Sustainability Report 2022

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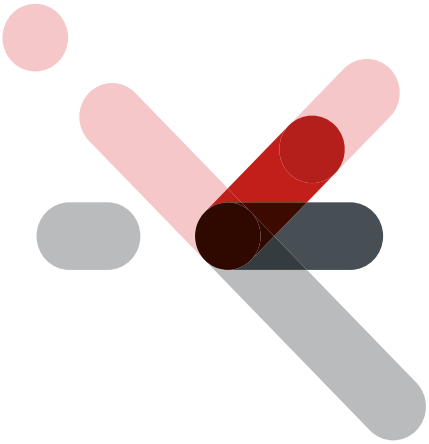
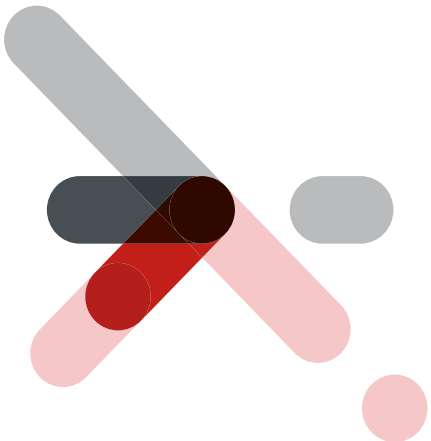


We are aware that there is still much to be done, and we will continue to work hard ***to improve our sustainability performance*** *and contribute to* ***the fight against climate change.***



Letter to our stakeholders

Dear **Stakeholders**,

Being this our second **Sustainability Report** for 2022, which is available on our website **www.omrspa.com**, we would like to update you about the company's activities during the reporting year and its impact on the relevant materiality areas.

In particular, I would like to emphasise that the significant growth combined with the previous challenges of **maintaining our specialised human resources** as well as **accelerating the ability of attracting new ones.** These efforts take place in a climate where competitiveness is high in the industry in which we operate and within our local area.
To that end, OMR has and will continue to operate in line with its own sustainability strategy by offering both a working environment that works to improve its environmental performance, as well as determination to **preserve the human capital** that has contributed to our success up to date.
However, we also aim to offer new employees an organisation where they can **enhance their skills** combined with an opportunity for **an ongoing professional development**.

We are well aware, as a company committed to **sustainability**, of the importance of adapting to regulatory changes, and we are ready to take additional measures to help realise the **targets set by the European Commission**.

In our previous work and with regard to the strategic choices we have made, we feel that we are already in a position to take advantage of the opportunities that will be generated in connection with new regulations (i.e. CSRD and the possible adoption of 'Fit for 55') and are currently working **to implement the necessary measures to meet the required sustainability standards.**
We believe that our ongoing commitment in sustainability is positioning us positively for ongoing regulatory changes, and we are convinced that this will allow us to continue to offer our customers high quality and sustainable products and services.
Our product portfolio is already adapted to the demands of large automotive groups regarding the conversion to **electrical or hydrogen engines**, and we are also working in partnership with them on developing further **solutions to meet requirements for technology, quality and minimisation of environmental and social impacts.**

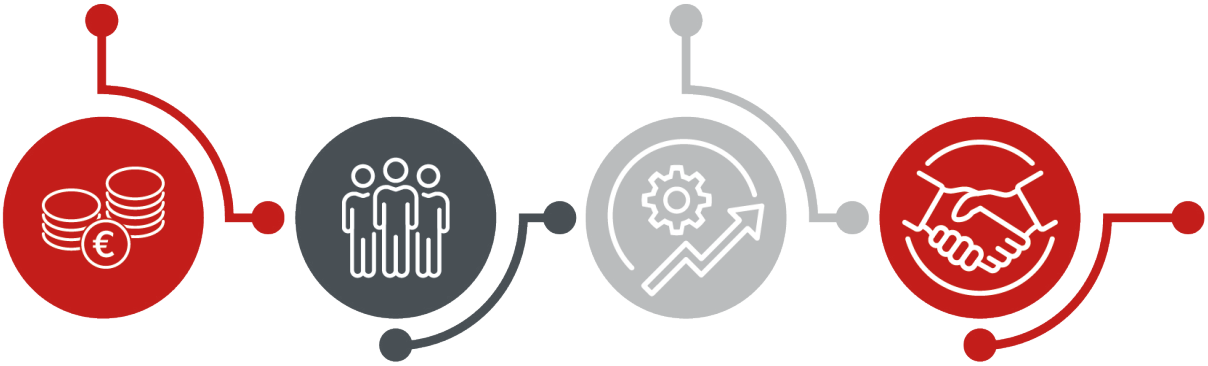
In 2022, we achieved a number of goals which we had set ourselves in the previous Sustainability Report. Firstly, we completed the first **Stakeholder Engagement**, a tool that allowed us to initiate a direct communication channel with our stakeholders and to refine our materiality matrix accordingly. We are continuing to invest in keeping our production process up-to-date with the latest technology in order to **meet our customers' needs.** Our choices are geared towards solutions that maximise consumption efficiency in line with our goals to reduce our carbon footprint. During the year, the installation of the **fourth photovoltaic system** with an additional capacity of **2371.77 kWp** was completed.

We are committed towards becoming an increasingly sustainable company and this is reflected in our Sustainability Report 2022. However, we are aware that there is still much to be done and we will continue to work hard to improve our sustainability performance and contribute to the fight against climate change.

Thank you for your continued support and we remain available for any information or clarifications.

Yours sincerely,
Ruggero Ceriali

Highlights



165 mln€
Turnover

15
Markets supplied

20.600.000
produced parts

584
Employees

Goals

	GOALS SET	2021	2022	2023	2024	2025	SDG
1	**Stakeholder engagement** in 2022 and expansion in 2023	✓	✓	✓			
2	Obtain **ISO 45001 certification** by 2025	✓	✓			✓	
3	20% **female component** by 2024*				✓		
4	1000 hours of **general and specific training** by 2024**				✓		
5	50% of energy needs covered through **photovoltaics** by 2024				✓		
6	Publishing **Supplier Code of Ethics** by 2023	✓	✓	✓			

*On total workers, employees and contractors.
**Do not include hours of health and safety training

Achievements in 2022 against targets set in 2021

- First Stakeholder Engagement and updating of OMR's materiality matrix
- 37% of the energy needs covered by photovoltaics
- 11% female component among employees reached

Additional results

- Partnership with the Arvedi Group for circular steel management fully effective throughout 2022
- 80% of prototypes for hydrogen vehicles converted into products
- Over 7 million euro investment in new machineries
- Over 250,000 euro allocated to social initiatives
- 100% of energy purchased from renewable sources and consequently zero indirect emissions for energy consumption - Scope 2 - Market Based
- 4,037 hours of health and safety training
- Drafting and dissemination of Integrated Environmental, Sustainability and Occupational Health and Safety Policy

Our next steps into our future

- Expanding interlocutors Stakeholder engagement 2023
- Achieving ISO 45001 certification by 2025
- 20% of female staff members by 2024
- 1.000 general and specific training hours by 2024
- 50% of power generation needs covered through photovoltaics by 2024
- Emissions calculation including Scope 3 and a decarbonisation plan
- Drafting Supplier Code of Ethics by 2023
- Registration of OMRs in the white list of the relevant territorial authorities for the 2024 financial year
- Procurement policy review in order to purchase and or use certified or recycled packaging

Who we are

OMR S.p.a. was established back in 1972 in its present premises in Remedello, in the Province of Brescia, as a metal carpentry company specialising in the production of pressed and assembled steel components for local industries.
At that time, the metalworking industry market in Brescia and Lombardy was in full boom, and the presence of large companies offered strong stimuli to a small businesses that wanted to grow.

Back then, the encounter with a multinational industrial vehicle company prompted us to make **decisive choices** on the commercial front and in steel components for the European automotive industry, going through a progressive technical and technological upgrade. Thanks to this, **we were among the first Italian companies to import laser cutting technology and among only a few to have a cataphoresis and powder painting plant within its production cycle.**

The continuous expansion of our pressing, bending, welding, machining and tumbling departments has in recent years led us to become one of the few models in the market for **complete verticalisation of the production cycle.** From the sheet metal coil, we are able to perform all the necessary processes to give the customer a finished product that is **delivered daily throughout Europe**, thanks to our integrated logistics that, relying on a bar coding and radio frequency system, not only ensures the traceability of the production cycle, but also accelerates pick-up and shipping operations.

Today OMR is an approved supplier to leading European industries in the production of industrial vehicles, commercial vehicles, construction machinery, agricultural machinery, and industrial handling equipment. In particular, over the past year we have added a new market segment for off-road and special vehicles.

We believe that our continuous **focus on quality and technology**, combined with our many years of experience, has enabled us to establish ourselves as **a benchmark in the industry** and to guarantee our customers high-quality, reliable products.

INDUSTRIAL AND COMMERCIAL VEHICLES SECTOR (80% of activities)

- Iveco Group
- Daimler Trucks
- Volvo Trucks

OFF-ROAD AND SPECIAL VEHICLES SECTOR

- INEOS
- Grenadier

AGRICULTURAL SECTOR

- CNH Industrial
- New Holland

CONSTRUCTION EQUIPMENT SECTOR

- CNH Industrial
- Caterpillar
- KOMATSU

We produce over **3000 components** for the automotive industry, and offer specialised solutions for electric vehicles every month, dividing our production between steel components from chassis, cabs, small cabs, seat support frames, engine support frames, anti-intrusion bars, tank support strips, hoods, handling arms and dedicated steel structures to house batteries.

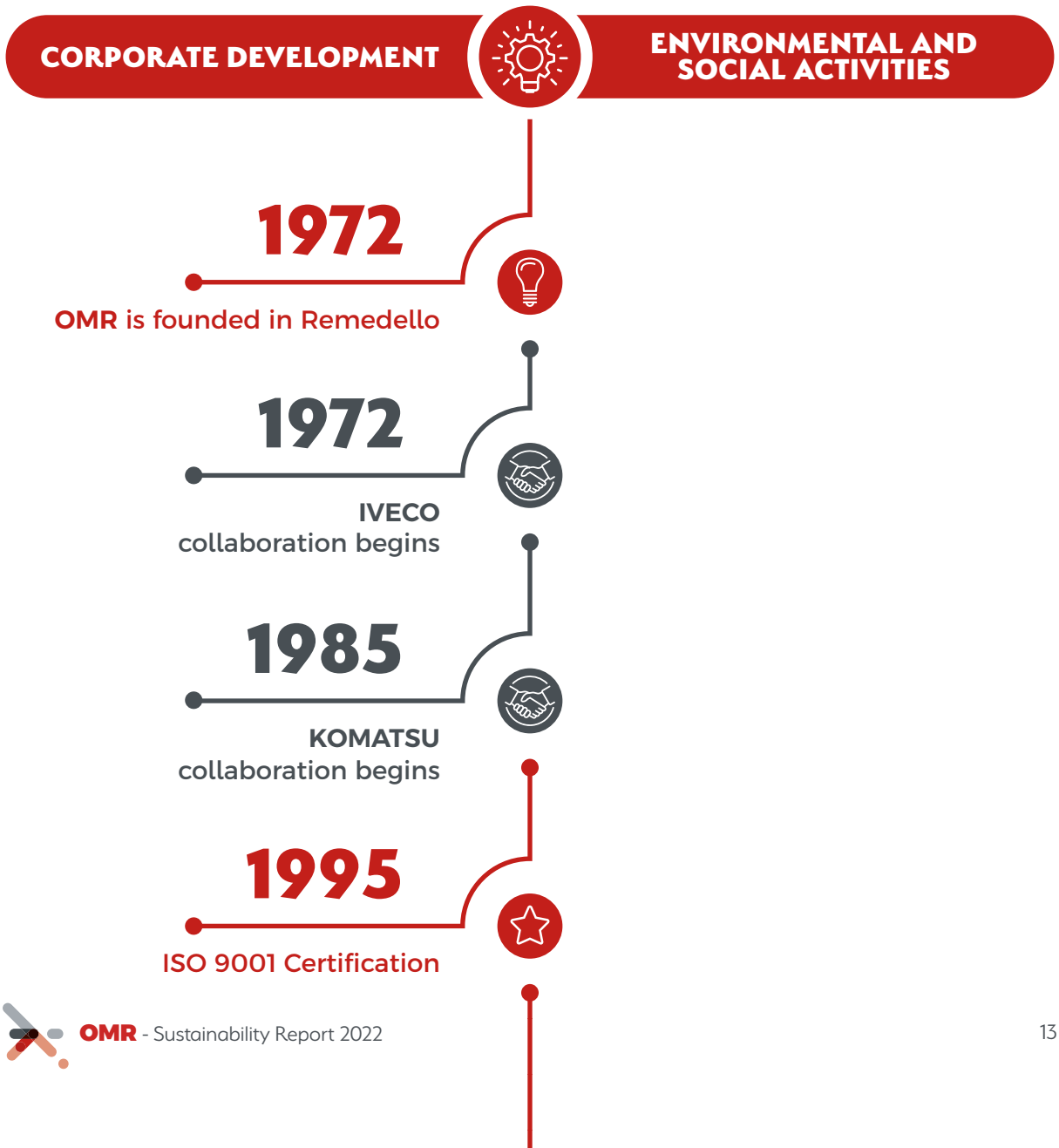
We are continuously **collaborating** with our customers' design platforms in order **to develop new modifications or products** that offer improved performance and cost.

We are constantly **investing in the growth of our engineering, prototyping and testing departments** to ensure that our customers receive the appropriate trials,

simulations and samples to help develop new ideas and improve the quality of the product.

Our know-how, which we have proudly developed throughout our history, allows us to be competitive in an increasingly demanding market, which requires not only the capacity to produce, but also increasingly **innovative solutions** and quality. In a global automotive context, the design and production of increasingly efficient, high-performance and cost-effective components are decisive in determining the success of a car, a commercial vehicle or an agricultural machine.

Our mission is very clear: **to accompany the customer in its technical, technological as well as its market evolution, providing all our resources to contribute to the research and development of excellent products.**
Thanks to this approach, we have managed to grow over the years and now serve over 20 customers across 15 different countries.



2002

INSTALLING FIVE PRESSES
from 600ton to 1000ton

2007

Production capacity of the first coating plant doubled (maximum dimensions of the gantry: 2500x1200xh1600)

2010

First 1617 kWp photovoltaic system installed

2012

Second 844,59 kWp photovoltaic system installed

2012

CATERPILLAR
collaboration begins

2013

INSTALLATION OF TWO
2400-ton PRINTING LINES (AIDA)

2014

AUTOMATED
ROBOTIZED ISLAND
INSTALLATION for
SUSPENSION
ASSEMBLY (KUKA)

2014

ISO 14001 Certification

2015

DAIMLER
collaboration begins

2017

Organisation Model
Legislative Decree
231/2001 adopted

2018

AUTOMATED WAREHOUSE INSTALLATION for FLAT METAL

(maximum storage 9000ton)

2018

SECOND PAINTING SYSTEM INSTALLATION (max. dimensions: 5000x1400xh1800)

2019

VOLVO
collaboration begins

2020

NIKOLA
collaboration begins

2021

SIAP CARRARO
collaboration begins

2021

First **Sustainability Report** drafted

2021

ART BONUS-FONDAZIONE BRESCIA MUSEI-MUSEI CIVICI

2021

DONATION PROJECT: FOOD FOR ALL

2021

ONE OCEAN FOUNDATION DONATION

2021

Third 2338,11 kWp photovoltaic system installed

2022

Fourth 2371,77 kWp, photovoltaic system installed

2022

CONTINUED DONATIONS to local cultural and environmental conservation organisations amounting 0.15% of Turnover

2022

Expanding our industrial surface area to over 240,000 sqm

2022

Sustainability Report in compliance with updated GRI Standards 2021

OMR in numbers	2021	2022
Turnover mln€	134	165
Net worth mln€	139	150
Profit for the year mln€	11.2	13.2
No. of employees	576	581
No. of pieces produced	20.600.000	20.521.356
Markets served (n)	15	15
Total Industrial Area (sqm)	188.712	240.820

BOX: Associations we are involved in

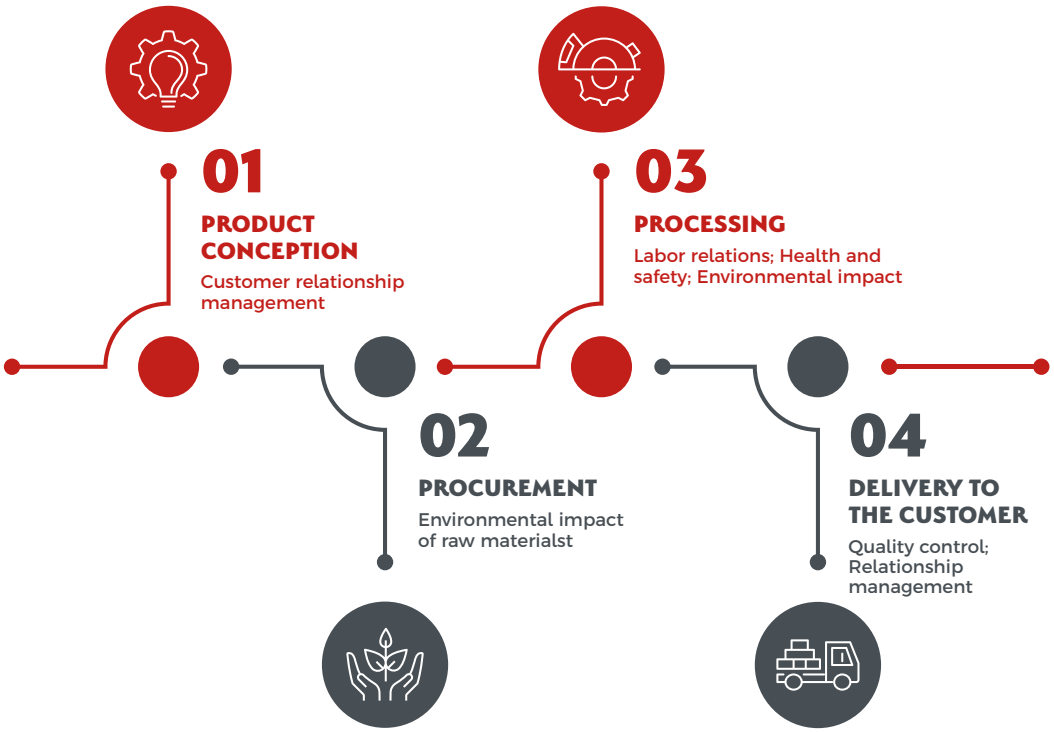
We believe that participation and confrontation are important to achieve our goals.
That is why we actively participate in territorial and trade associations.

Confindustria Brescia is the local organisation for the Province of Brescia of Confindustria, the main organisation representing 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



There are four separate stages in our value chain:

01. Product concept

We work in close contact with the customer through our engineering departments in product development and design. We define the characteristics of resistance and use that best suit the customer's needs, understanding their requirements and turning them fully into operational lines to be implemented. During this phase, we offer operational contributions to optimise the product. Recently, we have been involved in defining solutions to save weight and the use of self-supporting materials. We were motivated by the rising steel price and the need to reduce fuel consumption and consequently reduce impact of our products throughout their life cycle.

The design of the product involves the following activities:

- We receive the customer's CAD drawing of the product and its technical specifications;
- We collaborate in co-design process, sending the customer technical revisions of the product specifications and suggesting possible changes;
- Once we obtain the customer's approval on the final design, we move to the manufacturing phase.

02. Procurement

During 2022, we expanded our range of suppliers to more than 690. The local component continues to be significant, at around 30%, but decreased compared to the previous year (40%). We purchased 37,424 tonnes of materials, a drop of 34% compared to the previous year due to a stock containment decision. The main materials used are steel, paint, packaging, screws and other components. Steel continues to be our predominant raw material accounting for 90% of the total materials purchased. Special attention has always been paid to the sourcing of this metal, and thanks to a circularity agreement with a partner supplier, which started in 2021 and reached full operation in 2022, we reduce the environmental impact related to this material by increasing its circularity.

As for packaging and ancillary materials, we adhere to the technical and packaging specifications defined by customers, but we are committed to initiating dialogue with these customers in order to find solutions that will decrease the use of non-recycled plastic or non-certified cardboard. In addition, in 2023, our purchasing department will be evaluating alternatives of FSC-certified materials (paper and cardboard) and PSV recycled plastics content (film and bubble wrap fillers) for all packaging not subject to customer specifications.

03. General and Support Services

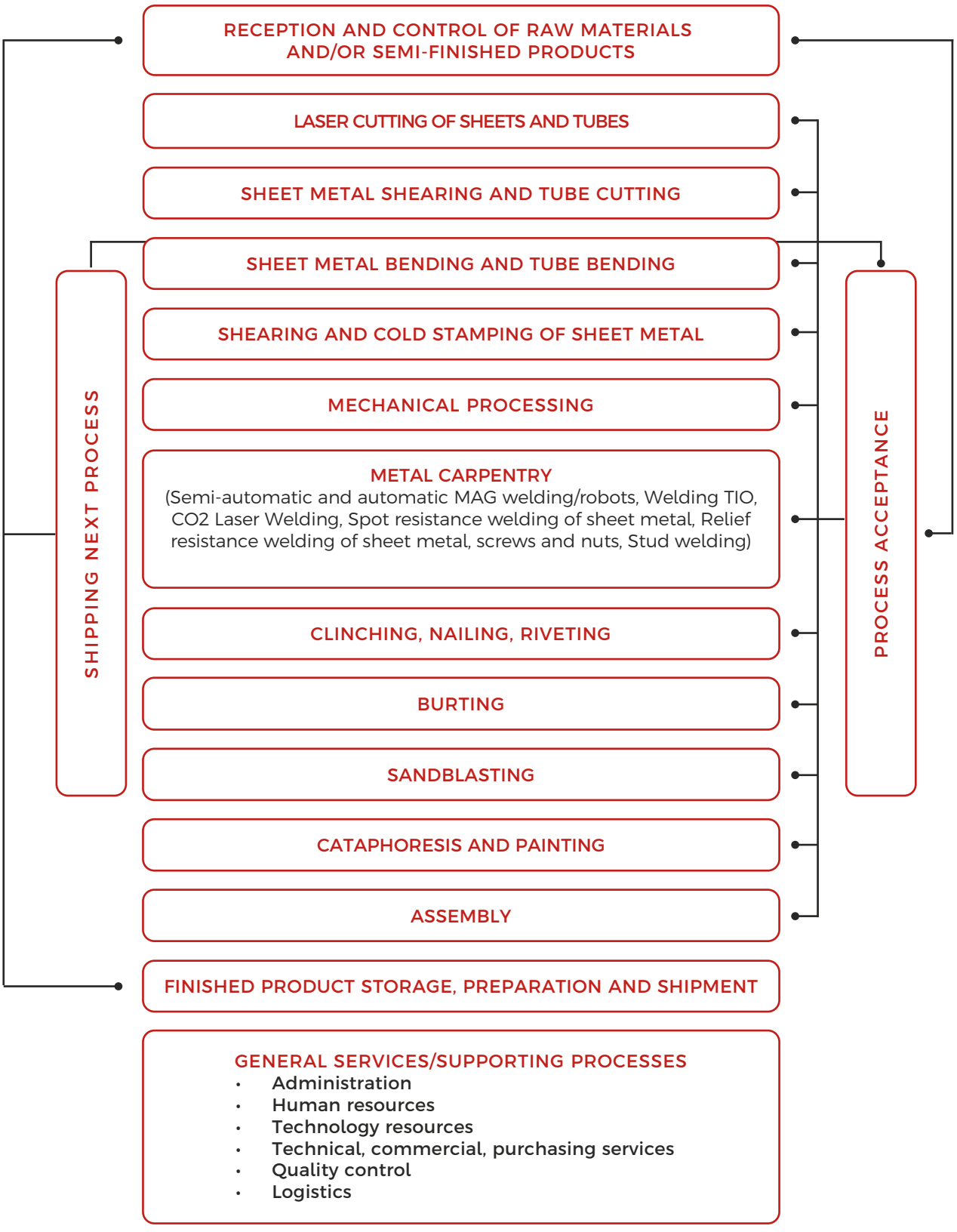
Our production process is highly integrated and involves 11 different processes as illustrated in the chart shown in the next box, structured according to the principles of the certifications we hold and the best practices required by our customers. In addition to these steps, inbound and outbound logistics and general and support services are crucial to ensure an efficient production cycle and quality level control that focuses on excellence.

In all these phases we involve our nearly 600 employees whom we take care of by introducing best practices to ensure a healthy and safe working environment.

We also generate our main environmental impacts in the production phase, mainly related to CO2 emissions both directly and indirectly through our energy consumption.

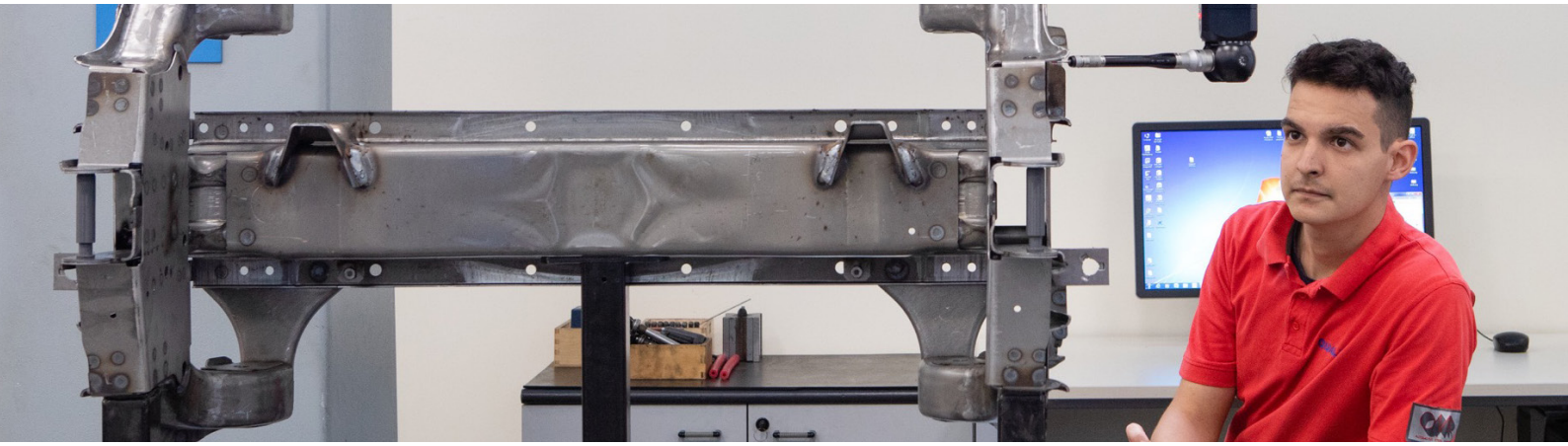
04. Customer Service Delivery

Quality controls are necessary to ensure that we offer our best service. As far as the purchase of services is concerned, the logistics and transport of products is handled - in about 90% of cases - directly by the client. Of the remaining cases, we have contracts with logistic companies for the transportation of purchased material and or supplies.


RECEPTION AND CONTROL OF RAW MATERIALS AND/OR SEMI-FINISHED PRODUCTS
LASER CUTTING OF SHEETS AND TUBES
SHEET METAL SHEARING AND TUBE CUTTING
SHEET METAL BENDING AND TUBE BENDING
SHEARING AND COLD STAMPING OF SHEET METAL
MECHANICAL PROCESSING
METAL CARPENTRY
(Semi-automatic and automatic MAG welding/robots, Welding TIO, CO2 Laser Welding, Spot resistance welding of sheet metal, Relief resistance welding of sheet metal, screws and nuts, Stud welding)
CLINCHING, NAILING, RIVETING
BURTING
SANDBLASTING
CATAPHORESIS AND PAINTING
ASSEMBLY
FINISHED PRODUCT STORAGE, PREPARATION AND SHIPMENT
GENERAL SERVICES/SUPPORTING PROCESSES
• Administration
• Human resources
• Technology resources
• Technical, commercial, purchasing services
• Quality control
• Logistics
SHIPPING NEXT PROCESS
PROCESS ACCEPTANCE

OMR's commitment

As OMR, we believe that sustainability is a key issue that affects our future and that of future generations. For this reason, we are committed to integrating sustainability into all our activities, decisions and strategies. Sustainability represents an opportunity to improve our efficiency, reduce our environmental and social impacts, and create value for all our stakeholders. We are committed to working with our partners, suppliers and customers to ensure that sustainability as a shared goal and to find innovative solutions to meet sustainability challenges.



Sustainability for OMR

With this second Sustainability Report, we wanted to review our progress and challenges in integrating ESG elements into our business strategy. While we are proud to have taken significant steps in becoming more sustainable, we are also aware that there is still a great deal to improve.

In this report, we have highlighted the results of our actions in the field of sustainability and outlined several concrete goals that we are committed to achieve in the following years.

We will continue to involve our stakeholders in our sustainability journey and work together to find innovative solutions to sustainability challenges. In addition, we will continue to monitor and update our materiality analysis to ensure that we are addressing the issues that are most important to our stakeholders and to the company as a whole.

Our *mission*

We aim in becoming a leading player in the sustainable transformation of the heavy-duty mobility component sector, offering our customers a reliable, sustainable partner capable of suggesting, through our technical expertise, the development of cutting-edge solutions to meet the needs of safe and increasingly environmentally friendly mobility.

We work closely with our customers to design the most appropriate innovative technical solutions for their products and, through a vertical integration approach, we manage the entire development process, from industrialisation to final component manufacture, ensuring timely delivery and high quality.

Our Values

Innovation, Research & Development

Vogliamo essere dei partner affidabili per i nostri clienti, capaci di aiutarli a costruire prodotti innovativi, di elevata qualità ed in grado di rispettare i migliori standard di sicurezza con il minor impatto ambientale.

Lavoriamo per cercare le migliori soluzioni possibili che coniughino qualità e sostenibilità del processo produttivo e continuiamo a investire in macchinari e strumenti all'avanguardia per raggiungere questo obiettivo.

Care for people

People are important to us. We look after those who work with us directly and those who live in the area and who indirectly contribute to our development. It is our aim to ensure a quality working environment for our employees and to be close to our region to grow together.

Quality, safety and environment

Health and safety is an essential commitment for all the people who work for us or deal with us. We are committed to ensure that workers behave safely and correctly when carrying out their work and that we provide the most suitable conditions for this to happen.

We believe that guaranteeing the best environmental performance is a fundamental and essential element for the performance of our activities and the achievement of our corporate objectives. Our guiding principles are the efficient use of resources and raw materials, limiting environmental impacts and, using the best available technologies and more sustainable environmental practices, ensuring a continuous improvement.

Partnering with our Clients

It is our mission 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.

Materiality Analysis

Well aware of the strategic importance of the **Materiality Matrix**, during the new **2022 Sustainability Report** we continued the work carried out during 2021 with the aim of furthering the understanding of the most relevant issues for OMR and its stakeholders, by maintaining a strong alignment between their expectations and business choices.

OMR's internal and external context is constantly evolving: the review of the matrix, therefore, represented a fundamental opportunity to orient OMR's **sustainability strategy** and to adequately consider its economic, environmental, and social impacts. The process of revising the above matrix was promoted and conducted by OMR's CEO with the support of top management and under the supervision of an external consulting firm.

This process involved:

· **An initial phase of analysis of the context of reference**, aimed at researching new, best market practices and the main sustainability trends in this sector.
In particular, the new **European CSRD** (Corporate Sustainability Reporting Directive) was examined, which encourages companies to adopt a dynamic approach in assessing materiality (Dynamic Materiality), i.e. to consider the evolution of the priorities and expectations of the stakeholders and the contexts in which the company operates over time.
This approach requires a **regular review** of the materiality matrix and its updating based on changes in the company and stakeholder context. This enables the company to ensure that its sustainability strategy is aligned with the needs and expectations of its stakeholders and the current and future market situation.
As a result of this analysis, a decision was made for this year to confirm the **12 materiality areas** identified the previous year. This choice was motivated by the fact that these topics are still considered valid and relevant, as well as aligned with the activities of our main competitors and international standards and initiatives.

· **An internal review**, in which department managers were actively involved in reviewing the importance attributed to each Materiality Area. The activity was carried out through a workshop aimed at **prioritising** and positioning the materiality areas on the new matrix. In particular, each participant was asked to give each of the 12 materiality areas a **quantitative score** on a scale of increasing importance from 1 to 5. In addition to the workshop, a thorough review of internal documentation updated to 2022 was carried out to ensure its consistency with OMR's new Materiality Matrix.

· **Direct involvement with external stakeholders**, through the S**takeholder Engagement** activity. For this year, in fact, in line with what we had set ourselves in the objectives of the 2021 Sustainability Report, we decided to further engage and pay more attention to the expectations and actual needs of our stakeholders. The Stakeholder Engagement activity made it possible to receive direct feedback from OMR's main stakeholders. This activity is discussed in more detail in the Stakeholder Engagement section.

· **Approval and Publication Stages**. OMR's top management reviewed, approved and shared the materiality matrix, which was subsequently published in this Sustainability Report, subject to the approval of the Company's CEO. The matrix will be subject to **continuous updates** in order to take into account developments in the industry, international trends and stakeholder perspectives.

Stakeholder Engagement

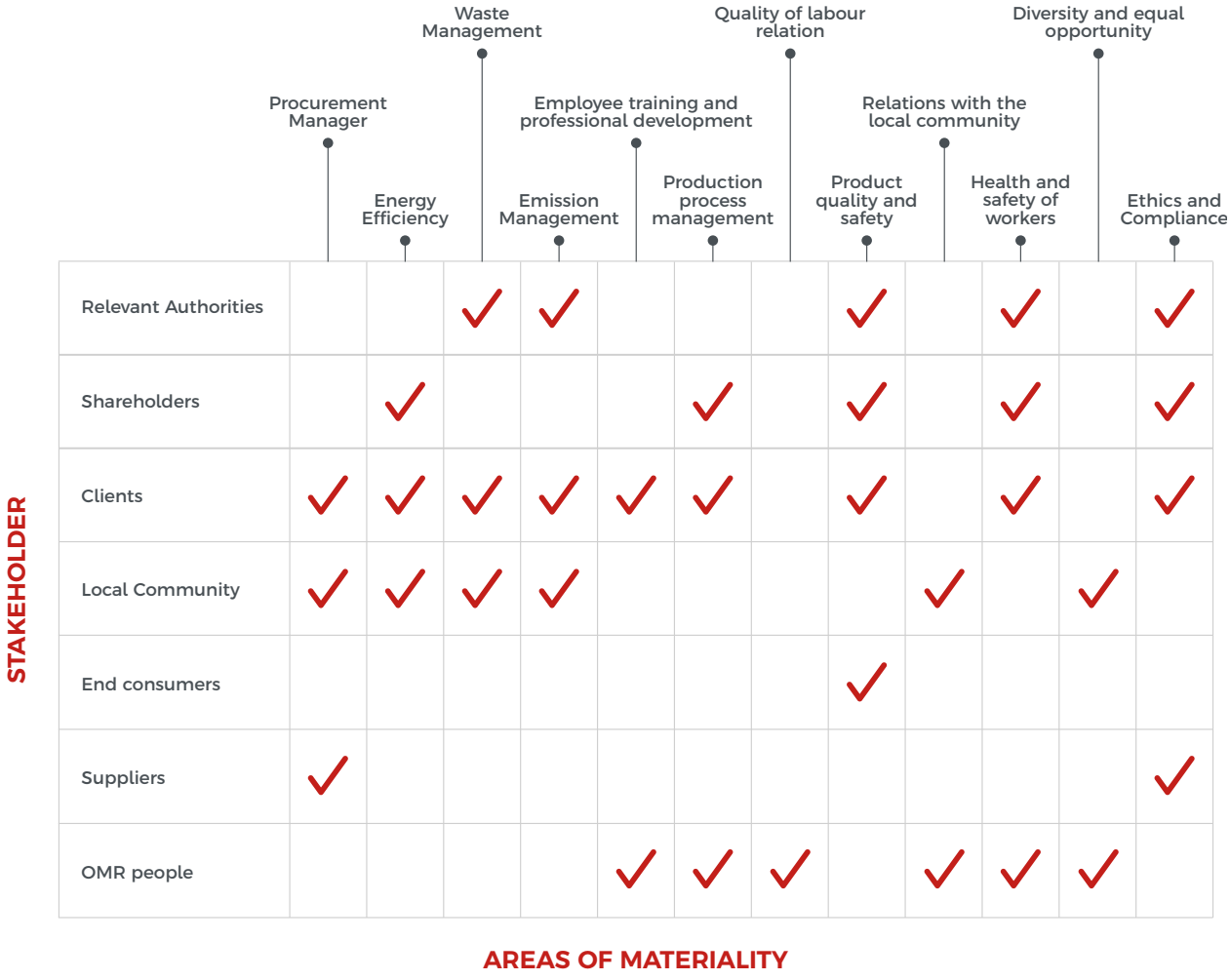
The Stakeholder's Engagement activity is a process that involves the active management and participation of an organisation's stakeholders in order to

understand and manage their expectations, needs and interests. The purpose of this activity is to create a constructive and transparent dialogue between the organisation and its stakeholders in order to develop and maintain long-term relationships based on trust and mutual understanding.

Stakeholder Engagement can help prevent conflicts, improve the organisation's reputation, identify risks and opportunities, and guide the organisation towards a more sustainable future. Furthermore, engaging stakeholders can lead to a greater sense of ownership and responsibility towards the organisation by those involved in the process.

The table below presents a mapping of OMR stakeholders and the areas of materiality that affect their expectations and decisions.

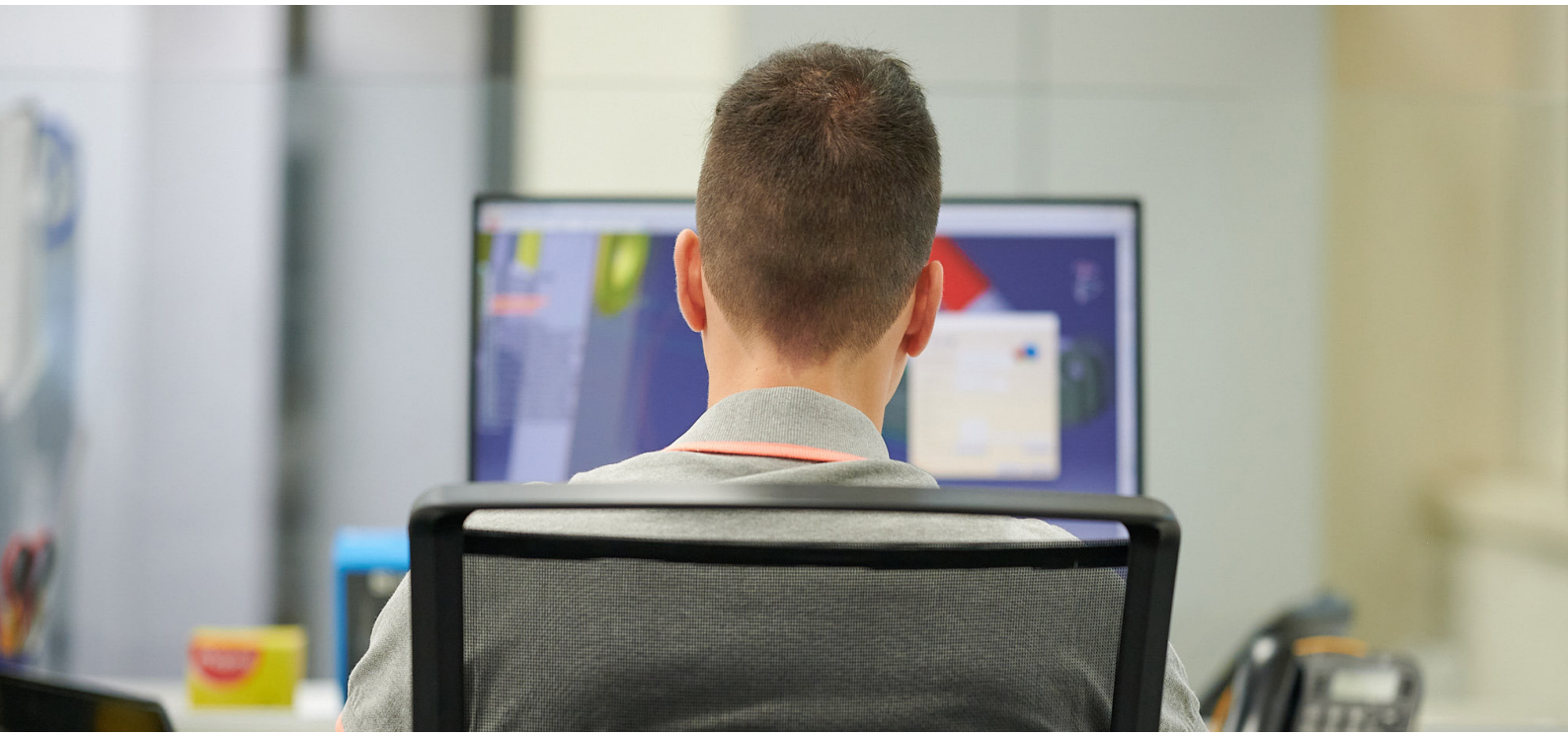
During 2022, our focus continued to be on **engaging our key stakeholders** through a dedicated online questionnaire. In particular, we actively involved our customers, OMR staff, the local community and our suppliers.



We shared the **questionnaire** with the Sustainability Area contacts of the main customer and supplier companies, with representatives of the local community in the area and, and in the case of OMR personnel, with the whole company staff.
Through this activity, we were able to obtain **quantitative feedback**, through which stakeholders rated the importance of the different materiality areas based on their needs and expectations, using a scale of increasing importance from 1 to 5. The average of stakeholder responses was used to **update our materiality matrix**, thus ensuring greater accuracy than in the previous year, when internal estimates were used.

In addition, the questionnaire allowed our stakeholders to assess our ability to successfully manage material issues based on their information. This allowed us to understand their views on the company's performance and adjust our sustainability strategy accordingly.

Engaging stakeholders has been crucial in ensuring that their needs are taken into account in our sustainability strategy.

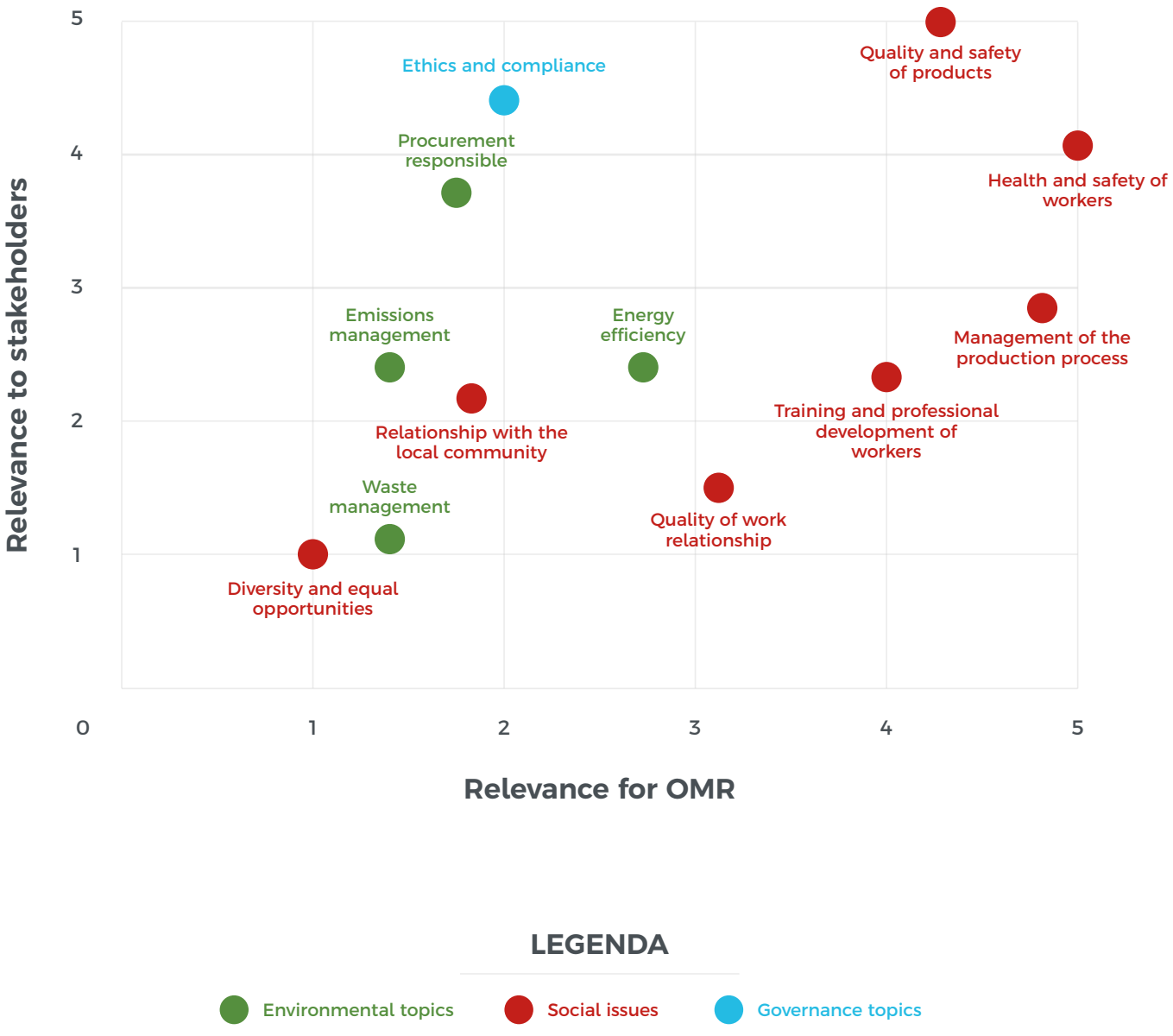


Materiality Matrix 2022

The materiality matrix 2022 shows the areas of materiality that are important for OMR and its stakeholders.

The materiality areas have been positioned along two axes:

- The **x-axis** where the **relevance for OMR** is measured;
- The **y-axis** where the **relevance to the Company's stakeholders** is measured.



ENVIRONMENTAL topics chosen by OMR	
Responsible sourcing	OMR uses high quantities of steel to manufacture its products. The relationship with the steel supply chain is therefore a key element in OMR's success in terms of quality, cost, logistics management and compliance and sustainability criteria (including direct and indirect environmental impacts).
Energy efficiency	The manufacturing carried out in OMR's plants involves numerous steelmaking processes. These processes require a high use of electricity. The plants also use significant amounts of fuel (methane gas) needed for the operation of the furnaces used for painting. Energy efficiency and energy supply are of major importance for OMR's business.
Waste Management	OMR's production activity results in 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 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. Considering the size of the total waste produced, the management of production waste is a relevant issue for OMR's operations.
Emissions management	The production carried out in OMR's plants involves direct emissions of greenhouse gases as well as a high use of energy that 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.

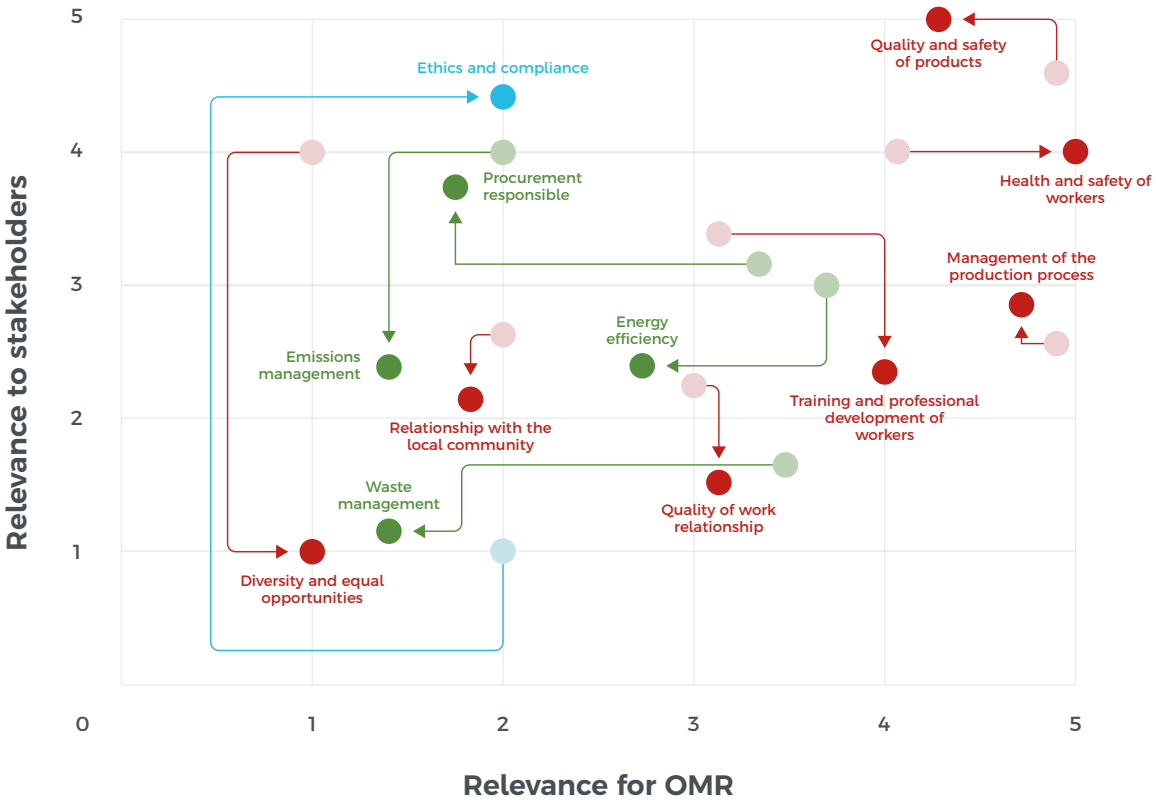
SOCIAL issues chosen by OMR

Employee training and professional development	Training and development of the professional and managerial skills of all OMR employees is fundamental for guaranteeing the quality and safety of the company's processes and ensuring the company's operational success. For some of the production activities - the use of presses and welding machinery - workers' specialisation, besides requiring years of training and the acquisition of advanced skills, is in fact considered fundamental for the quality of the production.
Production process management	OMR's main lever in customer relationship management lies in its ability to innovate the production process and related production techniques. This contribution represents an important element in the creation of value in the relationship with its clients as it enables the company to better interpret their needs, improve product quality and respect production times.

Work relationship quality	People are important for OMR's success. The loyalty and wellbeing of employees ensure employee retention, the development of the necessary skills and the creation of a positive working environment.
Product quality and safety	Minimising and eliminating the risk associated to the possibility of having product recalls and/or production delays caused because of quality defects, with both economic and reputational repercussions on the relationship with the customer, is fundamental to OMR's success. Furthermore, for some products, the risk associated with quality could affect the final consumer's physical safety.
Relationship with the local community	OMR has grown within its territory. The relationship with the local community is important in terms of reputation, in terms of attracting human resources and in terms of active participation in the development of the community and the territory, in economic, social and environmental terms.
Health and safety of workers	Workers' health and safety is a key priority area at OMR given the type of work that is carried out. It is necessary to focus on a consistent and proactive approach in order to prevent accidents and raise risk awareness throughout the company, adopting the highest standards and adopting best practices.
Diversity and equal opportunities	Safeguarding diversity and promoting equal opportunities is fundamental in order to create an inclusive and respectful working environment. Attracting female employees allows us to draw on a wider range of resources and enriches the organisation with new perspectives, becoming a key element in OMR's growth.

GOVERNANCE topics chosen by OMR

Ethics and compliance	The operations conducted by OMR involve numerous transactional processes that could be subject to bribery or other unethical behaviour if not properly managed. The risk of corruption could occur in a number of business relationships with external organisations, in the Company's contracts with customers and suppliers involving significant amounts, for example in the purchase of raw materials or services such as scrap management, transport or logistics services.



During the review of the materiality matrix, we could see that the **Quality and Product Safety** materiality area was ranked as the most important area for stakeholders, although it slightly decreased compared to the previous year from the OMR side. This outcome confirms customers' focus on quality and the risks associated with consumer safety. It also underlines the need for ongoing efforts to ensure that our products meet the highest quality and safety standards, creating added value for our stakeholders and society as a whole.

Workers' Health and Safety is recognised as an essential aspect for our business success, increasing its relevance and ranking first among OMR's most relevant materiality areas. This highlights the need to adopt a holistic approach, which includes the adoption of best practices and high standards to ensure a safe and healthy working environment for our employees.

The **Production Process Management** subject has remained constant since last year and remains a fundamental area of materiality to ensure the effective and efficient management of OMR's activities. OMR's strategic choice has always been to fully control all the processes required to manufacture its products, from raw materials to the finished product, improving transparency and constant supervision over the quality of the final product. By adopting these principles in the production process, OMR is guided along a path of innovation as well as continuous improvement.

The **Quality of the Employment Relationship** and T**raining and Professional Development of Employees** have been assessed as relevant materiality areas for OMR because they reflect the concern for the well-being and professional development of our employees. Promoting an inclusive and positive work environment that supports the professional growth and development of employees is fundamental to the creation of a **highly qualified and motivated team**. Furthermore, investing in the training of our employees allows us to develop the skills and knowledge necessary to meet the challenges of the changing market and to continuously improve our production processes. Finally, a good work relationship contributes to the **reduction of staff turnover**, thus improving the stability and continuity of our activities.

Significantly, **Ethics and Compliance** witnessed a significant increase in relevance for stakeholders. Indeed, a company that behaves ethically and complies with applicable regulations not only reduces the risk of legal sanctions and consequently of financial losses, but also builds a relationship of trust with its stakeholders. Furthermore, ethics and compliance represent one of the core values of a responsible business, where companies are called upon to pursue sustainability in social, ecological and economic terms.

This revision has been useful in orienting our **sustainability strategy** and adapting our activities accordingly, ensuring **alignment with the expectations** of our stakeholders and a greater internal focus on areas of greatest importance.

Assessing our impact

According to the GRI Universal Standards, we have assessed our impacts on the economy, the environment and people (including human rights).

CSRD is based on the principle of dual materiality, which requires companies to assess and report on the economic, social and environmental impacts of their activities, both internally and externally, with a focus on stakeholders. Among the required disclosures are those related to internal and external financial and materiality impacts. In particular, CSRD requires companies to identify and assess **sustainability risks** and **opportunities**, including those of a financial nature, and to provide transparent information on their management.

Accordingly, during the course of this year, we began to **map**, in general terms, the main impacts for each materiality area, which will be explored in greater detail in future years in order to highlight individual risk factors. Impacts will be assessed by taking into account severity (consisting of scale, scope and irremediability characteristics) for negative impacts and scale and scope for positive impacts. In the case of potential impacts, the likelihood of the impact itself will also be considered. A threshold will then be defined to determine which issues are relevant.

	Financial impact		Materiality Impact	
Materiality Analysis	**Internal**	**External**	**Internal**	**External**
Responsible Procurement	Increased supply chain resilience Increased procurement costs	Economic Development New customer acquisition with specific requirements	Developing circularity initiatives	Improving corporate reputation Reduction of corporate environmental footprint towards the outside world
Energy efficiency	Further Investment into more efficient technologies Reduced energy costs Increase in operational efficiency	Corporate reputation enhancement Clients' and investors' interest in the company	Greater motivation of employees towards environmental sustainability	Reducing environmental and social impacts
Waste Management	Reducing waste management costs Reducing fines or penalties.	Compliance with environmental regulations	Health risk reduction for workers	Enhancing the company's image Reduction of environmental and population health risks Resource saving

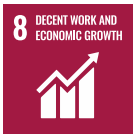
Emission Management	Cost reduction	ESG responsibility and gaining traction as business partners and employers	Enhancing employee health and safety Increasing employee motivation	Reducing environmental impact
Professional training and further development for workers	Increase in training costs Raising productivity and employee work quality	Enhancing corporate reputation Appealing to qualified employees	Boosting motivation and employee involvement Improved organisational environment	Greater positive impact on the community in the area
Production process management	Reduce costs on plant repair and/or plant investment Improvement of lead time	Increase in product quality and market competitiveness Supplier and business partner relations	Increasing employee motivation Better health and safety of employees	Environmental impact reduction Risk reduction
Quality of working relationship	Political costs increase Reduction in absenteeism and staff turnover	Enhancing corporate reputation Appealing to qualified employees	Employee motivation improvement Better organisational work environment	Provide job opportunities Promoting ethical practices throughout work
Product Quality and Safety	Reducing costs of replacing flawed products Reducing fines or penalties.	Improvement in corporate reputation and client trust. Increase profitability	Boosting employee motivation	Reducing clients' health and safety risks
Connecting with the local community	Reducing the onerousness in procedures	Corporate and social acceptance for the company and its projects Risk reduction of conflicts	Positive internal relations within the company and creation of a positive working environment	Cooperation and support Improvement of the image and reputation
Health and safety of workers	Productivity increase Legal compliance	Enhancing corporate reputation	Minimization of the risk of occupational diseases Improved mental health among employees	-
Diversity and equal opportunities	Productivity growth More opportunities to attract and retain talent Regulatory Compliance	Improved corporate reputation Opportunities for qualifying for bids and tenders	Discrimination risk reduced Increased opportunities for career development	Greater social impact opportunities
Ethics and compliance	Reduced costs related to penalties and legal disputes	-	Ethical and responsible working environment Corruption reduction and violations of employees' rights	Minimising negative impacts in the local community (pollution, observance of human rights)

OMR and SDG

Sustainable Development Goals (SDGs) are a set of **17 interconnected goals** that have been defined by the United Nations as part of the **2030 Agenda.**
Meeting them involves adopting a strategy to achieve a better and more sustainable future for all.

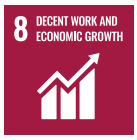
The 17 goals, which consist of 169 targets to be achieved by 2030, cover a wide range of issues related to sustainable development and its basic requirements. On 25 September 2015, the governments of the 193 UN member countries signed up to the SDGs with the aim of putting the world on a **sustainable path**, acting for people, planet and prosperity.

These are goals that require the contribution of everyone, from the public and private sectors down to individuals.
We have therefore **integrated the SDGs into our sustainability strategy**, recognising the importance of each stakeholder's contribution to the achievement of these goals. Specifically, we have identified the links between the priorities identified in our materiality matrix and the impact on the 17 UN goals, identifying six main SDGs to which we believe we can contribute over an extended period of time.

						
Responsible Procurement	●			●	●	●
Energy Efficiency				●	●	
Waste Management			●	●	●	
Emissions Management			●	●	●	
Training and professional development of workers	●					●
Production process management		●		●		
Quality of working relationships	●					

	8 DECENT WORK AND ECONOMIC GROWTH	9 INDUSTRY, INNOVATION AND INFRASTRUCTURE	11 SUSTAINABLE CITIES AND COMMUNITIES	12 RESPONSIBLE CONSUMPTION AND PRODUCTION	13 CLIMATE ACTION	17 PARTNERSHIPS FOR THE GOALS
Product quality and safety			●	●		
Local community relations		●	●		●	
Health and Safety of Workers	●			●		
Diversity and equal opportunities	●					
Ethics and Compliance						●

These identified SDGs will continue to inspire our future efforts at both strategic and operational levels and guide us in setting targets for improvement.



SDG 8 - Promote durable, inclusive and sustainable economic growth, full and productive employment and dignified jobs for all.
We care about people. We make a significant contribution to the productive and employment capacity of our local area and recognise the strategic importance of building a positive and inclusive environment to ensure people's operations and well-being. In 2022, our workforce increased by 12% and we are continuing our process of including a growing female component, a process that we intend to promote and develop.

SDG 9 - Resilient infrastructure, sustainable industrialisation and innovation.
Our company is an innovative partner, capable of responding to the sustainable innovation needs of its customers. In 2022, turnover from production destined for electric and hydrogen vehicles recorded a significant increase, which we expect to grow during 2023, confirming our reliability as an innovative partner at the heart of the transport sector ecosystem. We recognise the opportunity arising from new market trends and intend to consolidate our position as a reliable and innovative partner by supporting the major industry players.

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

We are sensitive to our surroundings. We actively strive to minimise negative externalities arising from our business activities and to contribute positively to the socio-economic environment in which we are embedded, while recognising that our success also depends on the community of which we are a part. Through 2022, we have donated over 250,000 euro to local environmental and social initiatives and intend to strategically reinforce our contribution.

SDG 12 - Ensuring sustainable patterns of production and consumption.

We believe in the potential and benefits of the circular economy. Starting in 2021, we have initiated a circularity project involving one of the main suppliers for our raw material, steel. Through an agreement with the Arvedi Group, we supply the Arvedi Group with our production waste (SCRAP) on a monthly basis and receive recycled raw material in return. Given the success of this agreement during 2022, we aim to extend these initiatives to the entire production cycle, collaborating with other partners, clients and suppliers.

SDG 13 - Promoting actions on all levels to fight climate change

We are environmentally aware. The entire production cycle is structured to reduce inefficiencies in the use of resources and to minimise any potential negative impact on the environment. In 2022, we have continued to reduce our indirect emissions to zero (Scope 2 - Market Based) by expanding the photovoltaic park and purchasing only 100% renewable energy. In recognition of the risks posed by climate change, we intend to further extend our efforts to minimise our environmental impact.

SDG 17 - Strengthening the means of goal implementation with renewed global partnership in sustainable development

Our commitment is to promote sustainability throughout the supply chain and to ensure that we have suppliers who adhere to our ethical and environmental values. These commitments are reflected in numerous initiatives that we have carried out over the years. In particular, we have initiated circularity projects with some of our suppliers and co-design initiatives to develop electric mobility and, more generally, to improve the environmental efficiency of our products. We also promote sustainable production practices, the use of recyclable materials and reducing polluting and uncertificated

packaging. We also promote sustainable production practices, using recyclable materials and reducing the amount of polluting and non-certified packaging, through close cooperation with our suppliers and customers. We support various local initiatives for the development of the area in which we operate and intend to intensify our cooperation efforts for sustainable development in the years ahead.

People at OMR

We recognise that our employees are a fundamental pillar in ensuring the sustainable growth of OMR, and therefore we are actively committed in adopting policies and actions aimed at creating a safe and positive working environment that promotes the well-being of our employees. We are well aware that a healthy and inclusive work environment has a significant impact on employee productivity, motivation and engagement, as well as helping to reduce absenteeism and company turnover.

Our corporate philosophy emphasises the importance of **human resources** as a **fundamental pillar** for the sustainable growth of our company. We strongly believe in respect, fairness, meritocracy, equal opportunities and non-discrimination, which all guide our activities.

Human resources is managed by the Human Resources Manager, who reports directly to the CEO. The Human Resources department, with the support of external consultants, is responsible for managing all aspects related to personnel, including selection, recruitment and hiring, administrative management, training and development, organisation, welfare, diversity and inclusion. In addition, he or she is responsible for managing internal trade union relations, in collaboration with the CEO.

In order to ensure a safe and positive working environment, the management of workers' health and safety is entrusted to the Prevention and Protection Service, which reports directly to the Managing Director. In addition, the Human Resources function provides support for communication and information on health and safety issues and for the management of complaints and disciplinary measures. Monitoring of activities related to personnel management and occupational health and safety is carried out by the Executive Committee, which assesses the results achieved and defines the actions necessary to further improve.

People in numbers

We recorded a **growth in the workforce** during 2022 with a parallel **process of stabilisation** of the type of relationship: the number of hired **employees** increased to **460**, an increase of 12% over the previous year.

At the same time, the number of temporary workers has decreased to 121 by 31 December 2022. This proves our strong focus on people and the **enhancement of human resources** within the company. In fact, the conversion rate of temporary workers into employees hired on permanent contracts rose from 12.4% the previous year to 16.6% this year, which confirms our commitment to promoting the employment stability among our employees.

N° OF EMPLOYEES AND CONTRACT WORKERS	2021	2022
Number of employees	411	460
Number of contract workers	165	121
% of contract workers over total workers	29%	21%
Rate of conversion of temporary workers into employees with permanent contracts	12,4%	16,6%

Demonstrating our commitment to employment stability, all our employees are employed on a permanent contract.

EMPLOYEES BY EMPLOYMENT CONTRACT	2021	2022
Permanent employment	410	460
Temporary employment	1	0
Total	411	460

We also apply a collective bargaining system whenever the law or the social system allows it. Currently, about 99% of employees are covered by a collective negotiation system. For employees not covered by collective bargaining agreements, OMR will determine their working conditions and terms of employment based on the 2019-2023 Industry Executives' Agreement.

EMPLOYEES COVERED BY COLLECTIVE BARGAINING	2021	2022
Number of employees covered by collective bargaining	396	454

Data on staff turnover point to critical issues in terms of employee retention.
In 2022, in order to meet the market's constant increase in demand for production capacity, we hired 86 new employees.
However, at the same time, we noticed an increase in the number of terminations compared to the previous year, particularly among employees under the age of 30 and those between the ages of 31 and 50. In view of the age groups concerned, these terminations are not solely attributable to cases of early retirement and/or retirement.

Being aware of the critical issues in terms of employee retention, we are currently closely analysing staff turnover data to understand what caused this phenomenon. In fact, we have launched an analysis of the underlying causes of resignations. This

was done by conducting interviews with employees who have chosen to leave the company.
The objective is to better understand the reasons why employees leave the organisation and, consequently, to intervene on these causes in order to improve staff retention. The first findings relate to the highly competitive market in relation to the salary dynamics offered by sectors such as logistics. Additionally, the distance from one's home was another factor that seemed to influence the decision to leave the company.

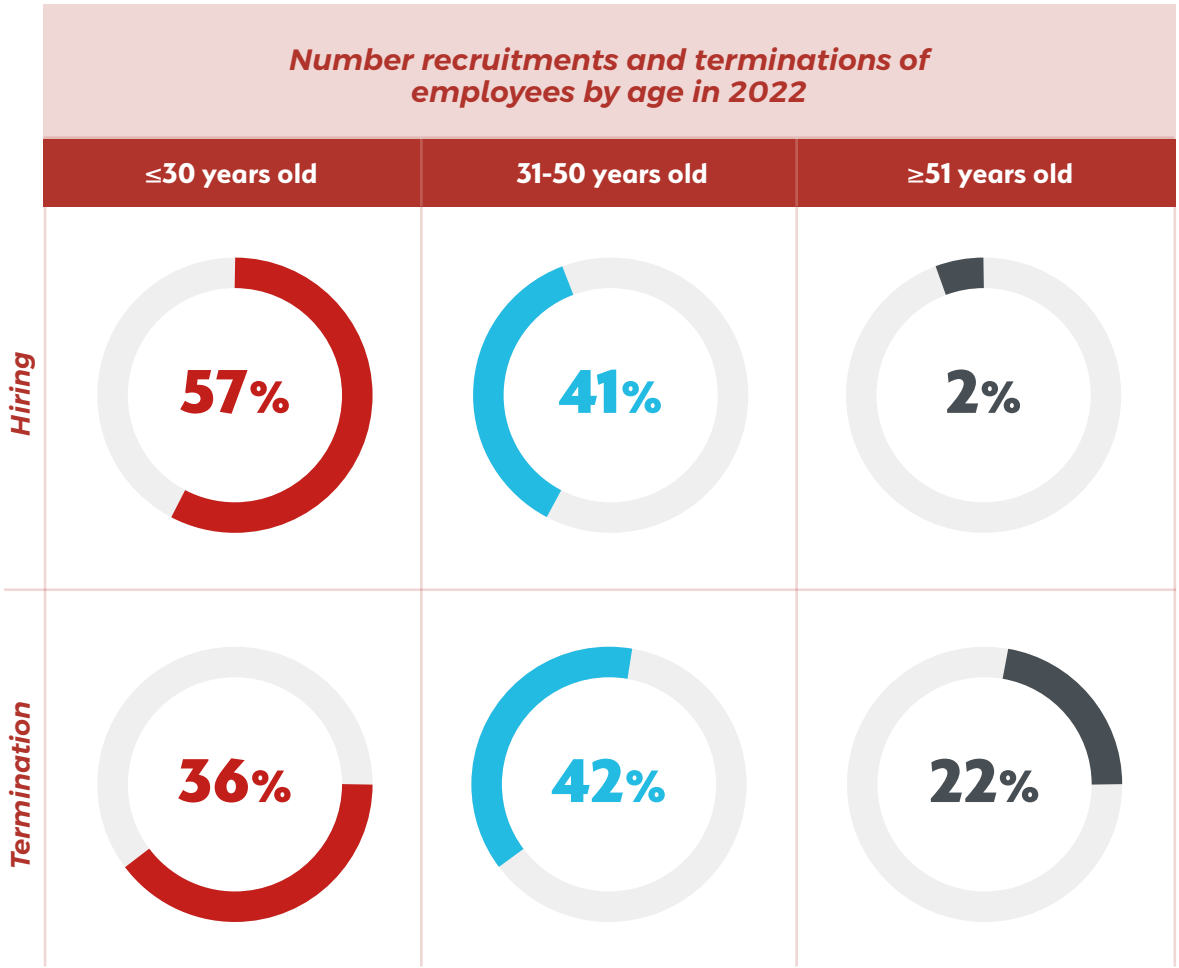
Overall, an increase in the hiring rate from 19.1% in 2021 to 20.9% in 2022, while the turnover rate increased from 5.5% in 2021 to 8.8% in 2022.
Turnover related to hirings and terminations for agency workers is higher than for employees because they have long-term, more stable employment contracts. However, agency workers are never employed in temporary or seasonal jobs, which means that their hirings and terminations are not affected by fluctuations in the labour market. On the contrary, we strive to provide agency workers with a positive working environment and fair treatment and seek to valorise their skills and encourage their professional growth within the company.

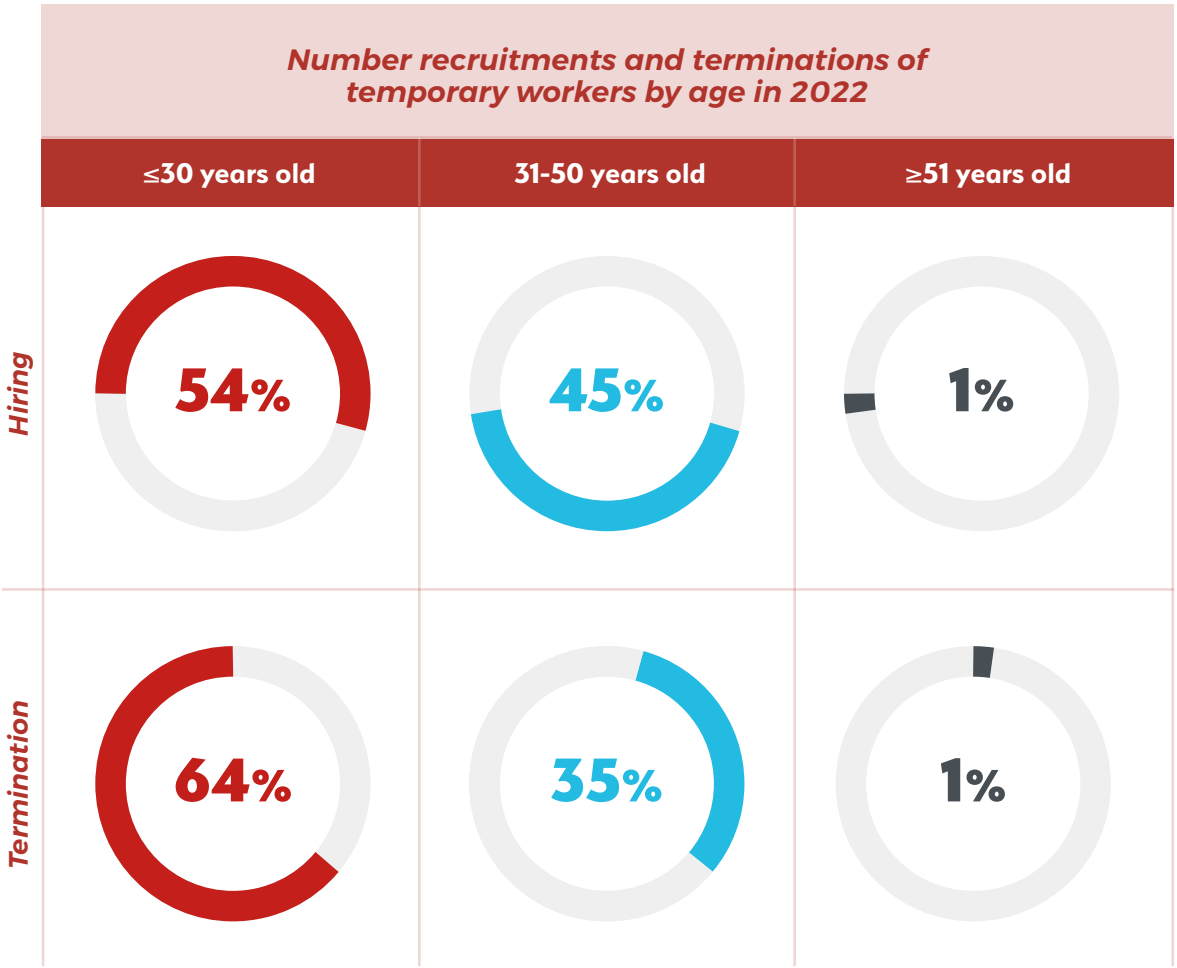
NUMBER OF HIRINGS AND TERMINATIONS OF EMPLOYEES BY AGE	2021		2022	
	Hiring	Termination	Hiring	Termination
≤30 years old	40	8	49	13
31-50 years old	29	7	35	15
≥51 years old	0	5	2	8
Total	69	20	86	39
Rate (recruitment/turnover)	19,1%	5,5%	20,9%	8,8%
NUMBER OF RECRUITMENTS AND TERMINATIONS OF TEMPORARY STAFF BY AGE	**2021**		**2022**	
	Hiring	Termination	Hiring	Termination
≤30 years old	114	125	71	92
31-50 years old	46	50	60	50
≥51 years old	1	0	1	1
Total	199	175	132	143
Rate (recruitment/turnover)	141,0%	124,0%	80,0%	86,7%

As for the increase in the number of employees, additions were made mainly at blue-collar level, while at white-collar level there were limited changes and mainly related to the Quality Department, where, in particular, some employees in the folding department were promoted to new tasks. Having already gained experience within the company and being familiar with the internal procedures, these employees can be trained to the new tasks more easily.

Furthermore, **internal upward mobility can increase the loyalty and satisfaction of employees who can grow within OMR.**
In-house growth represents a valid option for incentivising and enhancing staff, as well as being an opportunity for the company to select candidates with greater knowledge of production processes and company dynamics.

Number recruitments and terminations of employees by age in 2022





Health and safety of workers

We acknowledge the importance of creating a safe and healthy working environment and to maintain high standards of health and safety throughout our business activities and processes. We therefore have strict policies and procedures to prevent accidents, reduce health risks and ensure compliance with occupational health and safety regulations. Additionally, we actively promote a safety and health awareness culture among our employees in order to create a positive and sustainable 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), and implementing practices for the prevention of accidents and occupational illnesses. Additionally, let us promote work ergonomics and ensure that we select, manage, use and handle products and chemicals responsibly to ensure a safe and sustainable working environment. We carry out prevention and health surveillance and have adopted, where appropriate, additional tools such as hoists, cranes and platforms, in order to protect workers' health and safety. The general and preventive maintenance of the equipment and machinery is an additional element in preventing accidents at work. Finally, environmental monitoring to assess exposure to micropollutants is an essential practice to ensure the health of workers and prevent possible risks linked to work environment.

The actual management of these subjects is carried out by applying the Integrated **Policy for the Environment, Sustainability, and Occupational Health and Safety**, which defines the guidelines by which we are inspired in the performance of our activities (see the section 'Integrated Policy for the Environment, Sustainability, and Occupational Health and Safety').
Principles and methods of action described in the Integrated Policy are declined in the operational methods defined in the **Organisation and Management Model (MOG)** and in the **Risk Assessment Document**. The definition, application and compliance with the requirements established within the framework of the health and safety management system are under the responsibility of the Safety and Environment Delegate with the support of the Prevention and Protection Service, who collaborates with the heads of departments and, through a constant dialogue, with the Workers' Safety Representatives (RLS).

Prevention and Protection Service is responsible for the identification, evaluation and monitoring process of risks related to workers' health and safety. Such activity is carried out through in-depth analyses of the production process, work organisation and through audit activities. In fact, the Prevention and Protection Service carries out a series of stringent controls aimed at:

- assess existing and potential risks.
- perform checks on machinery and assess the need for adaptations.
- carry out any reprimands to workers in the event of violations of health and safety regulations.

In our company, we are committed to compliance with applicable occupational health and safety regulations. For this reason, the company undergoes **annual audits** conducted by a third party in order to verify and assure compliance.
The last audit was conducted in January 2023 and, although not yet UNI EN ISO 45001 certified, we are compliant and organised in most of the aspects examined.

The Safety Management System is properly implemented, complete with tools for document management, operational control, surveillance and monitoring of the main safety aspects. However, we are aware that there are areas that require improvement.
Given this context, we are proceeding with work towards the goal of **ISO 45001 certification by 2025.** This commitment demonstrates our willingness to continuously improve our focus on occupational health and safety and to comply with the industry's best practices.

Annually, the Prevention and Protection Service sets objectives and performance targets that aim to comply with or exceed industry standards.
Monitoring and audit findings are analysed and discussed at the annual Executive Committee meeting, in the presence of the CEO and the company management. This enables us to ensure maximum transparency and a results-based approach to occupational health and safety.

The commitment to handling health and safety issues for workers is also reflected in the monitoring of accidents and near missed as well as the investigation of registered accidents.

OCCUPATIONAL ACCIDENTS*	2021		2022	
	Employees	Temporary	Employees	Temporary
Recorded Injuries	5	8	11	6
Recorded incident rate (Incident rate)	1,44	5,04	2,69	4,75

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

In 2022, the rate of recordable accidents for employees stood at 2.69, up from 2021. In contrast, the recordable accident rate for temporary workers decreased compared to the previous year. We attribute the reasons for this increase to a higher turnover of employees during 2022, which led to the entry of new resources who are gradually adapting to OMR's safety standards.

It is important to carefully analyse the causes of this situation in order to find effective solutions. In order to improve the health and safety of our workers, we are already implementing specific **corrective actions.** In particular, we are aware

of the importance of information, education and training of newly recruited staff before starting their actual work. We are therefore committed to ensuring that new employees receive adequate training in occupational health and safety, in order to guarantee the entry of staff with suitable skills in a safe and healthy working environment from day one. Furthermore, we aim to increase the responsibility of the supervisors for health and safety at work.

We are committed to provide the necessary resources and training for them to **increase their awareness of the risks** and safety measures to be taken, in order to ensure an even safer and healthier working environment for all our employees.
In both categories of workers, there were **no serious accidents** that resulted in an absence of over six months. The main types of accidents were contusions (53%), injuries (41%) and dislocations, sprains and distortions (6%).

Furthermore, as in 2021, no cases of occupational diseases were recorded in 2022.

Occupational health and safety training

Occupational health and safety training
We are firmly convinced that health and safety training is essential to create a safe working environment and to spread a safety culture at all company levels. For this reason, during 2022, we activated general training courses on Health and Safety issues, mainly for newly hired staff and temporary workers, in compliance with regulatory requirements.

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

Annually, we schedule training activities for all our employees during working hours. In 2022, we invested a total of 4,037 hours in training, made up of 1,932 hours for our

employees and 2,105 hours for contract workers.

In comparison with the previous year and in light of the accident rate recorded in 2022, we intensified these efforts to ensure regular training activities for this group of workers, **an increase in average training hours was recorded for both contracted and employed staff.**

HEALTH AND SAFETY TRAINING FOR WORKERS	2021		2022	
	Employees	Temporary	Employees	Temporary
Total training hours	1.598	2.262	1.932	2.105
Number of workers involved in Training	197	185	213	155
Average hours of training	8,11	12,23	9,07	13,58

Diversity and Equal Opportunities

We acknowledge how important it is to make a concrete commitment to promote inclusiveness in our industry, as it is a key element for the well-being of our employees. This is precisely why, we set ourselves an ambitious goal in the 2021 Sustainability Report: to have 20% of the workforce made up of women by 2024. We are on the right track this year, since we have achieved a female component of 11 per cent in 2022, including both employees and temporary workers. We are aware that there is still a lot to be done, however, we are proud of this progress and will continue to work towards our goals on inclusiveness and diversity.

In an inclusive and diverse working environment attracts and retains high talent, as employees are more likely to feel welcomed and valued. This can lead to reduced costs in recruiting and training new employees, as well as an improvement in productivity and quality of work.

We act according to the core values of justice, equality, protection of dignity, integrity

and the avoidance of discrimination. In accordance with our Code of Ethics, we strive to build an inclusive business climate, opposing any kind of discrimination based on age, gender, background, political orientation, religious beliefs or physical conditions.

In 2022, we carried on with the project to incentivise applications from female workers by promoting gender diversity within OMR. As a result, the number of female staff increased from 21 in 2021 to 35 (mainly concentrated in the age group between 30 and 50), representing around 29% of the total number of staff administered, while the number of female employees grew from 13 in the previous year to 31.

Overall, considering both employees and temporary workers, the total number of female workers is 66, which is 11% of the total number of employees.
This data is a positive sign of our commitment in our aim to create a more inclusive and representative working environment for all individuals. We are pleased to see that we are making progress towards our 2024 target of reaching **20% of the workforce being female.** Nevertheless, we are aware that much work still needs to be done to ensure a greater diversity and inclusion within our company.

AGE AND GENDER (TEMPORARY)	2021			2022		
	Men	Women	Total	Men	Women	Total
≤30 years old	110	10	**120**	59	14	**73**
31-50 years old	34	10	**44**	26	21	**47**
≥51 years old	0	1	**1**	1	0	**1**
Total	144	21	**165**	86	35	**121**

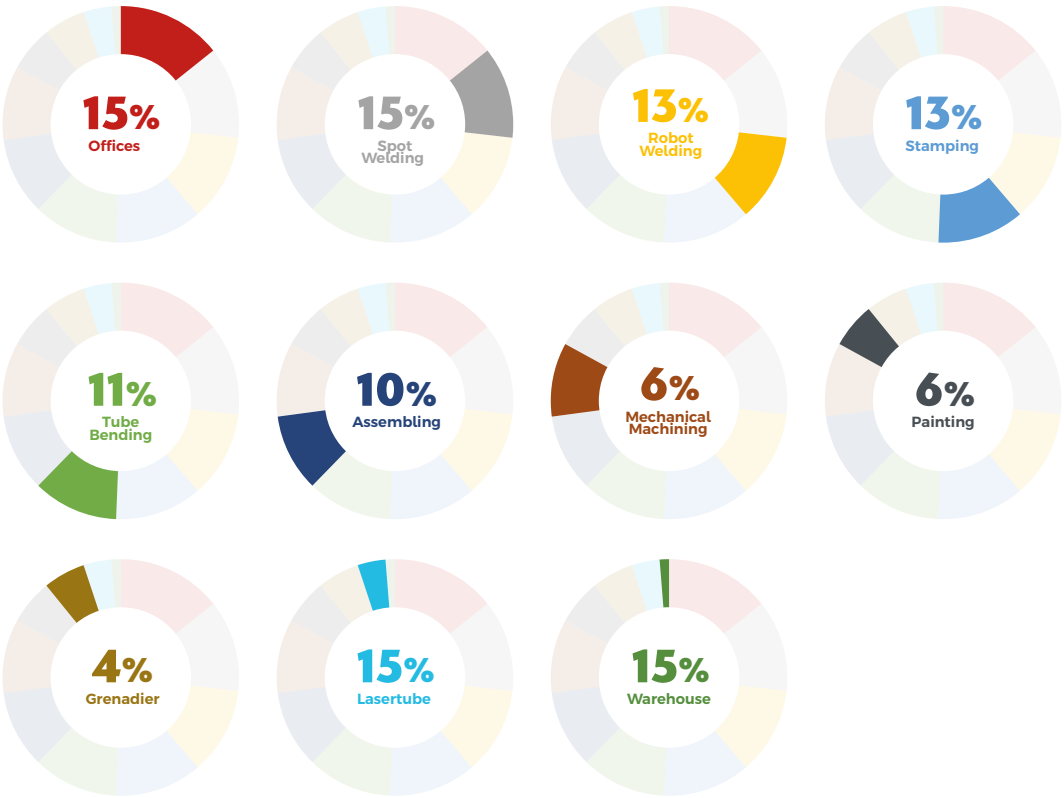
We made some organisational changes to enable and facilitate the new female membership by setting up dedicated facilities and services (e.g. women's changing rooms, a gift for International Women's Day).

Approximately 86% of our workforce is made up of blue collar workers, who are the professional category most represented at OMR. The second largest group of

employees are white-collar workers, who are 12.6%, followed by managers and senior executives, who are 0.2% and 1.3% of the workforce, respectively.
As for employees' professional classification, there was a significant increase in the number of women employed as manual workers, up from 1 employee to 19. In contrast, there was no change in the other professional levels, which remained unchanged during the period under review.

WORKERS BY AGE AND GENDER	2021			2022		
	Men	Women	Total	Men	Women	Total
≤30 years old	112	6	**118**	133	12	**145**
31-50 years old	200	6	**206**	213	17	**230**
≥51 years old	86	1	**87**	83	2	**85**
Total	398	13	**411**	429	31	**460**

Female staff in departments



An increase in the number of female employees among employees is a great opportunity for the company, as diversity can bring new perspectives, ideas and points of view. Furthermore, this change can lead to greater satisfaction and motivation among employees, contributing to improved productivity and efficiency.

EMPLOYEES BY RANK AND GENDER	2021			2022		
	Men	Women	Total	Men	Women	Total
Directors	4	1	**5**	5	1	**6**
Management	1	0	**1**	1	0	**1**
White collar workers	44	11	**55**	47	11	**58**
Blue collar workers	349	1	**350**	376	19	**395**
Total	398	13	**411**	429	31	**460**

Source: Management Review FY 2022 OMR (women's personal data on average duration)

Working to create an inclusive working environment is not just a matter of gender diversity. By building a culture that respects diversity, we create the conditions to ensure a working environment that is conducive to diverse cultural and religious needs. During 2021, the number of foreign employees increased from 18% to 21%. Of these, the majority (98%) are classified as blue-collar workers and 2% as white-collar workers.

EMPLOYEES BY RANK AND NATIONALITY	2021			2022		
	Italian	Foreigners	Total	Italian	Foreigners	Total
Directors	5	0	**5**	6	0	**6**
Management	1	0	**1**	1	0	**1**
White collar workers	52	2	**54**	56	2	**58**
Blue collar workers	277	74	**351**	301	94	**395**
Total	335	76	**411**	364	96	**460**

BASIC WAGE RATIO WOMEN'S WAGES COMPARED TO MEN'S	2021	2022
Directors	50,4%	58,1%
Management	N/A	N/A
White collar workers		
Level D2	N/A	N/A
Level C2	76,8%	85,6%
Level C3	87,5%	95,7%
Level B1	101,4%	83,2%
Level B2	N/A	N/A
Level B3	N/A	N/A
Blue collar workers		
Level D1	N/A	N/A
Level D2	79,4%	86,5%
Level C2	N/A	N/A
Level C3	N/A	N/A
Level B1	N/A	N/A
N/A either male-only or female-only		

In relation to the relation between women's basic wages and men's wages, the data highlights a positive trend over time. Disparities can mainly be attributed to the seniority and recent inclusion of women in blue-collar occupations. The percentage value represents the ratio of women's basic wages to men's wages. The higher the percentage value, approaching 100%, the higher the level of equity. It is important to note that the executive bracket, which is currently the least fair, is showing a positive trend towards greater pay equity.

Several internal initiatives have been taken to demonstrate our commitment to foreign staff. These include ensuring on a daily basis that the company canteen offers food options that respect different culinary and religious traditions. During the Christmas holidays each year, we ensure that gifts are culturally appropriate.

Furthermore, during recruitment and induction, we test foreign staff on their knowledge and understanding of Italian. This assessment allows us to verify that

foreign staff are able to understand and comply with health and safety procedures at work, thus ensuring their safety.

Training and professional development programme for workers

Our firm belief is that investing in training and developing our workers' skills is a key element in ensuring safety, quality and the long-term success of the company. Furthermore, we are aware of the need to consolidate in this field and strengthen our commitment.

Over the past few years, OMR has focused most its training efforts on the health and safety of workers, while leaving training on other subjects in second place. In particular, the training hours data show a very limited number of hours devoted to general and professional training of employees.

We are aware that this could undermine the ability of workers to acquire skills and knowledge useful to improve their productivity and to cope with technological and organisational changes in the sector. Moreover, the lack of adequate training, in the long run, can negatively affect the quality of work, the company's ability to compete in the market, and the professional development of our employees.

Specifically, during 2022, each employee received an average of 0.1 training hours, a figure that decreased compared to 2021. No training courses were provided for employees during 2022, except for courses related to occupational health and safety. These figures do not include health and safety training and "on-the-job" training, which amounted to 3,232 hours in 2022, an increase of 740 hours compared to last year.

AVERAGE AND TOTAL TRAINING HOURS PER EMPLOYEE	2021	2022
Total hours	220	48
Average hours	0,53	0,10

The average training hours for female employees amounted to 1.55 whereas no training for male employees took place.

TOTAL AND AVERAGE TRAINING HOURS BY GENDER	2021		2022	
	Men	Women	Men	Women
Total hours	160	60	0	48
Average hours	0,40	4,61	0	1,55

Specifically, the training activities only concerned employees (who received an average of 0.83 hours of training).

TOTAL AND AVERAGE TRAINING HOURS FOR EACH POSITION	2021		2022	
	Men	Women	Men	Women
Directors	0	0	0	0
Management	0	0	0	0
White collar workers	220	4,00	48	0,83
Blue collar workers	0	0	0	0

We have noticed that our efforts in providing staff training in recent years have not been sufficient and have not kept pace with the needs of the market and the industry standards. As we are aware of this gap, we consider it necessary to intensify our efforts in this direction, investing in dedicated training programmes for all staff and supporting specialisation programmes to meet different professional needs.

To fill the training gap, different training needs are taken into account, partly as management reviews, in relation to the company's needs, that can be collected at any time and formalised in terms of a training plan that will provide a total of 1,000 hours of training by 2024, with general and specific training courses for all company personnel.

Due to a fast-changing market dynamic and the increasing difficulty in finding new human capital, maintaining the previous target of 2,900 training hours for 2024 was not possible.

Quality of working relationship

A good working relationship is a fundamental aspect for the well-being and satisfaction of OMR's employees. The company, as a matter of fact, is aware that it is only through a serene and collaborative working environment that the achievement of its objectives can be fully guaranteed. For this reason, we are committed to creating a positive working environment, based on trust, transparency and the sharing of values and objectives.

During 2022, we allocated 0.6 per cent of our turnover to welfare initiatives, which is an increase on previous years (0.4 per cent in 2021).
We provide wage subsidies, which are normally available to all employees hired on a permanent basis. These initiatives have a positive impact on employees' purchasing power and help improve their satisfaction and motivation. We believe that these improvements will also have a positive effect on our corporate reputation, as they demonstrate our commitment to ensuring a healthy and rewarding working environment for all of our employees.
Specifically, these benefits concern:

- defined contribution pension plans;
- additional health care plans;
- defined insurance policies depending on the level of employment.

Employees are also given vouchers, as part of the contractual welfare package envisaged by the relevant CCNL, and, as part of the optional welfare of the CCNL to which we have decided to adhere, holiday gift vouchers. As far as the latter is concerned, in 2022 in particular, the distribution method was modified compared to the previous year: in agreement with the trade unions, the company chose to convert the bonus, usually paid in the pay packet, into petrol coupons and shopping vouchers for a local shopping centre. This decision enabled employees to benefit from a net spending value that was more than doubled for the lower grades and doubled for the higher grades, and allowed the company to benefit from a tax relief. This initiative was greatly appreciated by all employees.

As for compensation, we are committed towards providing a base salary that, in accordance with regulations, is competitive with the local market and industry. In particular, we offer our blue collar employees an integrated remuneration that is higher (over 18%) than the average for the metal sector which we refer to in terms of the National Collective Labour Agreement (CCNL).

Our commitment to promoting the wellbeing of our workers continues, by offering our employees special facilities for access to the catering service offered in the company canteen through a cost-sharing scheme. The reason for this was the desire to incentivise opportunities for socialising and sharing, which are functional in creating a positive working environment, besides providing an economic support.

We believe that only through a constant exchange of feedback and constructive dialogue with our employees can we build a healthy and productive working environment that is able to attract and retain the best talent. As a result, in 2022 we continued our commitment of constant dialogue with internal trade union representatives and Workers' Safety Representatives (RLS) and continued with the administration of satisfaction and awareness questionnaires to our workers. The purpose of this initiative is to ensure that employees' needs and demands are adequately considered in the company's decision-making processes, thus helping to promote a more serene and collaborative working climate.

During the annual assessment, the satisfaction level of our employees is measured by using a scale from 1 to 5, where 3.5 represents the minimum acceptable value, while the awareness level is measured on a scale from 0% to 100%, where 75% represents the threshold value. In the transition from 2021 to 2022, there was a slight decrease in the average satisfaction level from 3.88 to 3.84 points, while the awareness level increased from 80% to 84%.
A major project has also been launched to manage harassment and violence at work. In order to do this, the HSE Department is conducting a risk assessment on aggressive behaviour, entrusting the task to a specialised consultancy firm. The project has already started a phase of interviews with some employees, in order to collect useful information for the definition of possible corrective actions. This project plays an important role because the management of harassment and violence within a work environment is a highly relevant and sensitive issue, which can affect the standard quality of work.

We are planning a WebApp for the year 2023, focusing on two main areas: the simplification of bureaucratic activities related to interaction with the company (such as the management of holidays, leave and work activities), and a section dedicated to information, support and communication. This section aims at improving the quality of the employment relationship and providing a space for sharing suggestions and feedback, going beyond the mere contractual relationship between employee and company. We believe that this WebApp, which will also be developed by consulting requests from internal stakeholders, can be a valuable tool to improve communication and the relationship between employees and the company, thus contributing to the wellbeing of the organisation.

Corporate Governance

We continue to believe that a strong and efficient organisation within the company's decision-making processes and careful risk management are the basis for good governance of the business and for its sustainability over time.

Governance model

During 2022, OMR's ownership structure did not change. Our Company is 90% owned by the holding company ICE with its shares held directly by Ruggero Ceriali and Federica Ceriali (Enio Ceriali, the founder 's children) and 10% is held by a minority shareholder.
We are governed by a Board of Directors, appointed by the Ordinary Shareholders' Meeting and composed of three directors, one of whom is a woman (33% of the total). Ruggero Ceriali is Chairman of the Board of Directors who is also Managing Director. Regarding age, all three members are over 51. The Directors hold office for three financial years and their term of office terminates on the date of the Shareholders' Meeting called to approve the financial statements for the last financial year of their office.

Leadership roles by individuals representing and coinciding with ownership are typical of a family-owned business.
The board of directors is vested with 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; at present, there are no independent members.

Members	Position	Age	Gender	Executive Role	Indipendent	Other position held	Resposibilities	Stakehoder Representation
Ceriali Ruggero	Chairman	> 50	M	SÌ	NO	Chairman of I.C.E Holding and majority shareholder Managing Director of Ceriali Costruzioni Spa	Technical, strategic and economical/ financial	Stakeholder
Ceriali Federica	Counsellor	> 50	F	NO	NO	Counsellor of I.C.E Holding and minority shareholder Counsellor for Ceriali Costruzioni Spa	Management and Real Estate Support	Stakeholder
Conzadori Mario	Counsellor	> 50	M	SÌ	NO	-	Technical, strategic and economical/ financial	-

Possible conflicts of interest could arise in the assignment of the OMR company's expansion to the company Ceriali Costruzioni S.p.A, where Mr. Ruggero Ceriali acts as Managing Director. 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 the OMR company, such as a reduction in construction time and the certainty of using materials that comply with technical and quality specifications.

The procedure of determining remuneration rules takes place by means of minutes, whereby the shareholders' meeting establishes the remuneration of the Board of Directors (BoD) and the Managing Director, in relation to each field of competence.

Furthermore:

i. The CEO sets executive remuneration at the beginning of the year and the variable bonus awarded at mid-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 the variable bonus at the end of the year. In addition, executives are provided with fully paid health care by the company (FASI);
iii. At the end of the contract, end-of-contract benefits are paid as normally established by the legal constraints (TFR 'severance pay').

Supervision over the Board's work is entrusted to a supervisory board consisting of three members plus two alternates, who ensure that the law is observed and the principles of fairness are upheld. On the other hand, the Supervisory Board (SB), made up of two members, a man and a woman, is responsible for monitoring the functioning and observance of the Management as well as Control Organisational Model pursuant to Legislative Decree 231/2001, adopted by the Company.
The Board of Director defines the strategic guidelines and sustainability guidelines, identifying sustainability risks, approving the sustainability budget and the Sustainability Report.

The Board of Directors may appoint one or more Managing Directors, including the Chairman, who is also entrusted with all operational powers for the management of the Company and responsibility for implementing the sustainability guidelines. Currently, the Managing Director appoints his representatives from time to time to manage the main sustainability issues.
For the entire year related to this report, special powers of attorney have been maintained for an external collaborator with regard to aspects of monitoring and compliance in the field of Occupational Safety (Legislative Decree 81-2008) and issues of compliance with environmental regulations (Consolidated Environmental Act Legislative Decree 152/2006).

The impacts of the organisation on the economy, its environment and its people are analysed and discussed at the annual Executive Committee, in the presence of the CEO and the corporate management.
During the half-yearly reports, critical issues are reported to the Board of Directors (BoD). The Managing Director, or the delegated attorneys, provide a report on the course of business and present forecasts. The Board of Auditors is informed of critical issues every three months, as is the Supervisory Board (SB).

In 2022, an Industrial Committee was formed, to become operational in January 2023, consisting of the CEO and the heads of the various corporate functions, including the interim head of Sustainability. The aim of this committee is to strengthen the coordination of corporate functions and make decisions with the appropriate technical expertise, supporting the Board of Directors.

In addition to more strictly operational issues, this committee has the mandate to implement the sustainability strategy, monitoring the objectives, tracking plans to achieve these objectives and auditing the defined indicators.
The CEO participates in important conferences on sustainability as part of ongoing initiatives to promote the sharing of the collective knowledge, expertise and experience of the highest governing body on sustainable development.

In particular, he has participated in the conference organised by One Ocean

Foundation and attended the debate on steel and sustainability at the General Council of Confindustria Brescia, as well as various trade fair events.
These training events offer the opportunity to actively contribute to the dissemination and deepening of sustainable development issues.
For procedures to assess the performance of the highest governing body in monitoring the impacts of management on the economy, the environment and the people, an annual sustainability report drawn up by the company is the only tool currently used.

Managing and identifying risks

The governance model we have developed also incorporates a detailed analysis of the risks to which we are exposed.
Through joint work with the various operational functions, the following risks have been mapped and identified as the main ones:

- Commercial risk related to the quality of the product and service offered to customers;
- 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 operation of facilities;
- Non-Compliance Risk;
- Risks associated with the succession/replacement of company functions, including in light of the Company's expansion.

Following the work done in 2022 on the prioritisation of materiality areas and the main impacts generated by our business, we intend to revise our risk management model in 2023 to also include sustainability risks in the continuous monitoring of risk factors.

Ethics and Compliance

Ethics and compliance are the foundation of OMR's sustainable action. A structured governance model has been developed to ensure ethical conduct, reduce the risk of non-compliance and respond effectively to the expectations of key stakeholders.

In order to ensure high ethical standards and to comply with applicable laws, we have adopted a **complex management system based on our Code of Ethics and Conduct**, referred to herein as the 'Code of Ethics'. This code is the core of the system and should be interpreted and understood in conjunction with other key documents, such as the Management and **Control Organisational Model**, its protocols, and the policies and procedures currently in place, in order to ensure that OMR's values and principles are respected and promoted.

Code of Ethics and Conduct

The Code of Ethics states the **principles and shared values, expresses the commitments and the ethical and behavioural responsibilities** that OMR assumes and implements in the exercise of its business and that bind the behaviour of anyone in it and for it.
The purpose of the Code is to declare and disseminate the values and behavioural rules to which we intend to constantly refer when carrying out our business activities.

Specifically, it specifies the **duties of loyalty, fairness, equality, diligence** and helps to ensure that the activities of all parties are carried out in compliance with the **values of confidentiality, transparency, professionalism as well as in accordance with ethics and the laws in force.** It also lays down, as fundamental principles of the Company's actions, **respecting and protecting people and the environment.**

The second edition of the Code of Ethics was approved in December 2020 by the Board of Directors and is available to all stakeholders on our corporate website. In order to maintain its adherence to the corporate and external context, it is planned to be re-evaluated during 2023, which could lead to the approval of a third revision by the end of next year.

The Management and Control Organisational Model

In December 2017, OMR's Board of Directors adopted a Management and Control Organisational Model in compliance with the Legislative Decree 231/2001 (hereinafter 'Organisational Model' or 'Model 231').
Model 231 consists of:

- "A General Section in which the reference regulatory framework and the relevant offences are described, as well as the Company's profile, the purpose, structure, principles and responsibilities of the Model, the structure, functions and powers of the Supervisory Board (SB), information obligations, disciplinary system, and the methods to be adopted for its training and dissemination.
- 9 Special Sections relative to the specific types of offences the commission of which are considered abstractly conceivable for OMR in view of the activities carried out by the Company and in which the recipients, principles of conduct, criminal-prevention protocols and control systems implemented by the Company are defined.
- Risk Matrix (MR) that distinguishes between types of offence, showing: description of the regulatory offence, occurrence of risk, level of risk, commission method, risk activities, area of reference, responsible person and type of penalty.
- Prevention and Control Matrix (MPC) that distinguishes between predicate offences relevant to OMR, identifies the reference criminal-prevention protocol and the relevant procedures for prevention, documented evidence of preventive and control actions, the people responsible for such actions and the required minimum control frequency.

In December 2020, the Management and Control Organisational Model of OMR was updated to incorporate regulatory changes in the catalogue of predicate offences of Legislative Decree 231/01.
Model 231 is also scheduled for a complete re-evaluation during 2023 in order to include both the most recent regulatory changes and an assessment of current risks. Such process will lead to its subsequent approval by the administrative body by the end of the next financial year.

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.
Throughout 2022, the Supervisory Board assessed possible impacts arising from changes in risk profiles and the **process of managing health and safety of workers.** During 2022, the Supervisory Board did not determine that any further updates should have been made to the 231 Model, but will, as mentioned in the previous paragraph, conduct a thorough review during 2023.

Whistleblowing

Compliance with Legislative Decree 231/2001 requires the adoption of systems that allow recipients of the Model 231 to submit reports of unlawful conduct, relevant under Legislative Decree 231/2001, to the Supervisory Board. According to Law 179 of 30 November 2017 on whistleblowing, all companies that adopt an Organisational Model must set up computer channels for reporting any violations.
In compliance with regulatory requirements, in 2021 we activated a dedicated IT channel to report any irregularities or malpractices to the Supervisory Board. **All OMR stakeholders can report any cases of violations and irregularities using the dedicated e-mail (odv@omrspa.com)** without fear of possible retaliation. The whistleblowing management process is in fact structured to ensure the confidentiality of the person making the report and the **confidentiality** of the information received, and to ensure that the validity of the reports is verified.
The activation of the whistleblowing channel was accompanied by an internal communication campaign managed by the Human Resources Department.
During 2023, we are required, based on the solicitation of the SB(ODV), to update the Management Model in relation to the regulation of Whistleblowing to implement Legislative Decree No. 24 of 10 March 2023, which implements Directive 2019/1937. This decree lays down a regulatory framework aimed at ensuring a high level of protection for those who report any threats or prejudice to a public interest that they have become aware in the course of their professional activities.
As part of the integrated Corporate Management System adopted, we also have the following policies:

An integrated policy for environment, sustainability, occupational health and safety

OMR believe that the spreading to all our employees of the Awareness and Protection of the Environment, Sustainability, Occupational Health and Safety, the respect for human rights and Dignity of Man and Workers in the value of differences, is an ethically constitutive, essential and unavoidable element for exercising our activities, as well as

strategic for the full achievement of our corporate objectives. To this end, in 2022 we drew up the Integrated Policy for the Environment, Sustainability, and Occupational Health and Safety, which was disseminated and illustrated to all personnel of the Organisation and externally to all interested parties.

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

Our Quality Policy represents a commitment to pursuing the primary objective that we consider fundamental: achieving and maintaining customer satisfaction both by providing products and services of excellent and consistent quality and by continuously improving the company's processes. This policy, which is updated annually by the Quality Manager to include specific customer satisfaction objectives, and approved by the Managing Director, sets out the main requirements that OMR has drawn up and is committed to complying with in order to achieve its primary objective: customer satisfaction.

The requirements for quality management 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 IATF 16949, 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 the risk of corruption is a fundamental aspect in OMR's sustainable action. The activities we carry out involve numerous transactional processes that could lead to corrupt or illegal practices if not properly managed. As stated above, we have adopted a structured governance system that ensures ethical behaviour and reduces the risks of non-compliance, including the risk of corruption.

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 areas considered most at risk and establishes the main controls and procedures to prevent corruption risk, including:

- in dealing with the Public Administration and the Judicial Authorities, favouritism, pressure or other forms of privilege, including gifts, money or other advantages, are prohibited;
- any interaction must be carried out **in compliance with the specific corporate procedures** (in particular, the Criminal-Prevention Protocol for the Management of Financial Resources) and, in any case, **the principle of transparency and traceability must be respected**;
- any form of payment or donation to political parties and organisations or their representatives must be made in such a way as to ensure **maximum transparency and traceability** of payment, as required by the current legislation;
- dealings with the Public Administration and the Judicial Authorities are prohibited favouritism, pressure or other forms of privilege, including gifts, money or other advantages;
- any interaction must be carried out in compliance with the specific corporate procedures (in particular, the Criminal-Prevention Protocol for the Management of Financial Resources) and, in any case, the principle of transparency and traceability must be respected;
- any form of payment or donation to political parties and organisations or to their representatives must be made in such a way as to ensure maximum transparency and traceability of payment, as well as compliance with applicable regulations;
- all relations with customers, suppliers, partners and third parties in general are managed **according to the principles of collaboration, helpfulness, professionalism, transparency**, and any operation or economic transaction with them is managed in compliance with specific company procedures and the principles of legitimacy, authorisation, consistency and traceability;
- the authority within the Company is granted to a limited number of individuals to

authorise specific donations or contributions to charitable organisations, business relations with consultants and intermediaries, and sponsorships, in compliance with the system of powers, delegations and authorisations.

In order to ensure compliance with the preventive measures adopted, the Supervisory Board (SB) **constantly monitors the company's activities.** The Supervisory Board normally meets once every two months, but may be convened urgently, if necessary, at the request of any of its members, following a rigorous verification process, to examine documents and procedures, check risk areas and identify any critical issues or non-compliances. Accordingly, as in 2021 also in 2022, the Supervisory Board did not find any non-compliance and, since the date of activation of the reporting channel, it has not received any reports of any potential irregularities or illegalities.
The Supervisory Board's (ODV) checks also serve as a basis for proposing updates to the control and prevention measures in order to ensure that the company's procedures are aligned with regulatory developments and industry best practices. With this in mind, and in order to reduce the risk of corruption in relations with customers, suppliers and third parties, the Supervisory Board has recommended, as of the 2021 financial year, OMR's registration on the **white lists at the territorially competent prefectures** that manage the lists of suppliers and customers subject to verification by the public body. This entry is expected to be completed during the 2024 financial year.

Our commitment in managing the risk of corruption and, in general, in promoting a corporate culture based on the **principles of ethics and compliance**, and on respect for rules of conduct, is also realised through **training and information** initiatives. After the approval of the Organisational Model, all members of the Board of Directors, top management and area and department managers were adequately trained on the provisions of the Model and their dissemination throughout the organisation. The adoption of the Organisational Model was accompanied by an **internal training and communication campaign** managed by the Human Resources Function and the publication of the Code of Ethics and Model 231 on company channels. Finally, at the time of hiring, all employees are given the Information, Training and Awareness Manual, in which the adoption of the Organisational Model and the Code of Ethics is explicitly mentioned, along with the relevant requirements.

Product and customers

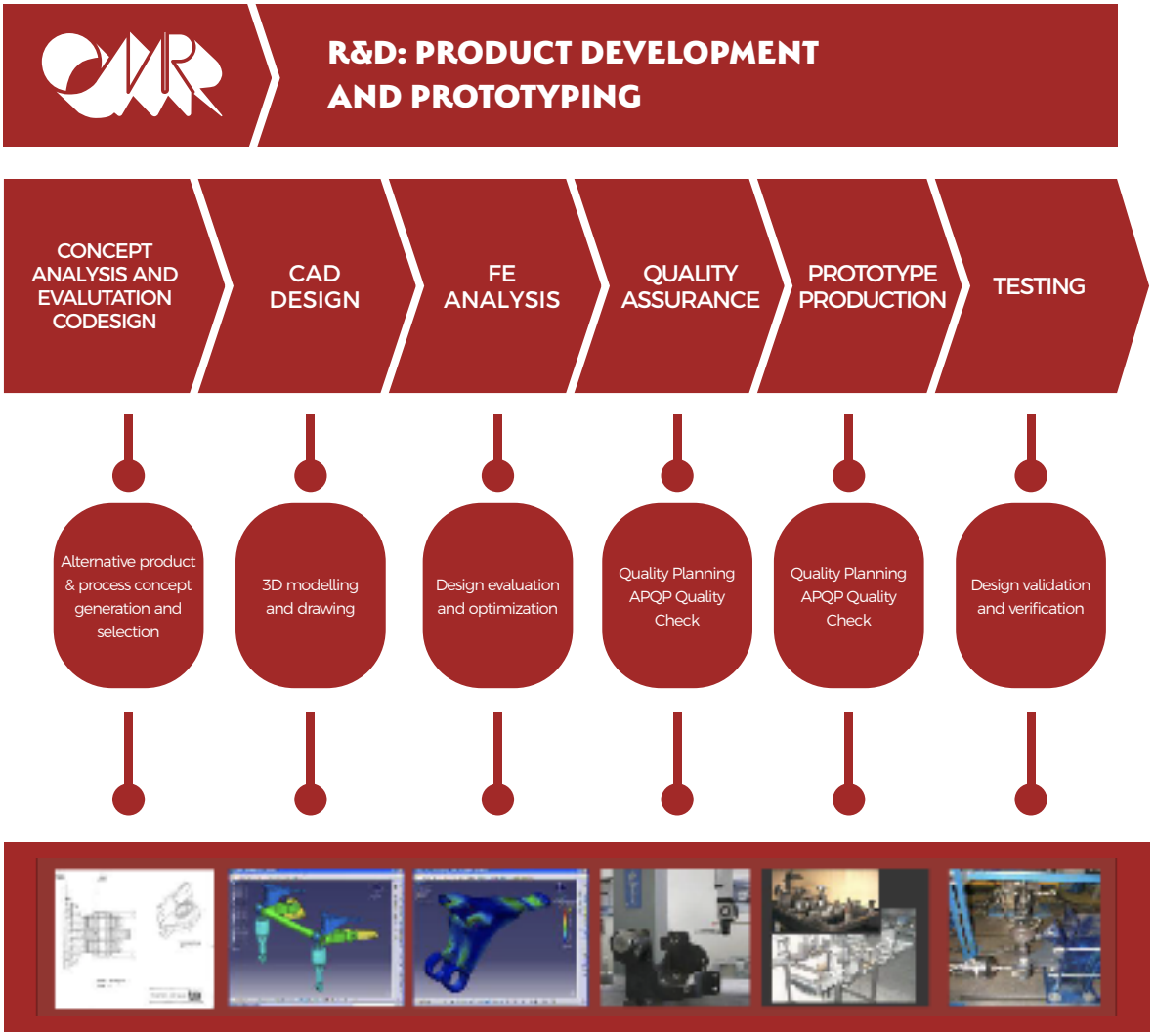
At OMR, a product is not just a component; it is a journey shared between us and our customers. We strive to achieve the highest standards in terms of innovation, quality, safety, efficiency and sustainability of our product and production process through our combined knowledge and experience. For this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

Our Products

Our customers are leading manufacturers of industrial vehicles, commercial vehicles, construction machinery, agricultural machinery, industrial handling equipment and off-road vehicles.
OMR manufactures chassis components and cross-members, cab suspensions, vehicle suspensions, tank mounts and belts, welded structural elements, anti-intrusion bars, axles, etc., for a total of more than 5500 handled finished product codes (more than 20,500,000 pieces shipped in 2022). Thanks to the company's vertical integration and our know-how, we support customers and partners in their technological evolution and market challenges, developing solutions of excellence. In particular, the Product Development process starts with the analysis and evaluation of the product concept and in case of need we are able to support the customer in co-design. Customer involvement in the design phase fosters technological innovation and the adoption of sustainable solutions, helping to improve the environmental impact of products. Furthermore, co-design can allow for greater flexibility in the production and customisation of products, making it possible to meet the specific needs of various customers and markets.

It is essential for us at OMR to be able to meet the requirements of an increasingly competitive automotive market. On the one hand, evolving technologies make products increasingly more complex, while on the other hand, customers are demanding high quality standards and innovative ideas.
We aim to be close to our customers and collaborate with them to develop new products that perform better and are more cost-efficient. In doing so, we strive to meet their needs and exceed their expectations.

In order to achieve this, we also work in synergy with our customers by suggesting the most suitable production process, with the aim of developing customised and innovative solutions that can stand out in the market. In addition, we offer our customers the opportunity to carry out **trials, simulations and samples in our prototyping and testing department, supported by our technical department, in order to guarantee a high quality product.**



At OMR, our focus has always been on the needs of our customers in terms of sustainable development, particularly in the area of new sustainable mobility. This is why, since 2020, we have been working on the prototyping and production of components related to electric and hydrogen mobility, with the aim of offering innovative and sustainable products.

Despite the fact that this area is still in the development phase, we are proud to report that it will already account for around 3.45% of our turnover in 2022. This is also demonstrated by the number of new product codes for electric and hydrogen vehicles introduced in 2022, which was higher than the previous year and amounted to 432 part numbers, but with a percentage of prototypes converted into products of 80% (down from 100% in the previous year).

We are confident that our commitment to the new sustainable mobility demonstrates our focus on sustainability and our capacity for technological innovation in the field. Furthermore, we believe that this commitment will enable us to stay ahead of the curve and offer competitive products that meet our consumers' needs in a sustainable manner.

PRODUCT TURNOVER FOR ELECTRIC AND HYDROGEN VEHICLES €/000	2021	2022
% Turnover from electric and hydrogen vehicle parts produced	0,82%	3,45%
Turnover from electric and hydrogen vehicle parts producted	1.103	5.700

Our customers

We have always had a strategy of enhancing the relationship we establish with our customers over a long period of time. We never apply transactional logic but rather initiate a partnership relationship that starts by listening to the needs not only of the technical and product but also of the quality of service.
A case in point was to bring the production facilities of one of our major customers closer to the assembly stages of a strategic component. Therefore, since 2017 we have been locating **OMR Truck Components S.A. in Madrid**, Spain. Thanks to the

production plant in Madrid, OMR has consolidated its position as a European leader in the production of steel components for the automotive industry and has established itself as a partner of the main manufacturers of industrial vehicles, commercial vehicles, earth-moving, agricultural and industrial handling equipment.

OMR Truck Components has resulted in improved service to our customers as well as optimised delivery logistics.

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 manufacturing 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 2022, OMR Truck Components generated a turnover of around 19 million Euro, registering a growth of 31% over the previous year.

Regarding personnel management, OMR Truck Components relies on a local cooperative. Currently, the team consists of seven male employees, who work in two separate shifts and are trained according to OMR procedures. OMR Truck Components is IATF 16949 certified, attesting to our focus on quality and customer satisfaction. In particular, OMR Truck Components' quality management is managed directly by OMR S.p.A. The 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, ensuring the consistency and cohesion of the production processes in all the company's locations. In addition, incoming and outgoing quality control at OMR Truck Components is carried out on a regular basis, through incoming spot checks and weekly outgoing checks. Net of the quality indicators, all remaining data concerning OMR Truck Components are not included in this Sustainability Report as they are not part of a consolidated.

Regarding waste management, shock absorber cartons, locks and pallets are the main ones. An external company takes care of the waste collection and managed the disposal of 7.41 tonnes of wood and 9.16 tonnes of unsorted waste in 2022.

Production process management

OMR excels in the management of customer relationships through its ability to provide an integrated production process that ensures adherence to schedule, sustainability, and a high standard of quality in the realization of customer requirements.

Our strategical choice has always been to control integrally all the processes required to manufacture our products (from raw material to finished product).
Our goal has been to achieve excellence at every single stage by making use of the best technologies on the market, building and maintaining in-house know-how.
The benefits that the Vertical Integration offers our customers are:

- Production flexibility
- Reduced lead time
- Consistent quality excellence
- Back-up on production facilities to mitigate downtime

Our ongoing commitment to innovation in the manufacturing process and production techniques is evident since we were first established. We are dedicated to continually undergo audits and certifications to guarantee the effectiveness and safety of our products. Tangible evidence of our commitment is our strong organizational oversight, constant monitoring and certifications obtained, and the continuous investments made to constantly improve operations.
The entire production process is coordinated by the Operations Manager who reports directly to the Managing Director and upon whom the Supply Chain, Engineering and Quality functions report, which in turn direct the managers of the 11 process stages.
We make use of the most advanced technologies available on the market in our production process, as evidenced by our constant focus on investment in this area. Over the course of 2022, we invested more than

7 mln€ to purchase 43 new machines,

aimed at ensuring that we maintain the highest quality standards of our production process and meet the needs of our customers. The investments mainly involved new welding islands and bending machines that OMR purchased to increase production capacity.

INVESTMENT IN MACHINERY €/000	2021	2022
Number of new machines purchased	18	43
Expenditure on purchase of new machines	13.798	7.169
Number of used machines not for scrapping (returned/sold and reconditioned)	0	0

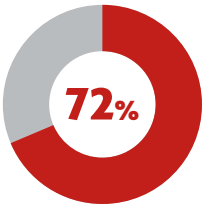
In order to meet our environmental commitments, we have adopted a production process that is in line with ISO 14001 requirements and obtained the relevant certification in 2014, as described in The Management of Environmental Impacts of this Annual Report.
In addition, in line with our commitment to managing the production process, our quality management system has also been ISO 9001 certified since 1995.

The adoption of certified management systems enables us to improve product quality, reduce environmental impacts and increase the efficiency of production processes. It also demands a strong engagement of the entire organization and constant monitoring of performance to ensure the achievement of objectives. For this reason, periodic monitoring meetings are held with the company's management to share objectives and performance indicators, both general and specific for individual customers.

OMR has achieved a high level of prestige in the industry, becoming an approved supplier to major manufacturers of industrial vehicles, commercial vehicles, construction equipment, agricultural machinery and industrial handling equipment in Europe. Most of our customers require compliance with sustainability principles demonstrated through management systems and continuous monitoring as a key element in selecting their suppliers.

In 2022 in particular, we took part in compilingl **The Sustainability Assessment Questionnaire (SAQ 4.0)**, a tool developed to assess the sustainability of companies requested by one of our customers. We are pleased to announce that we obtained a 72% score, which compares

favorably with the average for the manufacturing components and supplies industry of 69% among 19,607 companies. In addition, our score is **higher than the Italian national average**, which is 57% out of 2,013 locations evaluated through the NQC Supplier Assessment platform.



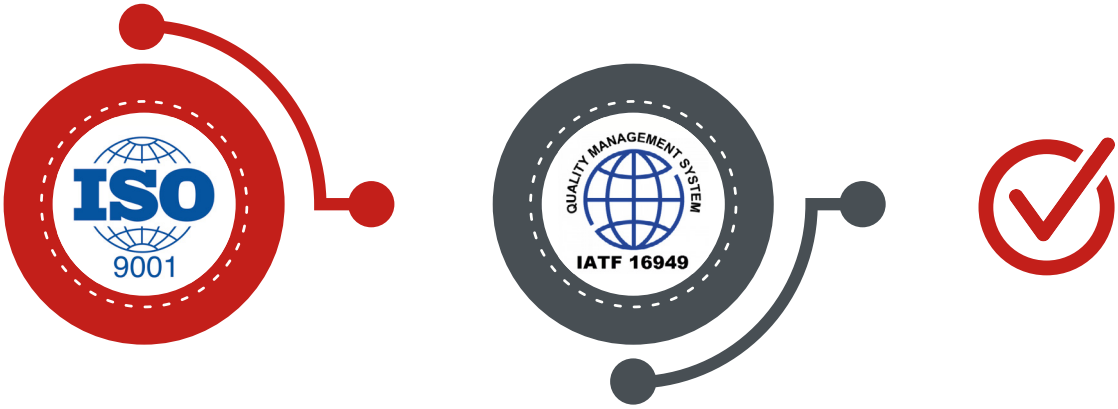
Passing these assessments is a tangible proof of the quality of our ongoing commitment to our company.

Lastly, although not included in the reporting period, its relevant for us to mention that a new Industrial Committee has been formed during 2023 that can respond more effectively and efficiently to both customer requests and possible issues related to quality or speed in delivery.

Product Quality and Safety

We have always been primarily committed to meeting customer needs through high standards of quality and safety. The quality of our products is therefore critical to achieving success and establishing our reputation in the market. During 2022, our dedication and focus on quality was recognized with the prestigious "Beyond Quality Together" award given by Iveco Group. This recognition is a testament to our ongoing commitment to ensuring high quality and safe products that meet our customers' expectations and lead to long-lasting relationships with them.

OMR has always set the highest priority on achieving and maintaining customer satisfaction, both through the provision of high and consistent quality products and services and through the constant improvement of business processes. To achieve these goals, OMR has adopted a Corporate Management System for quality certified to **ISO 9001** and **IATF 16949** by DNV Det Norske Veritas.



The Corporate Management System has been developed with the goal of ensuring consistent product conformity to customer specifications. This goal is achieved through the use of effective processes, which ensure a high level of quality, and efficient processes, which reduce costs.
Through this approach, we are able to reduce and cancel the risk of product recalls and production delays, avoiding negative economic and reputational consequences towards our customers. In addition, for some products, low quality could have major consequences on the physical safety of the end user of the vehicles on which they are mounted.
OMR's Quality Policy, which was updated in 2022 and approved by the CEO, represents our **ongoing commitment** to ensure high quality products and services, putting **the satisfaction of our partners at the center.** We take a **proactive approach** to them, to anticipate their needs and provide increasingly innovative and customized solutions.

OMR is also committed to continuous improvement of its **energy management and environmental impact** processes to minimize the negative effects of its activities on the environment and society. Our focus on social responsibility and sustainability is an ongoing commitment for us, resulting in concrete actions to support the local community and the environment.
We are also aware that the achievement of our goals is above all linked to our ability to spread a **quality culture**, and we work to involve and empower everyone to apply the requirements of the Quality and Environmental Management System.

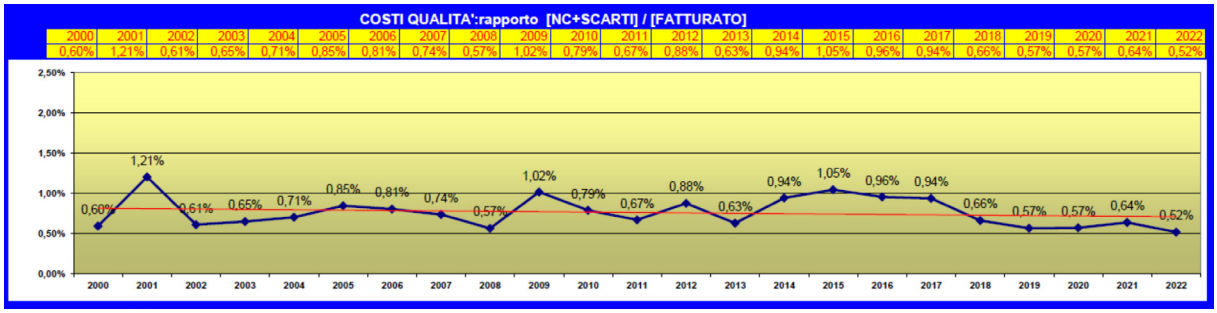
Quality issues are managed by the Quality Manager who reports to and assists the Operations Manager in supervising 11 process steps. Our Quality Department is made up of approximately 15 people who carry out measurement activities, and perform,

in our dedicated laboratory, mechanical, chemical, metallographic, coating and painting tests and non-destructive inspections, in accordance with customer-defined specifications and international standards, and verify compliance with requirements in the field in the different stages of the production process.

Monitoring and control over quality issues are entrusted to the Operations Manager with support from the Quality function on monthly meetings and to the Executive Committee, which reviews the defined KPIs and evaluates deviations from the objectives defined by each customer at annual meetings. The results of the indicators, normally measured in part per million, in number of claims, number of relevant events, determine the ratings assigned to OMR by different customers.

In addition to the parameters required by our customers, we use internally about 50 parameters to monitor the quality of our products and processes. Among the various indicators measured entirely, we believe that the most indicative for representing our quality performance is the ratio of non-quality costs to sales. This ratio allows us to assess the economic impact of quality problems, including both nonconformity (NC) and scrap-related costs.

In 2022 this ratio was 0.52% of turnover compared to 0.64% in the previous year, and over the past 20 years this indicator has exceeded 1% in only 3 cases.



As hard as our every effort is made to achieve excellence in our product, since product and customer service quality is a crucial issue, both in reputational and financial terms, so we have undertaken two insurance policies and made appropriate cautionary provisions in the balance sheet to protect ourselves against the commercial risk related with the possibility that a delay could result in a customer supply chain stoppage and product recall risk.

Management of environmental impacts

We are well aware that the climate crisis poses a serious threat to our planet and to the future of the generations to come. The IPCC's recent summary confirmed that the world is still struggling to reverse the global warming trend and that the next ten years will be crucial for action. We feel it is our duty to stop greenhouse gas emissions now, using all the tools available to us. This is no longer just an option, it is the only viable choice to protect our future and that of our planet.

In the management of our production process, we are strongly committed to the protection of the environment and are constantly seeking the best available technologies to ensure high environmental performance. We are concerned with reducing inefficiencies in the use of resources and minimizing any possible negative impact on the surrounding environment.
Environmental protection is at the core of our activities. We aim to limit our environmental impact by reducing emissions of climate-altering substances and promoting efficient use of energy, resources and raw materials. We acknowledge that energy also used in our plants is a major source of greenhouse gas emissions and, for this reason, we are committed to reducing emissions by transitioning to more efficient and environmentally friendly production processes. In addition, we are gradually moving toward the exclusive use of renewable energy sources.

In order for our environmental approach to be as efficient as possible, we have implemented a structured environmental governance and management system. The

[3] *https://www.ipcc.ch/report/sixth-assessment-report-cycle/*

principles and requirements for the best environmental performance are defined in our Integrated Policy for Environment Sustainability, Health and Safety at Work, which is reviewed periodically and approved by the CEO.

This policy also defines the principles and requirements that guide the management of our Environmental System, which has been **ISO 14001 certified since 2014**. The responsibility for managing the Environmental System lies with the Safety to Environment Delegate, who reports directly to the CEO and works closely with the EHS (Environment, Health & Safety) office and the Technology and Facilities Function.

Our Management System is audited annually by independent third parties to verify that it fully complies with international standards in order to obtain or maintain management system certification. The last audit was conducted in September 2022 and no Nonconformities were found. This sampling 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 work to improve our processes and ensure the highest level of compliance with internal regulations and procedures.
Additionally, our management system presents operational requirements that focus on preventing environmental risks, going beyond the concept of simply complying with requirements defined by local legislation. Specifically, our operational requirements focus on the reduction of air emissions, efficient management of energy and water resources, and other relevant environmental issues. We believe that the prevention of environmental risks is essential to ensure the long-term sustainability of our business and to protect the environment we operate in.

Annually, together with the monitoring objectives and targets defined within the ISO 14001 Management System, goals (together with related indicators) for improving environmental performance are defined internally, taking as a baseline the results achieved during the previous year. Monitoring of activities carried out and targets achieved is carried out annually by the Executive Committee.
No noncompliance incurred during 2022. In 2021, 2 instances of non-compliance were noted by the AIA. Both of the above noncompliances did not generate any sanctions neither administrative nor pecuniary.

Energy Efficiency

We are constantly focusing on energy efficiency and it is one of the pillars of our commitment toward environmental sustainability. Throughout 2022, the company continued to implement initiatives to improve energy efficiency in our production processes and facilities, reducing our impact on the environment. In particular, we completed a project to expand our photovoltaic system by 2371.77 kWp, for a total of 4,878 panels and a gross covered area of 15,324 m2.

Our concern towards the environment and sustainability drives us to adopt increasingly responsible energy supply choices. Aligned with the requirements for environmental management defined in the Integrated Policy and in accordance with the ISO 14001-certified Environmental Management System, we are committed to preferring renewable energy sources at the expense of fossil fuels. In addition, also in 2022 we have proceeded to expand the installation of photovoltaic panels in order to increase energy production from renewable sources. Thanks to these choices, we gradually reduce energy consumption and achieve a reduction in processing costs, as well as a significant reduction in climate-changing emissions.

Over the years, our commitment to self-generation of energy has been constant, with the construction of several photovoltaic plants. As early as 2010, we started construction of our first photovoltaic system, equipped with a rated capacity of 1,617 kWp. Then in 2012, we installed a second photovoltaic system, with a rated capacity of 850 kWp, to further increase our self-generation capacity. During the first half of 2021, we made a further investment with the installation of a third photovoltaic system equipped with an even higher rated power of about 2,338 kWp.

Ultimately, in 2022, we increased our energy self-generation capacity a little further through an expansion of the photovoltaic system. This expansion added 4,878 new solar panels and increased the nominal capacity by about 2,371.77 kWp. The gross covered area of the plant is 15,324 m2, or 11,450 m2 net. However, **due to bureaucratic obstacles** generated by the grid operator, the panels in question have not yet been connected, and the current situation is not attributable to our company. We estimate that if the panels were activated, such a facility could produce about 2,500,000 kWh/year. Further, investments have been placed in a 2023-2024 budget to equip the parking lots with shelters that will be used to install additional solar panels that will add 0.8 MWp to the self-generation capacity.

As a result of the investments made so far, we are able to generate about 5,301,457 kWh of energy, consume about 78 percent of it, and cover **37%** of our energy needs. Had the last plant been available as well, on a yearly basis, this percentage would have risen to 46%.
Our commitment to reducing the environmental impact generated by our production processes extends to the purchase of renewable energy. Since March 2020, we signed an agreement with our energy supplier and increased from 79% to 100% of purchased energy from renewable sources.
Thanks to this major milestone, we have lowered indirect emissions (Scope 2 - Market Based Approach) starting in 2021, as reported in the Emissions Management chapter of this Report.
In relation to energy intensity, the indicator for energy intensity on sales is the only value that has improved since 2021.

ENERGY INTENSITY	2021	2022	Delta %
Energy intensity on turnover (KWh/€)	0,28	0,24	-16%
Energy intensity per unit of product (KWh/piece)	1,84	1,92	+4%
Energy intensity on weight of production (KWh/ton)	1.304,42	1.363,56	+5%

If we analyze the energy intensity indicators, related solely to electricity consumption, however, we can see that there has been an improvement. This is the result of our investments in state-of-the-art technology and mode-rni equipment in order to optimize electricity consumption and minimize waste.

ENERGY INTENSITY ELECTRICAL CONSUMPTION	2021	2022	Delta %
Energy intensity on turnover (KWh/€)	0,09	0,07	-21,3%
Energy intensity per unit of product (KWh/piece)	0,56	0,54	-2,6%
Energy intensity by production weight (KWh/tonne)	392,82	384,22	-2,2%

Overall, we consumed 39,359,161 kWh of energy in 2022, 3.7% more than in 2021. This consumption is predominantly natural gas (about 64% of total energy consumption), which is mainly used to operate the ovens of the painting plant.

ANNUAL ENERGY CONSUMPTION BY SOURCE (KWH)	2021	2022
Energy from non- renewable sources		
Natural Gas	24.094.364,3	25.341.511,4
Energy from renewable sources		
Photovoltaics - self-produced and consumed	3.013.322,6	4.114.297
DIRECT CONSUMPTION	27.107.686,9	29.455.808,4
Electricity	11.433.173	11.090.513
From renewable sources	11.433.173	11.090.513
From non-renewable sources	0	0
INDIRECT CONSUMPTION	11.433.173	11.090.513
Self-produced energy (photovoltaic) and sold	574.920	1.187.160
Total energy consumed*	37.965.939,9	39.359.161,4

**In compliance with GRI Standard 302-1, total energy consumed is calculated as the sum of direct and indirect consumption minus self-generated energy.*

Emission Management

Managing greenhouse gas emissions is a key aspect of our commitment to sustainability. Conscious of the importance to reduce our activities' environmental impact, we are committed to effectively managing CO2 emissions from our production processes.

During 2021, a decision was made to embark on a journey to measure our GHG emissions, starting with the compilation of our first GHG inventory. Aligned with the Greenhouse Gas Protocol (GHG Protocol) reporting standards, we measured emissions related to activities directly attributable to the company (scope 1) and those related to purchased and consumed energy (scope 2). Through this inventory, we have identified the areas where the greatest CO2 emissions are concentrated and are committed to monitoring and improving our environmental impact over the long term. We remain committed to this in 2022, to ensure greater sustainability and environmental responsibility in the running of our operations.

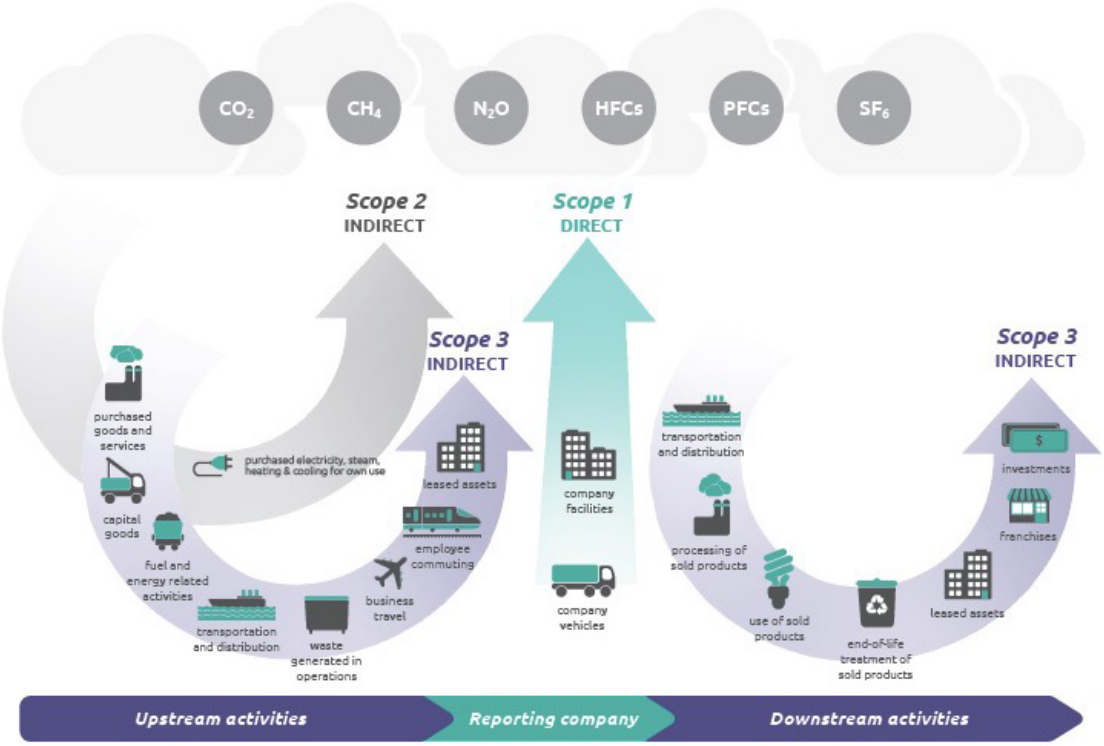
Scope 1, 2 and 3

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.

Figure [1.1] Overview of GHG Protocol scopes and emissions across the value chain



From January 1, 2021 to December 31, 2022, is the period taken into consideration for calculating GHG emissions in the following Sustainability Report. Scope 1 direct emissions from stationary and mobile combustion and leakage of fluorinated greenhouse gases and Scope 2 indirect emissions from purchased power generation were included. For the calculation of Scope 2 indirect emissions, two different values calculated according to market-based and location-based methodologies, respectively, are provided in accordance with the GHG Protocol and GRI Standards. Market-based methodology requires calculating emissions based on the factors of purchased energy sources, in accordance with what is specified in the supply contract. From March 2020, **OMR continued to purchase only 100% renewable electricity certified with a guarantee of origin**, so under this methodology, emissions related to the purchased electricity are zero. In contrast, the location-based methodology involves calculating GHG emissions using national emission factors related to the set of primary energy sources used to generate the electricity ("fuel mix" or energy mix).

PURCHASED ENERGY FROM RENEWABLE SOURCES

As part of an effort to align ourselves with international best practices, starting from this year 2023, we are committed to assessing the possibility of also reporting emissions from our value chain (Scope 3).

Furthermore, we intend to establish a multi-year decarbonization plan in 2023 that, through the definition of appropriate strategies, will enable us to systematically reduce direct and indirect CO2 emissions related to the three types of emissions.
During 2022, the total CO2eq emissions generated by our production activities amounted to 5,070.15 tons (Scope 1 and Scope 2 - Market Based). In comparison with 2021, there was an increase of about 5.8% of the total emissions generated.

GREENHOUSE GAS EMISSIONS PER SCOPE (IN T CO2EQ) *	2021	2022
Scope 1**	**4.793,90**	**5.070,15**
Emissions from production facilities (*stationary combustion*)	4.366,72	4.592,75
Emissions from company vehicles (*mobile combustion*)	356,18	419,34
Other fugitive emissions from production facilities* **	60,27	57,25
Refrigerant gases from air-conditioning systems (*fugitive emissions from air-conditioning*) ***	10,73	0,81
Scope 2 – *Location Based*	**2.910,55**	**2.823,32**
Scope 2 – *Market Based*	**0,00**	**0,00**
Scope 2 – *Market Based*	**4.793,90**	**5.070,15**

Note for methods
(*) 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.

EMISSION INTENSITY	2021	2022	Delta %
Intensity of emissions on turnover (tCo2eq/ M €)	35,75	30,68	-14,18%
Intensity of emissions per unit of product (tCo2eq/n pieces produced)	0,00023	0,00025	+6,17%
Intensity of emissions on weight of production (tCo2eq/t)	0,165	0,176	+6,64%

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 under the responsibility of the EHS (Environment, Health & Safety) office, which fully manages the process, dealing with the following activities:

- weighing of the waste and monitoring of its fates at the time of storage;
- verification of weights found at destination;
- data reporting through waste management software and forms required by regulations;
- verification of requirements at 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 2022, a total of 17,251.08 tons of waste was produced (an increase of about 2.5 percent over the previous year, against a slight reduction in the number of pieces produced), of which 90 percent is steel waste (scraps), the main raw material in our production process, and 95.4 percent is non-hazardous waste.

Besides steel waste, our production cycle also generates significant amounts of waste from chemical-surface treatment and metal coating, such as sludge and degreasing

waste from welding, sandblasting, and tumbling.
So in addition to these two main categories of waste, our production activities involve the generation of other residual types of waste. Significant among them are aqueous suspensions containing paints and varnishes, which result from the painting process, aqueous washing solutions, aqueous concentrates, and packaging waste (such as wood, paper and cardboard, and plastic).

WASTE BY COMPOSITION IN TONS (T)	2021			2022		
	Not to be disposed of	To be disposed	Total	Not to be disposed of	To be disposed	Total
Waste from chemical surface treatment and coating of metals and other materials (EWC 11)	0,00	197,58	**197,58**	0,00	344,34	**344,34**
Waste from processing and physical and mechanical surface treatment of metals and plastics (EWC 12)	15.395,14	382,67	**15.777,81**	15.722,96	381,41	**16.104,37**
Of which steel (EWC 12.01.99)	15.227,47	0,00	**15.227,47**	15.722,96	0,00	**15.722,96**
Other wastes*	317,11	529,82	**846,93**	382,96	419,41	**802,37**
Total	**15.712,25**	**1.110,07**	**16.822,12**	**16.105,92**	**1.145,16**	**17.251,08**

**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 2022, we are proud to say that 93% of waste is not destined for disposal, but instead undergoes recycling (98%) and recovery (2%) activities at sites outside the Company. The 2022 figures show a similar trend to that of 2021, which demonstrates a constant focus on environmental impact and efficient use of resources, which has allowed us to maintain high recycling and recovery rates of the waste produced.
Specifically, steel represents the main component destined for recycling, which is managed through an agreement with the Arvedi Group, our raw material supply partner, described in detail in the chapter on Responsible Sourcing.
We are actively working to reduce the volume of waste going to disposal and promote the sustainable use of resources. This is why other categories of waste, where possible, undergo recycling and/or recovery activities.

Water and wastewater

The geographic location of our plant is listed by the World Resources Institute (www.wri.org) and the Institute for Environmental Protection and Research (www.ispraambiente.gov.it) as one of the areas that could experience water stress with medium to high values by 2030. Our focus, therefore, is on monitoring this resource, which could have both economic and supply impacts due to its future scarcity.

All of our production activities require the use of significant amount of water; however, our utmost attention remains focused even in relation to what was mentioned in the previous paragraph. Specifically, water supply differs according to use and is from well (groundwater) for activities related to the production process and from aqueduct (third-party water resources) for ancillary purposes (e.g., sanitation). Specifically, during 2022, we withdrew a total of 16.35 mega liters of water, registering a decrease of 1.2% compared to the quantity withdrawn in 2021.

WATER WITHDRAWAL (ML) BY SOURCE	2021	2022
Groundwater	9,08	9,35
Freshwater	9,08	9,35
Other types of water	==	==
Third-party water resources	7,48	7,00
Freshwater	7,48	7,00
Other types of water	==	==
Total	**16,56**	**16,35**

Concerning the use of underground water taken from production wells, this is used in the processes of tumbling, pre-treatment and cataphoretic coating. In order to reduce water usage and ensure its recycling, we have adopted three separate recovery systems for each of these processes.
For tumbling, we use a recovery system that separates any liquid parts from the solid parts generated by the process. The solid parts, in the form of sludge, are deposited, while the clean process water is collected in a tank and subsequently reused. During the separation process, flocculants and liquid cleaning products based on cationic polymers are added to neutralise the ionic effects of the particles. These products do

not affect the chemical properties of the processed water, keeping its concentration unaltered. Sludge, containing approximately 20 per cent water, is automatically removed from the system and properly disposed of..

For the cataphoretic pretreatment and painting processes, the treatment system used is based on the integration of several technologies:

- Recirculation of dynamic rinses on special towers with special and differentiated ion exchange resins;
- regeneration of resins with times, modes and volumes of water totally different from traditional systems;
- selection of residues with differentiated physical and chemical treatments of preconcentration and neutralization, followed by a final phase of extraction by vacuum evaporation with a heat pump system.

These systems enable us to achieve the goal of "zero discharge" as they allow total recirculation of spent process water with only the production of reduced volumes of residual and sludge managed as waste through authorized disposers. In 2022, the wastewater managed through authorized disposers was 1041.63 t, up from 2021[2].

With respect to third-party water resources (obtained from the aqueduct) used for purposes ancillary to production activities, we do not have monitoring tools that allow us to quantify the amount of water released after use. However, water discharges to surface water bodies, soil, and subsoil involve only rainwater, stormwater runoff, and water used for sanitation (such as the cafeteria and locker rooms), which are re-injected after being treated. In order for water balance to be increasingly accurate and to be able to identify and reduce every source of waste, by 2023 we intend to start monitoring water flows (withdrawal, discharge, and significant internal uses) with the goal of monitoring by 2024. The defined objective aims to identify every source of waste and abnormal consumption to enable the introduction of specific improvement actions consistent with the relevant context in addition to studying solutions that can harness stormwater for the purpose of non-industrial uses.

Potential impacts of our activities on water resources in terms of contamination risk are minimal. To ensure that water resources are managed in compliance with current regulations and to keep any impacts of our production activities to a minimum, we have established internal instructions that define common management standards. It is also important to note that no incidents of significant leaks or spills of hazardous substances into the environment have been reported in our production plants during 2021 to 2022.

[2]The "Attachments" section provides additional details to meet the information requirements of GRI Standards 303 (2018). The "Attachments" section also presents details of wastewater disposal EWC codes.

Responsible sourcing

We promote a responsible and sustainable sourcing that takes into account the social and environmental impacts of our suppliers and supply chain. As such, we are proud to have continued with our agreement with the Arvedi Group to incentivize the circular use of raw material, which allows us to reduce waste and promote the circular economy. It is our commitment to work with all our suppliers to promote sustainable and responsible practices in order to reduce the social and environmental impacts of our business and generate value for all our stakeholders.

We believe that a responsible management of our supply chain, which takes into consideration environmental and social sustainability elements, is critical to our long-term success. In addition to ensuring a strong relationship with our suppliers, we are committed to promoting sustainability at all levels in the supply chain to ensure product quality, reduce costs, improve management of logistics, and meet compliance criteria. We are committed to working together with our suppliers to promote sustainable practices and to build a more sustainable and resilient supply chain that creates value for our company and society as a whole.

The management of our suppliers is under the responsibility of a Purchasing Function that reports directly to the Chief Executive Officer. The new supplier activation phase involves checking that suppliers possess reputational, quality and compliance with worker health and safety requirements in line with the provisions of our Code of

Ethics and policies.
The evaluation of quality aspects, given the centrality of the issue in the relationship with our customers, involves the following controls:

- checking whether the supplier possesses ISO 9001 certification, which is considered a fundamental guarantee of compliance with product quality requirements;
- evaluation of the technical and technological requirements of the supplier's facilities.

The accreditation process also involves new suppliers handing over and accepting specifications outlining the requirements that suppliers must meet for different product categories. These specifications, in addition to specifying the technical characteristics, define the control and audit activities that we can carry out, including at the supplier's premises.
Concerning suppliers' verification regarding aspects related to environmental issues management, currently, such checks are carried out according to the category and relevance of the product. In particular, the assessment of environmental aspects, assumes particular relevance in the selection of suppliers of steel, paint plant treatments and packaging.

We are facing a number of challenges in the coming years related to the careful selection of our suppliers and the promotion of sustainability in the supply chain. We aim to teach our current suppliers about the values of sustainability that we promote in order to encourage greater adherence to the principles of sustainability and to improve our environmental and social impact. This commitment is not limited to the choice of materials, but covers the entire supply chain of raw materials and components used in our manufacturing operations. We believe it is also important to focus attention on these aspects, and we are committed to working towards these goals. For this reason, by the end of 2023, we also want to draw up a Supplier Code of Ethics that, alongside principles of fairness in managing the relationship and complying with regulations, will also include an indication of principles related to respect for the environment and people. The Code will be sent to all suppliers and its signature by the supplier will become an integral part of contracts with new suppliers and in renewals with existing suppliers.

Throughout 2022, there were 692 suppliers we used, generating a purchase value of approximately EUR 121 million for all raw materials, components, materials and services auxiliary to production. This showed a growth of about 13 % compared to 2021, where the supply value was about 107 million euros for a total of 640 suppliers. Among the materials purchased, the most important component was raw materials and, in particular, steel, which was 90% of it by weight. Gases used for lasers and welding robots (1829 t), packaging materials (728 t) and fasteners (554 t) are also significant.

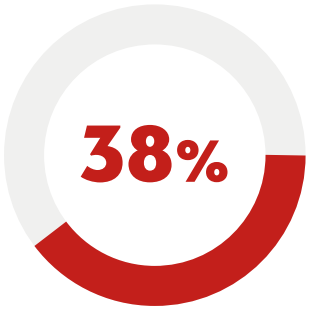
MATERIALS USED BY WEIGHT (IN TONS)	2021	2022
Steel	45.000	33.500
Powders	386	382
Hardware	509	554
Tooling	30	31
Lubricants	20	40
Treatments	107	110
Welding wire	326	250
Gases (for lasers and welding robots)	1.844	1.829
Total packaging	666	728
• **of which lumber**	174	226
• **of which paper and cardboard**	165	169
• **of which plastic**	327	333
Total purchasing weight	**48.888**	**37.424**

Our company uses huge quantities of steel, so the relationship with the steel supply chain is a crucial aspect for ensuring us to be successful in the long term. We are aware of the importance of this issue and the indirect impacts generated through the purchase of raw materials, so we carefully select our steel suppliers, prioritizing those who take initiatives to reduce their environmental impact. One of these suppliers is also our partner Gruppo Arvedi, with whom we have established a long-standing supply relationship. Based near our headquarters, Arvedi Group has been committed to reducing the environmental impact of its production process for years, demonstrating a strong commitment towards sustainability.
Thanks to the implementation of environmental policies, constant improvement of its technologies, and research and innovation, the Arvedi Group is able to produce steel with a high degree of environmental compatibility. In particular, Arvedi, has improved its efficiency index by +2.6% in recent years, achieving a reduction in carbon dioxide production of about 250 thousand tons per year. Thanks to the increased performance of ESP (Endless Strip Production) technology, and the adoption of energy efficiency policies, the Arvedi Group is able to achieve much higher yields than the production mix of traditional steelmaking, generating significant energy savings. The collaboration with Arvedi thus allows us to adopt a sustainable business model, demonstrating the importance of the steel supply chain in our sustainability strategy.

The agreement signed with Arvedi Group in 2021 aimed at encouraging the circular use of raw material is proceeding satisfactorily. Under this agreement, every month we supply Arvedi with our total scrap metal (SCRAP) waste and in return we receive

recycled raw material. In 2022 we delivered about 15,400 tons of scrap to Arvedi; against this delivery we ordered about 14,300 tons of sheet metal for the year 2022.

Due to this collaboration, in 2022 about 43% of the total steel we have sourced has undergone a recycling process, a percentage that has increased compared to 2021, when this figure was around 38%, resulting in a reduction in indirect emissions generated by steel production of about 21,000 tCO2eq in 2022 (+23.5% compared to 2021). The circular use of resources is an important value for OMR, in line with our commitment to a sustainable environment.



Our commitment towards a responsible procurement management also includes the other materials we use. In 2022, we recorded an increase in the percentage of recycled materials purchased, now accounting for 38 percent of the total, up from 35 percent in the previous year. However, the percentage of renewable materials used has remained constant at 1 percent of the total, partly due to the specific requirements of our production process.

We also have been intensifying our efforts to promote the use of

sustainable and recycled packaging

In particular, we have made a request to our main paper/cardboard packaging supplier, and we are pleased to announce that starting with deliveries in May 2023, we will begin receiving some **Forest Stewardship Council (FSC)-certified** packaging references. The FSC certificate guarantees that the wood used to produce our packaging comes from responsibly and sustainably managed forests. We are proud of this step forward and will continue to work to further improve the sustainability of our supply chain.

FSC

OMR's responsible procurement management is also embodied in our search for local suppliers who not only guarantee the required quality requirements but also, all things being equal, prefer sustainable business models.
Selecting local suppliers not only brings benefits related to reduced costs and logistical risks, or greater business continuity. It also represents a moral and social commitment to the local community. This can lead to greater trust and support from the local community, which can benefit from the advantages of our presence. In addition, choosing local suppliers is being a way to promote environmental sustainability by going out to reduce the environmental impact caused by transportation.

213
local suppliers

Specifically, during 2022, we used **213 local suppliers** (located within a 100 km radius of our headquarters) representing about 30 percent of our total suppliers. A significant component of these suppliers (86 suppliers, 12.4%) are suppliers of strategic importance to our business (for which the purchase value exceeds €50,000 annually).

Relationship with our community

The relationship we have with our local community plays a central role for OMR, which recognizes the importance of giving back to the community that which it has received, in a selfless and sustainable way. This interest in the local community translates into initiatives that promote sociality, culture, the environment, and health. Such initiatives not only help improve the company's reputation, but are also a way to strengthen the company's recognition and gain important indirect benefits.

OMR is more than just a company; it is part of a larger community of people and resources that surround us. Our business has an impact on the local area and the people who live there. For this reason, we want to have a responsible attitude toward the local community.
It is not just about giving something back to the area in which we operate, but about creating a bond of mutual trust and cooperation. In fact, working in synergy with the surrounding realities can bring many benefits to both the local community and our company.

Through donations, sponsorships, investments in art and culture, and corporate volunteer initiatives, we strive to maximize positive effects that create prosperity for the community.
We are constantly committed to our local area, aiming to create economic value by

promoting social progress and safeguarding environmental resources. All decisions to intervene are made directly by the CEO, demonstrating the importance attached to the local community. All in all, we aim not only at creating value for our employees and shareholders, but also for the community of which we are a part, recognizing the importance of active and long-term collaboration.

As a result of this strong connection with the local area, in addition to our annual donation to the parish and a number of local associations, we supported AIRC, one of Italy's leading organizations funding cancer research, with a €5,000 donation. AIRC funds research projects in many fields, from basic research to clinical research and to translational research, that is, the research that deals with transferring basic research findings directly to patients.

We are also committed to Italian art and public cultural heritage; we are alert to needs expressed by institutions within the territory of Brescia, choosing the projects that, on a yearly basis, we consider most significant: we supported the Art Bonus with an intervention of €20,000.00 in 2021 and €130,000.00 in 2022. In particular, in 2022 we supported the conservative restoration of the facades of the bell tower of the former Church of the Disciplines in Remedello, now home to the Remedello Civic Archaeological Museum. In addition, we supported the Brescia Musei Foundation with a donation of €30,000.

Globally, we supported One Ocean Foundation, a nonprofit organization whose mission is to safeguard the oceans and promote sustainable practices for the management of marine resources, on a global level for the second year in a row. The foundation aims to raise awareness of environmental problems related to the sea and oceans by promoting scientific research and the development of innovative solutions to protect marine ecosystems.

Specifically, One Ocean Foundation focuses on four main thematic areas: reducing marine pollution, conserving marine biodiversity, promoting sustainable fishing, and mitigating climate change that affects the oceans. The foundation works in collaboration with a wide network of partners and stakeholders, including businesses, scientific institutions and governments, to develop shared solutions and promote the adoption of sustainable practices worldwide.

2021 COMMUNITY INTERVENTIONS	amount	%
Emergency covid - Piero Park Association ODV	€ 50.000	25%
Vaccine for all Medicus Mundi	€ 7.410	4%
Parish	€ 2.000	1%
Charity	€ 29.200	14%
Cultural sector (Art Bonus - Brescia Musei Foundation)	€ 50.000	25%
One Ocean Foundation	€ 50.000	25%
Sports sponsorships	€ 15.000	7%
Total donated in 2021	**€ 203.610**	**100%**

2022 COMMUNITY OPERATIONS	importo	%
AIRC - Research Against Cancer	€ 5.000	2%
Parish	€ 14.000	6%
Charity	€ 9.800	4%
Cultural sector (Art Bonus - Brescia Musei)	€ 160.000	63%
One Ocean Foundation	€ 50.000	20%
Sports sponsorships	€ 15.000	6%
Total donations in 2022	**€ 253.800**	**100%**

Methodological Note

The Sustainability Report 2022 of OMR S.p.A., covering the time period from January 1 to January 31, 2022, was prepared, with the support of an external consultant (Impactage Srl), in accordance with GRI Standards (Global Reporting Initiative). No audit and assurance firm has been included for the published Report at this time.
The Sustainability Report is prepared annually by OMR S.p.A. and is submitted to the Board of Directors for approval.
The Sustainability Report 2022 was approved by the Board of Directors on July 11, 2023 by evaluating the completeness and consistency of the relevant topics in the materiality matrix.
The reporting scope covers OMR S.p.A. only.
The Sustainability Report 2022 was prepared voluntarily by OMR S.p.A. and does not take on the status of a Consolidated Non-Financial Statement (DNF) pursuant to Legislative Decree No. 254/2016. The Sustainability Report 2022 is also not subject to third-party verification.

Contacts

For those who wish to receive any additional information, address questions, comments or request clarifications regarding OMR S.p.A.'s sustainability activities, they may do so by emailing: **sustainability@omrspa.com**.

GRI Table of Contents

Statement of Use	OMR S.p.a has reported in accordance with GRI Standards for the period January 1 to December 31, 2022.
Used GRI 1	GRI 1: Foundation 2021
Relevant GRI Industry Standards	None

				OMISSIONS	
GRI STANDARD	**INFORMATION**	**LOCATION**	**REQUIREMENTS OMITTED**	**REASONS**	**EXPLAINATION**
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	**OMR's people**			
	2-8 Non-employee workers	**OMR's people**			
	2-9 Structure and composition of Governance	**Governance model**			
	2-10 Appointment and selection of the highest governing body	**Governance model**			
	2-11 President of the highest governing body	**Governance model**			
	2-12 Role of the highest governing body in the control of impact management	**Materiality Analysis**			

				OMISSIONS	
GRI STANDARD	INFORMATION	LOCATION	REQUIREMENTS OMITTED	REASONS	EXPLAINATION
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	Materiality Analysis; 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	Letter to stakeholders	2-21 a,b	Not applicable	Family-controlled companies with active operational roles
	2-22 Sustainable development strategy statement	Integrated policy for environment, sustainability, occupational health and safety; Quality Policy; Code of Ethics and Behavior			
	2-23 Policy commitment	Quality Policy			
	2-24 Integration of commitments in terms of policy	Integrated policy for environment, sustainability, occupational health and safety; Quality Policy; Code of Ethics and Behavior			
	2-25 Processes to remedy negative impacts	Organizational Management and Control Model			
	2-26 Mechanisms for requesting clarification and raising concerns	Organizational Management and Control Model			
	2-27 Compliance with laws and regulations	The management of environmental impacts			
	2-28 Membership in associations	Who we are			

				OMISSIONS	
GRI STANDARD	INFORMATION	LOCATION	REQUIREMENTS OMITTED	REASONS	EXPLAINATION
GRI 2: 2021 General Disclosure	2-29 Approach to Involving	Stakeholder Engagement			
	2-30 Stakeholders	Employees covered by collective bargaining agreements			
MATERIAL TOPICS					
GRI 3: Material Topics 2021	3-1 Process of determining material themes	Materiality Aanlysis			
	3-2 List of material themes	Materiality Analysis			
ECONOMIC PERFORMANCE					
GRI 3: Material Themes in 2021	3-3 Management of material issues	Our numbers			
GRI 201: Economic Performance	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: Products and clients			
GRI 202: Market Presence in 2016	202-2 Percentage of senior management hired	Tables supplementing the "Our Numbers" 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-Corruptionin 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			

				OMISSIONS	
GRI STANDARD	INFORMATION	LOCATION	REQUIREMENTS OMITTED	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: Energy intensity electrical consumption			
	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 Topic 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			

				OMISSIONS	
GRI STANDARD	INFORMATION	LOCATION	REQUIREMENTS OMITTED	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 or hirings and terminations of employees by age; Number of hirings and terminations of temps by age			
	401-2 Benefits provided for full-time employees, but not for part-time or fixed-term employees	Quality of the Employment Relationship			
HEALTH AND SAFETY AT WORK					
GRI 3: Material Issues 2021	3-3 Management of material issues	HEALTH AND SAFETY AT WORK			
GRI 403: Occupational Health and Safety 2018	403-1 Occupational health and safety management system	HEALTH AND SAFETY AT WORK			
	403-2 Hazard identification, risk assessment and accident investigation	HEALTH AND SAFETY AT WORK			
	403-3 Occupational health services	HEALTH AND SAFETY AT WORK			
	403-4 Worker participation and consultation and communication on occupational health and safety	HEALTH AND SAFETY AT WORK			
	403-5 Occupational health and safety training for workers	Workplace Health and Safety Training			

				OMISSIONS	
GRI STANDARD	INFORMATION	LOCATION	REQUIREMENTS OMITTED	REASONS	EXPLAINATION
GRI 403: Occupational Health and Safety 2018	403-6 Worker health promotion	HEALTH AND SAFETY AT WORK			
	403-7 Prevention and mitigation of occupational health and safety impacts within business relationships	HEALTH AND SAFETY AT WORK			
	403-9 Occupational accidents	Occupational accidents*; Tables to complement the section 'People at OMR"			
	403-10 Occupational diseases	Worker Health and Safety: Tables to complement the section 'People at OMR			
TRAINING AND TEACHING					
GRI 3: Material Issues 2021	3-3 Management of material issues	Employee training and professional development			
GRI 404: Training and Teaching In 2016	404-1 Average annual training hours per employee	Total Training Hours and Average Hours per Employee; Total Training Hours and Average Hours by Gender; Total Training Hours and Average Hours by Job Position			
DIVERSITY AND EQUAL OPPORTUNITY					
GRI 3: Material Issues 2021	3-3 Management of material issues	Diversity and Equal Opportunity			
GRI 405: Diversity and Equal Opportunity	405-1 Diversity in governing bodies and among employees	Diversity and Equal Opportunity; 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 Management of material issues	Community relationship			
GRI 413: Local Communities in 2016	413-1 Activities involving local community involvement, impact assessments and development programs	Community relationship			

				OMISSIONS	
GRI STANDARD	INFORMATION	LOCATION	REQUIREMENTS OMITTED	REASONS	EXPLAINATION
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		2021	2022	Delta
Generated value	**Revenues**	**133.257.498 €**	**165.646.694 €**	**24%**
Distributed value	Operating Costs	96.282.778 €	104.261.970 €	8%
	Total Salary Expenses	25.491.821 €	27.411.026 €	8%
	Benefit Expenses	550.278 €	1.062.089 €	93%
	Donations and Sponsorship Expenses (Community Initiatives)	203.611 €	253.800 €	25%
	Employee Training Expenses	43.439 €	27.272 €	-37%
	Employee Health and Safety Expenses	465.674 €	405.125 €	-13%
	Interest Paid to Capital Providers	44.145 €	37.235 €	-16%
	Payments to Public Administration*	3.332.845 €	5.574.732 €	67%
Generated value	**Revenues**	**126.414.591 €**	**139.033.249 €**	**10%**
Generated value	**Revenues**	**6.842.907 €**	**26.613.445 €**	**289%**

* Only paid taxes

Charts to complement the section "OMR's people"

INFORMATION 2-7 At 31.12.2022		
Women	**Men**	**Total**
Number of employees (number of people)		
31	429	460
Number of permanent employees (number of people)		
31	429	460
Number of temporary employees (number of people)		
-	-	-
Number of employees with hours not guaranteed (number of people)		
-	-	-
Number of full-time employees (number of people)		
31	429	460
Number of part-time employees (number of people)		
-	-	-

Percentage of senior management hired from the local community	2021	2022
Number of local managers and executives	6	7
Percentage local managers	100%	100%

	2021		2022	
Occupational accidents	**Employed**	**Temporary**	**Employed**	**Temporary**
Deaths resulting from injuries	0	0	0	0
Accidents that resulted in an absence of more than 6 months	0	0	0	0
Recordable accidents	5	8	11	6
Total hours worked	691.722	317.356	818.390	252.423
Rate of deaths resulting from accidents (Incident rate)	0	0	0	0
Rate of accidents that led to an absence of more than 6 months (Incident rate)	0	0	0	0
Rate of recordable injuries (Incident rate)	1,45	5,04	2,69	4,75

	2021		2022	
Occupational diseases	**Employed**	**Temporary**	**Employed**	**Temporary**
Deaths resulting from occupational diseases	0	0	0	0
Occupational diseases upheld during the year	0	0	0	0

Charts supplementing "Waste Management"

Waste NOT for disposal through recovery operations, in tons (t)	2021	2022
	At an external site	At an external site
Hazardous Waste	0	0
Preparation for reuse	0	0
Recycling	0	0
Other recovery operations	40,81	63,00
Total	**40,81**	**63,00**
Non-Hazardous Waste		
Prepared for reuse		
Recycling	15.377,83	15.705,58
Other recovery operations	293,61	337,34
Total	**15.671,44**	**16.042,92**
Waste to be disposed of by recovery operations, in tons (t)	**2021**	**2022**
	At an external site	**At an external site**
Hazardous Waste		
Incineration (with energy recovery)		
Incineration (without energy recovery)		
Landfilling		
Other disposal operations	617,93	731,45
Total	**617,93**	**731,45**
Non-Hazardous Waste		
Incineration (with energy recovery)		
Incineration (without energy recovery)		
Landfilling		
Other disposal operations	492,14	413,71
Total	**492,14**	**413,71**

Waste by composition, in tons (t)	2021			2022		
Waste type	**Waste generated**	Waste not destined to be disposed of	Waste to be disposed of	**Waste generated**	Waste not destined to be disposed of	Waste to be disposed of
Waste of Inorganic Chemical Processes	1,80	0,00	1,80	0,00	0,00	0,00
Waste from the manufacture, formulation, supply and use of coatings (paints, varnishes and glazes), adhesives, sealants and printing inks (EWC 08)	142,01	1,15	140,86	128,16	1,98	126,18
Waste from chemical surface treatment and coating of metals and other materials; nonferrous hydrometallurgy (EWC 11)	197,58	0,00	197,58	344,34	0,00	344,34
Waste from processing and physical and mechanical surface treatment of metals and plastics (EWC 12)	15.777,81	15.395,14	382,67	16.104,37	15.722,96	381,41
· of which Steel (EWC 12.01.99)	15.227,47	15.227,47	0,00	15.544,94	15.544,94	0,00
Packaging wastes, absorbents, rags, filter materials and protective clothing (EWC 15)	330,49	305,56	24,93	334,23	329,97	4,26
Waste not otherwise specified in the list (EWC 16)	367,94	6,04	361,90	297,33	8,36	288,97
Waste from construction and demolition operations (EWC 17)	1,61	1,48	0,13	41,92	41,92	0,00

Waste by composition, in tons (t)	2021			2022		
Waste type	**Waste generated**	Waste not destined to be disposed of	Waste to be disposed of	**Waste generated**	Waste not destined to be disposed of	Waste to be disposed of
Waste from waste treatment plants, off-site wastewater treatment plants, as well as from water purification and preparation for industrial use (EWC 19)	0,20	0,00	0,20	0,00	0,00	0,00
Municipal waste (household and similar waste generated by commercial and industrial activities as well as institutions) including waste from separate collection (EWC 20)	2,89	2,89	0,00	0,73	0,73	0,00
Total	**16.822,12**	**15.712,25**	**1.110,07**	**17.251,08**	**16.105,92**	**1.145,16**

Charts supplementing Water and Drainage section

Water disposed as waste*			2021	2022
Internal designation	**Official designation**	**Description of origin**	Quantity disposed of (ton)	
Cataphoresis water	aqueous slurry containing paint and varnish (other than those mentioned in EWC 08 01 19) - EWC 08.01.20	Waste water generated by osmosis filtration on the recirculation circuit and pH adjustment of cataphoresis water.	107,51	96,83
Exhausted degreasing bath	degreasing wastes containing dangerous substances - EWC 11.01.13	Alkaline degreasing solution waste, with added surfactants, from the degreasing process.	171,2	325,37
Spent oil from processing	mineral-based machining oils, not containing halogens (except emulsions and solutions) - EWC 12.01.07	Mineral oil waste used in lubrication, hydraulic and hydraulic circuits of machine tools and industrial machines.	1,04	1,74
Spent emulsions	emulsions and solutions for machinery, not containing halogens - EWC 12.01.09	Emulsion from machine tools such as CNC lathes, machining centers, grinding machines, milling machines.	13,65	12,52
Equipment and machine wash waters	aqueous washing solutions - EWC 12.03.01	Wastewater from the washing of equipment and machines in general and finished "industrial" type concrete floors.	318,81	316,2
Evaporator concentrator residue	aqueous concentrates (other than those in CER 16.10.03) - CER 16.10.04	Concentrated residue from the treatment evaporator of the clarified water treatment plant.	268,42	288,97
		Washing residue from the evaporator-concentrator.		
Total			**880,63**	**1041,63**

Charts complementing the "Responsible Sourcing" chapter

Renewable and non-renewable materials by weight (in tons)	2021	2022
Total non-renewables	**31.549**	**22.729**
Steel	28.000	19.200
Powders	386	382
Hardware	509	554
Tooling	30	31
Lubrificants	20	40
Treatments	107	110
Welding wire	326	250
Gases (for laser and welding robots)	1.844	1.829
Total packaging	**327**	**333**
· of which lumber	0	0
· of which paper and cardboard	0	0
· of which plastic	327	333
Rinnovabili totale	**339**	**395**
Steel	0	0
Powders	0	0
Hardware	0	0
Tooling	0	0
Lubrificants	0	0
Treatments	0	0
Welding wire	0	0
Gases (for laser and welding robots)	0	0
Total packaging	**339**	**395**
· of which lumber	174	226
· of which paper and cardboard	165	169
· of which plastic	0	333
Materiali riciclati totale	**17.000**	**14.300**
Steel	17.000	14.300
Powders	0	0
Hardware	0	0

Tooling	0	0
Lubrificants	0	0
Treatments	0	0
Welding wire	0	0
Gases (for laser and welding robots)	0	0
Total packaging	**0**	**0**
· of which lumber	0	0
· of which paper and cardboard	0	0
· of which plastic	0	0

Charts supplementing the chapter "Water and wastewater discharges"

Drainage Water	2021	2022
Drainage Water	**20,24**	**20,93**
Third-party water resources	**7,10**	**6,65**

AUTOMOTIVE STEEL COMPONENTS

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