

SUPPLIER AND SUSTAINABLE PROCUREMENT POLICY

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With its Sustainable Supplier and Procurement Policy, FOMA aims to provide its purchasing staff and all employees involved with guidelines for sourcing in line with ESG principles.

This policy is a reference tool for guiding purchasing decisions towards criteria of responsibility, transparency and sustainability, contributing to the creation of value throughout the supply chain.

To ensure the achievement and continuity of its corporate objectives, the Company is committed to promoting sustainability in the management of environmental, social and economic impacts throughout the entire supply chain.

In this context, it encourages collaboration with suppliers who operate in accordance with the four fundamental pillars:

| ETHICS | SOCIAL |
|-----------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------|
| Ensuring integrity, transparency, respect for human rights and compliance with regulations. | Protecting the health, well-being and safety of workers, promoting training and the development of local communities. |
| QUALITY | ENVIRONMENT |
| Ensure risk-based management systems, compliance with specific customer requirements and stability of production processes. | Reducing environmental impact, optimising the use of natural resources and promoting sustainable practices. |

These principles guide the selection, evaluation and collaboration with suppliers, with the aim of building a responsible and resilient supply chain.

1.1 REGULATORY REFERENCES AND INTERNATIONAL PRINCIPLES

The policy is inspired by the principles of the ILO Conventions and the UN Guiding Principles on Business and Human Rights. Suppliers must comply with these principles.

1.2 ETHICS

1.2.1 Corporate Integrity

- Report conflicts of interest (personal or family relationships with FOMA employees).
- Adopt transparent and fair business practices in communication.
- Adopt anti-corruption and anti-fraud practices.
- Protect the personal data of employees, customers and suppliers in accordance with current regulations (e.g. GDPR).
- Ensure a secure and confidential mechanism for reporting unethical behavior or violations (whistleblowing).
- Provide ESG data and information upon request to ensure transparency and compliance with international standards.

1.2.2 Human Rights

- Respect principles relating to the protection of human rights, diversity and inclusion.
- Comply with national and international guidelines on social responsibility.
- Ensure the protection of health and safety at work.
- Prohibit any form of forced child or coercive labor.
- Ensure decent working conditions, including fair working hours and remuneration in accordance with regulations.
- Guarantee freedom of association and the right to collective bargaining.
- Prevent discrimination based on gender, ethnicity, religion, sexual orientation or other personal characteristics.
- Promote the physical and mental well-being of workers by fostering an inclusive and safe environment.

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1.2.3 *Compliance with laws and regulations*

- Ensure compliance with applicable laws, regulations and customer requirements relating to production processes and products.
- Implement traceability and due diligence processes to identify and mitigate social, environmental and ethical risks throughout the supply chain.
- Ensure compliance with local and international anti-corruption and anti-money laundering regulations.
- Ensure compliance with international trade laws, including export restrictions and sanctions.
- Apply data protection and privacy procedures (e.g., GDPR).
- Maintain accurate and verifiable records to demonstrate compliance.
- Collaborate with FOMA in the event of audits or compliance checks.

1.2.4 *Intellectual property and confidentiality*

- Treat all company data and information received as confidential and use it exclusively for the provision of the service and/or product.
- Restrict access to information to only those personnel who strictly need it.
- Ensure measures are in place to prevent unauthorized disclosure, loss or compromise of data throughout the entire supply cycle.

In addition to the above requirements, the Company values suppliers who adopt certified management systems as an expression of their commitment to the protection of company data and information. The adoption of an Information Security Management System compliant with ISO 27001 and/or TISAX certification are considered distinctive elements.

1.2.5 *Due Diligence and ESG Risk Management*

- The Company implements due diligence processes to identify social, environmental and ethical risks in the supply chain.
- Suppliers must cooperate by providing information and documentation.

1.3 SOCIAL

1.3.1 *Employee Health and Safety*

- Promote safe and healthy work environments.
- Prevent and reduce risks.
- Encourage cooperation and continuous training.

In addition to the above requirements, the Company values suppliers who adopt certified management systems as an expression of their commitment to health and safety at work. The adoption of an Occupational Health and Safety Management System compliant with ISO 45001 is considered a distinctive feature.

1.3.2 *Responsible conduct with stakeholders*

- Promoting awareness and compliance with our Code of Ethics throughout the supply chain to prevent corruption, fraud and illegal practices.
- Promote the ethical and sustainable development of local communities through responsible sourcing practices.
- Ensure emergency and business continuity plans are in place to reduce the impact of critical events on supply.

1.4 QUALITY

1.4.1 *Risk-based quality system*

- Adopt a quality management approach focused on prevention and risk assessment throughout the supply chain.
- Ensure the traceability of processes and materials to reduce the likelihood of non-compliance.
- Promote continuous improvement through audits, performance indicators and corrective action plans.

1.4.2 *CSR (Customer Specific Requirements)*

- Ensure compliance with specific customer requirements, including industry standards and international regulations.

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- Actively collaborate in the management of critical processes and the preparation of technical documentation (e.g. FMEA, PPAP, APQP) where applicable.
- Ensure transparency and timeliness in communicating changes to processes, materials or subcontracting.

1.4.3 Machinery and equipment

- Maintain machinery, equipment and plants in optimal condition to ensure process stability and product quality.
- Apply recognized control methodologies for special processes (casting, welding, heat treatment, coating, etc.).
- Implement preventive maintenance plans and periodic validation of process conditions.

1.4.4 Innovation and continuous improvement

- Promote innovative solutions and continuous improvement practices to reduce risks and increase efficiency.

In addition to the above requirements, the Company values suppliers who adopt certified management systems as an expression of their commitment to quality and sustainability. For strategic suppliers, it is a mandatory requirement to have a Quality Management System that complies with and is certified to at least ISO 9001, with preference given to IATF 16949 certification.

1.5 ENVIRONMENT

1.5.1 Environmental Protection

- Ensuring the protection and preservation of the environment.
- Reducing environmental impact and improving social and economic performance.
- Define sustainability objectives and optimize the consumption of natural resources.
- Ensure compliance with international regulations and standards on responsible sourcing of minerals (e.g. Dodd-Frank Act, EU Regulation 2017/821) and complete the CMRT and EMRT templates.
- Ensure compliance with regulations on the management of chemicals and hazardous materials, including REACH and GADSL, ensuring traceability and correct declaration throughout the supply chain.
- Adopt waste management practices and promote the reuse and recycling of materials in accordance with the principles of the circular economy.

In addition to the above requirements, the Company values suppliers who adopt certified management systems as an expression of their commitment to environmental protection and energy efficiency. The adoption of an Environmental Management System compliant with ISO 14001 and/or an Energy Management System compliant with ISO 50001 are considered distinctive elements.

FOMA reserves the right to conduct audits of suppliers to verify compliance with the requirements of this policy. Assessment questionnaires and periodic checks are provided to monitor ESG performance. Suppliers must cooperate by providing documentation and access to the requested information.

In the event of non-compliance, the supplier must implement corrective actions within the time frame defined by FOMA. Failure to comply or improve may result in the suspension or termination of the business relationship.

Managers must disseminate the above commitments and guidelines to achieve the company's objectives and continuously improve the effectiveness of its Management Systems.

REVISION HISTORY

| REVISION | DATE | DESCRIPTION |
|----------|------------|-------------|
| 0 | 09/12/2025 | New issue |