

# CMC GROUP SUPPLIER CODE OF CONDUCT

## 1. PURPOSE AND SCOPE

This Supplier Code of Conduct (hereinafter also Code of Conduct) applies to all suppliers, contractors, and service providers of CMC S.p.A. and its subsidiaries worldwide (hereinafter, CMC Group, the Group or CMC). It outlines the Group's overall expectations regarding business conduct, environmental awareness, labor practices, health and safety, and ethical integrity across its value chain. CMC expects its partners to act in a consistent manner with responsible supply chain practices, continuous improvement, and the wellbeing of individuals and communities impacted by its operations.

CMC Group is committed to conducting its business in an ethical, responsible, and sustainable manner. This Supplier Code of Conduct sets out the expectations we have for all suppliers with respect to applicable laws and responsible conduct, environmental and social responsibility. It reflects the values expressed in CMC's Code of Ethics and Global Procurement Policy as well as other relevant internal governance instruments.

## 2. GENERAL PRINCIPLES

CMC's suppliers are expected to:

- Respect human rights and applicable labor standards.
- Operate in ways that reduce environmental impact and promote sustainability to the best of their capabilities.
- Conduct business with integrity, avoiding corruption and unethical behavior.
- Operate in a manner consistent with applicable laws and regulatory expectations.

## 3. HUMAN and LABOR RIGHTS

Suppliers should:

- Prohibit child labor, forced labor, and any form of modern slavery.
- Ensure safe, healthy and fair working conditions.
- Comply with minimum applicable wage laws and working time regulations.
- Promote diversity, equity, and inclusion in the workplace.
- Respect freedom of association and the right to collective bargaining.

## 4. HEALTH, SAFETY & THE ENVIRONMENT

Suppliers are encouraged to:

- Implement occupational health and safety management systems.
- Identify and mitigate environmental impacts, including emissions and waste.
- Promote energy efficiency, water conservation, and responsible resource use.
- Avoid harmful substances and manage hazardous materials responsibly.

## 5. ETHICAL BUSINESS PRACTICES

Suppliers are expected to:

- Avoid any form of corruption, bribery, extortion, or fraud.
- Refrain from offering gifts or advantages that may influence business decisions.

- Respect intellectual property and protect confidential information.
- Avoid conflicts of interest in business dealings.

## 6. DATA PROTECTION AND PRIVACY

Suppliers are expected to:

- Handle personal and business data responsibly, in accordance with applicable privacy laws (e.g., EU GDPR).
- Protect the confidentiality, integrity and availability of CMC's and third-party information.

## 7. QUALITY, TRACEABILITY AND CONTINUOUS IMPROVEMENT

Suppliers are expected to:

- Deliver products and services that meet agreed specifications and quality standards.
- Maintain traceability of materials and production processes where required.
- Engage in continuous improvement of processes and ESG performance.

## 8. COMPLIANCE AND MONITORING

CMC is committed to fostering open dialogue and collaboration with its suppliers regarding the expectations outlined in this Code:

- Periodic reviews or assessment initiatives may be proposed in partnership with the supplier, with the goal of identifying areas for improvement and supporting alignment with CMC's responsible sourcing approach.
- In case of persistent misalignment with these expectations, CMC may consider appropriate measures, including the possible re-evaluation of the business relationship.

## 9. REPORTING CONCERNS

Suppliers are encouraged to report any concerns regarding unethical or unlawful behavior via the CMC Whistleblowing Channel. Reports can be made confidentially and without fear of retaliation.

## 10. ACCEPTANCE AND ACKNOWLEDGMENT

By entering a business relationship with CMC Group, the supplier acknowledges this Code of Conduct and commits to aligning its practices, where applicable, with the expectations set forth in this Code.

### Supplier Acknowledgement

*This Code of Conduct is an integral part of CMC's overall sustainable procurement approach and complements existing contractual terms and policies. By signing the present Code of Conduct the supplier acknowledges this Code of Conduct and commits to aligning its practices accordingly.*

Company Name: \_\_\_\_\_

Authorized Representative: \_\_\_\_\_

Title/Position: \_\_\_\_\_

Date: \_\_\_\_\_

Signature: \_\_\_\_\_