobility. We work closely with our customers to create innovative technical solutions, perfectly adapted to their products. Through a vertical integration approach, we manage the entire development cycle, from initial industrialisation through to final component production, and ensure fast delivery and high quality.

Our values



Innovation, research and development

We aim at being reliable partners for our customers, capable of helping them to build innovative, high quality products that meet the highest safety standards with the lowest environmental impact.

We work towards finding the best possible solutions that combine quality and sustainability in the production process, and we continue to invest in state-of-the-art machinery and tools to achieve this goal.



Care for people

People are important to us. We look after those who work with us directly and those who live in the surrounding area and who indirectly contribute towards our development. We aim at ensuring a good quality working environment for our employees and consider our region as to grow together.



Quality, safety and environment

Health and safety is an essential commitment for all the people who work for us or who deal with us. We are committed to ensuring compliance with safe and correct behaviour when carrying out our work and providing the right conditions for this to happen.

We believe that guaranteeing the best environmental performance is a fundamental and vital element in the conduct of our business and the achievement of our corporate objectives. Our guiding principles are the efficient use of resources and raw materials, the containment of environmental impacts and, using the best available technologies and sustainable environmental practices and continuous improvement.



Partnering with our Clients

Our mission is to provide customer satisfaction through the supply of excellent products. In order to achieve this goal, OMR continuously invests to ensure robust and reliable processes. Our guiding principles are continuous process improvement and business continuity.

We believe, moreover, that the relationship with our clients can become a broader partnership in order to deal together with the challenges of sustainable development and try to provide solutions that go beyond the mere creation of a product.

Double Materiality

For the 2023 Sustainability Report, we decided to analyse our material topics by integrating the methodology and guidelines set out by the **Corporate Sustainability Reporting Directive (CSRD)**.

Therefore, we performed an in-depth **Dual materiality analysis.**

This process, unlike previous years, was not limited to only considering inside-out impacts, i.e. the environmental, social and economic impacts generated directly by our operations, but also extended the focus to include outside-in impacts.

The latter include external influences such as social and behavioural trends, demographic dynamics and environmental risks related to climate change, which



can significantly affect the long-term sustainability of the company and its financial performance.

Adopting this integrated approach demonstrates our growing awareness that non-financial events or influences can have a considerable impact on long-term value and corporate reputation.

Through the dual materiality analysis, we have taken a further step towards understanding and effectively managing the interactions between financial performance and sustainability, with the aim of generating a positive impact on all our stakeholders.

In order to ensure the completeness and accuracy of the analyses conducted, we adhered to the principles of materiality, inclusiveness and comprehensiveness, as outlined in the Global Reporting Initiative (GRI) standard. This analysis process was promoted and conducted by OMR's CEO with the supervision of an external consulting firm.

The first step was to carry out an analysis of our reference context, with the aim of identifying new best market practices and key sustainability trends relevant to our industry.

By applying the concept of *Dynamic Materiality*, which considers the evolution of stakeholder priorities and expectations as well as the company's operating contexts over time, we examined the possibility of revising and updating our material issues list in response to changes in the business and the stakeholders' business scenario. This process allows us to ensure that our sustainability strategy remains consistent with the needs and expectations of stakeholders, as well as remaining relevant to current and future market dynamics.

In particular, we proposed the inclusion of a new material topic for top management to consider: **biodiversity**. This choice was motivated by the growing importance of preserving natural ecosystems and their biological variety, which is essential for maintaining environmental balance. Consequently, we believed that addressing this topic could further enrich our sustainability strategy, aligning it with current global environmental needs and reinforcing our commitment to more sustainable and environmentally friendly practices.

Despite having a significant potential, however, the topic did not receive an adequate materiality rating from the front line; therefore, for the period covered by this Report, the topic was not included in the list of material topics.

As for the other material topics, **we decided to confirm the 12 materiality areas** already identified in previous years. This decision was made because these topics continue to be relevant and pertinent, not only reflecting on the activities of our main competitors but also on international standards and initiatives.

We then started a thorough process to identify the **impacts, risks and opportunities associated with each material issue**. This stage followed an assessment conducted by OMR's top management, involving 7 managers, where each element was examined individually and evaluated through a quantitative score.

Specifically, following the inside-out perspective, different criteria to assess impacts were considered including **scale, purpose and probability of occurrence**; for negative impacts we also assessed **irremediability**, i.e. the feasibility of reducing the effects and re-establishing the former state.³

The work group's analysis allowed us to prioritise these 45 identified impacts. The following table highlights the 10 main impacts.⁴

Material Theme	Impact (Inside-out)	Ranking
Health and safety of workers	Comply with safety standards, failing to do so can lead to injuries and serious accidents	1
Energy Efficiency	Research and maximising the use of energy from renewable sources	2
Product Quality and safety	Safety and environmental compliance, since failure to do so could lead to critical injuries or accidents to third parties	3
Training and professional development for workers	Employee remuneration level	4
Relationship with the local community	Direct and indirect job creation	5
Training and professional development of workers	Product quality offered to customers	6
Responsible sourcing	Promotion of sustainable sourcing of the company restaurant (local producers, vegan choices)	7
Product quality and safety	Product quality improvement, as poor quality products can reduce safety or/ and customer satisfaction	8
Quality of work relationship	Corporate environment	9
Energy Efficiency	Efficient Energy Efficiency of operations related to energy consumption	10

³ The complete list of points that can be awarded is attached in the Appendix.

⁴ The full list of impacts, risks and opportunities is included in the Appendix.

OMR has a strong impact on the compliance with safety standards. This aspect is crucial since non-compliance can lead to serious consequences, such as personal injury or critical accidents, which could compromise both employees' health and the company's image.

Another key aspect that emerged from the analysis concerns the impact generated by OMR's choice in renewable energy. In fact, for several years, we have been committed to maximising the use of green energy to reduce our environmental footprint and advance future energy sustainability regulations, generating a positive impact externally.

The quality of the product is another strategic pillar. The company, which is responsible for the quality of its products, recognises that poorer quality products can negatively affect both downstream process safety and customer satisfaction.

From the perspective of human resources, it has been shown that the company has a positive impact both on the remuneration levels of its employees as well as on the development of job opportunities, both direct and Indirect.

In addition, we noted a positive impact on the corporate climate, which we believe is crucial to the well-being of our people.

We then proceeded, following the outside-in perspective, to define and examine the risks and opportunities associated with each material issue. During this phase, we assessed **the probability of occurrence as well as the potential effects on OMR's balance sheet**⁵ arising from each identified risks and opportunities.

A total number of 24 risks and 26 opportunities were identified. The following table highlights the top 10 risks and opportunities that received the highest rating of significance.⁶

Material Theme	Risks	Opportunities	Ranking
Energy Efficiency	Bureaucratic delays in the activation of new renewable energy plants		1
Production process management		New technologies that improve the production process (e.g. energy efficiency, reduction in non-conformities)	2

⁵ The complete list of scores to be awarded is included in the Annexes
⁶ La lista completa di impatti, rischi e opportunità è inserita negli Allegati.

Material Theme	Risks	Opportunities	Ranking
Product quality and safety		Current customers confirm a continuing relationship with the supplier company due to the quality and safety of the product	3
Energy Efficiency	Energy (electricity and fuel) price volatility due to exogenous events impacting company costs		4
Responsible Sourcing	Increased procurement costs for a more sustainable value chain		5
Emission Management	Stricter regulatory requirements on carbon emissions from the production process (e.g. CBAM, carbon taxes, renewable energy regulations, etc.).		6
Product quality and safety		New customers seek higher product quality and safety from suppliers	7
Emissions management		The credit system grants favourable conditions to companies with a positive sustainability rating for the management of emissions	8
Emissions Management	Regulatory and market demands to reduce the carbon footprint of the entire value chain, including logistics, may require continuous financial investment		9
Training and professional development of workers	The lack of qualified personnel with specific knowledge in the sector		10

The analysis of OMR's outside-in risks highlights significant challenges related to the implementation and management of a sustainable development strategy. A major risk relates to bureaucratic delays in the commissioning of new renewable energy plants. Such delays may not only slow down the transition to cleaner energy sources, as is happening in our case, but also negatively affect the company's pace of growth and innovation.

Another important risk is the volatility of energy prices, both electricity and fuel, which can fluctuate significantly due to exogenous events. These fluctuations can impact operating costs and reduce financial predictability, exposing the company to unforeseen economic risks.

In addition, the increased cost of procurement due to the choice of a more sustainable value chain poses a challenge. Although this strategy is in line with our long-term sustainability goals, we are aware that such choices may entail higher initial costs, which require careful management to maintain financial balance.

The company also has to deal with increasingly stringent regulatory requirements regarding the carbon emissions from its production process. Regulations such as the Carbon Border Adjustment Mechanism (CBAM), carbon taxes and renewable energy regulations require significant adjustments that may entail substantial investments and operational restructuring.

Lastly, the demand from regulators and the market to reduce the carbon footprint of the entire value chain, including logistics, underlines the need for continuous financial investment. This, coupled with the difficulty of finding qualified personnel with industry-specific knowledge, poses challenges not only in terms of cost, but also in terms of internal skills development.

As to the most relevant and most likely outside-in opportunities, there is the adoption of new technologies that can improve energy efficiency and reduce non-conformities in production processes, allowing the company to reduce operating costs and improve product quality. This helps maintain the loyalty of current customers as well as to attract new customers who are looking for high standards of quality and safety.

Furthermore, having a positive sustainability rating (such as, for example, Supplier Assurance - SAQ 5.0 or OpenES) leads our customers to evaluate our company, in their production allocation decisions, as a supply chain partner that contributes positively to their sustainability profile. Such collective opportunities allow OMR to project itself as an innovative and responsible leader, strategically positioning itself for sustainable growth in an increasingly sustainability-oriented market.

Relationship with Stakeholders

The Corporate Sustainability Reporting Directive (CSRD) and the main reference standards such as the European Sustainability Reporting Standard (ESRS) and the Global Reporting Initiative (GRI) emphasise the crucial role of stakeholders in the sustainability strategy setting process.

All of the stakeholders are considered an **integral part of the impact assessment process**. The purpose of stakeholder engagement may be, for example, to identify potential and actual impacts or to determine prevention and mitigation responses to potential negative impacts.

Overall, we emphasise the importance of transparency in communication and stakeholder engagement to ensure the quality and relevance of company information and decisions in the path to achieving our sustainability goals.

While we had to temporarily discontinue stakeholder engagement activities during this reporting period, it is our commitment, as outlined in the **Sustainability Plan 2024-2030, to restore and intensify these interactions on an annual basis starting from next year.**

An active engagement with stakeholders not only prevents potential conflicts and improves the organisation's reputation, but it is also essential in identifying emerging risks and opportunities, steering the organisation towards a more sustainable future. Furthermore, actively involving stakeholders helps to generate an increased sense of ownership and responsibility towards the organisation, elements that are vital for mutual success.

In order to better understand our approach and priorities, below we provide a detailed table that maps OMR stakeholders and identifies the areas of materiality that significantly influence their expectations and decisions.

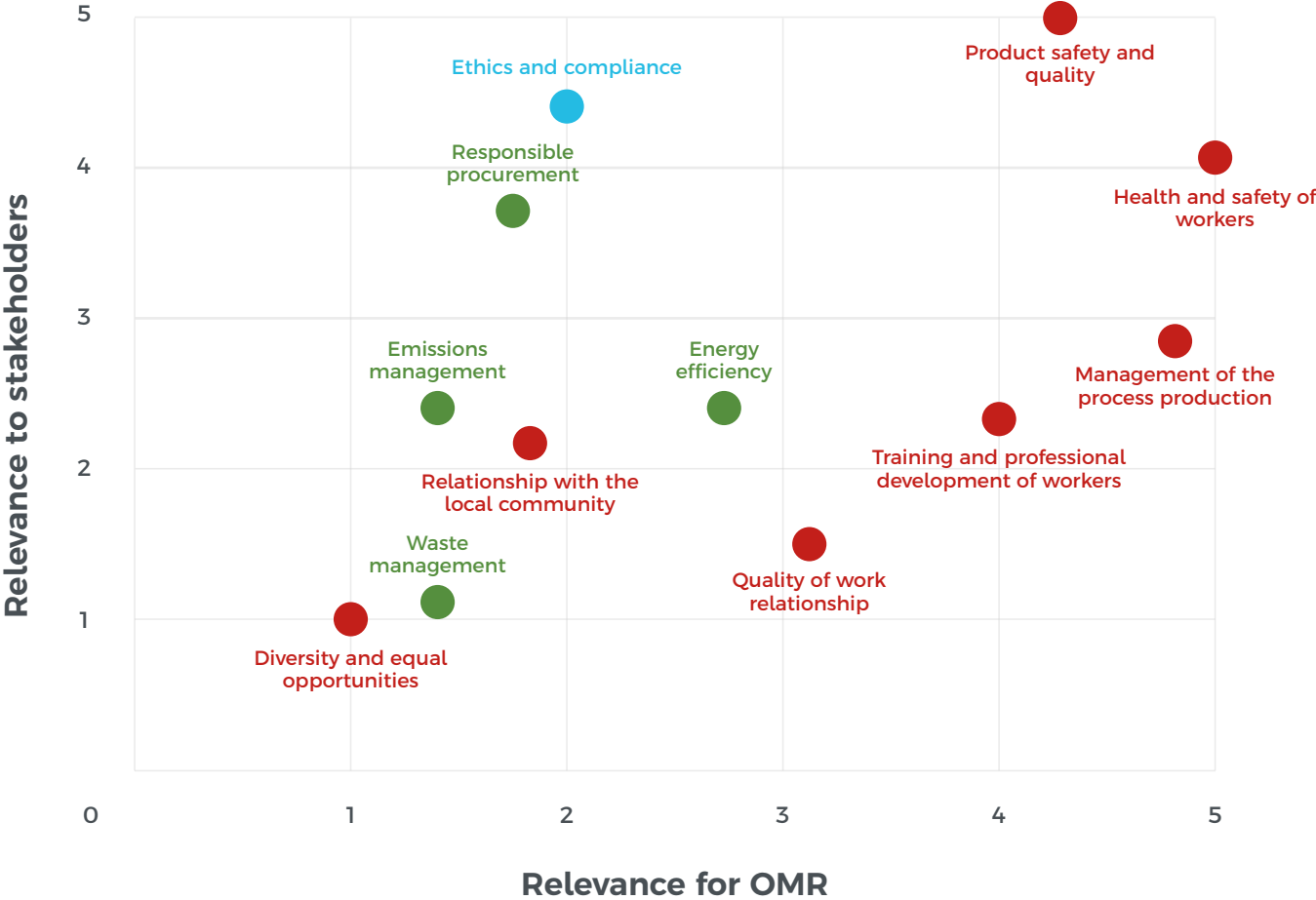
STAKEHOLDER	MATERIAL THEMES												
	Responsible Procurement	Energy Efficiency	Waste Management	Emissions Management	Worker training and professional development	Management of the production process	Quality of working relationships	Product safety and quality	Relationship with the local community	Workers' health and safety	Diversity and equal opportunities	Ethics and compliance	
Competent Authorities			✓	✓				✓		✓		✓	
Shareholders		✓				✓		✓		✓		✓	
Customers	✓	✓	✓	✓	✓	✓		✓		✓		✓	
Local Communities	✓	✓	✓	✓					✓		✓		
Final Consumers								✓					
Suppliers	✓											✓	
OMR People					✓	✓	✓		✓	✓	✓		

Materiality Matrix 2023⁷

Within the 2023 materiality matrix, the materiality areas regarded as relevant for OMR and for stakeholders are shown.

The materiality areas have been positioned along two axes:

- The **x-axis** measures the **relevance for OMR**;
- The **y-axis** measures the **relevance for the Company's stakeholders**



LEGEND

- Environmental Theme
- Social Issues
- Governance Topics

⁷ The Materiality Matrix for 2023 has not been updated from the 2022 Sustainability Report, based on the strategic evaluation that confirmed the validity of the previous version.

ENVIRONMENTAL themes chosen by OMR

<p>Responsible sourcing</p>	<p>OMR uses large quantities of steel to manufacture its products. Therefore, the relationship with the steel supply chain is a key element for OMR's success in terms of quality, cost, logistics management and compliance and sustainability criteria (including direct and indirect environmental impacts).</p>
<p>Energy efficiency</p>	<p>The production carried out in OMR's plants involves numerous steelmaking processes. These processes require a high use of electricity. The plants also use considerable amounts of fuel (methane gas) needed to operate the ovens used for painting. Energy efficiency and energy supply are of major importance to OMR's business.</p>
<p>Waste Management</p>	<p>OMR's production activity involves the production of a significant amount of scrap metal waste (SCRAP), generated during the steel transformation process. Steel, in fact, represents the most significant raw material for OMR's production activity, and therefore, most of the waste produced is non-hazardous scrap metal that is sold to be recycled. The production process also involves the generation of other types of waste (mainly sludge, water and packaging materials), which however represent a small percentage of the total waste produced. Given the size of the total waste produced, the management of production waste is a relevant issue for OMR's operations.</p>
<p>Management of emissions</p>	<p>The production carried out at OMR's plants involves direct emissions of greenhouse gases as well as a high use of energy that</p>

contributes indirectly to the emissions generated by the Company. In particular, some manufacturing processes - welding and painting - have a high impact on direct emissions generated by the production process.

SOCIAL issues chosen by OMR

Employee training and professional development

Development and growth of professional and managerial skills of all employees within OMR is fundamental for the quality and safety of the company's processes and in order to guarantee the Company's operational success. For some of the production activities, years of training and the acquisition of advanced skills where employees specialize over years this is why training is in fact fundamental for the quality of the production.

Production process management

OMR's main lever in managing its relationship with its customers is its ability to introduce innovation in the production process and related production techniques. This contribution represents an important element in the creation of value in the relationship with customers because it makes it possible to better interpret their needs, improve product quality and respect their production times.

Work relationship quality

People are important to OMR's success. Employee retention and wellbeing ensure employee retention, the development of necessary skills and the creation of a positive working environment.



<p>Product quality and safety</p>	<p>Reducing and eliminating the risk associated with the possibility of product recalls and/or production delays generated by quality defects, with economic and reputational repercussions in the relationship with the customer, is fundamental to OMR's success. In addition, for some products, quality risk could affect the final consumer's physical safety.</p>
<p>Relationship with the local community</p>	<p>OMR has grown up within its territory. The relationship with the local community is relevant in terms of reputation, attraction of human resources and active participation in the development of the community and the territory, in economic, social and environmental terms.</p>
<p>Workers' health and safety</p>	<p>The issue of workers' health and safety is an area of priority importance for OMR given the type of work that is carried out. It is necessary to focus on a consistent and proactive approach to prevent accidents and increase risk awareness throughout the company, adopting the highest standards and best practices.</p>
<p>Diversity and equal opportunities</p>	<p>Protecting diversity and promoting equal opportunities is key to creating an inclusive and respectful work environment. Drawing in female employees allows us to tap into a broader range of resources and enriches the organisation with new perspectives, becoming a key element for OMR's growth.</p>

GOVERNANCE topics chosen by OMR

Ethics and compliance

The business operations within OMR involve numerous transactional processes that could be subject to corruption or other unethical behaviour, unless properly managed. In a number of business relationships with external organisations, like in contracts of the Company with customers and suppliers that involve significant amounts, such as, in the purchase of raw materials or services like the management of scrap, transport and logistics services, the risk of corruption could occur.

Sustainability Plan for 2024-2030

Based on the priorities we defined with the dual materiality analysis, we made the decision to expand our **Sustainability Plan**.

The new **Sustainability Plan for 2024-2030** introduces quantitative and qualitative targets that extend over a much longer time horizon than the previous one, up to 2030.

The table below illustrates the targets that have been set with the relevant KPIs involving various topics, from ethics to compliance, health and safety, responsible sourcing to environmental commitment.

Each objective in the plan is described in detail in the relevant material topics' paragraphs.

Materiality Area	Action	Past			Plan 2024-2030			
		2021	2022	2023	2024	2025	2026	2027-2030
ETHICS AND COMPLIANCE	Recruitment of a resource and establishment of a position of Operational Manager Sustainability	-	-	-	Selection	Recruitment and fully operational	Operational	Operational
ETHICS AND COMPLIANCE	Stakeholder engagement carried out in 2022, suspended in 2023 to be taken up in 2024	-	Yes	No	Yes	Yes	Yes	Yes
DIVERSITY AND EQUAL OPPORTUNITIES	Target for more female members over total workers	5,90%	11,36%	13,11%	15,00%	17,00%	20,00%	20,00%



Materiality Area	Action	Past			Plan 2024-2030			
		2021	2022	2023	2024	2025	2026	2027-2030
TRAINING AND WORKERS PROFESSIONAL DEVELOPMENT	Increase in general or specific training (excluding health and safety)	220h per year	48h per year	Total 486h per year equivalent to 0,7h/ per year per employee	At least 1h/ per year per employee	At least 1,2h/ per year per employee	At least 1,3h/ per year per employee	At least 1,4h/ per year per employee
PROFESSIONAL TRAINING AND DEVELOPMENT OF WORKERS	In-house training activities regarding code of conduct, human rights, working conditions, business ethics, environmental management	-	-	-	-	Training sessions for homogeneous groups		
HEALTH AND SAFETY OF WORKERS	Certification ISO 45001 obtained	-	-	-	Requirements Defined	Obtained	Obtained	Obtained
RESPONSABLE PROCUREMENT	Drafting Supplier Code of Ethics and its implementation on key suppliers ⁸	-	-	-	-	Approved	Operating	Operating
RESPONSIBLE SUPPLIER	Supplier audit procedures implemented						Approved	Operating
EMISSIONS MANAGEMENT	Calculation Scope 3				Assessment	Performed	Performed	Performed
EMISSIONS / PRODUCTION PROCESS MANAGEMENT	Product Carbon Footprint (PCF) calculation for relevant products				Strategic Product Selection	Products amounting to 5% Turnover	10% Turnover	40% Turnover
EMISSIONS MANAGEMENT	Certification 14064-1 (Emissions)					Obtained	Obtained	Obtained
ENERGY EFFICIENCY	Photovoltaic electricity produced in relation to electrical energy demand ratio	21%	27%	27%	30%	40%	50%	50%
EMISSIONS MANAGEMENT	Defining a Decarbonisation Plan (Following Scope 3 calculation)						Approved	Operating
EMISSIONS MANAGEMENT	CDP rating and continuous improvement				Obtained	Operating	Operating	Operating
EMISSIONS MANAGEMENT	Member of the Science Based Target Initiative (SBTi)						Obtained	Operating
EMISSIONS MANAGEMENT	Reducing Emissions by 2030 in line with SBTi in order to limit the rise of 1.5 degrees					Yes	Yes	Yes

⁸ The original goal was to create a Code of Ethics for suppliers by 2023. However, due to unforeseen circumstances and the complexity of the process, we were unable to meet this target within the expected timeframe. Therefore, we have decided to postpone the development of the Code of Ethics to 2025 to ensure a more effective and comprehensive implementation.

OMR and SDG

OMR has, for several years now, integrated the Sustainable Development Goals, known as SDGs, into its sustainability strategy, recognising that these goals are essential for promoting equitable and sustainable global development.

The Sustainable Development Goals are 17 global goals defined by the United Nations as part of the 2030 Agenda, aimed at promoting a better and more sustainable future for all. These goals, which include 169 specific targets to be achieved by 2030, address a wide range of key sustainable development issues. Endorsed on 25 September 2015 by the governments of 193 UN member countries, the SDGs aim to steer the world towards a path of sustainable development that puts people, planet and prosperity at its core.

The importance of these goals is universal and requires a commitment from all sectors, including public to the private sector and individuals.

In particular, we identified links between the priorities identified in the materiality analysis and the impact on the 17 UN goals, identifying **seven main SDGs** to which we believe we can contribute in the long run.

For this Sustainability Report, we decided to integrate an additional **SDG, SDG 14, conserve and sustainably use the oceans the seas and marine resources.**

	8 DECENT WORK AND ECONOMIC GROWTH	9 INDUSTRY, INNOVATION AND INFRASTRUCTURE	11 SUSTAINABLE CITIES AND COMMUNITIES	12 RESPONSIBLE CONSUMPTION AND PRODUCTION	13 CLIMATE ACTION	14 LIFE BELOW WATER	17 PARTNERSHIPS FOR THE GOALS
Responsible Procurement	●			●	●	●	●
Energy Efficiency				●	●		
Waste Management			●	●	●	●	
Emissions Management			●	●	●	●	
Training and professional development for workers	●						●
Production process management		●		●			



	8 DECENT WORK AND ECONOMIC GROWTH	9 INDUSTRY, INNOVATION AND INFRASTRUCTURE	11 SUSTAINABLE CITIES AND COMMUNITIES	12 RESPONSIBLE CONSUMPTION AND PRODUCTION	13 CLIMATE ACTION	14 LIFE BELOW WATER	17 PARTNERSHIPS FOR THE GOALS
Quality of labour relations	●						
Quality and safety of products			●	●			
Connecting with the local community		●	●		●	●	
Health and Safety of Workers	●			●			
Diversity and equal opportunities	●						
Compliance and Ethics						●	●

These identified SDGs remain the inspiration for our future striving at both strategic and operational levels and guide us in setting targets for improvement.



SDG 8 - Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for everyone.

We care about people and we are an important driver of the local economy and employment. We recognise the importance of creating a positive and inclusive working environment to ensure the well-being and productivity of our employees. In 2023, we recorded a 9% growth in our team and we have continued the process of including women, a commitment we want to sustain and strengthen.



SDG 9 - Resilient infrastructures, sustainable industrialisation and innovation.

We are a partner at the forefront of innovation, ready to meet the sustainability needs of our customers. In 2023, we recorded a significant increase in revenue in the electric and hydrogen vehicle production sector by 51%, and we expect this to continue during 2024, proving our credibility as an innovation partner at the heart of the transport sector ecosystem, supporting the major market players.



SDG 11 - Making cities and human settlements inclusive, safe, durable and sustainable.

We take care of our local community and actively strive to minimise the negative impacts of our operations while contributing positively to the local socio-economic environment. We recognise that our success is closely linked to the well-being of the community in which we operate. In 2023, we allocated more than €300,000 (+19% compared to 2022) to local environmental and social initiatives, and we intend to further strengthen our support strategically.



SDG 12 - Securing sustainable patterns of production and consumption.

We believe in the potential and benefits of a circular economy. Since 2021, we initiated a circularity project involving one of the main suppliers of our raw material, steel. During the first part of 2023, through an agreement with the Arvedi Group, we supplied the Group with our production waste (SCRAP) and received recycled raw material in return.



SDG 13 - Promote climate change actions at all levels.

We are aware of the environment. Our entire production cycle is structured to reduce inefficiencies when using resources and to minimise any potential negative impact on the environment. We continued to zero our indirect emissions in 2023 (Scope 2 - Market Based) by expanding the photovoltaic park and purchasing only 100% renewable energy. Recognising the risks of climate change, we intend to further extend our efforts to minimise our environmental impact.



SDG 14 - Conserving and making sustainable use of the oceans, seas and marine resources for a sustainable development

OMR, through its support for the One Ocean Foundation since 2021, has been actively participating in research and awareness-raising projects, helping to promote awareness of marine issues. One Ocean Foundation (OOF), established in March 2018, is an Italian initiative of international relevance for the preservation of the ocean. The Mission of the Foundation is to accelerate solutions to the problems of the oceans by inspiring international leaders, companies and individuals, by promoting a sustainable blue economy and by improving ocean literacy.



SDG 17 - Reinforcing means to implement the goals and renew the global partnership for a more sustainable development.

We are strongly committed to promoting sustainability along the entire supply chain, ensuring that our suppliers share our ethical and environmental values. Over the years, we have implemented several initiatives to concretise this commitment. In particular, we have initiated circular economy projects with some of our suppliers and promoted co-design initiatives to foster the development of electric mobility and improve the environmental efficiency of our products. In addition, we support sustainable production practices, the use of recyclable materials and the reduction of polluting and non-certified packaging by working closely with our suppliers and customers. We also contribute actively in various local initiatives for the development of the area in which we operate and plan to further intensify our collaboration to promote a sustainable development in the years to come.

SUSTAINABLE DEVELOPMENT GOALS





People at OMR

We recognise that our employees play a crucial role in OMR's sustainable growth. Accordingly, we are committed to implementing policies and actions aimed at creating a safe and positive working environment that promotes employee well-being. Our company recognises that a healthy and inclusive work environment can have a positive impact on employee productivity, motivation and commitment, and can also help reduce absenteeism and company turnover.

Our corporate philosophy places human resources at the centre of sustainable growth. We firmly believe in values such as respect, fairness, meritocracy, protection of dignity, equal opportunities and non-discrimination; principles that guide all of OMR's activities.

The management of human resources is entrusted to the Human Resources Manager, who reports directly to the Managing Director. Supported by external consultants, this function deals with the complete management of personnel, including selection, recruitment, hiring, administration, training, development, organisation, welfare, diversity and inclusion. This function is also responsible for managing relations with trade union representatives, assisting the CEO.

To ensure a safe and positive working environment, workers' health and safety management is delegated up to the Prevention and Protection Service, which reports



directly to the CEO. Human Resources also support information and communication on health and safety issues and manage complaints and disciplinary measures. Monitoring all activities related to personnel management and occupational health and safety is carried out by the Executive Committee as part of the Management Review, which assesses the results achieved and defines the actions necessary to further improve.

People in numbers

During 2023, we recorded further growth in the workforce with a parallel process of stabilisation in the types of employment relationship: the number of hired employees increased to 503, an increase of 9% compared to the previous year. At the same time, the number of temporary workers also increased and stood at 191 by 31 December 2023.

The conversion rate of agency workers into permanent employees remained stable at 15.77% this year and close to 16.6% the year before. The promotion of employment stability of our employees is confirmed with the figures shown in the table below.

N° OF EMPLOYEES AND CONTRACT WORKERS	2022	2023
Number of employees	460	503
Number of contract workers	121	191
% of contract workers over total workers	21%	28%
Rate of conversion of temporary workers into employees with permanent contracts	16,6%	15,77%

To further demonstrate our commitment in guaranteeing stability in employment, almost all of our employees are employed on permanent contract. Fixed-term contracts are used on a limited basis and, if the resource is positively evaluated, for their subsequent conversion into permanent contracts.

EMPLOYEES BY EMPLOYMENT CONTRACT	2022	2023
Permanent employment	460	499
Temporary employment	0	4
Total	460	503

Our intention is to follow a system based on a system of collective bargaining agreements where they are provided for by law or by the social system. Currently, 100% of our employees benefit from a collective agreement system (CCNL Metalmeccanici Industria and CCNL Dirigenti Industria).

EMPLOYEES COVERED BY COLLECTIVE BARGAINING	2022	2023
Number of employees covered by collective bargaining	460	503

In 2023, the critical situation in terms of employee retention will continue, as the staff turnover figures indicate.

For the year under review, we hired 97 new employees to cope with the further increase in demand by the market for production capacity. At the same time, however, we experienced an increase in the number of terminations compared to the previous year, within all age groups. When analysed by age group, these terminations cannot be attributed to retirement and/or early retirement.

Aware of the critical issues in terms of our ability to retain our employees. We continue to analyse the underlying causes of the resignation phenomenon by conducting exit interviews with employees who have chosen to leave the company.

The findings relate to the highly competitive market in relation to the salary dynamics offered by similar or even very different sectors such as, for example, logistics. Despite the fact that, with regard to compensation, we strive at providing workers with a basic salary that, in accordance with regulations, is competitive with the local market and the sector in question. Specifically, our employees working in the blue-collar and intermediate sector receive an integrated remuneration that is higher (**over 13%**) than the average for the metal sector to which we refer in terms of the National Collective Labour Agreement (CCNL).

We thus assume that distance away from home is a determining factor in influencing the decision to leave the company, which is not adequately compensated by the

compensation differential.

Overall, the hiring rate increased further, with respect to last year's budget from 20.9% in 2022 to 21.1% in 2023, just as the turnover rate increased from 8.8% in 2022 to 12.6% in 2023.

The turnover related to hirings and terminations for agency workers is even higher than for employees since the latter have more stable and long-term employment contracts.

Significantly, some of the terminations, amounting to around 56, were generated by decisions not to continue the contractual relationship by the company or unsuitability of the staff to perform the assigned tasks.

However, temporary workers are never employed in temporary or seasonal jobs, which means that their recruitment and termination are not affected by OMR's fluctuations in the market. On the contrary, we are committed to providing temporary workers with a positive working environment and equitable treatment, seeking to enhance their skills and promote their professional growth within the company as well as to their ongoing stabilisation.

NUMBER OF HIRINGS AND TERMINATIONS OF EMPLOYEES BY AGE	2022		2023	
	Hiring	Termination	Hiring	Termination
≤30 year old	49	13	51	22
31-50 year old	35	15	43	25
≥51 year old	2	8	3	11
Total	86	36	97	58
Rate (recruitment/turnover)⁹	20,9%	8,8%	21,1%	12,6%
NUMBER OF RECRUITMENTS AND TERMINATIONS OF TEMPORARY STAFF BY AGE	2022		2023	
	Hiring	Termination	Hiring	Termination
≤30 year old	71	92	121	61
31-50 year old	60	50	105	38
≥51 year old	1	1	13	3
Total	132	143	239	102
Tasso (assunzioni/turnover)	80,0%	86,7%	197,5%	84,3%

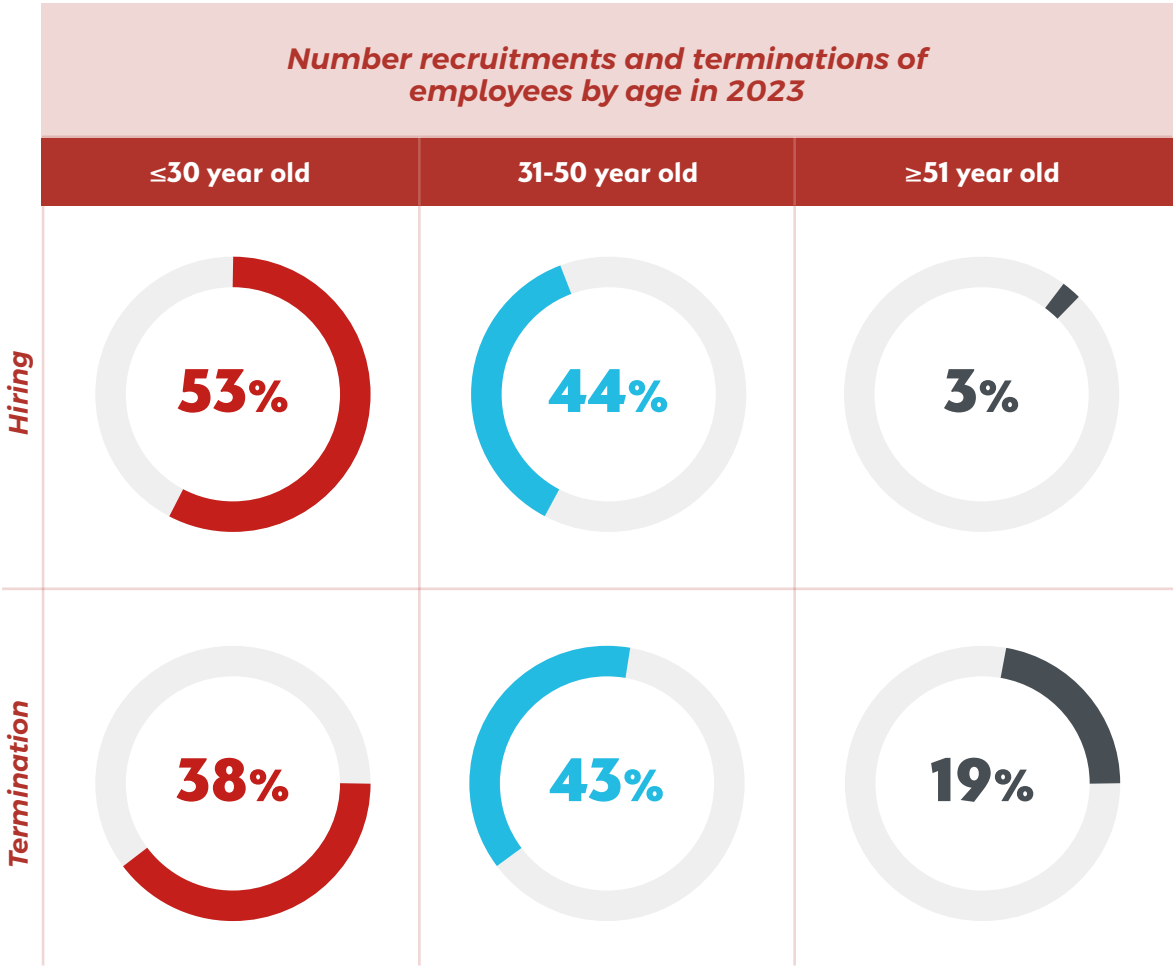
⁹ The hiring/turnover rate is determined by the ratio between the number of hires/terminations in year n, divided by the number of employees/temporary staff as of 12/31 of year n-1.

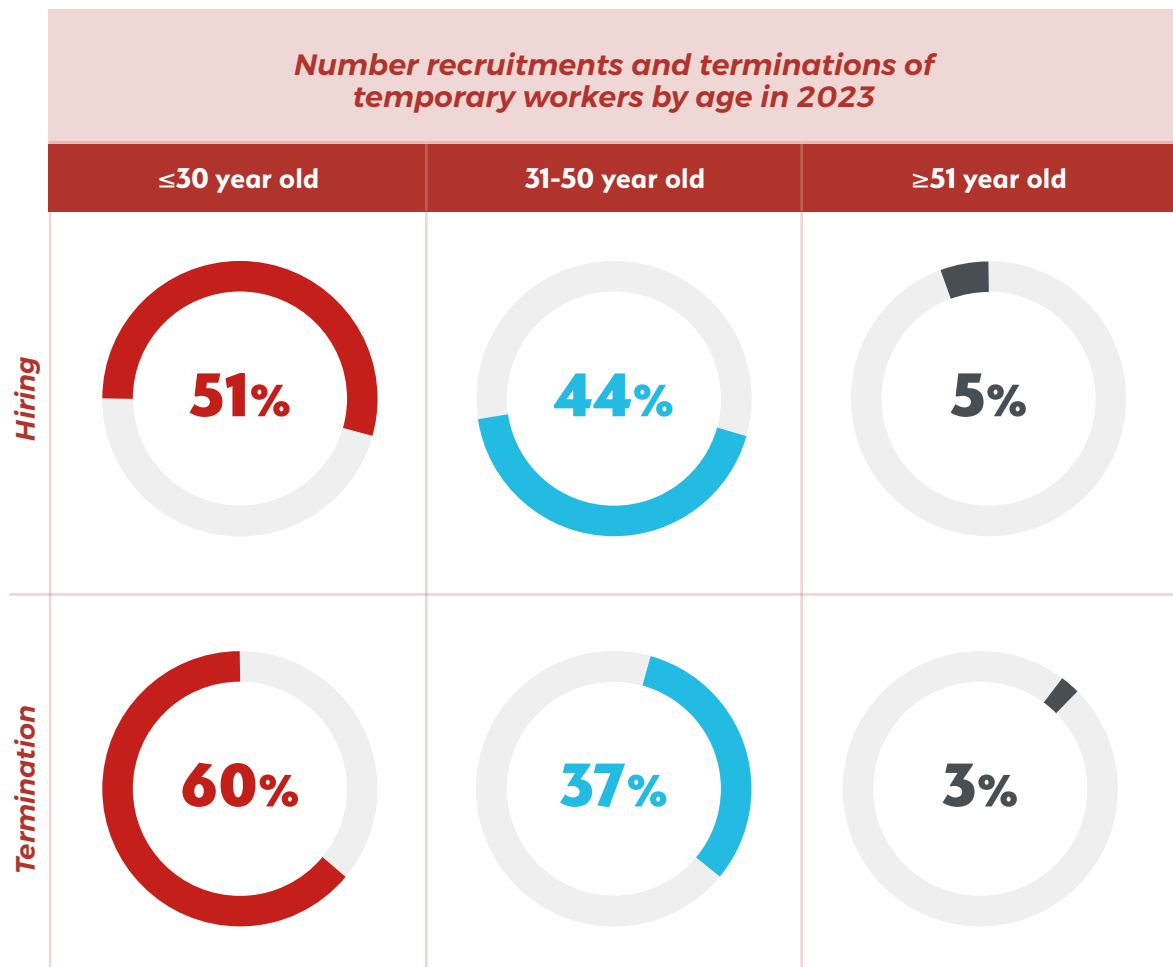
Particularly within the growth of the total number of employees, the increase in the middle management component was achieved through the promotion of internal staff who took on additional management and coordination responsibilities. As these employees already have experience within the company and are already familiar with internal procedures, they can deal with their new tasks more easily. The primary objective achieved was to improve the operations organisation.

Though, **he upward internal mobility can increase the loyalty and satisfaction of employees who have the opportunity to grow within OMR remains.**

The remaining part of the workforce was also recruited at worker level due to the opening of a new automated production line.

In the latter case as well, internal growth was favoured as it represents a valid option for incentivising and enhancing personnel, as well as being an opportunity for the company to select candidates with greater knowledge of production processes and company dynamics.





Health and safety of workers

We recognise how important it is to establish and maintain a safe and healthy working environment by adhering to high health and safety standards in all our operations and business processes. We therefore adopt strict policies and procedures to prevent accidents, reduce health risks and ensure compliance with occupational safety regulations. Additionally, we actively promote a safety and health culture among our employees in order to create a positive and sustainable working environment.

Within OMR, we regard it essential to identify and manage any risks or dangers to the health and safety of our employees who are involved in our business activities. Therefore, we take all necessary and possible measures to eliminate or mitigate these risks, thus ensuring a safe and healthy working environment.

At OMR, we believe that it is essential that we identify and manage any risks and dangers to the safety and health of personnel involved in our company's activities. We therefore take all necessary and possible measures to avoid or contain such risks in order to ensure a safe and healthy working environment at all times for our employees.

It is our duty to ensure the maximum safety of all machinery, equipment, premises and facilities, providing adequate collective protection systems and personal protective equipment (PPE), adopt practices for the prevention of occupational injuries and illnesses. We promote work ergonomics within the workplace and ensure that we responsibly select, manage, use and handle products and chemicals to ensure a safe and sustainable working environment. Preventive and general maintenance of the equipment and machinery is an additional element in the prevention of occupational accidents. Environmental monitoring for the purpose of assessing exposure to micropollutants is an essential practice to ensure the health of workers and prevent any possible risks associated to the working environment.

These aspects are effectively managed through the **application of an Integrated Policy for the Environment, Sustainability, Health and Safety at Work**, from which we draw the guidelines for our activities (see below under 'Integrated Policy for the Environment, Sustainability, Health and Safety at Work').

Principles and action methods outlined in this policy are transferred to the operational methods defined in the Organisation and Management Model (OMC) and the Risk Assessment Document. The Safety and Environment Delegate is responsible for defining, applying and complying with the requirements of the health and safety management system, with the support of the Prevention and Protection Service, which collaborates with department heads and the Workers' Safety Representatives (RLS) through a constant dialogue.

Protection and Prevention Service is in charge of identifying, assessing and monitoring risks related to workers' health and safety, through detailed analyses of the production process, work organisation and regular audits. It conducts rigorous checks to assess existing and potential risks, verify the suitability of machinery and reprimand workers in the event of health and safety violations.

We are committed to complying with current occupational health and safety regulations at our production site by having the company undergo annual audits conducted by a third party to verify and ensure compliance.

The most recent audit was conducted in December 2023 with a positive result from the appointed third party. Specifically, out of 228 requirements audited, 17 formal



and minor nonconformities were identified, mainly relating to training needs in different areas.

Safety Management System is appropriately applied, fully equipped with tools to manage documents, operational control, surveillance and monitoring of the main safety aspects.

The outcome of the audit in any case indicates that, although we are not yet UNI EN ISO 45001 certified, we are compliant and structured for most of the aspects investigated to date, and that OMR has already started a process, which is also included in the **2024-2030 Sustainability Plan**, that will lead it to work on the missing aspects in 2024 and obtain certification in 2025.

Annually, the Prevention and Protection Service is committed to developing performance objectives and targets aimed at meeting or exceeding industry standards. Monitoring of the results and audit evidence is analysed and discussed in the context of the annual Executive Committee, with the participation of the CEO and the company management. Objectives for improvement, corrective actions and persons responsible for their achievement are also set at that meeting.

This approach allows us to ensure full transparency and to adopt a strategy focused on occupational health and safety results. We are also committed to the management of occupational health and safety issues through the **continuous monitoring of accidents and near misses, as well as through the analysis of recorded incidents.**

OCCUPATIONAL ACCIDENTS*	2022		2023	
	Employees	Temporary	Employees	Temporary
Recorded Injuries	11	6	18	9
Recorded incident rate (Incident rate¹⁰)	2,69	4,75	3,98	5,56

**Additional details can be found in the "Annexes" section to meet the disclosure requirements of GRI Standards 403 (2018).*

In 2023 for employees, the rate for recordable injuries stood at 3.98 and rose further compared to 2022 and also to 2021. In 2023, the recordable accident rate for temporary workers also increased compared to the previous year. Our reasons for this increase can be attributed to a higher turnover of employees in 2023, which led to the entry of new resources who are gradually adapting to OMR's safety standards. We recognise the importance of carefully analysing the causes of this situation in order to find effective solutions.

¹⁰ The incident rate, in accordance with GRI Standards 403, is calculated as (No. of work-related injuries / No. of hours worked) x 200,000. The rate includes commuting injuries when transportation is organized by OMR.

To enhance the health and safety of our workers, we are already implementing specific corrective actions.

We recognize the fundamental importance of information, training, and instruction for newly hired personnel before the start of operational activities. To this end, we are committed to ensuring that new employees receive adequate training on occupational health and safety, guaranteeing the entry of personnel with appropriate skills into a safe and healthy work environment from day one. At the same time, we aim to increase the sense of responsibility of our supervisors concerning health and safety in the workplace, providing them with the necessary resources and training to increase their awareness of risks and safety measures, in order to ensure an even safer and healthier working environment for all our employees.

The main types of recorded accidents were injuries (48%), contusions (19%), dislocations, distortions and sprains (15%). The main recorded causes of accidents could be attributed to the following main reasons: Facilities/Equipment (29%), Attitude/Behaviour (24%) and Procedures/Systems (18%).

For both categories of employees, however, we would like to point out that

there were no serious injuries leading to death or periods of absence longer than six months.

Furthermore, as in 2022 and 2021, no cases of occupational disease were recorded in 2023.



Occupational health and safety training

We truly believe that health and safety training is essential to create a safe working environment as well as to spread a culture on safety to all Occupational levels within the company.

We have therefore activated training courses on general health and safety issues, mainly for newly hired staff and temporary workers, in accordance with regulatory requirements.

Additionally, in order to ensure continuous professional updating on occupational health and safety, we have activated refresher courses and specific training courses, adapting the contents to the different tasks and to the assessment of the related risks and training needs.

HEALTH AND SAFETY TRAINING FOR WORKERS	2022		2023	
	Employees	Temporary	Employees	Temporary
Total training hours provided	1.932	2.105	2.331	2.152
Number of workers involved in training	213	155	237	243
Average training hours	9,07	13,58	9,84	8,86

We annually program training activities for all our employees, delivering them during working hours. In 2023, **we invested a total of 4,483 training hours, divided into 2,331 hours** for our employees and 2,152 hours for temporary workers.

Given the trend in the accident rate recorded during 2023, we have intensified our efforts to ensure periodic training activities for all categories of workers.

However, due to the high turnover of temporary workers, our commitment has only managed to ensure an increase in average training hours for permanent staff, while temporary staff shows a decrease in average training hours compared to the previous year.

Diversity and Equal Opportunities

We recognize the importance of a concrete commitment to promote inclusiveness within our sector, as it represents a fundamental element for the well-being of our employees. Precisely for this reason, from starting the 2021 Sustainability Report, we set ourselves an ambitious goal: to increase the number of female members among our total number of staff by 2024.

This year, in defining the 2024-2030 Sustainability Plan, we have taken a further step in the right direction, having reached 13% of **female components** 2023, considering both permanent and temporary female workers.

At the same time, we have set new objectives that will progressively lead us to a **20% quota by 2027.**

We are aware that there is still much to be done, however, we are proud of the progress made so far and we will continue to work to achieve our goals in terms of inclusiveness and diversity.

An inclusive and diverse work environment is able to attract and retain the best of talents, for employees feel more appreciated and valued. This can result in reduced costs for recruiting and training new employees, as well as improved productivity and quality of work.

Our actions are based on the fundamental values of justice, equality, safeguarding dignity, integrity, and prevention of any type of discrimination.

In accordance with our Code of Ethics, we strive to build an inclusive company climate, opposing any type of discrimination based on age, gender, origin, political orientation, religious beliefs, or health conditions.

During 2023, we continued with the project of encouraging the recruitment of female staff, promoting gender diversity within OMR. The number of temporary female workers increased to 37, compared to 35 in 2022 (mainly concentrated in the 31-50 age group), while the number of permanent female employees rose to 54, compared to 31 in the previous year.

Overall, considering both permanent and temporary workers, the **total number of female workers amounts to 91, or 13.11% of total staff.**

ADMINISTERED BY AGE AND GENDER	2022			2023		
	Men	Women	Total	Men	Women	Total
≤30 year old	59	14	73	84	12	96
31-50 year old	26	21	47	61	23	84
≥51 year old	1	0	1	9	2	11
Total	86	35	121	154	37	191

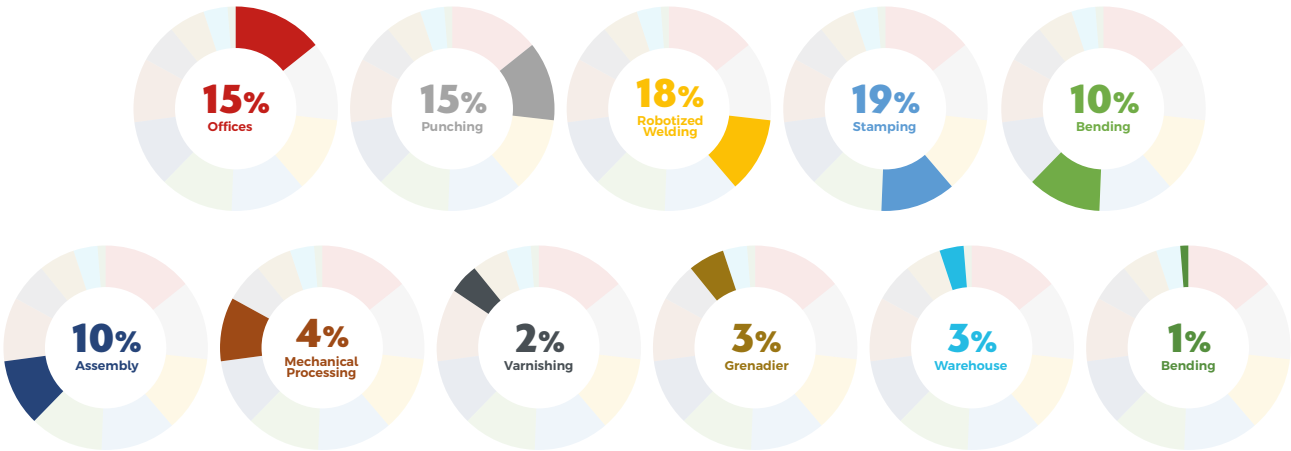
In order to adapt the structure to the heterogeneity of the genders of our employees, we have made some changes aimed at making the spaces more welcoming and usable by all (e.g. women's changing rooms, Women's Day celebrations). We are also always careful to listen to the requests of the female component when analysing the climate within the company, so that the working environment is open and inclusive.

ADMINISTERED BY AGE AND GENDER	2022			2023		
	Men	Women	Total	Men	Women	Total
≤30 year old	133	12	145	144	15	159
31-50 year old	213	17	230	220	36	256
≥51 year old	83	2	85	85	3	88
Total	429	31	460	449	54	503

Approximately 86% of the employee workforce consists of blue-collar workers, the professional category most represented in OMR. The second largest category belongs to white-collar workers, equal to 11%, followed by middle managers and company executives, accounting for 2% and 1% of the workforce, respectively.

In terms of professional classification of employees, there has been a significant increase in the number of women employed as blue-collar workers, rising from 19 employees to 41. Regarding other professional levels, the increase was minimal, going from 12 in 2022 to 13 during the period of analysis.

Breakdown of female staff in production and offices¹¹



¹¹ Source: Management Review FY 2022 OMR (female staff data related to average tenure)

The increase in female personnel is proving to be a great opportunity for the company, as diversity enriches the organisation with new perspectives, ideas, and points of view.

Furthermore, this change has contributed to an improvement in productivity and efficiency in some specific areas, such as an increased attention to procedures by female staff and the increased accuracy in production declarations.

EMPLOYEES BY LEVEL AND GENDER	2022			2023		
	Men	Women	Total	Men	Women	Total
Directors	5	1	6	4	1	5
Middle Managers	1	0	1	8	0	8
Office White collar workers	47	11	58	44	12	56
Blue collar workers	376	19	395	393	41	434
Total	429	31	460	449	54	503

Our commitment to creating an inclusive work environment is not just about gender diversity. Building a culture that respects diversity means creating conditions to ensure a work environment that is suitable and adapted to different cultural and religious needs. During 2022, the number of foreign employees increased further, from 21% to 26%. Of these, the majority (98%) are classified as manual blue collar workers, while 2% are white collar office workers.

STAFF BY CATEGORY AND NATIONALITY	2022			2023		
	Italians	Foreigners	Total	Italians	Foreigners	Total
Directors	6	0	6	5	0	5
Middle Managers	1	0	1	8	0	8
Office White collar workers	56	2	58	54	2	56
Blue collar workers	301	94	395	306	128	434
Totale	364	96	460	373	130	503

BASIC WAGE RATIO SALARY OF WOMEN COMPARED TO MEN	2022	2023
Directors	58,1%	75,6%
Middle Managers	N/A	N/A
Office workers		
Level D2	N/A	N/A
Level C2	85,6%	89,9%
Level C3	95,7%	107,9%
Level B1	83,2%	67,3%
Level B2	N/A	N/A
Level B3	N/A	N/A
Blue collar workers		
Level D1	N/A	N/A
Level D2	86,5%	92,0%
Level C2	N/A	N/A
Level C3	N/A	N/A
Level B1	N/A	N/A
N/A MALE OR FEMALE ONLY COMPONENT		

Regarding the relationship between the base salary and remuneration of women and men, the data show a continuing positive trend over time.

The disparities found can be mainly attributed to length of service and the recent inclusion of women in manual worker classifications.

The percentage value represents the ratio of women's base salary and remuneration to that of men. The higher the percentage value, approaching 100%, the greater the level of equity. It's important to note that in all bands and for all classifications, except for the B1 Office Worker level, the data are showing us a positive trend towards greater pay equity. Moreover, in the C3 office worker band, for 2023 the ratio is in favour of the female components.

We have adopted various internal initiatives to demonstrate our commitment to foreign staff. For example, we ensure daily that the company restaurant offers food

options that respect different culinary and religious traditions. Every year, during the Christmas holidays, we ensure that gifts are appropriate to cultural diversities.

Furthermore, during the hiring and onboarding phase, we subject foreign personnel to a test of knowledge and understanding of the Italian language. This assessment allows us to verify that foreign personnel are able to understand and comply with health and safety procedures in the workplace, ensuring their safety.



Worker Training and Professional Development

We are firmly convinced of the strategic importance of investing in the training and skills development of our employees, recognizing it as a crucial pillar to ensure safety, elevate quality, and promote the sustainable success of the company. We also recognize the urgent need to strengthen and expand our commitment in this area.

In recent years, OMR has prioritized training related to worker health and safety. Analysis of training hours reveals a significant lack of time allocated to general and professional education, an aspect that could compromise our employees' ability to develop fundamental skills and knowledge to improve their productivity and effectively address technological and organizational changes in the industry.

The lack of adequate training risks deteriorating over time the quality of work performed, the company's competitiveness in the market, and the professional growth path of our workers. For example, in 2023, each employee received an average of only 0.57 hours of training, a slight increase compared to 2022. For temporary staff, in 2022, about 200 hours of training were provided, corresponding to an average of about 1 hour per person per year.

This data does not include the number of hours dedicated to health and safety training or "on-the-job" training, which in 2023 reached 4,348 hours, an increase of 1,116 hours compared to the previous year.



WELDING ACADEMY

OMR has launched the Welding Academy to support the new robotic welding project for axle production requested by an important customer: the goals we set ourselves, in collaboration with a well-known employment agency, aimed to ensure the selection and training of specialized resources capable of operating efficiently on modern robotic islands.

The Welding Academy took place from October 23 to 27, 2023, preceded by an assessment day. The project phases were articulated in several key stages: project promotion, selection managed by the employment agency with aptitude and behavioral tests to identify the most suitable candidates, individual interviews with OMR to assess skills and affinity with company values, an intensive assessment day with self-presentation tests, group exercises not related to the company context and specific tests related to the company environment, and finally a week of intensive training lasting 40 hours.

From the initial assessment, which involved 12 candidates, 8 resources were selected for the automated axle production line, while one candidate was assigned to the stamping department, without following the Academy.

The training was conducted through various methods: company visit to provide an overview of the company structure and organization, theoretical lessons on general and specific safety modules, mechanical drawing, measuring instruments, and company regulations. Furthermore, the hybrid mode allowed combining theoretical and practical lessons in the laboratory to learn welding processes, defect identification, and quality control, followed by on-the-job training in the department for direct experience with robotic welding equipment.

SUBJECT DETAIL	TIME (hours)	DAYS
COMPANY PRESENTATION AND TOUR	4	1
GENERAL SAFETY	4	
SPECIFIC SAFETY HIGH RISK	8	2
SAFETY HIGH RISK	4	3
HR: REGULATIONS, RECRUITMENT AND DELIVERY OF CLOTHING	2	
MECHANICAL DRAWING	1	
MEASURING INSTRUMENTS	1	
WELDING PROCESS	3	4
WELDING DEFECTS	2	
PROCESS/PRODUCT CONTROLS	3	
SHADOWING IN DEPARTMENT	8	5

Project and development was managed by the HR department, in close cooperation with the employment agency, and with direct involvement of the Head of Manufacturing. All training was supported by external lecturers for the safety modules, while the technical and specific aspects were dealt with by internal experts.

There was positive feedback on the initiative, as the targeted selection process led to the identification of qualified profiles. This Academy provided comprehensive theoretical training, which is usually not covered in such depth in single resource placements. This way, all employees started their journey in the company with an adequate technical basis, calibrated to our needs and the processes in the new automated line. Considering the success of the initiative, we plan to offer the Welding Academy over again. The next course, however, will be organised in a more streamlined way as far as the selection process is concerned, while maintaining a 40-hour training period in order to guarantee a high standard of the technical preparation required.



Clearly, enhancing and expanding our training offerings is essential to meet these challenges and ensure a prosperous future to all members within the company.

TOTAL AND AVERAGE TRAINING HOURS PER EMPLOYEE	2022	2023
Total hours	48	286
Average hours	0,10	0,57

The average training hours for female employees amounted to 2.15, whereas for male employees this year the training rate picked up again, at an 0.38 average.

TOTAL AND AVERAGE TRAINING HOURS PER GENDER	2022		2023	
	Men	Women	Men	Women
Total hours	0	48	170	116
Average hours	0	1,55	0,38	2,15

Nel 2023 le attività formative sono state ampliate, oltre che al personale Impiegatizio che migliora ulteriormente la quota pro-capite, anche ai Quadri e Dirigenti.

TOTAL AND AVERAGE TRAINING HOURS PER CATEGORY	2022		2023	
	Total	Average	Total	Average
Directors	0	0	10	2,00
Middle Managers	0	0	50	6,25
Office White collar workers	48	0,83	226	4,04
Blue collar workers	0	0	0	0

Our efforts in providing training to staff over the past year are moving in a positive direction in order to adapt to market needs and industry standards. We also deem it necessary to intensify our efforts in this direction, investing in training programmes dedicated to all staff and supporting specialisation programmes to meet different professional needs.

Management's aim to bridge the training gap is to take into account, also during the review of the, different training needs in relation to the company's needs, which can be gathered at any time and formalised in a **training plan**, which in alignment with the **2024-2030 Sustainability Plan**, **will gradually increase to 1.4 hours per year per capita** from the current 0.57, with general and specific training courses, aimed at all the company's personnel.

It is also important for us to develop training courses aimed at further promoting awareness of the code of conduct, human rights, working conditions, business ethics and environmental management. This goal has also been included in the **Sustainability Plan 2024-2030**.

Quality of working relationships

Quality working relationships play a crucial role in the well-being and satisfaction of OMR's employees. The company recognises that a peaceful and cooperative working environment is essential in order to achieve its objectives. Accordingly, we are actively committed to creating an optimal working climate based on trust, transparency and sharing common values and goals.

In 2023, we invested 0.5% of our turnover in welfare initiatives, down slightly from 0.6% in 2022. This change is mainly attributable to the 2022 legislation that allowed tax-free fringe benefits of up to € 3,000.00, a condition that was not repeated in 2023.

In addition, we continue to offer salary supplements, generally available to all permanent employees, which increases the purchasing power of employees, thereby improving their satisfaction and motivation. These improvements also contribute positively to our corporate reputation, proving our commitment to a healthy and rewarding working environment for all.

Benefits offered include:

- Defined contribution pension plans;
- Supplementary health care plans;
- Customised insurance policies (only for managers).

Additionally, we provide shopping vouchers and other contractual benefits under the sector's collective bargaining agreement, worth around €200 per person.

In terms of wages, we make sure to offer basic salaries that are competitive with the local market and the industry. In particular, for our blue-collar employees, **the**



integrated salary is 13.47% higher than the average for the metal sector, according to the National Collective Labour Agreement (CCNL).

The company continues its efforts to promote employee well-being by facilitating access to food service in the company restaurant. In addition to providing economic support, it is also aimed at encouraging moments when employees can socialise together in the company which are essential for nurturing a positive working environment.

COMPANY RESTAURANT

“If you eat well, you feed yourself and work well”



Within OMR, we provide a company restaurant for all employees, an initiative undertaken not only to offer economic support, but above all to promote moments to socialise together, which are essential to create a positive working environment.

Our Chef Gianluca Musatti, who understands our desire of making mealtime a real break for the workers, pays great attention to the individual in every dish he prepares. He chooses to use only high quality Italian products, personally taking care of the selection and purchase of

raw materials, used fresh every day to preserve all the essential nutritional properties.

'Lunch break is not only a company's duty towards its employees, but a moment to be enjoyed with sight, smell and taste. This is why OMR does not offer a simple canteen, but a real restaurant,' states the Chef.

Attention is paid to everyone's needs in the restaurant: a hearty dish is always prepared for those working in the departments and a lighter version for those in the office, making sure that they have the energy they need to work effectively.

Cultural diversity is also taken into account, for example, by offering pork-free alternatives for Muslim workers and always ensuring a vegan/vegetarian option or the possibility of a salad or poké. In addition, an allergen list is available for each dish, in compliance with HACCP standards.

Chef Musatti ensures that all workers, whether in the morning or afternoon shifts, can enjoy the restaurant, which operates in two shifts for this reason. Attention is paid not only to quality and people, but also to waste: a weekly menu is drawn up that allows the exact quantities of ingredients to be purchased.

Ultimately, by favouring local suppliers in line with the company's procurement policy, OMR helps to reduce transport emissions and support the local economy.

All these efforts are a source of pride for OMR, which once again proves to be attentive to its employees and the surrounding environment.

We believe that a healthy and productive working environment, able to attract and retain the best talented people, can only be built through a constant exchange of feedback and constructive dialogue with our employees. For this reason, in 2023 we continued our efforts to maintain an ongoing dialogue with trade union representatives and Workers' Safety Representatives (RLS), and continued to distribute satisfaction and awareness questionnaires. This initiative is aimed at ensuring that the needs and demands of our employees are adequately considered in the company's decision-making processes, thus helping to promote a more serene and collaborative working



climate.

The employee satisfaction level in our annual evaluation is quantified on a scale of 1 to 5, where 3.5 is the minimum acceptable. In contrast, the level of awareness is measured on a scale from 0% to 100%, with 75% as the threshold value. From 2022 to 2023, we noticed an increase in the average satisfaction level, which rose from 3.84 to 3.94, while the awareness level decreased from 84% to 77%. This last change, being too close to the minimum value we set ourselves, is mainly attributable to the increase in the workforce and the constant high turnover, as described in the section.

Additionally, we have initiated a major project to deal with harassment and violence at work. The HSE Department is conducting a risk assessment on aggressive behaviour, relying on a specialised consultancy firm. The project has already embarked on a phase of interviews with a number of employees to gather information that can be used to define improvement actions. The management of harassment and violence is an issue of great importance and sensitivity, which is essential to preserve the quality in working relations.

It is important, however, to emphasise that we have a prevention objective, since no such incidents have ever occurred in our company.





Corporate Governance

A solid and efficient business decision management system and rigorous risk management is still fundamental to ensuring a good corporate governance. This guarantees the ability to face new competitive challenges and maintains its sustainability over time.

Governance model

During 2023, no changes took place within OMR's ownership structure. Our company is 89.93% owned by the holding company ICE Spa, which shares are held directly by Ruggero Ceriali and Federica Ceriali (by the founder, entrepreneur Mr Enio Ceriali's children), and the remaining 10.07% is held by a minority shareholder.

A Board of Directors is appointed by the Ordinary Shareholders' Meeting and consists of three directors, one of whom is a woman (33% of the total). The position of Chairman of the Board of Directors is held by Ruggero Ceriali, who also acts as Managing Director. Regarding the age composition, two of the three members are



over 51 years old, while the third is under 30. Directors hold office for three years and their term of office expires on the date of the Shareholders' Meeting called to approve the financial statements for the last year of their office.

The fact that the senior roles of the individuals representing the company are coincident with those of the owners is typical of a family business.

The board of directors holds all powers for the ordinary and extraordinary management of the company.

The selection of the members of the board of directors is an expression of the will of the majority shareholder in order to ensure adequate representation of the company; there are currently no independent members.

In terms of the stakeholders' representation, the members of the board of directors are exclusively appointed by the majority of shareholders.

Member	Role	Age	Sex	Executive Role	Independence	Other positions held	Expertise
Ceriali Ruggero	President	> 50	M	YES	NO	I.C.E Holding President Majority shareholder Managing Director of Ceriali Costruzioni Spa	Technological, strategic and economical/financial
Ceriali Federica	Counsellor	> 50	F	NO	NO	I.C.E Holding Counsellor Minority shareholder Ceriali Costruzioni Spa Counsellor	Management and Real Estate Support
Ceriali Davide	Counsellor	< 30	M	YES	NO	-	Business Development

Potential conflicts of interests could arise in assigning the job of expanding OMR to Ceriali Costruzioni S.p.A, of which Ruggero Ceriali holds the position as Managing Director. In the scope of the company's expansion activities, no quotations were requested from other construction companies, and this choice was motivated by the fact that entrusting the work to Ceriali Costruzioni S.p.A exclusively entails benefits for OMR, such as a reduction in construction time and the certainty of using materials that comply with quality and technical specifications.

The procedure to determine the remuneration rules is carried out by means of minutes, in which the shareholders' meeting establishes the remuneration for the Board of Directors (BoD) and the Managing Director, in relation to each area of responsibility.

Additionally:

- i. The Managing Director determines at the beginning of the year the managers' remuneration and the variable bonus awarded at half-year and at the end of the year;
- ii. normally at the beginning of the year the fixed salaries of the executives are reviewed and at the end of the year the variable bonus. In addition, executives are provided with fully paid health care by the company (FASI);
- iii. there are no recruitment incentives
- iv. at the end of the contract, the end-of-contract entitlements established 'severance pay' by law are paid (TFR).

Supervision of the Board's activities is ensured by **the Board of Statutory Auditors**, which consists of three full members and two alternates. This body ensures compliance with legal regulations and the maintenance of standards of integrity. In parallel, the **Supervisory Board**, consisting of a man and a woman, is dedicated to monitoring the effectiveness and compliance of the Management and Control Organisational Model, in line with Legislative Decree 231/2001, implemented by the Company.

The board of directors establishes strategic directives and sustainability policies, identifies associated risks, and approves the budget for sustainability and the related Sustainability Report. It can also designate one or more Managing Directors, including the figure of the Chairman, who are given all operational powers for corporate management and implementation of sustainability policies. The CEO periodically appoints representatives to handle major sustainability issues.

During this reporting year, special mandates to an external collaborator for monitoring and compliance in the areas of occupational safety (Legislative Decree 81-2008) and environmental regulations (T.U. Ambiente D. LVO 152/2006) remained in place.

The organization's effects on the economy, the environment and social welfare are analyzed and discussed at the annual Executive Committee, which is attended by the CEO and management team.

In the half-yearly reports, emerging issues are reported to the Board of Directors. The Chief Executive Officer, or his delegates, provides updates on the state of management progress and forecasts for the future. The Board of Auditors is updated on critical issues every three months, as is the Supervisory Board.

As of January 2023, an Industrial Committee was established including the CEO and managers from the various functional areas of the company, including the interim



head of Sustainability. This committee aims to improve coordination between the various corporate functions as well as to provide decisions based on solid technical expertise, in order to effectively support the Board of Directors.

Enhanced implementation of the sustainability strategy and effective coordination between the different functions concerned, as well as monitoring, following the action plan to achieve the targets and controlling the established indicators, the company has included in its **Sustainability Plan 2024-2030** the recruitment of a **new Sustainability Operations Manager** who will be fully operational in 2025.

Part of the initiatives to promote the sharing of the collective knowledge, expertise and experience of the highest governing body regarding sustainable development, members of the Board of Directors participate in important conferences on sustainability.

In particular, in 2023 they participated in meetings and in-depth discussions related to the development of steel production processes without the use of fossil energy sources, using electric furnaces powered by renewable energy or hydrogen (GREEN STEEL). The implementation and impact on procurement policy of the new Carbon Border Adjustment Mechanism (CBAM)¹² regulation was also explored in depth with ad hoc training courses.

These training events provide an opportunity to actively contribute to the dissemination and deepening of sustainable development issues.

Related to the procedures for assessing the performance of the highest governing body in controlling the management of impacts on the economy, the environment and people, the only tool currently used is the Sustainability Report prepared annually by the company.

¹² By Regulation (EU) 2023/956 of the European Parliament and of the Council of 10 May 2023, published in the Official Journal of the European Union on 16 May 2023.

Risk identification and management

In our governance model, we also integrate a detailed analysis of the risks to which we are exposed.

Through a joint work with the different operational functions, we have mapped and identified the following risks as the main ones:

- Commercial risk related to the quality of the product and service offered to the client;
- Logistical risk related to the possibility of experiencing delays and/or shortages in the supply of raw materials (this risk has increased following the Covid-19 pandemic);
- Business risk related to the functioning of facilities;
- Non-compliance risk;
- Risk associated with the succession/replacement of company functions, also with a view to the Company's expansion in terms of size.

During 2023, we expanded our previous risk analyses by integrating an advanced monitoring system, as described in the section on Dual Materiality. The system assesses not only the main impacts of our business on the external environment, but also the risks and opportunities the latter may present for our economic and financial performance. This holistic approach to risk management will allow us to refine our strategy to create value in the medium to long term, while meeting the expectations of all the stakeholders involved.





Ethics and compliance

Ethics and regulatory compliance are the central pillars of OMR's sustainable practices.

In order to support them, **we have implemented a robust governance model designed to promote ethical behaviour, minimise the risk of non-compliance and proactively meet the expectations of our key stakeholders.**

In order to maintain our high ethical standards and comply with applicable regulations, we have introduced a sophisticated management system anchored in our Code of Ethics and Conduct. This code, which forms the heart of our system, must be interpreted and applied in synergy with other key resources such as the Management and Control Organisational Model, related protocols, and the policies and procedures currently in place, ensuring that the values and principles of OMR are respected and enhanced.

Code of Ethics and Conduct

OMR's Code of Ethics expresses principles, shared values, and ethical and behavioural responsibilities to which the company is committed in the course of its business activities.

The purpose of this document, which is binding for all those who work within and on behalf of the company, is to promote and disseminate the rules of conduct that constantly guide our activities.

Specifically, the Code of Ethics outlines the duties of loyalty, fairness, equality, diligence, and supports the performance of activities in accordance with the values of confidentiality, transparency, and professionalism, ensuring compliance with ethics and current regulations. The respect and protection of people and the environment are also fundamental to the company's actions.

The Board of Directors ratified its third edition in 2023, which updates the contents to include a strengthened commitment to environmental issues and a reinforced link to the MOCG.

The Code of Ethics is accessible to all stakeholders in the company's website.

Organisational Management and Control

OMR's Board of Directors adopted a Management and Control Organisational Model in December 2017 pursuant to Legislative Decree 231/2001 (hereinafter 'Organisational Model' or 'Model 231').

Model 231 includes:

- **General Section:** This describes the regulatory reference framework, the relevant offences, the Company profile, the objectives, the organisational structure, the fundamental principles and responsibilities of the Model. In-depth information is also provided on the structure, functions and powers of the Supervisory Board (SB), reporting obligations, the disciplinary code and strategies for the training and dissemination of relevant information.
- **9 Special Sections:** These sections deal with specific categories of crimes that could potentially be committed within the scope of company operations, establishing recipients, behavioral principles, criminal prevention protocols, and control systems implemented by the Company.
- **Risk Matrix (RM):** Divided by type of offense, it includes a description of the regulatory offenses, risk assessment, risk level, methods of commission, activities at risk, involved company areas, responsible parties, and types of applicable sanctions.
- **Prevention and Control Matrix (PCM):** Differentiated by types of predicate offenses significant for the OMR, it determines the reference criminal prevention protocol and related preventive procedures, documents evidence of preventive and control actions, those responsible for these activities, and the minimum frequency of controls.

This structure ensures accurate and systematic management of business risks related to the possible commission of crimes.

Supervisory Board

The Supervisory Board ("OdV") is the entity formally appointed to supervise the functioning, **effectiveness and observance of Model 231** and ensure that it is kept up-to-date by carrying out a constant review of the company's activities with a view to monitor the risk of the potential commission of the offences in question. The current Supervisory Board, appointed by the Board of Directors on 19/12/2017 and renewed on 02/12/2020, is composed of two members, a man and a woman, who, as established by the Organisational Model, remain in office for a duration of 3 years. Based on the provisions of the Model 231 regarding the requirements for the members of the Supervisory Board (autonomy, independence, honourableness, professionalism), the members of the Supervisory Board were selected among individuals who, in



addition to the above-mentioned requirements, possess specific skills in audits and consultancy.

During 2023, the Supervisory Board (OdV) assessed potential impacts arising from evolving risk profiles and the management of workers' health and safety, which led to the revision and necessary updates of Model 231 throughout the year.

Whistleblowing

Compliance with Legislative Decree 231/2001 involves implementing systems that allow subjects involved in Model 231 to submit reports of illicit activities relevant to Legislative Decree 231/2001 to the Supervisory Body. According to Law 179 of November 30, 2017, regarding whistleblowing, along with Legislative Decree 24/2023, all companies adopting an Organizational Model are required to establish digital channels for reporting possible violations.

In compliance with the applicable legislation, we have provided that reporting should take place in the following manner: through an internal reporting channel in writing by means of a registered mail.

External reporting to the channel through the National Anti-Corruption Authority (ANAC) is only possible if:

- no internal reporting channel is mandatory, or this channel, even if it is mandatory, is not active or, even if activated, does not comply with Article 4 of Legislative Decree 24/2023;
- the person who reported has already made an internal report and the report has not been followed up;
- the person making the report has reasonable grounds to believe that, if he or she were to make an internal report, the report would not be effectively followed up or that the report might lead to the risk of retaliation;
- the person making the report has reasonable grounds to believe that the breach may constitute an imminent or obvious danger to the public interest.

Through this channel, **the confidentiality** of the identity of the person who reported the breach, of those involved and of those mentioned in the report, as well as the content and documentation of the report, is guaranteed, using encryption tools. Moreover, the certainty of non-retaliation is guaranteed.

The process of handling whistleblowing is designed to ensure anonymity and confidentiality of the information provided, and to carefully verify the authenticity of each report.

The implementation of the whistleblowing channel was supported by an internal awareness-raising campaign, handled by the Human Resources Department.

As part of the integrated Corporate Management System adopted, we also have the following policies:

Integrated policy for environment, sustainability, occupational health and safety

We, at OMR, are firmly convinced that promoting the Culture of Environmental Protection and Protection, Sustainability, Occupational Health and Safety, as well as respect for the Rights and Dignity of the individual and the worker in the recognition of diversity, is a fundamental ethical imperative and indispensable for the implementation of our activities. This approach is also strategic for the complete achievement of our corporate objectives. This is why the first revision to the **Integrated Environment, Sustainability and Occupational Health and Safety Policy**, first issued in 2023, was carried out. This policy was communicated and explained in detail to all staff in the organisation and shared with external stakeholders..

Requirements for the management of environment, sustainability and occupational health and safety

- To identify and manage the environmental impacts connected to activities, adopting the necessary measures to contain them, in order to protect and enhance the Environment and Biodiversity, using raw materials, energy resources and water resources with a view to sustainability and maximum efficiency and favouring, where possible, the use of renewable energies, containment of emissions with particular regard to their quality in the air (including greenhouse gases) and in water, containment at source, recovery and recycling of waste.
- To identify and manage sustainability issues relevant to OMR (materiality), taking them on as sustainable development goals (SDGs - Sustainable Development Goals), promoting their valorisation and evaluating their progress over time through the adoption of a sustainability report.
- To identify and manage any risks and dangers for the safety and health of all the personnel involved in the company's activities, by adopting all the necessary and possible measures towards avoiding them, or their containment in order to provide safe and healthy working conditions, ensuring adequate collective protection systems and personal protective equipment (PPE), the prevention of accidents and occupational diseases, the maximum safety of machinery, equipment, premises and facilities, ergonomics in the workplace, the correct choice and management, the responsible use and handling of products and chemicals.
- To ensure compliance with all applicable laws and requirements by using



the Best Available Technology and implementing constant monitoring of regulatory compliance.

- To ensure the continuous training and acquisition by the personnel, operating at all levels, of awareness of the fundamental elements of the management of the Environment, Sustainability and Health and Safety of oneself, one's colleagues and all parties concerned.
- To define objectives relevant to the aspects of Environment, Sustainability and Occupational Health and Safety (including specific indicators on accidents), as well as appropriate tools and indicators to monitor and periodically review company performance and identify areas for possible improvement, actively promoting the adoption of high standards.
- To ensure the implementation of these objectives by means of procedures, instructions, and training for the correct and safe performance of assigned tasks, so that the entire company structure (managers, supervisors, workers) participates according to their attributions in the achievement of safety objectives, with responsibility with reference to the task performed.
- To implement the necessary processes to prevent and prepare the response to potential emergency situations, with special attention to the prevention of fires and respective protection measures.
- To promote workers' and their representatives' consultation and participation, raising awareness and involving all stakeholders, in particular employees and suppliers, in the promotion of a safe, sustainable, environmental, and ethical practices, by informing them on the performance achieved and gathering their requests, maintaining an open and effective communication system with view to understand and share with them the contents and objectives of this Integrated Policy.

Quality Policy

OMR's Quality Policy is the core of our efforts towards our main goal: ensuring and **perpetuating customer satisfaction**. We do so through the consistently excellent delivery of superior quality products and services and the relentless improvement of our business processes. Annually, our Quality Manager updates this policy to incorporate specific objectives aimed at further enhancing customer satisfaction. Endorsed by the CEO, the policy defines the essential standards that OMR is committed to maintaining to achieve its primary objective: complete customer satisfaction.

Quality management requirements defined in the Quality Policy

- to ensure the continuous conformity of products to customer specifications through effective (high quality and service) and efficient (cost reduction) processes.
- To pursue the continuous improvement of processes (technological aspect) and company organisation (management aspect).
- To adopt a proactive approach towards customers (establishing partnerships).
- Encouraging the commitment of all company areas in applying the provisions of the Quality and Environmental Management System (Environmental Policy), involving each area in the objective of improving quality performance.
- A general orientation towards quality through problem prevention.
- Compliance with IATF16949, ISO 9001 and ISO 14001 technical specifications.
- Improvements in energy and environmental impact management processes.
- Focusing on social responsibilities and sustainability.

Corruption risk management

Managing corruption risk is crucial to the integrity and sustainability of OMR's operations. Our operations, full of complex transactional processes, can expose us to corruption risks if not managed rigorously. We have implemented a robust governance system that promotes ethical conduct and reduces non-compliance, as outlined in the previous section, to mitigate these risks.

The **Code of Ethics** clearly sets out the principles guiding the management of business relationships, particularly with regard to the risk of corruption:



Fairness: we are committed to ensuring that all persons working at OMR abide by the principles of fairness and loyalty in the performance of their duties.

Honesty in business: we ensure that all individuals operating in OMR behave correctly and honestly, both in the performance of their duties and in their relations with other members of the Company, avoiding pursuing illicit or illegitimate ends or generating situations of conflict of interest in order to obtain undue advantages, either their own or those of third parties.

Fair competition: we comply with national and EU regulations on antitrust matters, as well as the guidelines and directives of the National Antitrust Authority, committing ourselves not to adopt behaviours or enter into agreements with other companies that may negatively influence the system of competition between various operators.

The Management and Control Organisational Model additionally identifies the highest risk areas, and establishes the main controls and procedures to prevent corruption risk, such as:

- **Prohibition of favouritism and pressure** in relations with the Public Administration and the Judicial Authorities.
- Adherence to specific corporate procedures to ensure **transparency and traceability of transactions**.
- Transparent and traceable **regulation of donations** to political entities, in compliance with current regulations.
- Management of all external relations according to **principles of collaboration, professionalism and transparency**.
- **The power to authorise** specific donations or contributions to charitable organisations, business relations with consultants and intermediaries, sponsorships **is vested in a limited number of persons**, in compliance with the system of powers, delegations and authorisations.

The Supervisory Board's verification activities are also crucial in order to propose updates to the control measures to bring the company's procedures in line with current regulations and industry best practices.

OMR's commitment to promote sound business ethics is also manifested through training and information programmes. After the Organisational Model was approved, we launched an internal training campaign, and communicated the Code of Ethics and Model 231 widely through our company channels. In addition, all employees receive a handbook that includes details of the Organisational Model and Code of Ethics and their subsequent revisions, consolidating awareness and adherence to our ethical standards from the beginning of their journey at OMR.

The Human Resources Department is responsible for such information and the training campaign.



Product and customers

At OMR, a product is not just a component; it is a journey shared between us and our customers. We strive to achieve the highest standards in terms of innovation, quality, safety, efficiency and sustainability of our product and production process through our combined knowledge and experience. For this reason, we have established long-term partnerships with many of our customers, based on mutual cooperation and support.

Our Products

Our customers have always been key participants in the heavy automotive and industrial machinery markets.

OMR specialises in the co-design and production of a wide range of components such as chassis cross-members, cab suspension, vehicle suspension, tank mounts and belts, welded structural elements, anti-intrusion bars and axles for industrial vehicles, commercial vehicles, agricultural machinery, industrial handling equipment and off-road vehicles and more. With over 5,250 finished product codes and more than 22,600,000 parts shipped in 2023 alone (+10% vs 2022), we are committed to providing excellent solutions that exceed industry expectations.

The strength of our business lies in the **vertical integration** and know-how developed over the years, which allow us to actively collaborate with customers to address technological and market challenges. Based on the analysis of product concepts, we also offer co-design services to ensure customised and innovative solutions. By engaging customers from the early design stages, we promote innovation and the adoption of sustainable solutions, thus helping to reduce the environmental

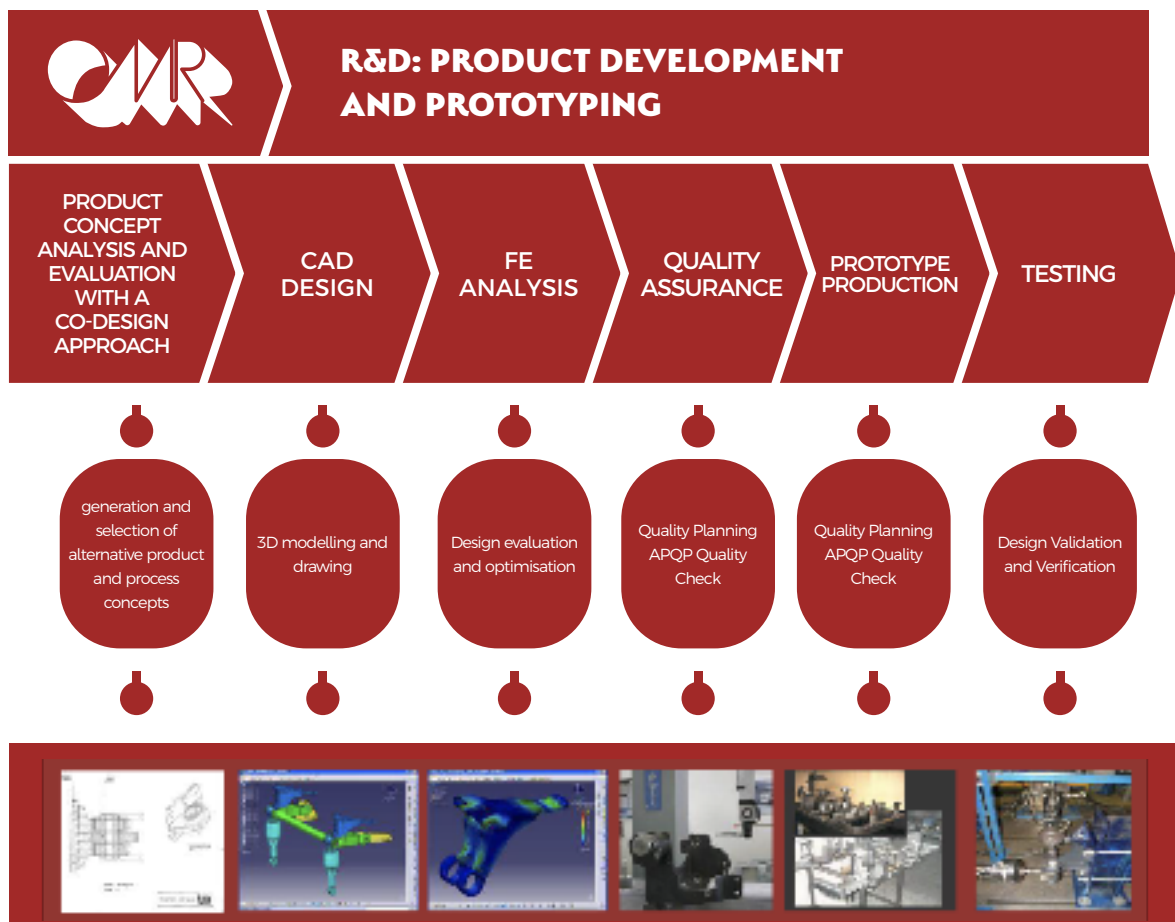


impact of products.

Within an increasingly competitive automotive environment, we are committed to responding to our customers' ever-changing needs. Not only does this mean ensuring high quality standards and innovative ideas, it also means working in synergy with our customers to develop better performing and more cost-efficient products. We offer guidance on the optimal production process and provide our customers with our prototyping and testing infrastructure, managed by a highly qualified technical team, to guarantee top quality products.

In an increasingly competitive automotive environment, we are committed to responding to customers' evolving needs. This means not only ensuring high quality standards and innovative ideas, but also working together in synergy with our customers to develop products that perform better and are more cost-efficient. We offer guidance on the optimal production process and provide our customers with our **prototyping and testing infrastructure**, managed by a **highly qualified technical team**, to ensure the highest product quality.

Our aim, in short, is to maintain a close collaboration with customers to develop tailor-made solutions that stand out in the market for innovation combined with appropriate pricing, quality and sustainability, thus contributing to the success of our partners and the growth of the entire industry.



OMR is firmly committed to meeting customer needs through sustainable development, particularly in the emerging area of sustainable mobility. Since 2020, we have intensified our efforts in the prototyping and **production of components for electric and hydrogen mobility**, aiming to provide state-of-the-art products.

While this sector is still in the early stages of its development, we are proud to announce that it has already **contributed almost 5% of our total turnover** by 2023. This result is further underlined by an increase of new product codes for electric and hydrogen vehicles reaching a total number of 435 parts in 2023.

We are convinced that our efforts in sustainable mobility not only highlight our focus on sustainability, but also our ability to remain a leader in technological innovation. This approach allows us to offer competitive and sustainable products that meet the growing expectations of our customers.

PRODUCT TURNOVER FOR ELECTRIC AND HYDROGEN VEHICLES €/000	2022	2023
% Turnover from electric and hydrogen vehicle parts produced	3,45%	4,57%
Turnover from electric and hydrogen vehicle parts produced	5.700	8.625

Our customers

We have always focused our strategy on enhancing long-term customer relationships. We avoid purely transactional approaches, favouring instead the **creation of partnerships based on listening carefully to customers' needs**, which include technical, product and service quality aspects.

To illustrate our approach, a new automated axle production line was completed in

2023. This line was built in response to the requirements from our customer Carraro for the production of components for INEOS Grenadier. This significant investment is based on medium- to long-term relationship based on the confidence our customers have in OMR's ability to successfully tackle and overcome complex challenges.

Another outstanding example of this approach was bringing the assembly stages of a key component closer to the production facilities of a significant customer. Since 2017, we have established OMR Truck Components S.A. in Madrid, Spain. This production facility in Madrid has enabled OMR to strengthen its leadership in the European automotive steel components market, establishing itself as a reliable partner for major manufacturers of industrial vehicles, commercial vehicles, earthmoving, agricultural and industrial handling equipment.

Customer sustainability questionnaires

Increasingly, our customers assess compliance with sustainability principles, this is done through management systems and continuous monitoring, and is becoming an essential criterion in supplier selection.

In 2023, we participated for the second time in Supplier Assurance's **Sustainability Assessment**



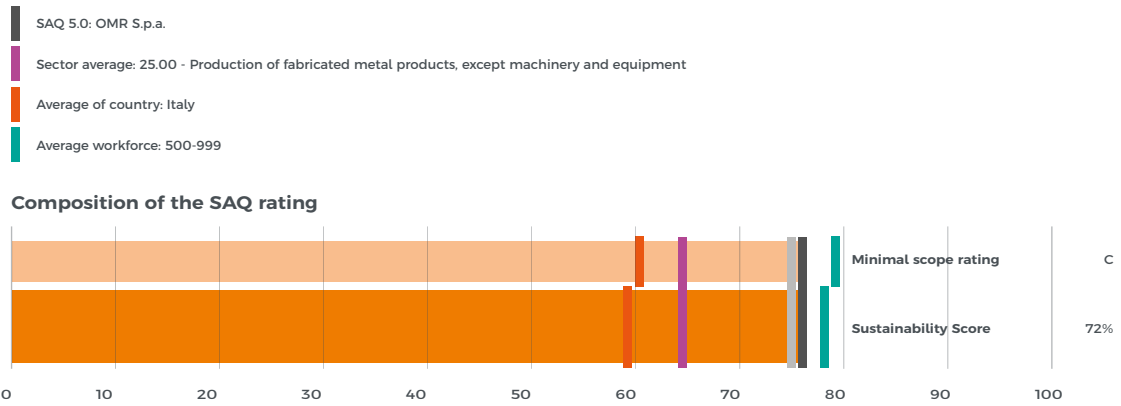
Questionnaire (SAQ 5.0), a tool developed to assess the sustainability of companies requested by one of our customers.

We are delighted to report that we obtained a **C rating of Minimum Scope (MS) and a Sustainability Score of 72%**.

The first rating (**MS**) compares favourably with the average for the metal products manufacturing sector excluding machinery and equipment of C among 14,421 companies. Furthermore, our score is higher than the Italian national average, which is D out of 4,594 assessed locations.

The **Sustainability Score** is slightly above the sector average by 25.00 - Manufacture of fabricated metal products excluding machinery and equipment, which stands at 61% among 14,368 locations.

In addition, the Sustainability Score is slightly above the average for Italy, which is 56% in 4,581.



Additionally, by request of our established customer, we completed the ESG positioning assessment in the **OpenES platform**.



The rating achieved was also well above the industry average and just below the best benchmark.

Passing these ratings is a tangible proof for us of our quality and ongoing commitment to sustainability as a distinguishing element compared to our competitors.



Production process management

At OMR, we always strive for excellence in customer relationship management, thanks to a fully integrated production process that ensures punctuality, sustainability and high quality standards in the fulfilment of customer requirements.

We base our strategy on the complete control of all the processes, from the raw material to the finished product, aimed at achieving excellence at every stage, using the best available technologies and developing in-house know-how.

The benefits offered to customers by our vertical integration include:

- Production flexibility;
- Reduced delivery times;
- Constant quality excellence;
- Plant back-up ability to reduce any downtime.

Our efforts in research and innovation in production processes and techniques have been evident since the foundation of our company. We are constantly striving to undergo audits and obtain certifications to ensure the effectiveness and safety of our products, demonstrated by our rigorous organisational control, constant monitoring and the certifications we have acquired, along with continuous investments to improve our operations.

The production process since 2023 is coordinated by the Manufacturing Manager who leads the eleven process step managers and reports directly to the Managing Director.

The Supply Chain, Engineering and Quality functions are in turn managed by highly experienced business people always reporting to the CEO.

Lastly, in the area of production process management, it is relevant to mention that a new Industrial Committee has been set up in 2023 to respond more effectively and efficiently to both customer requests and any issues related to quality or speed of delivery.

In our plant, we use state-of-the-art technology, which is evidenced by our continuous investments in this area. **Over the last four years 2020-2023,**

we have invested more than €29 million, while in 2023 we acquired 23 new machines, focused on maintaining high quality standards, including new robot islands, 3D laser systems and horizontal machining centres to increase our production capacity.

INVESTMENT IN MACHINERY €/000	2022	2023
Number of new machines purchased	43	23
Expenditure on the purchase of new machinery	7.169	6.314

As part of our efforts to meet our environmental commitments, we have implemented an ISO 14001-compliant production process, obtaining certification as early as 2014, as highlighted in the 'Management of Environmental Impacts' section of our Annual Report. In parallel, our quality management system has been certified to ISO 9001 since 1995.

Implementing these certified systems significantly improves product quality, minimises environmental impacts and optimises the efficiency of production processes. This demands a sustained commitment from the entire organisation and constant monitoring of performance to ensure that the company's objectives are met. This is why regular monitoring meetings are held with company management to discuss targets and performance indicators, both at a general level and for individual customers.

OMR has established itself as a prestigious leader in the industry, becoming a certified supplier to notable manufacturers in Europe of industrial, commercial, earthmoving, agricultural and industrial handling vehicles.

Establishing OMR Truck Components has led to an improvement in our service towards our customers, as well as optimising delivery logistics in terms of both economics and transport emissions.

OMR Truck Components

OMR Truck Components S.L.U. specialises in the assembly of front and rear suspension components for customers in the automotive industry. The production process takes place through four assembly benches, two for front and two for rear suspensions, with an average daily production of around 400 suspensions. In 2023, OMR Truck Components generated a turnover of around € 19.5 million, showing a slight increase compared to the previous year.

As far as personnel management is concerned, OMR Truck Components relies upon a local cooperative. Currently, the team consists of seven male employees, who work in two separate shifts and are trained in accordance with procedures at OMR. The OMR Truck Components is IATF 16949 certified, which proves our focus on quality and customer satisfaction. OMR Truck Components' quality management is managed directly by OMR S.p.A. Quality indicators described in the Quality and Product Safety chapter of this Report are managed by OMR S.p.A and also include the Madrid branch, thus ensuring the consistency and cohesion of the production processes across all the company's locations. In addition, incoming and outgoing quality control at OMR Truck Components is carried out on a regular basis, through random incoming inspections and weekly outgoing inspections. Apart from the quality indicators, all other data relating to OMR Truck Components are not included in this Sustainability Report as they are not consolidated.

Product Quality and Safety

Our priority has always been to meet customers' needs through high standards of quality and safety. The quality of our products is essential to our success and to establish our reputation on the market.

OMR has always placed customer satisfaction at the centre of its commitment,

achieved by offering products and services of high and consistent quality and by continuously improving business processes. To this end, OMR has adopted a Corporate Quality Management System certified to ISO 9001 and IATF 16949 by DNV Det Norske Veritas. This system ensures the constant conformity of the product to the customer's specifications through effective processes, which ensure a high level of quality, and efficient processes, which reduce costs.

Thanks to this approach, we are able to minimise the risk of product recalls and production delays, avoiding negative economic and reputational consequences for our customers. Furthermore, for some products, poor quality could have serious consequences on the physical safety of the end user of the vehicle on which our products are mounted.

OMR's Quality Policy and customer-specific objectives, approved annually by the CEO, represent our ongoing efforts to ensure high quality products and services, with the satisfaction of our partners at the centre. We adopt a proactive approach to anticipate their needs and provide increasingly innovative and customised solutions.

OMR is also committed to the continuous improvement of its energy and environmental impact management processes to minimise the negative effects of its activities on the environment and society. Social responsibility and sustainability are a constant commitment for us, translated into concrete actions to support the local community and the environment.

We are conscious that achieving our goals depends on our ability to spread a **high-quality culture**. We work to involve and empower all personnel to apply the requirements of the Quality and Environmental Management System.

Quality management is entrusted to the Quality Manager, who, as of 2023, reports directly to the Managing Director. His role is to supervise quality maintenance and improvement aspects in all 11 process steps.



The Quality Department, consisting of approximately 15 people, carries out measurement and testing activities in our dedicated laboratory, performing mechanical, chemical, metallographic, coating and painting tests, and non-destructive inspections, according to customer specifications, any external nonconformity requests, and international standards.

Quality monitoring and control is entrusted to the Quality Manager who, during monthly meetings, participates in the Executive Committee. During these meetings, cross-functional issues are addressed that can be solved more efficiently through the coordination of joint efforts.

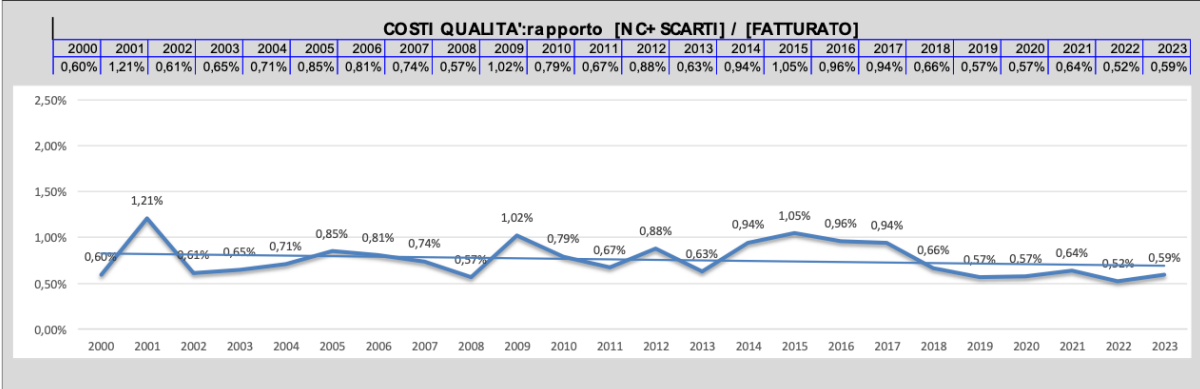
The Executive Committee annually reviews the KPIs related to quality performance and assesses deviations from the targets defined by each customer. The results of the indicators, measured in PPM (parts per million) and in the number of complaints and relevant events, determine the ratings assigned to OMR by customers.

In addition to the parameters required by our customers, we use about 50 internal parameters to monitor the quality of our products and processes. Among these parameters, the ratio of non-quality costs to turnover is considered the most indicative of our results. This ratio allows us to assess the economic impact of quality problems, including both non-conformity (NC) and reject costs.

In 2023, the ratio was equal to 0.59% compared to 0.52% in the previous year. This slight increase is partly due to the start-up of the new automated line for axle production, which in 2023 was still in its ramp-up phase and had not yet reached its standard performance at the beginning of 2024.

It should also be noted that the production of pure automotive axles has slightly higher quality requirements than those for heavy vehicles.

In general, however, it is important to note that over the past 23 years this indicator has only exceeded 1% on three occasions.





Managing environmental impacts

For decades now, the scientific community has unequivocally described how the planet's climate is changing alarmingly as a result of human activities, mainly the major use of fossil fuels. This has led us to face increasingly extreme and frequent climate phenomena. It is our duty to reduce greenhouse gas emissions, using all the resources and tools at our disposal. This is not only an ethical choice, but a necessity to protect the future of our Planet.

Our commitment to environmental protection guides all our activities. In managing the production process, we are determined to reduce inefficiencies in the use of resources and to minimise any possible negative impact on the environment.

We are aware that the energy used for the operation of our plants represents the main source of greenhouse gas emissions. For this reason, we are committed to reducing emissions through the transition to more efficient and environmentally friendly production processes. In addition, we are gradually moving towards the exclusive use of renewable energy sources. This approach represents our tangible efforts to promote sustainable practices and actively contribute to environmental conservation. In addition, during 2023 we installed temporary sensors on our machinery, allowing for more accurate control and optimised management of energy resources.

The Environmental System is managed by the Safety and Environment Delegate, who reports directly to the CEO and works closely with the EHS (Environment, Health



& Safety) department and the Technology and Plant Function.

In order to promote a production model based on safe and efficient processes, respect for the environment, and the principles of circular economy and sustainable

development, we have had a well-structured environmental governance and management system in place, **since 2014, according to**

an ISO 14001-certified Environmental Management System.

Our criteria and standards for best environmental performance are defined in our Integrated Policy for the Environment, Sustainability and Occupational Health and Safety, subject to periodic review and approved by the CEO.



Our Management System is audited annually by independent third parties to verify its full compliance with international standards, in order to obtain or maintain certification of the management system. The last audit was carried out in June 2023 and no Non-Compliances (neither minor nor major) were found.

Furthermore, the sampling performed confirmed that our management system is effective and conforms to the standard. This result demonstrates our ongoing commitment to quality and excellence, and our continuous efforts to improve our processes and ensure the highest level of compliance with internal regulations and procedures.

Additionally, our management approach includes a set of operational criteria aimed at mitigating environmental risks, going beyond mere compliance with local legal requirements. These criteria focus on reducing air emissions, optimising the use of energy and water resources, and other relevant environmental issues. We firmly believe that the prevention of environmental risks is essential to ensure the long-term sustainability of our activities and to protect the ecosystem in which we operate.

Finally, no non-compliance with laws and regulations was encountered during the two years of reporting.



Energy efficiency

Energy efficiency stands at the core of our efforts towards environmental sustainability. During 2023, we have pursued a number of innovative initiatives to optimise the use of energy in our production processes and facilities. These actions not only reduce our impact on the environment, but also push us towards a more sustainable and responsible future.

We are committed to favouring renewable energy sources over fossil fuels, in line with the requirements for environmental management defined in the Integrated Policy and in accordance with the ISO 14001-certified Environmental Management System.

In 2023, we continued with the expansion of our photovoltaic park, implementing an extension of 520.6 kWp, for a total of 1,370 panels and a gross/net covered area of 2,586m². This initiative not only allows us to reduce our energy costs, but also has a significant impact on CO₂ emissions.

Our photovoltaic system started back in 2010 with the first system with a nominal power of 1,617 kWp. In 2012, we installed a second photovoltaic system, with a nominal capacity of approximately 850 kWp, to further increase our self-generation capacity. In the first half of 2021, we made a further investment with the installation of a third photovoltaic system with a nominal capacity of approximately 2,338 kWp.

In 2022, 4,878 new solar panels were added, increasing the nominal capacity by approximately 2,371.77 kWp.

The investments made so far allow us to generate 5,208,105 kWh of energy, consume about 77% of it, and **cover 27% of our electricity needs.**

With the plants included in 2023 mentioned above, we are now able to cover a net area of 42,594m².

However, **due to bureaucratic obstacles caused by third parties**, the panels installed in 2022 and 2023 have not yet been connected and are therefore not in production. If the panels were active we estimate that such a facility could produce almost 3,200,000 additional kWh/year and the percentage of coverage of our electricity



needs would have risen to 52%. We are therefore confident that we will meet the target set in the **Sustainability Plan 2024-2030**, i.e. to achieve 30% coverage by 2024 and 40% in 2025.

We also contribute towards reducing our impact by purchasing renewable energy. We began this important initiative in March 2020, by entering into an agreement with our supplier and switching from 79% to 100% **energy purchased from renewable sources**. This reduced our indirect Scope 2 emissions (Market Based approach) to zero from 2021, as shown in the Emissions Management chapter of this report.

Overall, we consumed 40,743,931.45 kWh of energy in 2023, +0.49% compared to 2022, showing a relatively stable management of overall energy consumption. Consumption is predominantly in the form of natural gas (around 63% of total energy consumption), which is mainly used to operate the ovens of the paint shop and increased by +1.93% during the two-year reporting period.

ANNUAL ENERGY CONSUMPTION BY SOURCE (KWH)	2022	2023	Delta %
Energy from non-renewable sources			
Natural gas	25.341.511,4	25.831.242,45	+1,93%
Energy from renewable sources			
Photovoltaics - self-produced and used	4.114.297	4.019.925	-2,29%
DIRECT CONSUMPTION	29.455.808,4	29.851.167,4	+1,34%
Electricity	11.090.513	10.892.764	-1,78%
From renewable sources	11.090.513	10.892.764	-1,78%
From non-renewable sources	0	0	-
INDIRECT CONSUMPTION	11.090.513	10.892.764	-1,78%
Self-produced energy (photovoltaic) and sold	1.187.160	1.188.180	+0,09%
Total energy consumed*	40.546.321,40	40.743.931,45	+0,49%

**In compliance with GRI Standard 302-1, total energy consumed is calculated as the sum of direct and indirect consumption. The figure has been subject to a restatement from previous years, when self-produced and sold energy was subtracted.*

During this reporting period, we analysed energy intensity measured in terms of kilowatt hours per euro of turnover (kWh/€), per unit of product (kWh/piece) and per weight of production (kWh/tonne). This analysis allowed us to comprehensively assess our energy consumption, identifying areas for improvement and opportunities for optimisation.

In particular, all the energy intensity indicators show an improvement compared to 2022.

POWER INTENSITY	2022	2023	Delta %
Energy intensity on turnover (KWh/€)	0,25	0,22	-10%
Energy intensity per unit of product (KWh/piece)	1,98	1,80	-9%
Energy intensity on production weight (KWh/tonne)	1.404,69	1.203,73	-14%

Emission Management

Since as early as 2020 we made our purchased electricity 100% renewable, certified with Guarantees of Origin. We did not stop there: in 2023, we expanded our self-producing energy capacity further with the installation of 520.6 kWp. These are just some of the initiatives that demonstrate our efforts to ensure effective management of CO2 emissions from production processes, one of the fundamental pillars of our commitment to environmental sustainability.

In 2021, we embarked on a journey of assessing our greenhouse gas emissions, engaging in the compilation of our first GHG inventory.

Through this approach, we identified the main sources of CO2 emissions, paving the way for mitigation and reduction strategies in the short and long term. We continued to carry out this process in 2022 and will continue in 2023, demonstrating that we are committed to a more sustainable and more responsible way of managing our operations.

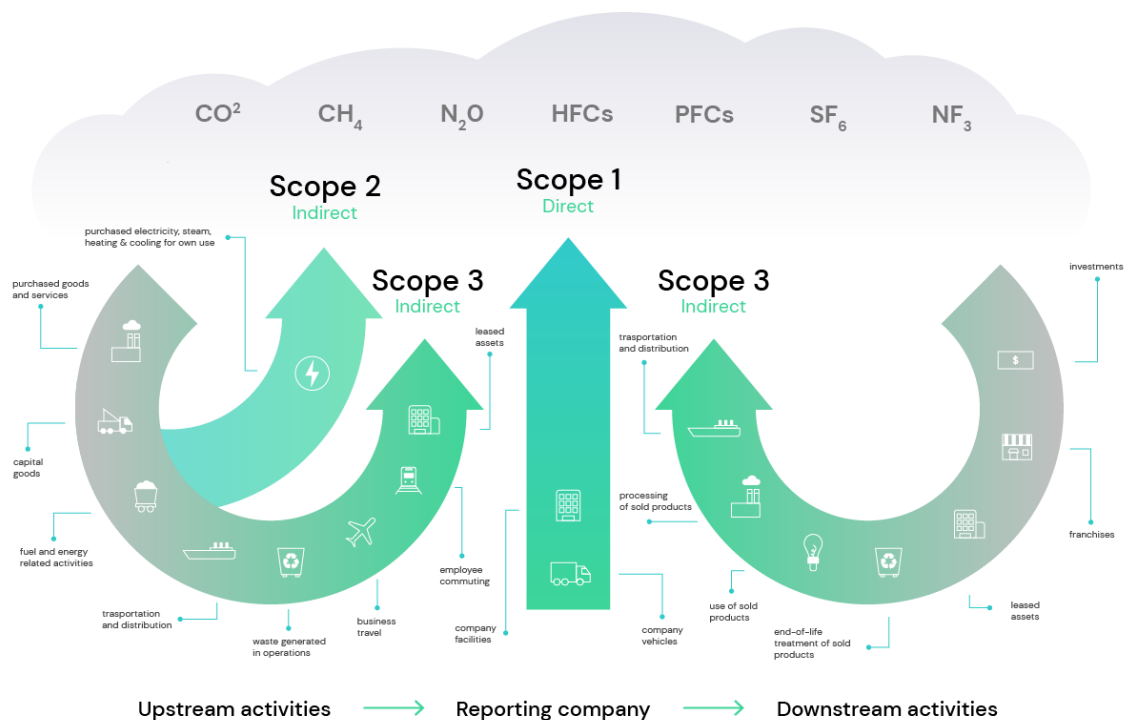
Scope 1, 2 e 3

Scope 1: Refers to direct emissions generated from sources owned or controlled by a company. Emissions from fossil fuels used in production processes, refrigerant gas leaks in air conditioning systems, and the use of the company's fleet fall into this category.

Scope 2: This refers to indirect emissions derived from the generation of purchased energy by a company. Through energy purchases, in fact, a company contributes indirectly to emissions generated by energy suppliers.

Scope 3: These are all indirect emissions (not included in Scope 2) that occur along a company's value chain (both downstream and upstream). For example, included in the Scope 3 calculations would be emissions arising from distribution and handling between plants, from personnel commuting between home and work or on business trips.

The GHG Protocol



Img credits to Net0: <https://net0.com/blog/scope-1-2-3-emissions>

Emissions are calculated on the basis of the international standard **Greenhouse Gas Protocol** (GHG Protocol). The GHG Protocol originated in 1997 through an initiative of the World Resources Institute (WRI) and the World Business Council for Sustainable Development (WBCSD), which recognised the need for an international standard for greenhouse gas accounting in view of the evolution of international climate change policies. After about four years, the first edition of the GHG Protocol was published as 'A Corporate Accounting and Reporting Standard'.

The operational boundaries for this calculation are:

Scope 1

- Direct emissions from standing use of fuels (e.g. methane gas for heating);
- Emissions from mobile combustion fuel use related to OMR's owned or controlled corporate fleet (e.g. leased vehicles);
- Emissions from leaks. Intentional or unintentional releases of gases such as HFCs from refrigeration equipment.

Scope 2

- Indirect emissions from purchased electricity.

For the calculation of indirect Scope 2 emissions, two different values are provided, calculated according to market-based and location-based methodologies respectively, in compliance with the GHG Protocol and GRI Standards.

As for the Market-Based approach, an approach that allows for the quantity of energy from renewable sources purchased directly by the company to be taken into account, **as 100% of the energy purchased is certified renewable by the Energy Service Operator (GSE) that issue the certificate of origin (Guarantees of Origin)**, in both years, an emission factor of zero is used for this calculation.

In contrast, the location-based methodology involves the calculation of greenhouse gas emissions using national emission factors for the set of primary energy sources used for electricity production (the so-called fuel mix or energy mix).

The period considered for the calculation of GHG emissions in the following Sustainability Report is 1 January 2022 to 31 December 2023.

As part of our efforts to comply with international excellence, we have outlined several targets in our Sustainability Plan 2024-2030, with a focus on emissions management. We intend to start our Scope 3 assessment process from 2024, with the aim of **achieving ISO 14064-1 certification by 2025**.



At the same time, we aim to develop a decarbonisation plan and join the Science Based Targets Initiative starting in 2025. Importantly, these initiatives will contribute to our rating at the CDP (Carbon Disclosure Project), which we intend to launch during 2024 with reference to the results of the year 2023.

Furthermore, starting in 2025, we intend to start calculating the carbon footprint of selected products of ours (Product Carbon Footprint).

In 2023, the total CO₂eq emissions generated by our production activities amounted to 4,858.52 tonnes of CO₂eq (Scope 1 and Scope 2 - Market Based). Compared to 2022, this represents an increase of approximately 3% of the total emissions generated.

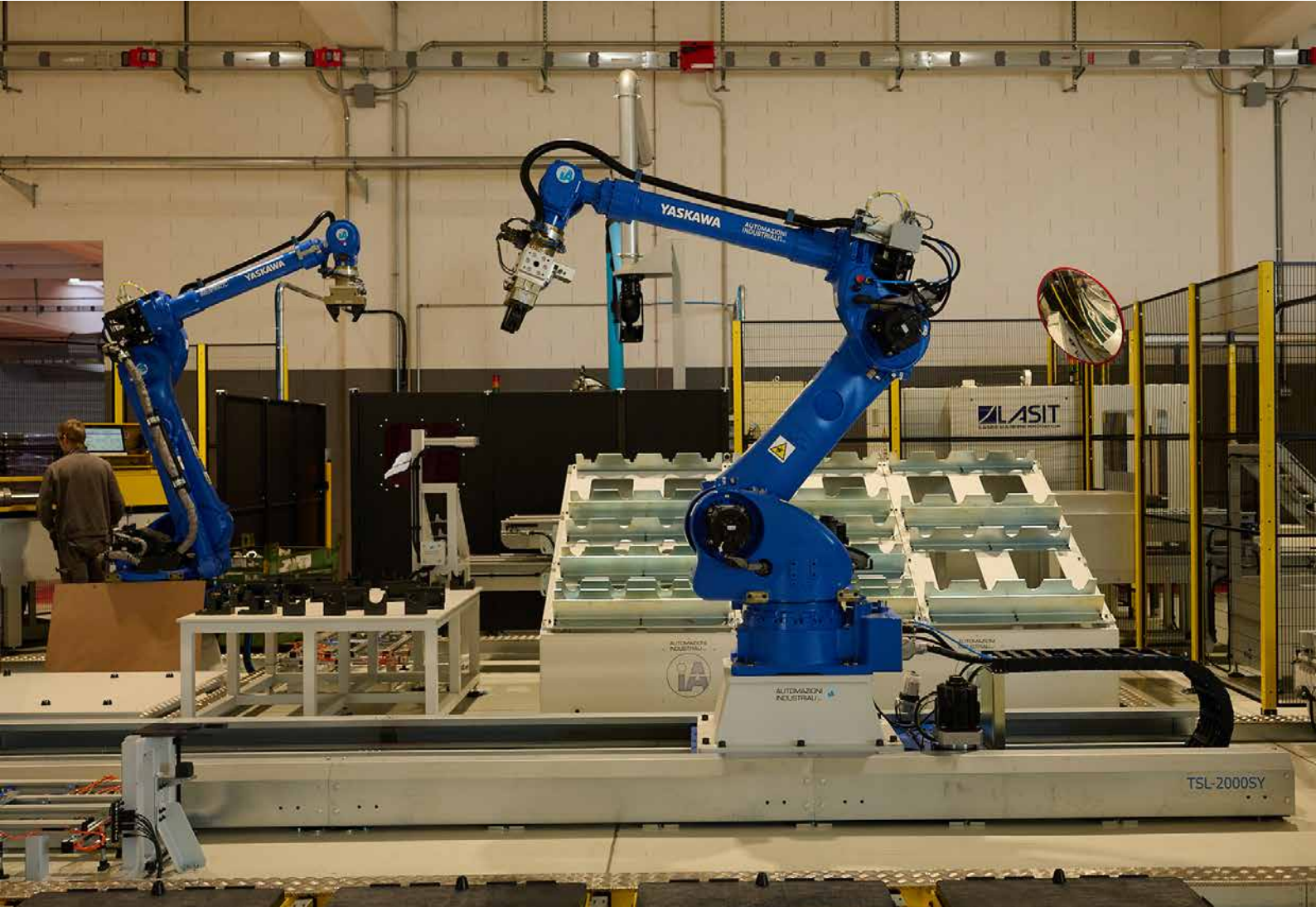
GREENHOUSE GAS EMISSIONS PER SCOPE (IN T CO₂EQ) *	2022	2023	Delta %
Scope 1**	4.713,97	4.858,52	+3,07%
Emissions from production facilities (stationary combustion)	4.592,75	4.681,50	+1,93%
Emissions from company vehicles (mobile combustion)	63,16	62,67	-0,78%
Other fugitive emissions from production facilities***	57,25	64,13	+12,02%
Refrigerant gases for air conditioning systems (fugitive emissions from air-conditioning) ****	0,81	50,22	+6.084,73%
Scope 2 – Location Based	3.228,45	2.594,65	-19,63%
Scope 2 – Market Based	0,00	0,00	-
Total (Scope 1 + Scope 2 – Market Based)	4.713,97	4.858,52	+3,07%

Methodological Note
 (*) The calculation of CO₂eq (which includes emissions of CH₄, NO₂, HFCs, PFCs, SF₆ when present) was done in accordance with the Greenhouse Gas Protocol guidance (See <http://www.ghgprotocol.org/calculation-tools/all-tools>) - GHG Emissions Cross Sectors Calculation Tool. Source of emission factors used to convert combustions to CO₂eq: Scope 1 - EPA, "Emission Factors for Greenhouse Gas Inventories," Tables 1-2-11-12, April 1, 2021; Scope 2 - Location Based - ISPRA 2021, "Emission Factors for Electricity Production and Consumption in Italy." The emission factors have been updated to the year 2021 and therefore the value of CO₂ emissions for the year 2021 has been restated.
 (**) The calculation of Scope 1 emissions includes the following gases: CO₂, CH₄ and N₂O. The calculation of Scope 1 emissions also includes the fuel consumption of vehicles owned or leased by OMR, which was not included in the previous Sustainability Report 2021. For the purpose of comparison, we have recalculated the 2021 values and for that reason the value is different from the emissions reported in the 2021 Sustainability Report.
 (***) These are emissions from the use of CO₂ gas in the production process.
 (****) The figure includes the quantities of refrigerant gases leaked into the atmosphere reported in the specific registries during periodic refills of air conditioning systems.

Within the context of corporate environmental management, greenhouse gas (GHG) emission intensity indices are a key tool for assessing OMR's operational effectiveness and environmental impact. By expressing GHG emissions in relation to company-specific parameters, it is possible to assess not only the absolute level of GHG emissions, but also their efficiency in relation to the activity performed.

Concerning the considered emission intensity indicators (intensity on turnover, per unit of product and weight of production), during the reporting period we recorded a particular reduction in the intensity of CO2eq emissions for all analysed indicators.

EMISSION INTENSITY	2022	2023	Delta %
Intensity of emissions on turnover (tCo2eq/ M €)	28,52	26,32	-7,71%
Intensity of emissions per unit of product (tCo2eq/n pieces produced)	0,00023	0,00021	-6,45%
Intensity of emissions on weight of production (tCo2eq/t)	0,163	0,144	-12,11%





Waste Management

Waste management is an important aspect for our production activity, which involves the production of a considerable amount of waste, particularly during steel processing. We are fully aware of the environmental risks and regulations to which we are subject regarding their management. That is why, working closely with some of our partners to reduce waste and encourage the reuse of materials, we strive to ensure that they are properly managed to minimize these risks. We believe that this is not only an ethical imperative, but also a strategic choice that can improve the efficiency of our production process and increase our competitiveness in the market, thus creating added value for the environment and society.

The waste management process at OMR is the responsibility of the EHS (Environment, Health & Safety) department, which oversees the entire process, handling the following activities:

- weighing of waste and monitoring its destination during storage;
- verification of weights recorded at destination;
- reporting of data through waste management software and regulatory forms;
- verification of the requirements for destination facilities.

Specifically, we have a structured waste management and monitoring system that **prioritizes recycling and recovery wherever possible**. This system helps to limit the environmental impact of our business because the circular economy can have a positive impact on natural resources, as it helps to reduce the extraction of raw materials and the energy consumption required to produce new materials. Secondly, an efficient and sustainable waste management system can help reduce disposal costs and increase the efficiency of the production process.

Additionally, this system ensures a careful management of waste that complies with regulations and allows constant monitoring of quantities and their destinations.

During 2023, a total of 20,209.92 tonnes of waste was produced (approximately +17% compared to the previous year, of which 93.5% was steel waste (scraps), the main raw material in our production process, and 95.8% was non-hazardous waste.

The increase in tonnes of waste produced during 2023, compared to the previous year, is mainly attributable to the increase in steel waste. This change is directly related to the increase in production volumes (production weight increased by 17.26% compared to 2022).

In addition to steel waste, in our production cycle we also generate significant amounts of waste from chemical surface treatment and metal coating, such as sludge and degreasing waste from welding, sandblasting and tumbling.

Besides these two main categories of waste, our production activities also involve the production of other residual types of waste. The most significant include aqueous suspensions containing paints and varnishes from the painting process, aqueous washing solutions, aqueous concentrates and packaging waste (such as wood, paper, cardboard and plastic).

WASTE BY COMPOSITION IN TONS (T)	2022			2023		
	Destined to be recovered	Destined to be disposed	Total	Not to be disposed of	Destined to be disposed	Total
Waste from chemical surface treatment and coating of metals and other materials (EWC 11)	0,00	344,34	344,34	0,00	319,25	319,25
Waste from processing physical and mechanical surface treatment of metals and plastics (EWC 12)	15.722,96	381,41	16.104,37	18.441,15	456,54	18.897,69
of which steel (EWC 12.01.99)	15.544,96	0,00	15.544,96	18.249,02	0,00	18.249,02
Other wastes*	382,96	419,41	802,37	422,96	570,02	992,98
Total	16.105,92	1.145,16	17.251,08	18.864,11	1.345,81	20.209,92

**The " Annexes" section provides details of waste quantities by EWC code as provided in the disclosure requirements of GRI Standards 306 (2018).*

With respect to the total waste produced in 2023, we are proud to say that 93% of waste is not destined to be disposed, but instead **undergoes recycling (98%)** and recovery (2%) activities at sites outside the Company.

We are actively working to reduce the volume of waste for disposal and promote the sustainable use of resources. For this reason, other waste categories are recycled and/ or recovered wherever possible.

Water and wastewater

Preventing and containing water pollution, including industrial and urban discharges, helps to protect marine habitats and biodiversity, thus promoting the marine ecosystem conservation goals outlined in SDG 14.

Furthermore, the World Resources Institute (www.wri.org) and the Istituto Superiore per la Protezione e la Ricerca Ambientale (www.ispraambiente.gov.it) have identified the geographical location of our plant as one of the areas potentially subject to high levels of water stress by 2030.

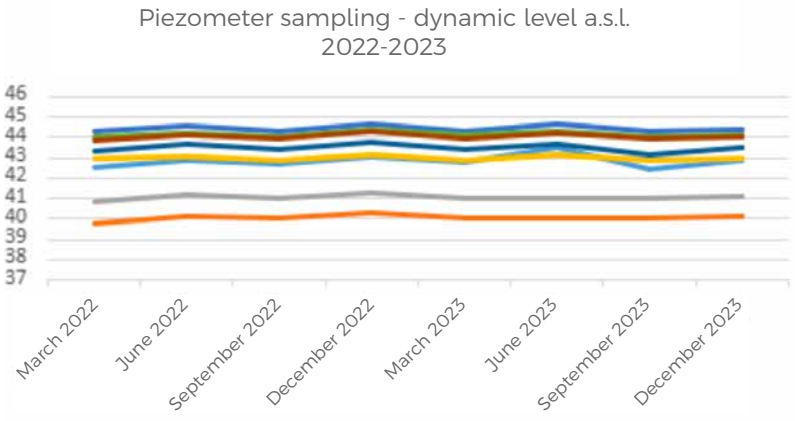
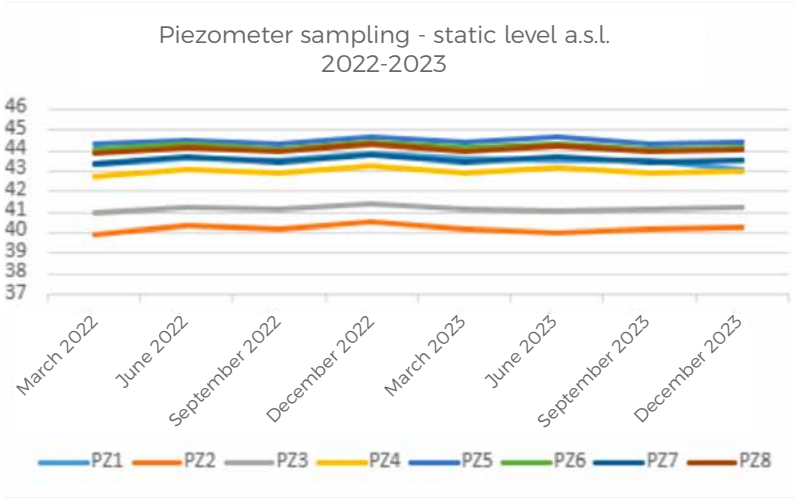
This context makes active monitoring of our water resources essential, as their future scarcity could have significant impacts on both the economic and supply side. Although our production activities do not require the use of significant quantities of water, we are still paying close attention to what was said in the previous paragraph. In particular, the supply of water differs depending on the use and is from wells (groundwater) for activities related to the production process and from aqueducts (third-party water resources) for accessory purposes (e.g. toilets). In particular, during 2023, we withdrew a total of 19.90 mega litres of water, showing an increase compared to 2022.

WATER WITHDRAWAL (ML) FROM SOURCE	2022	2023
Groundwater	9,35	10,15
Freshwater	9,35	10,15
Other types of water	==	==
Third-party water resources	7,00	9,75
Freshwater	7,00	9,75
Other types of water	==	==
Total	16,35	19,90

Concerning the usage of underground water taken from wells for production, this is used in the processes of tumbling, pre-treatment and cataphoresis painting.

On a quarterly basis, the monitoring plan outlined for the **Integrated Environmental Authorisation (AIA)** provides for the detection of the piezometric level of the water table, thus allowing us to keep the groundwater situation under constant control. During the analyses carried out on each well, the height of the water table is measured, recording both the static and dynamic levels in detail.

The values measured by the various piezometers show a substantial constancy, confirming a stable trend over time of the monitored aquifers. This data uniformity is indicative of a hydrogeological balance maintained in the areas monitored.



To reduce the use of water and ensure it is recycled, we have adopted three separate recovery systems for each of these processes.

For the tumbling process, we use a recovery system that separates the liquid and solid parts generated by the process. The solid parts, consisting of sludge, are deposited,

while the clean process water is collected in a tank and reused later. During the separation phase, flocculants and cleaning liquids based on cationic polymers are used to neutralise the ionic effects of the particles. The chemical properties of the process water remain unaffected by these products and their concentrations remain unchanged. Sludge, containing approximately 20 per cent water, is automatically removed from the system and properly disposed of.

For the cataphoretic pre-treatment and coating processes, the treatment system used is based on the integration of several technologies:

- recycling dynamic rinses on special towers with special and differentiated ion exchange resins.
- the regeneration of the resins with time, methods and volumes of water totally different from traditional systems.
- selection of residues with differentiated physical and chemical pre-concentration and neutralisation treatments, followed by a final extraction phase by vacuum evaporation with a heat pump system.

These plants help us to achieve the goal of 'zero discharge', as they promote the complete recycling of the process water used, generating only small quantities of residues and sludge, which are treated as waste by authorised disposers.

In 2023, wastewater managed through as waste authorised disposers amounted to 1,167.91 t, a slight increase compared to 2022.¹³

Currently, we do not have monitoring tools that allow us to accurately quantify the amount of water released after use, with regard to third-party water resources used for purposes ancillary to production activity. However, water discharges to water bodies, soil and subsoil only concern rainwater, first rainwater and water used for sanitary facilities (such as the restaurant and changing rooms), are re-injected after being treated.

The risk that our activities may contaminate water resources is extremely low. To ensure that these resources are managed in compliance with applicable laws and to minimise the impacts of our production process, we have implemented internal protocols that establish uniform management criteria. It is also crucial to point out that, in our production facilities, there have been **no reports of leakages or significant spills of harmful substances into the environment in the period between 2022 and 2023.**

¹³ The 'Annexes' section provides further details to meet the disclosure requirements of GRI Standards 303 (2018). The 'Annexes' section also presents details of the EWC codes for wastewater disposal.



Responsible sourcing

Responsible sourcing is about choosing suppliers who respect ethical, environmental and social principles, aiming to reduce global impacts and promote sustainable practices throughout the supply chain. We believe that responsible management of our supply chain, taking into account elements of environmental and social sustainability, is critical to our long-term success.

Supplier management is under the responsibility of the Purchasing Department reporting directly to the Managing Director. The process of activating new suppliers envisages checking that they meet reputational, quality and worker health and safety requirements in line with the provisions of our Code of Ethics and policies.

The assessment of the quality aspects, given the centrality of the issue in the relationship with our customers, envisages the following checks:

- verifying whether the supplier is in possession of ISO 9001 certification, considered a fundamental guarantee of compliance with product quality requirements;
- assessment of the technical and technological requirements of the supplier's facilities.

As part of the accreditation process, new suppliers are required to provide and accept specifications. These documents outline the requirements that suppliers

must meet for the different product categories and include, in addition to technical specifications, the control and audit procedures that we may conduct, including at the supplier's premises.

Concerning the assessment of aspects relating to the management of environmental issues by suppliers, these checks are currently carried out in relation to the category and relevance of the product. Specifically, the assessment of environmental aspects is especially relevant in the selection of suppliers of steel, coating plant treatments and packaging.

Recent European directives, the Corporate Sustainability Reporting Directive (CSRD) and the Corporate Sustainability Due Diligence Directive (CSDD), are revolutionising the approach to sustainability in the corporate world. These regulations not only extend transparency requirements but also impose a more rigorous approach to responsibility throughout the entire supply chain.

In line with the recent Directives, we at OMR are committed not only to strengthening our relationships with our suppliers, but also to fostering sustainability at all levels of the supply chain. This approach aims to improve product quality, optimise logistics management and ensure compliance.

We are committed to making our current suppliers aware of the sustainability values we promote, in order to stimulate greater adherence to sustainability principles and to enhance our environmental and social impact. This commitment is not limited to the choice of materials but concerns the entire supply chain of raw materials and components used in our production activities. We aim to create a supply chain where transparency and accountability can become the pillars of business management, influencing not only reputation but also resilience and market competitiveness.

In response to these emerging needs, within our **Sustainability Plan 2024-2030**, we have set as a **priority the goal of developing and formalising a Code of Ethics for Suppliers**. We expect to finalise this document by 2025, to ensure it becomes fully operational in early 2026. This Supplier Code of Ethics will be a fundamental requirement for all our key strategic suppliers, who will be required to sign it.

In parallel to this process, we are also committed to **implementing new ESG audit procedures**, specifically designed for our suppliers, starting in 2027. These audits will be instrumental in monitoring and ensuring adherence to the principles of the Code of Ethics, as well as assessing the impact of suppliers' practices on their communities and the environment.

These measures represent crucial steps towards greater commitment to corporate social responsibility and a stronger ethical footprint in our supply chain management.

During 2023, we used 696 suppliers. Among the materials purchased, the most important component is raw materials and, in particular, steel, which accounts for about 90% by weight. Equally important are the gases used for lasers and welding robots (2,524 t), packaging materials (1,019 t) and screws (581 t).

The total purchased volumes are increasing compared to 2022 (+29%). For lubricants, treatments, screws and, to some extent, steel, the increase in figures is influenced by procurement policies and stock management. On the other hand, for the other product categories, the significant increase is mainly due to the launch of the new automated axle production line and new investments, which had a direct impact on the final result.

MATERIALS USED BY WEIGHT (IN TONS)	2022	2023
Steel	33.500	43.000
Powders	382	507
Fasteners	554	581
Tools	31	36
Lubricants	40	35
Treatments	110	115
Welding wire	250	319
Gas (for laser and welding robots)	1.829	2.524
Total packaging	728	1.019
• of wood	226	324
• of paper and cardboard	169	193
• of plastic	333	502
Total purchasing weight	37.424	48.136

Our company, which uses large quantities of steel, recognises the crucial importance of a strong relationship with the steel supply chain for long-term success. We are particularly careful in purchasing raw materials and carefully select our steel suppliers, giving priority to those who pursue initiatives to minimise their environmental impact. The Arvedi Group, our long-standing partner, is committed to reducing the environmental impact of its operations through advanced policies, continuous

technological improvements and investment in research and innovation. This has enabled Arvedi to produce steel with a high degree of environmental compatibility, improving efficiency by 2.6% and reducing CO2 emissions by around 250,000 tonnes per year¹⁴.

The collaboration with Arvedi allowed us to adopt a sustainable business model, highlighting the importance of the steel supply chain in our sustainability strategy. The agreement signed in 2021 to encourage the circular use of raw material continued in 2023. As a result of this collaboration, about 25 per cent of the steel we used in 2023 was recycled, reducing indirect emissions by about 15,600 tCO2eq¹⁵.

We continue to direct our scrap to authorised external recyclers and are actively engaged in finding effective solutions for sustainable practices and supporting the circular economy.

We are also strengthening our efforts to favour the use of **sustainable and recycled packaging**. Most of our suppliers already offer **Forest Stewardship Council (FSC)** certified paper or cardboard packaging solutions, ensuring that the paper used for our packaging comes from responsibly and sustainably managed forests. Furthermore, when it comes to plastic packaging, we mainly opt for purchasing packaging with recycled material.

However, we do not currently have a comprehensive monitoring system to verify the actual amount of sustainable material purchased. Despite this, we are satisfied with the progress made and are committed to further improvement in this area.

OMR's responsible management of resources also manifests itself in the **selection of local suppliers** who not only meet the strict quality standards required, but also adopt ethical and sustainable business models whenever possible. Opting for

local suppliers not only brings benefits in terms of reduced costs and risks associated with logistics, or greater operational stability, but also represents an ethical and social commitment to the local community.

This choice can strengthen the trust and support of the community, which benefits from our presence.

In addition, favouring local suppliers contributes to environmental sustainability, as it minimises the environmental impact of transport.



¹⁴ Source: <https://www.arvedi.it/sostenibilita-e-qualita/il-rispetto-ambientale/il-rapporto-con-lambiente/>

¹⁵ The figure derives from information obtained from an extract on the Siderweb portal (<https://www.siderweb.com/>)



Specifically, during 2023, we used **289 local suppliers** (located within a 100 km radius of our headquarters) representing approximately 42% of our total suppliers (a percentage that is up from 30% in 2022).

A significant component of these suppliers (97 suppliers, 13.94%) are suppliers of strategic importance to our business (for which the purchase value exceeds €50,000 per year).





Relationship with the community

OMR believes that cooperating with the local community is essential, valuing the principle of altruistically and sustainably giving back a part of the value it has contributed to generate. The company's commitment to the local social fabric is manifested through projects that support socialisation, culture, the environment and health. These activities not only raise the company's profile, they also strengthen its identity and bring significant indirect benefits.

OMR is not just a company; it is a vital element within an extended community formed by the people and resources that surround us. Our business significantly impacts the environment and the local population, which is why we take an accountable attitude towards the community.

Our goal is not just to give back to the local area; we aspire to build a relationship of mutual trust and cooperation. Synergy with local realities not only benefit the community, but also bring significant advantages to our company.

The company is committed to amplifying positive effects that contribute to the collective well-being through donations, sponsorships, investments in art and culture, and corporate volunteering initiatives. Our efforts are continuous and aim to generate economic value while promoting social progress and the protection of environmental resources.

Strategic resource allocation decisions are made directly by the CEO, emphasising the importance we place on the well-being of the local community.

In 2023, we increased resources allocated to local support by 19%, in line with OMR's economic growth. We dedicated 33.6% of resources to local church bodies, continuing our three-year commitment to restoring the roofs of the church in Remedello Sopra, the municipality where our facilities are located.

Furthermore, our efforts are extended to the art and public cultural heritage of Italy, responding to the needs of institutions in the Brescia area with targeted interventions: in 2022 we donated €130,000.00 and in 2023 €70,000.00. In particular, in 2023, we supported Fondazione Brescia Musei with a donation of €20,000 for the Art Bonus and €50,000 for cultural initiatives such as Fabbrica del Futuro in Brescia.

Following the floods in Romagna and other specific local needs, we increased our charitable share from 4% in 2022 to 21.5% in 2023.

Worldwide, for the third consecutive year, we are supporting the One Ocean Foundation, a non-profit organisation that promotes ocean preservation and sustainable marine resource management practices, focusing on reducing marine pollution, conserving biodiversity, promoting sustainable fisheries and mitigating marine climate change, as one of the main partners.

PARTNER ONE OCEAN FOUNDATION (Fonte sito www.1ocean.org)





MISSION The mission of the Foundation is to accelerate solutions to Ocean issues by inspiring international leaders, institutions, companies, and people; promoting sustainable blue economy and enhancing ocean knowledge through ocean literacy.

www.1ocean.org

COMMUNITY ACTION 2022	Amount	%
AIRC – Cancer Research	€ 5.000	2%
Parish	€ 14.000	6%
Charity	€ 9.800	4%
Cultural sector (Art Bonus - Brescia Musei Foundation)	€ 160.000	63%
One Ocean Foundation	€ 50.000	20%
Sports sponsorship	€ 15.000	6%
Total donations 2022	€ 253.800	100%

COMMUNITY INTERVENTIONS 2023	Amount	%
Ecclesiastical organisations	€ 102.000	33.8%
Cultural sector (Art Bonus - Fondazione Brescia Musei)	€ 70.000	23.2%
One Ocean Foundation	€ 50.000	16.6%
Charity	€ 64.800	21.5%
Sports sponsorship	€ 15.000	5.0%
Total donations 2023	€ 301.800	100%



Methodological Note

The Sustainability Report 2023 of OMR S.p.A., covering the period from 1 January to 31 January 2023, was drafted, with the support of an external consultant (Impactage Srl), in accordance with the GRI Standards (Global Reporting Initiative).

The Sustainability Report is prepared annually by OMR S.p.A. and is submitted to the Board of Directors for approval.

The Sustainability Report 2023 was approved by the Board of Directors on 19 June 2024 by assessing the completeness and consistency of the relevant topics of the materiality matrix.

The reporting scope exclusively concerns OMR S.p.A.

The Sustainability Report 2023 was drawn up voluntarily by OMR S.p.A. and does not qualify as a Consolidated Non-Financial Statement (DNF) pursuant to Legislative Decree no. 254/2016.

This Sustainability Report 2023 was also not audited or certified by a third party.



Contacts

Whoever wishes to receive information, ask questions, make remarks or request clarifications regarding OMR S.p.A.'s sustainability activities can do so by sending an e-mail to: **sustainability@omrspa.com**.



Content index GRI

Statement of Use	OMR S.p.a has reported in accordance with GRI Standards for the period January 1 to December 31, 2023.
Used GRI 1	GRI 1: Foundation 2021
Relevant GRI Industry Standards	None

GRI STANDARD	INFORMATION	LOCATION	REQUIREMENTS OMITTED	OMISSIONS	
				REASONS	EXPLANATION
GRI 2: 2021 General Disclosure	2-1 Organizational details	Who we are			
	2-2 Entities included in the organization's sustainability reporting	Who we are: Our clients			
	2-3 Reporting period, frequency and point of contact	Methodological Note: Contacts			
	2-4 Review of information	Emission management (Methodological Note)			
	2-5 External assurance	Methodological Note			
	2-6 Activities, value chain and other business relationships	Who we are: Value chain			
	2-7 Employees	People at OMR			
	2-8 Non-employee workers	People at OMR			
	2-9 Structure and composition of governance	Governance model			
	2-10 Appointment and selection of the highest governing body	Governance model			
	2-11 Presidente del massimo organo di governo	Governance model			
	2-12 Role of the highest governing body in the control of impact management	Double Materiality			

GRI STANDARD	INFORMATION	LOCATION	REQUIREMENTS OMITTED	OMISSIONS	
				REASONS	EXPLANATION
GRI 2: 2021 General Disclosure	2-13 Delegation of responsibility for impact management	Governance model			
	2-14 Role of the highest governing body in sustainability reporting	Double Materiality; Methodological Note			
	2-15 Conflicts of interest	Governance model			
	2-16 Communication of critical issues	Governance model			
	2-17 Collective knowledge of the highest governing body	Governance model			
	2-18 Performance evaluation of the highest governing body	Governance model			
	2-19 Rules concerning remuneration	Governance model			
	2-20 Procedure for determining remuneration	Governance model	2-20-b	Not applicable	Concentrated capital structure.
	2-21 Annual total remuneration ratio		2-21 a,b	Not applicable	Family-controlled companies with active operational roles.
	2-22 Sustainable development strategy statement	Letter to stakeholders			
	2-23 Policy commitment	Integrated policy for the environment, sustainability, occupational health and safety; Quality Policy; Code of Ethics and Behaviour			
	2-24 Integration of commitments in terms of policy	Integrated policy for the environment, sustainability, occupational health and safety; Quality Policy; Code of Ethics and Behaviour			
	2-25 Processes to remedy negative impacts	Management and Control Organisational Model			
	2-26 Mechanisms for requesting clarification and raising concerns	Quality policy; Organisational Model			
	2-27 Compliance with laws and regulations	Management of environmental impacts			
	2-28 Membership in associations	About Us			



GRI STANDARD	INFORMATION	LOCATION	REQUIREMENTS OMITTED	OMISSIONS	
				REASONS	EXPLANATION
GRI 2: 2021 General Disclosure	2-29 Approach to Involving	Stakeholder relationship			
	2-30 collective contracts	Employees covered by collective bargaining agreements			
MATERIAL TOPICS					
GRI 3: Material Topics 2021	3-1 Process of determining material themes	Double Materiality			
	3-2 List of material themes	Double Materiality			
ECONOMIC PERFORMANCE					
GRI 3: Material Topics 2021	3-3 Management of material issues	Our Numbers			
GRI 201: Economic Performance 2016	201-1 Directly generated and distributed economic value	Tables supplementing the "Our Numbers" section			
OUR PRESENCE IN THE MARKET					
GRI 3: Material Themes in 2021	3-3 Management of material issues	The value chain: Product and customers			
GRI 202: Market Presence in 2016	202-2 Percentage of senior management hired	Tables supplementing the "People of OMR" section"			
PROCUREMENT PRACTICES					
GRI 3: Material Themes in 2021	3-3 Management of material issues	Responsible sourcing			
GRI 204: Procurement practices in 2016	204-1 spending proportion to local suppliers	Responsible sourcing			
ANTICORRUPTION					
GRI 3: Material Issues in 2021	3-3 Management of Material Issues	Ethics and compliance			
GRI 205: Anti-Corruption in 2016	205-1 Operations assessed for corruption-related risks	Ethics and compliance			
	205-2 Communication and training on anticorruption policies and procedures	Ethics and compliance			
	205-3 Established incidents of corruption and actions taken	Ethics and compliance			
MATERIALS					
GRI 3: Material Topic in 2021	3-3 Management of material issues	Responsible sourcing			

GRI STANDARD	INFORMATION	LOCATION	REQUIREMENTS OMITTED	OMISSIONS	
				REASONS	EXPLANATION
GRI 301: Materials in 2016	301-1 Materials used by weight or volume	Materials used by weight (in tons)			
	301-2 Materials used that come from recycling	Tables supplementing the chapter "Responsible Sourcing"			
ENERGY					
GRI 3: Material Topic in 2021	3-3 Management of material themes	Energy efficiency			
GRI 301: Energy in 2016	302-1 Energy consumed within the organization	Annual energy consumption by source (kWh)			
	302-3 Energy intensity	Energy intensity			
	302-4 Reduction in energy consumption	Energy efficiency			
WATER AND WASTEWATER					
GRI 3: Material Topic in 2021	3-3 Management of Material Issues	Water and water discharges			
GRI 303: Water and Discharge in 2018	303-3 Water withdrawal	Water withdrawal (ML) by source			
	303-4 Water discharges	Tables supplementing the chapter "Water and water discharges"			
EMISSIONS					
GRI 3: Material Topics 2021	3-3 Management of material issues	Emissions management			
GRI 305: Emissions 2016	305-1 Direct GHG emissions (Scope 1)	Greenhouse gas emissions by scope (in t CO2eq)*			
	305-2 Indirect GHG emissions from energy consumption (Scope 2)	Greenhouse gas emissions by scope (in t CO2eq)*			
	305-4 Intensity of GHG emissions	Intensity of emissions			
	305-5 Reduction of GHG emissions.	Emissions management			
WASTE					
GRI 3: Material Topic 2021	3-3 Management of material issues	Waste Management			
GRI 306: Waste 2020	306-1 Generation of waste and significant waste-related impacts	Waste Management			



GRI STANDARD	INFORMATION	LOCATION	REQUIREMENTS OMITTED	OMISSIONS	
				REASONS	EXPLANATION
GRI 306: Waste 2020	306-2 Management of significant waste-related impacts	Waste Management			
	306-3: Waste generated	Waste by composition in tons (t)			
	306-4: Waste not landfilled	Tables supplementing the chapter "Waste Management"			
	306-5 Waste sent to landfills	Tables supplementing the chapter "Waste Management"			
EMPLOYMENT					
GRI 3: Material Issues in 2021	3-3 Management of material issues	People in numbers			
GRI 401: Employment in 2016	401-1 New hire and turnover	Number of hirings and terminations of employees by age			
	401-2 Benefits provided for full-time employees, but not for part-time or fixed-term employees	Quality of working relationship			
HEALTH AND SAFETY AT WORK					
GRI 3: Material Issues 2021	3-3 Management of material issues	Health and safety of workers			
GRI 403: Occupational Health and Safety 2018	403-1 Occupational health and safety management system	Health and safety of workers			
	403-2 Hazard identification, risk assessment and accident investigation	Health and safety of workers			
	403-3 Occupational health services	Health and safety of workers			
	403-4 Worker participation and consultation and communication on occupational health and safety	Health and safety of workers			
	403-5 Occupational health and safety training for workers	Workplace Health and Safety Training			

GRI STANDARD	INFORMATION	LOCATION	REQUIREMENTS OMITTED	OMISSIONS	
				REASONS	EXPLANATION
GRI 403: Occupational Health and Safety 2018	403-6 Promoting workers' health	Health and safety of workers			
	403-7 Prevention and mitigation of occupational health and safety impacts within business relationships	Health and safety of workers			
	403-9 Occupational accidents	Accidents at work: Tables supplementing the section 'The people of OMR'			
	403-10 Occupational accidents	Health and Safety of Workers: Tables supplementing the section 'The People of OMR'			
TRAINING AND TEACHING					
GRI 3: Material Issues 2021	3-3 Managing Material Themes	Employee training and professional development			
GRI 404: Training and Teaching In 2016	404-1 Average annual training hours per employee	Total and average training hours per employee; Total and average hours of training by gender; Total and average hours of training by classification;			
DIVERSITY AND EQUAL OPPORTUNITY					
GRI 3: Material Issues 2021	3-3 Managing Material Themes	Diversity and Equal Opportunity			
GRI 405: Diversity and Equal Opportunity	405-1 Diversità negli organi di governo e tra i dipendenti	Diversity and Equal Opportunity; The governance model			
	405-2 Ratio of basic salary and remuneration of women vs. men	Diversity and Equal Opportunity			
LOCAL COMMUNITIES					
GRI 3: Material Topics in 2021	3-3 Managing Material Themes	Community relationship			
GRI 413: Local Communities in 2016	413-1 Activities involving local community involvement, impact assessments and development programmes	Community relationship			



GRI STANDARD	INFORMATION	LOCATION	REQUIREMENTS OMITTED	OMISSIONS	
				REASONS	EXPLANATION
GRI 413: Local Communities in 2016	413-2 Activities with significant negative, potential and current impacts	Management of environmental impacts			
TOPIC NOT COVERED BY GRI INDICATORS: PRODUCT QUALITY AND SAFETY					
GRI 3: Material Topics in 2021	3-3 Management of material issues	Product Quality and Safety			
TOPIC NOT COVERED BY GRI INDICATORS: PRODUCTION PROCESS MANAGEMENT					
GRI 3: Material Topics in 2021	3-3 Management of material issues	Production process management			

Attachements

Charts to supplement the section "Our Numbers"

Economic value directly generated and distributed		2022	2023	Delta
Value generated	Revenues + Fin. Income	133.257.498 €	185.540.963 €	12%
Distributed value	Operating Costs	104.261.970 €	120.687.837 €	16%
	Total expenditure on salaries	27.411.026 €	34.027.747 €	24%
	Expenditure on benefits	1.062.089 €	873.184 €	-18%
	Expenditure on donations and sponsoring (local community initiatives)	253.800 €	301.800 €	19%
	Expenditure on employee training activities	27.272 €	45.430 €	67%
	Expenditure on workers' health and safety	405.125 €	487.771 €	20%
	Interest paid to capital suppliers	37.235 €	54.248 €	46%
	Payments to public administration*	5.574.732 €	7.856.358 €	41%
	Dividends paid to shareholders	2.500.000 €	4.000.000 €	60%
TOTAL Value distributed		141.533.249 €	168.334.375 €	19%
Value withheld		24.113.445 €	17.206.588 €	-29%

* Only paid taxes

Double Materiality Tables - Evaluation Method

Scale	Just how serious a negative impact or how beneficial the positive impact is for people or the environment
0	None
1	Minimum
2	Low
3	Medium
4	High
5	Very High
Objective	The extent to which negative or positive impacts are widespread. For environmental impacts, the scope can be understood as the extent of environmental damage or a geographical perimeter. In the case of impacts on people, the scope can be understood as the number of people harmed
0	None
1	Limited
2	Perimeter
3	Medium
4	Diffuse
5	Global / Total
Irremediability	Whether and to what extent negative impacts can be repaired, i.e. to what extent the environment or the people affected by the negative impact are restored to their previous state.
0	Very easy to remediate
1	Fairly easy to remediate (in the short term)
2	Remediable with effort (time and cost)
3	Difficult to remedy (in the medium term)
4	Very difficult to remedy (in the long term)
5	Not remedial / irreversible
Probability	Probability of impact occurrence
0,5	Unlikely
0,75	Slightly Probable
0,85	Most Likely
1	Certainly
Probability	Probability of occurrence risks/opportunities
0,5	Unlikely
0,75	Slightly Probable
0,85	Most Likely
1	Certainly
Potential effect dimension	Size of the economic impact that can be generated by the described risks and opportunities
0	None
1	Minimum
2	Low
3	Medium
4	High
5	Very High

Supplementary tables to the section 'Double Materiality' Complete list of impacts (inside-out)

Material theme	Inside-Out Impacts	Score
Health and safety at work	Comply with safety standards, as failure to do so may lead to injuries and critical accidents	
Energy Efficiency	Seeking and maximising the use of energy from renewable sources	
Product quality and safety	Compliance with safety and environmental standards, as failure to do so may result in critical accidents and injuries to third parties	
Training and professional development of workers	Level of employee remuneration	
Relations with the local community	Creation of direct and indirect jobs	
Training and professional development of workers	Quality of the product offered to customers	



Material theme	Inside-Out Impacts	Score
Responsible Sourcing	Promotion of sustainable sourcing of the company restaurant (local producers, vegan choices)	
Product quality and safety	Increase in product quality, as poor quality products can reduce customer safety and/or satisfaction	
Quality of labour relations	Corporate climate	
Energy Efficiency	Efficiency of operations in relation to energy consumption	
Worker health and safety	Employee motivation	
Relationship with the local community	Supporting the development of local communities through initiatives to create shared value (cultural and sports)	
Diversity and equal opportunities	Gender pay equity	
Quality of employment	Support for employees' families	
Emissions management	GHG emissions generated by operations (Scope 1)	
Emissions management	GHG emissions from incoming and outgoing logistics flows for goods and people using means of transport (Scope 3)	
Management of the production process	Reduction of GHG emissions from production processes through the use of BAT (best available technologies)	
Diversity and equal opportunities	Professional growth of women	
Quality of employment	Training programmes and welfare plans can influence employee satisfaction and motivation	
Product quality and safety	Employee motivation	
Responsible sourcing	Promotion of procurement with the aim of product circularity	
Emissions management	GHG emissions due to own supply chain (Scope 3)	
Ethics and compliance	Transparency towards all stakeholders	
Production process management	Evolution of the product offered	
Biodiversity	Land consumption	
Diversity and equal opportunities	Inclusion of minorities (e.g. ethnicity, sexual orientation, religion, protected categories)	

Material theme	Inside-Out Impacts	Score
Responsible Sourcing	Selection and evaluation of raw materials (traditional and high-strength) based on ESG criteria	
Waste Management	Waste plastics	
Responsible Sourcing	Selection and evaluation of suppliers based on ESG criteria	
Waste Management	Scrap metal waste	
Relationship with the local community	Training of young people, recent graduates and knowledge sharing	
Ethics and compliance	Governance model and control bodies (e.g. structuring of ESG committee)	
Ethics and compliance	Promotion of an ethical value chain	
Water and waste	Utilisation of water resources for production activities	
Worker health and safety	Level of turnover	
Waste management	Promoting the use of fewer resources through circular economy practices contributes to reducing the company's environmental footprint	
Quality of labour relations	Involvement of employees in environmental improvement decisions	
Training and professional development of workers	Occurrence of accidents due to inadequate training	
Ethics and compliance	Need to be more selective even when choosing customers	
Biodiversity	Loss of terrestrial and marine biodiversity	
Emissions management	GHG emissions generated by power purchase (Scope 2)	
Ethics and compliance	Corruption, unethical behaviour, violation of workers' rights	
Water and wastewater	Water discharges to the external environment and soil pollution	
Waste Management	Health of employees if hazardous waste is not managed properly	
Waste Management	Disposal of waste not properly sorted	



Supplementary Tables to the Double Materiality Section - Complete List of Risks and Opportunities (outside-in)

Material Theme	Risks	Opportunities	Score
Energy Efficiency	Bureaucratic delays in commissioning new renewable energy plants		
Production Process Management		New technologies that improve the production process (e.g. energy efficiency, reduction of non-conformities)	
Product Quality and Product Safety		Existing customers continuously confirm their relationship with the supplier company in the presence of Product Quality and Product Safety	
Energy Efficiency	Energy (electricity and fuel) price volatility due to exogenous events impacting company costs		
Responsible Sourcing	Increased procurement burdens in the face of a more sustainable product value chain		
Emissions Management	Stricter regulatory requirements on carbon emissions from its production process (e.g. CBAM, carbon taxes, renewable energy regulations, etc.)		
Product Quality and Product Safety		New customers seek greater Product Quality and Product Safety from suppliers	
Emissions Management		Credit system grants favourable conditions to companies with a positive sustainability rating for emissions management	

Material Theme	Risks	Opportunities	Score
Emissions Management	Demands from regulators and the market to reduce the carbon footprint of the entire value chain, including logistics, may require ongoing financial investments		
Training and professional development of workers	Lack of qualified personnel with sector-specific knowledge		
Responsible Sourcing	Non-compliance of suppliers with regulations impacting on ESG issues (discriminatory activities, human rights, safety and environment) may cause non continuity of supply		
Responsible Sourcing	Use of raw materials from conflict lands or labour exploitation areas may cause reputational damage		
Energy Efficiency		Taking advantage of subsidies for the use or self-production of renewable energy	
Health and safety at work	Infectious diseases or pandemics may threaten the health of workers, affecting business continuity		
Responsible Sourcing	Non-compliance of suppliers with regulations impacting ESG issues (discriminatory activities, human rights, safety and environment) can cause reputational damage/ rating		

Material Theme	Risks	Opportunities	Score
Procurement Responsible		The credit system is increasingly shifting towards granting favourable conditions to companies that have a value chain with a positive sustainability rating	
Emissions Management		Presence of European and/or national subsidies to promote decarbonisation strategies	
Responsible Sourcing		Stability of supply continuity in the case of product circularity	
Emissions Management		Automotive customers select suppliers with lower emission levels	
Product Quality and Product Safety	Client companies increasingly look for products that are sustainable on an ESG level, excluding as possible suppliers companies that do not meet these standards		
Ethics and Compliance	Suppliers' non-compliance with regulations with an impact on ESG issues (Code of Ethics and compliance) may cause non continuity of supply		
Energy Efficiency		Automotive customers select suppliers with minimum energy consumption characteristics	
Water and waste water	Continuity and licence to operate may be revoked in the face of groundwater leakage or soil contamination		

Material Theme	Risks	Opportunities	Score
Quality of labour relations		Minimisation of turnover and increased retention due to the quality of the working relationship	
Training and professional development of workers		Professional development and innovative training make it possible to attract professionals who can contribute to the development of new business lines	
Training and professional development of workers	Low attractiveness as an employer in the absence of training and professional development paths		
Diversity and equal opportunities	Customers decide to exclude the company as a supplier due to low ESG ratings (gender equality and inclusiveness)		
Waste management		Existence of European and/or national subsidies to promote circular economy/waste reduction initiatives	
Product Quality and Product Safety	Unforeseen changes in technical and/or product safety regulations may increase the cost of achieving compliance		
Water and wastewater	More stringent environmental regulatory requirements may result in unforeseen additional costs to ensure compliance.		
Quality of labour relations	Workers seeking competitive salaries select other companies willing to offer them		



Material Theme	Risks	Opportunities	Score
Relations with the local community		Greater attractiveness to ethical and social stakeholders	
Training and professional development of workers		Cooperative partnerships with universities and academic communities can increase the potential pool of recruitment	
Waste management	More stringent environmental regulatory requirements (e.g. plastic taxes) may result in unforeseen additional costs to ensure compliance		
Biodiversity	Revocation of permits on production activities due to destruction/damage to biodiversity		
Responsible sourcing		Suppliers that pay attention to sustainability principles provide products/services with higher quality and tend to be long-term partners	
Water and waste water	Possible shortage of water from groundwater or in the area where the production plant is located		
Health and safety at work	High insurance rates (INAIL) in case of accidents at work		
Responsible Procurement		Business opportunities exist if the company can boast a supplier base with ESG-improving characteristics	

Material Theme	Risks	Opportunities	Score
Health and safety at work		Increased attractiveness as an employer, reduced human resources costs	
Relations with the local community		Increased business and relationship opportunities through synergies with stakeholders	
Biodiversity		Being recognised by one's own market or extended network as a promoter of biodiversity conservation activities	
Responsible Sourcing		Relative price stability in case of product circularity	
Diversity and equal opportunities	Reputational risks in case of discrimination		
Quality of employment	Employees looking for welfare plans select other companies willing to offer it		
Ethics and compliance	Reputational risks in case of breach of ethics and corporate morals		
Ethics and compliance	Need for integration of new skills and new professional profiles to manage ESG opportunities and threats, thus increasing management costs		
Health and safety at work		Reduction of personnel recruitment and onboarding/coaching/training costs due to reduced turnover	

Material Theme	Risks	Opportunities	Score
Waste management		Valorisation of waste as a raw material, second material or by-product	
Ethics and compliance	Non-transparency of suppliers on ESG issues may lead to non continuity of supply		
Relations with the local community	License to operate could be revoked due to improper management of the relationship with the local community		
Diversity and equal opportunities		Inclusion of minority groups can expand the population of workers eligible for required positions and available skills	
Ethics and compliance	Risk of corruption (inadequate knowledge of the principles of Legislative Decree 231/01 and related offences resulting in increased litigation costs)		
Employee training and professional development	High insurance rates (INAIL) with untrained staff		
Diversity and equal opportunities		Attractiveness as an inclusive employer	
Diversity and equal opportunities	Bureaucratic delays in commissioning new renewable energy plants	Higher attractiveness for employers, reduce human resources costs	

Complementary charts to the section "The people of OMR"

NOTICE 2-7 31.12.2023		
Women	Men	Total
Number of employees (number of people)		
54	449	503
Number of permanent employees (number of people)		
54	445	499
Number of temporary employees (number of people)		
0	4	4
Number of temporary hourly employees who are not guaranteed (number of people)		
0	0	0
Number of full-time employees (number of people)		
54	448	502
Number of part-time employees (number of people)		
0	1	1

Percentage of senior management recruited from the local community¹⁶	2022	2023
Number of local managers and executives	7	13
Percentage of local managers	100%	100%

Occupational Accidents	2022		2023	
	Employees	Temporary	Employees	Temporary
Deaths resulting from accidents	0	0	0	0
Accidents leading to an absence for more than 6 months	0	0	0	0
Recordable accidents	11	6	18	9
Total hours worked	818.390	252.423	904.792	323.452
Rate of deaths resulting from accidents (Incident rate)	0	0	0	0
Accident rate leading to an absence of more than 6 months (Incident rate)	0	0	0	0
Recordable accident rate (Incident rate)	2,69	4,75	3,98	5,56
Occupational diseases	2022		2023	
	Employees	Temporary	Employees	Temporary
Deaths resulting from occupational diseases	0	0	0	0
Occupational diseases recognised in the year	0	0	0	0

¹⁶ Employees classified as executives and managers are considered managers, and the local community is defined as the area within a 100 km radius of the OMR headquarters



Supplementary Table to the chapter “Waste Management”

GRI 306-5 Waste NOT Destined to be Disposed of by Recovery Operations, in tonnes (t)	2022	2023
	In an external site	In an external site
Hazardous Waste		
Preparation for re-use		
Recycling		
Other recovery operations	63,00	77,97
Total	63,00	77,97
Non Hazardous Waste		
Preparation for re-use		
Recycling	15.705,58	18.430,88
Other recovery operations	337,34	355,25
Total	16.042,92	18.786,13
GRI 306-4 Waste for disposal through recovery operations, in tonnes (t)	2022	2023
	In an external site	In an external site
Hazardous Waste		
Incineration (with energy recovery)		
Incineration (without energy recovery)		
Landfill		
Other Recovery Operations	731,45	780,90
Total	731,45	780,90
Non Hazardous Waste		
Incineration (with energy recovery)		
Incineration (without energy recovery)		
Landfill		
Other Recovery Operations	413,71	564,91
Total	413,71	564,91

GRI 306-3 Waste by composition, in tonnes (t)	2022			2023		
	Generated waste	Waste not destined to be disposed of	Waste to be disposed of	Generated waste	Waste not destined to be disposed of	Waste to be disposed of
Wastes from inorganic chemical processes	0,00	0,00	0,00	0,00	0,00	0,00
Wastes from the manufacture, formulation, supply and use of coatings (paints, varnishes and glazes), adhesives, sealants and printing inks (EWC 08)	128,16	1,98	126,18	197,50	3,69	193,81
Wastes from chemical surface treatment and coating of metals and other materials; non-ferrous hydrometallurgy (EWC 11)	344,34	0,00	344,34	319,25	0,00	319,25
Wastes from shaping and physical and mechanical surface treatment of metals and plastics (EWC 12)	16.104,37	15.722,96	381,41	18.897,69	18.441,15	456,54
· of which steel (EWC 12.01.99)	15.544,94	15.544,94	0,00	18.249,02	18.249,02	0,00
Waste packaging, absorbents, wiping cloths, filter materials and protective clothing (EWC 15)	334,23	329,97	4,26	410,64	405,72	4,92
Wastes not otherwise specified in the list (EWC 16)	297,33	8,36	288,97	358,48	10,84	347,64
Construction and demolition wastes (EWC 17)	41,92	41,92	0,00	2,45	1,74	0,71



GRI 306-3 Waste by composition, in tonnes (t)	2022			2023		
	Generated waste	Waste not destined to be disposed of	Waste to be disposed of	Generated waste	Waste not destined to be disposed of	Waste to be disposed of
Waste from waste-water treatment plants, off-site wastewater treatment plants and the preparation of water intended for industrial use (EWC 19)	0,20	0,00	0,20	22,94	0,00	22,94
Municipal waste (household and similar waste from commercial and industrial activities and institutions) including separately collected waste (EWC 20)	2,89	2,89	0,00	0,97	0,97	0,00
Total	17.251,08	16.105,92	1.145,16	20.209,92	18.864,11	1.345,81

Supplementary table the chapter “Water and Waste Water”

Water disposed as of waste*			2022	2023
Internal Designation	Official name	Description of origin	Quantity disposed of (ton)	
Cataphoresis water	Aqueous suspensions of paints and varnishes (other than those mentioned in EWC 08 01 19) - EWC 08.01.20	Waste water generated by osmosis-based filtration on the recirculation circuit and pH adjustment of cataphoresis water.	96,83	154,70
Exhausted degreasing bath	Waste water from osmosis filtration on the circulation and pH adjustment of cataphoresis water	Waste alkaline degreasing solution, with added surfactants, from the degreasing process.	325,37	288,59
Exhaust oil from processes	Degreasing wastes containing dangerous substances - EWC 11.01.13	Waste of mineral oil used in lubrication, hydraulic and hydraulic circuits of machine tools and industrial machines.	1,74	3,06
Used emulsions	Waste alkaline degreasing solution with added surfactants from the degreasing process	Emulsion from machine tools such as CNC lathes, machining centres, grinding machines, milling machines.	12,52	7,09
Washing water from equipment and machines	mineral-based machining oils, not containing halogens (except emulsions and solutions) - EWC 12.01.07	Waste water from washing equipment and machines in general and finished 'industrial' concrete floors.	316,2	369,32
Residue concentrator evaporator	Waste mineral oil used in lubrication, hydraulic and oleodynamic circuits of machine tools and industrial machines.	Concentrated residue from the sewage treatment plant's clarifying evaporator.	288,97	345,15
		Washing residue from evaporator-concentrator.		
Total			1041,63	1.167,91



Supplementary table for the "Responsible Sourcing" chapter

Renewable and non-renewable materials by weight (in tonnes)			2022	2023
Total non-renewable			22.729	37.019
Steel			19.200	32.400
Powders			382	507
Screws			554	581
Tooling			31	35
Lubricants			40	35
Treatments			110	115
Welding Wire			250	319
Gases (for lasers and welding robots)			1.829	12.524
Total Packaging			333	502
· of wood			0	0
· of paper and cardboard			0	0
· of plastic			333	502
Total renewable			395	517
Steel			0	0
Powders			0	0
Screws			0	0
Tooling			0	0
Lubricants			0	0
Treatments			0	0
Welding Wire			0	0
Gases (for lasers and welding robots)			0	0
Total Packaging			395	517
· of wood			226	324
· of paper and cardboard			169	193
· of plastic			0	0
Total recycled material			14.300	10.600
Steel			14.300	10.600
Powders			0	0
Screws			0	0

Tooling	0	0
Lubricants	0	0
Treatments	0	0
Welding Wire	0	0
Gases (for lasers and welding robots)	0	0
Total Packaging	0	0
• of wood	0	0
• of paper and cardboard	0	0
• of plastic	0	0

Supplementary table to the "Water and waste water" chapter

Waste Water Discharge	2022	2023
Water discharge¹⁷	20,93	14,44
Third-party water resources¹⁸	6,65	9,26

¹⁷ Volume discharged into CIS exclusively from first rainwater treatment plant (S1P, S2P, S3P)

¹⁸ Volume estimated with a 95% coefficient relative to the withdrawn amount, according to guidelines from the Brescia Ambit Office



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