



MANNI GROUP
BUILDING FUTURE

SOURCING POLICY

JULY 2024

ENGLISH



INTRODUCTION

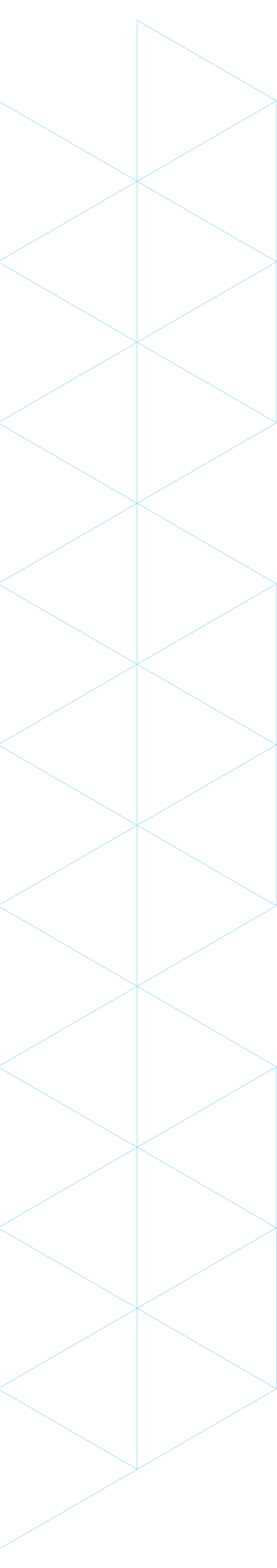
Manni Group's business model, leader in the international market of processing steel components and metal insulation panels for buildings and active in the renewable energy sector is strongly characterized by its supply policy. This model features the supply of pre-processing services, finishing and preparation for the installation, as well as the transforming of raw materials into a product of lasting significance. This makes the Sourcing Policy and its application a key element to add value to the company and its shareholders.

This Policy reassumes the vision and the development strategy of the Group, the Code of ethics and the Sustainability Policy, making its application substantial; it takes the form of a document which is constantly updated and, through the involvement of the suppliers, makes the choice of supplies coherent with the evolution of the business strategy.

Manni Group extends a unified and transversal approach to sustainability, which involves the entire supply chain: under the Policy, the company and all other businesses controlled by the group are committed to the integration of the social/environmental variable in the management of the supply chain allowing the identification, prevention and diminution of the existing or potential impact.

Manni Group intends to consolidate its own market leadership, contributing to an increase in the demand for sustainable products and services by offering products with a high social/environmental performance.

In fact, the application of the supply Policy of the Group determines:

- The traceability of the main social/environmental indicators of the products
 - The comparability of the relative performances
 - An efficient evaluation of the materials and the innovations of the products
 - The constant updating of the development strategies of the Group
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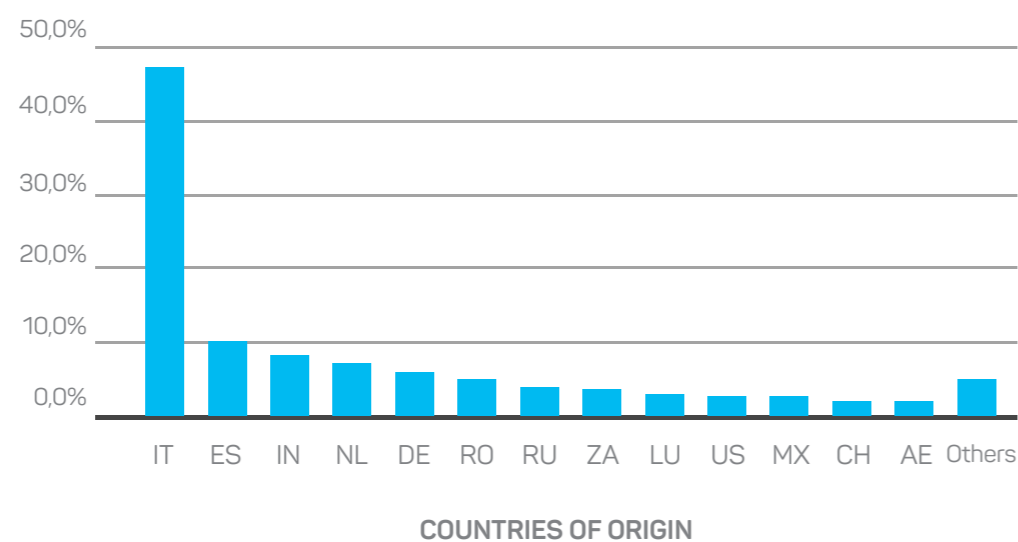
THE MAIN SOURCES OF INSPIRATION OF THE POLICY

The Sourcing Policy of Manni Group acknowledges the fundamental principles laid down by the Global Compact Initiative of the United Nations, universally recognized because of its origin in: the Universal Declaration of Human Rights, the Declaration of the International Labour Organization on the Fundamental Principles and Rights at Work, the Rio Declaration on Environment and Development and the United Nations Convention against Corruption.

FIELDS OF APPLICATION

Manni Group has an extensive supply chain that includes over 1300 suppliers and more than 10,000 clients in 64 countries. The Group purchases input materials and products from 32 countries. These materials range from steel to chemical products, to insulating materials, and include carpentry, transport and services.

ORIGIN OF PRODUCTS PURCHASED - MANNI GROUP 2017



National purchases * 49,8%
Foreign purchases * 50,2%

* Analyses conducted on each of the production companies of the Manni Group Group and subsequently aggregated. Products coming from the same nation as the relative company, are classified as "national"; products coming from a nation that is different from that of the relative company are classified as "foreign".

LA SOURCING POLICY

1. GENERAL OBJECTIVES

The supply policy of Manni Group, and the integration of the suppliers into the business model, aim at providing an opportunity for the growth of partners and the value of the company. The objectives that Manni Group pursues through the Policy are:

- Minimise the social/environmental impact in the supply chain;
- Guarantee that its own suppliers and partners share the principles and values pursued by the Group;
- Guarantee the transparency of the suppliers concerning the criteria of supply of raw materials;
- Reduce operational risks and risks of compliance;
- Purchase from companies pledged to improving quality according to the certification of products and processes;
- Improve the ethical, social and environmental credentials of the products and services offered and therefore the brand reputation of the company;
- Promote the innovation of sustainable products and processes;
- Raise and strengthen the level of involvement of our suppliers and clients.

2. QUALIFICATIONS OF SUPPLIERS

In the process of qualifying suppliers, Manni Group carries out a quality/quantitative evaluation of the following elements:

- Technical and managerial capacities
- Quality of performance
- Economic reliability
- Respect for ethical requirements
- Care and protection of the environment and of biodiversity
- Adoption of significant social/environmental practices:
 - Plans and actions for the reduction of emissions
 - Energy efficiency
 - Rate of waste recyclability and statement of origin
 - Reduction of hazard level of substances used
 - Eco-efficiency of products and materials
 - Policies of safety and quality, local communities
 - Active participation in Sustainability Networks
 - Initiatives of green office/employee engagement
 - Communication of our commitments through written Sustainability or Integrated report
- Transparency concerning the criteria of supply of raw materials
- Development of business models oriented towards the circular economy
- Policies on innovation and sustainability of products and processes
- Conformity to the principles laid down by the present Policy
- Adoption of a company code of ethics
- Possession of certification

3. AREAS OF APPLICATION

ETHICS AND HUMAN RIGHTS

Manni Group is committed to respecting the rights of its collaborators and requests from its suppliers and partners the development of policies and procedures that promote the respect of human rights.

The suppliers and partners of the Group are encouraged to perform their duties according to the principles set out in the Manni Code of Ethics, pledged to the principles of trust, honesty, transparency, the central importance of human resources, the safeguarding of the workplace and the environment, social responsibility, loyalty, fairness and respect of the current norms.

Manni Group requires that its suppliers carry out their activities in an ethically correct manner, acting with integrity.

Finally, Manni Group asks its supply chain to contrast every form of discrimination at the workplace concerning gender, sexual orientation, nationality, race, language, religion, political opinion, age and other personal and social conditions.

SAFETY

Manni Group favours suppliers in possession of the most rigorous International certification in matters of safety at the workplace and safeguard of health (OHSAS 18001), and is committed to the constant upgrading of its standards.

ENVIRONMENT

In the process of selection and purchase, the Group not only manages its supply chain considering economic competitiveness and the conformity to quality, but also gives considerable importance to the respect of advanced social/environmental criteria.

With regard to these, Manni Group favours suppliers who:

- Keep account of their own social/environmental impact, both direct and indirect (emissions, water, raw materials, waste, etc)
- Set ambitious targets of reduction of these impacts in the short, medium and long term
- Put in place performance monitoring systems

Manni Group has chosen to adopt the Life Cycle Assessment approach on the entire supply chain in order to guarantee the social/environmental comparability of the company's products.

Manni Group chooses suppliers that develop specific Waste Management projects that aim at increasing the process of recycling the materials used by them. More specifically, the company wishes to offer its contribution in the promotion of a steel sector that is traceable and 100% circular that no longer needs to consume raw materials, according to the approach "Beyond Raw Materials".

In this respect, Manni Group favours suppliers that set incremental targets of recycled materials in their products.

LOCAL COMMUNITIES

The Group gives great importance to the evaluation of the impact of its own business on the local community. Manni Group selects suppliers that:

- Analyse and map the main social/environmental concerns generated by its activities.
- Promote the launching of significant projects of requalification, compensation and/or programmes aimed at reducing impacts defined on the basis of clear indicators (e.g. air quality, water quality, etc.)

INNOVATION

Manni Group gives preference to suppliers that, in relation to their own turnover, devise appropriate plans of investment in the research and development of innovative products and solutions with a low environmental impact and oriented towards the circular economy.

TRAINING

Manni Group prefers suppliers that, considering the internal and external resources of the company, give the most importance to specific training initiatives on the subjects of sustainability and the green & circular economy, following the logic of the supply chain between industries.

POLICY REVIEW

Manni Group carries out a periodic update of the Policy and the relative KPI in order to maintain and increase the social/environmental performance of the Group regarding the evolution of emerging issues, the norms, the scientific evidence and international scenarios.

Manni Group has planned to gradually integrate minimum thresholds of functional performance as part of the instruments of supplier qualification in an upgrade of the social/environmental sustainability of the entire supply chain.

The activity of stakeholder engagement is ever-present and transversal to the strategy of business sustainability of the Group. This activity is also included in the process of defining the present Policy and subsequent updating with the scope of involving the various bodies (NGO, institutions, relative trade associations, universities, research centres, as well as suppliers).

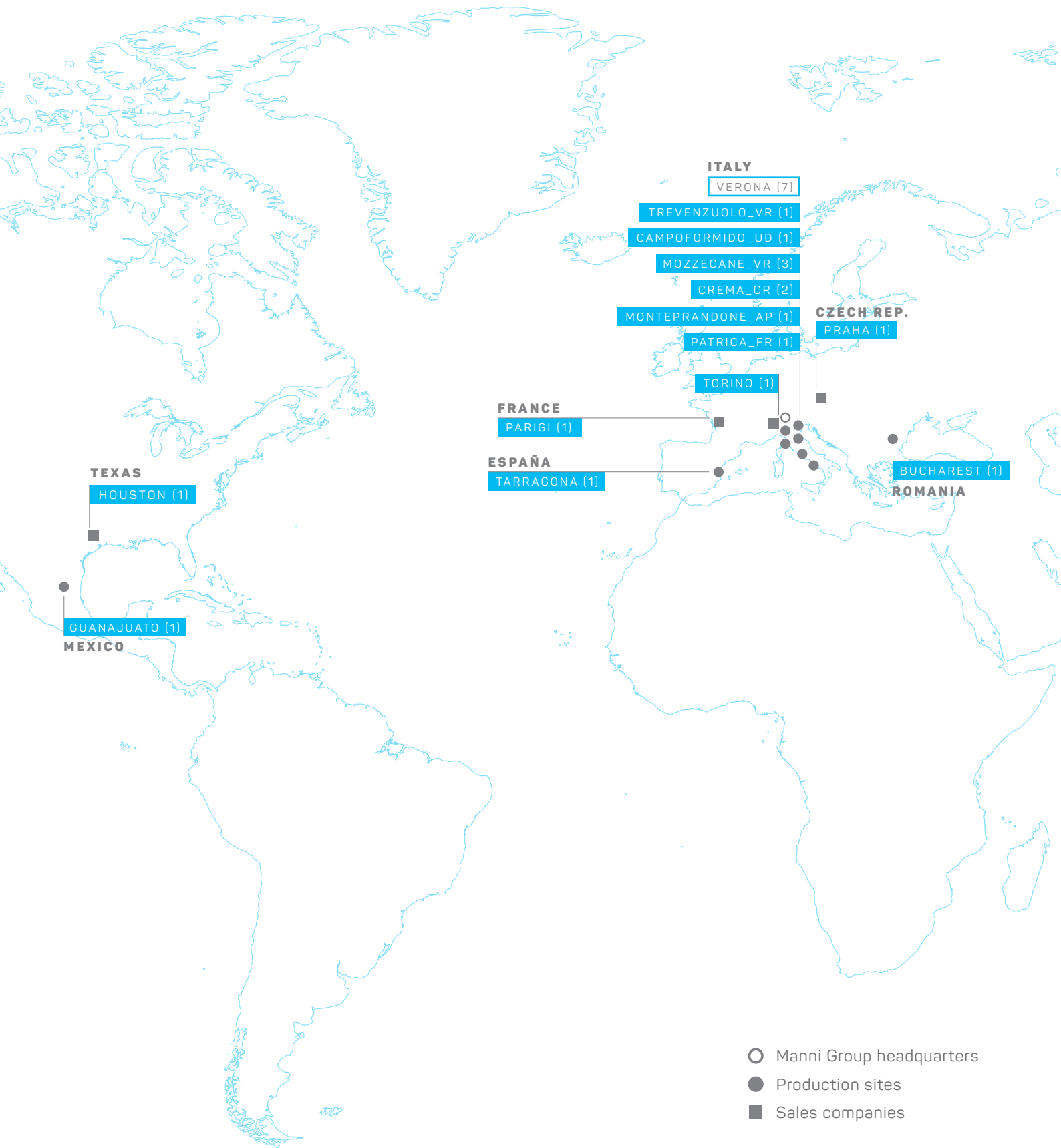
QUALIFICATION TOOLS AND COMPLIANCE CHECKS

The qualifying procedure for suppliers is based on a questionnaire and it will make use of an information system for business management (SAP).

Manni Group will carry out a periodical compliance check of suppliers according to the principles set out in the Policy, using self-evaluation questionnaires concerning social/environmental performances, site visits and second party audits.

Enrico Frizzera
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Chief Procurement & Logistic Officer



- MANNI GROUP headquarters
- Production sites
- Sales companies



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