



Sustainable Procurement Policy

About this version

This Policy replaces the previous Procurement Policy and formally incorporates environmental, social and governance (ESG) principles into procurement activities, supporting M-Cube Group's sustainability objectives and commitments.

1. Purpose

M-Cube Group recognizes that supplier selection and purchasing decisions can significantly influence environmental, social and governance (ESG) performance across the value chain. The purpose of this Policy is to ensure that procurement activities support the Group's business objectives while promoting responsible environmental, social and ethical practices.

2. Scope

This policy applies to:

- All employees involved in purchasing decisions.
- All suppliers and service providers.
- All procurement activities performed by M-Cube Group companies.

Requirements relating to information security, privacy, cybersecurity and business continuity are governed through the Company's ISO 27001 ISMS (Information Security Management System) policies and supplier management processes.

Requirements relating to Supplier Evaluation, Monitoring, Continuous Improvement, Relationship Management Procedures are governed through the ISO 9001 QMS (Quality Management System).

3. Procurement Objectives

M-Cube Group aims to:

- integrate ESG considerations into procurement decisions;
- promote responsible, sustainable and ethical supply chains;
- reduce sustainability-related risks;
- encourage continuous improvement among suppliers;
- support local suppliers and businesses where appropriate, contributing to local economic development while maintaining competitiveness and quality requirements;
- create long-term value for customers, employees, shareholders and society.

4. Sustainable Procurement Principles

4.1 Ethical Business Conduct (Code of Conduct)

Suppliers shall operate in compliance with M-Cube Code of Conduct and with applicable laws or demonstrate compliance with equivalent documented standards.



Suppliers shall operate ethically, lawfully and responsibly, respecting anti-corruption, human rights, labour, health and safety, environmental, confidentiality and compliance requirements across the entire supply chain

4.2 Environmental Responsibility

Suppliers are encouraged to reduce their environmental impact through efficient use of resources, waste reduction, minimization of hazardous substances, use of materials from legal sources, compliance with environmental regulations, sustainable innovation and continuous improvement.

Suppliers are encouraged to reduce greenhouse gas emissions, improve energy efficiency and support climate-related objectives wherever relevant.

4.3 Value for Money

Purchasing decisions shall consider overall value, including quality, reliability, lifecycle costs, sustainability performance and business resilience.

4.4 Human Rights

Suppliers are expected to respect internationally recognized human rights, provide fair working conditions, prohibit child labor and forced labor, and ensure equal opportunities and non-discrimination in the workplace.

5. Governance and Responsibilities

Group President

Has overall accountability for this Policy and its effectiveness.

Purchasing Function

Is responsible for implementing this Policy, evaluating suppliers and integrating ESG considerations into procurement activities and maintaining appropriate records demonstrating the application of sustainable procurement principles.

Employees

Must comply with this Policy and support sustainable procurement objectives.

6. Compliance

M-Cube Group reserves the right to request evidence of compliance from suppliers and to take appropriate actions where significant non-compliance is identified.

ESG due diligence activities may be applied on a risk-based basis, considering factors such as supplier criticality, country of operation, industry sector and sustainability risk exposure.

Supplier sustainability performance may be periodically monitored through questionnaires, certifications, self-assessments, audits or other appropriate evaluation mechanisms.

This Policy shall be reviewed periodically and updated as necessary.

7. Statement of Commitment

M-Cube Group is committed to using its purchasing activities to promote responsible business practices and contribute positively to environmental, social and governance objectives across its supply chain.

This policy is effective as of 01/07/2026 and will be reviewed and updated as necessary to reflect changes in our operations and to develop best practices.

Milan, 30/06/2026

A handwritten signature in black ink, appearing to be "Manlio Romanelli", written over a light gray rectangular background.

Manlio Romanelli
Group President