

15. ESRS E1 - Climate change



Governance

For the **steel sector**, the transition to a low-carbon economy represents a structural challenge. In fact, it is a "**hard-to-abate**" sector, i.e. one that presents significant challenges in reducing emissions as the relevant production processes are complex and require large amounts of high-temperature energy.

In this context, Feralpi Group has developed an ambitious **climate strategy** over the years, supported by the continuous search for advanced technical and technological innovations and by targeted long-term investments. By doing so, the Group intends to establish itself as a point of reference in the steel industry for the transition towards more efficient, resilient and environmentally friendly industrial models.

[ESRS 2 GOV-3]

Given the importance of the issue, a formalised performance management system (MBO) is in place for the managerial level in the Group's companies in Italy and Germany, based on objective quantitative and qualitative indicators. These include the objectives in the Feralpi Group ESG Scorecard, which includes targets relating both to decarbonisation, in terms of specific CO₂ emissions (Scope 1, 2 and 3 core boundary) and absolute emissions (Scope 3 non-core boundary), and to the use of renewable energy.

These targets are crucial to align with global emission reduction commitments and to contribute to collective efforts against climate change.

For further details on remuneration schemes, refer to paragraph **ESRS 2 GOV-3** in **Section 14**.

Strategy

E1-1 Transition plan for climate change mitigation

[ESRS E1-1 14]

Reducing greenhouse gas emissions in the sectors in which the Group operates, from construction steels to special steels, is essential for mitigating climate change, as its impacts are increasingly frequent and intense globally. To tackle this challenge and to align with evolving European regulations and international agreements, Feralpi Group has developed a **climate transition plan**, a framework that specifies the strategies for reducing Scope 1 and Scope 2 emissions and details the practices, processes, and investments aimed at achieving this objective.

The Group is concurrently committed to collaborating with other players in its supply chains to reduce indirect emissions from the supply chain and transport (Scope 3).

[ESRS E1-1 16.a]

Feralpi Group has divided the climate transition plan into two time horizons, short term (2030) and long term (2050), with the aim of helping to limit the global temperature increase to within 1.5°C. To ensure the alignment of Feralpi Group's decarbonisation targets with the Paris Agreement, they were developed following the guidelines relating to the steel sector published by the **Science-based Targets Initiative (SBTi)**¹⁸, an organisation that independently evaluates and approves the company's greenhouse gas objectives.

For more information on the decarbonisation goals, refer to **ESRS E1-4**.

[ESRS E1-1 16.b]

To achieve the established objectives, Feralpi Group has collaborated with expert strategic partners to identify, assess, and prioritise the **technological and systemic levers** available for reducing greenhouse gas emissions. This identified the following levers:

- Scope 1 emissions: Process electrification; Heat recoveries and energy efficiency; Use of Green Fuels and coal substitute materials.
- Scope 2 emissions: Energy efficiency and heat recovery; Self-production from renewable plants; Purchase of Guarantees of Origin and Green PPA.

Details of the solutions identified are available in **Section 4.1** of the **Report on Operations**.

With regard to Scope 3 emissions, Feralpi Group promotes awareness in the supply chain through constant and constructive dialogue with suppliers, aimed at sharing primary data and promoting decarbonisation actions in its supply chain.

The Transition Plan of Feralpi Group is also based on collaborations with other stakeholders, both industrial and governmental, and on the adoption of new technologies with low or zero greenhouse gas emissions.

In Italy, the Group is involved in the **Green Metals** project, which aims to decarbonise the Brescia steel industry through the production of biomethane. Meanwhile, in Germany, FERALPI STAHL has joined the **Meissen Energy and Hydrogen Alliance (EWI)**, which seeks to promote the use of hydrogen as a methane alternative¹⁹.

In addition, the Group is engaged in numerous **Research and Development** activities to contribute to the introduction of new technologies capable of further mitigating its environmental impacts. For more information, refer to **Section 5** of the **Report on Operations**.

ENVIRONMENT

¹⁸ www.sciencebasedtargets.org

¹⁹ The strategy of the new German government envisages a reshaping of the energy transition with a view to adapting to the current geopolitical and economic situation. The hydrogen backbone network has received the go-ahead from both the federal and state governments, but the completion date has been postponed to beyond 2030.

Within Feralpi Group, there is a dedicated company, **Feralpi Power On**, for the development and management of projects related to generating energy from renewable sources, through photovoltaic installations and potentially wind power. Further information about this is available in [Section 4.2](#) of the [Report on Operations](#).

[ESRS E1-1 16.c; ESRS E1-1 16.e]

Information relating to investments and financing that support the implementation of Feralpi's transition plan, as well as the targets and plans (CapEx, CapEx plans, OpEx) aimed at aligning its economic activities (revenues, CapEx, OpEx) with the criteria set out in Commission Delegated Regulation 2021/2139, has not been disclosed in relation to the 2024 financial year. However, investments related to climate change mitigation and energy efficiency are included in the disclosure related to the European Taxonomy Regulation.

[ESRS E1-1 16.d]

The steel sector requires large long-term investments, which implies that many of the emissions generated today are defined as "**locked-in**", making them difficult to avoid in the short term due to existing infrastructure that takes time to upgrade and improve.

As far as Feralpi Group is concerned, the expected share of "locked-in" emissions, linked to the process and the current situation of other complementary sectors, is not expected to compromise the pursuit of the decarbonisation goals.

[ESRS E1-1 16.h]

Based on their financial materiality, or at the request of the administrative, management and supervisory bodies, the investments of the Group companies may be subject to analysis of any impact on the indicators included in the ESG Scorecard. In this way, Feralpi Group intends to ensure consistency between investments and its environmental, social and governance sustainability objectives, including those of decarbonisation.

In addition, these objectives are also included in the remuneration schemes for the managerial level, as illustrated in [ESRS 2 GOV-3](#).

[ESRS E1-1 16.i]

The Group's decarbonisation objectives have been formally approved by the Board of Directors of the Parent Company, Feralpi Siderurgica, which is periodically updated on their achievement and on the current and prospective trend of Scope 1, 2 and 3 emissions.

[ESRS E1-1 16.j]

The improvements in the Group's absolute emissions in 2025 compared to 2024 are attributable to several key factors. With regard to Scope 2, there was an increase in the percentage of electricity purchased from renewable sources. This increase was driven in particular by the contribution of the Riesa site, which now far exceeds the minimum consumption coverage required by European legislation. For Scope 3 – Category 1 (Raw Material Procurement), more precise primary data was used to characterise some incoming raw materials. A significant impact resulted from the use of specific emission factors, obtained from the Environmental Product Declarations (EPD) of lime suppliers, reflecting intensive work to engage and raise awareness in the supply chain. Finally, with reference to Scope 3 – Category 3 (Energy Carriers), the main source of renewable energy purchased in 2025 was hydroelectric, which has a lower specific impact than other solutions.

For the purposes of the climate transition plan, Feralpi Group has adopted a conservative approach and only the technologies that are feasible and available to date have been taken into account in the emission reduction estimates. In this way, the potential risk of not achieving the approved emission reduction targets is mitigated.

ESRS 2 SBM-3 Material impacts, risks and opportunities and their interaction with the strategy and business model

[ESRS 2 SBM-3 18]

In carrying out the double materiality analysis, the following impacts, risks and opportunities related to the topics of climate change and the energy transition were identified as relevant.

SUB-TOPIC	DESCRIPTION	IRO	VALUE CHAIN	TIME HORIZON
Climate change adaptation	Risk of exposure of company assets to acute weather events as a result of climate change		◆	◆
	Risk of business interruptions due to extreme weather events		◆	◆
	Business continuity and/or related activity risk linked to chronic climate risks		◆	◆◆◆
Climate change mitigation	Contribution to climate change through climate-changing emissions from the Group's activities	-	◆ ◆◆	◆ ◆◆ ◆◆
	Risk that the market is not yet ready to guarantee rewards to the steel industry on the basis of the environmental performance of products		◆	◆ ◆◆ ◆◆
	Risk that the achievement of decarbonisation goals is compromised by an unfavourable development of public policies and the economic environment		◆	◆◆ ◆◆ ◆◆
	Business opportunities arising from the increasing focus on products with a low impact in terms of CO ₂ emissions		◆	◆◆
Energy	Undermining of the energy transition due to the continued use of fossil energy sources	(-)	◆ ◆◆	◆◆ ◆◆ ◆◆
	Opportunities in terms of cost reduction resulting from energy efficiency and the use of renewables		◆	◆◆
	Risk in terms of costs to maintain the competitiveness of steel products with a reduced environmental impact		◆	◆◆

IRO
RISK

OPPORTUNITY

IMPACT

FERALPI OPERATIONS

VALUE CHAIN

SHORT

MEDIUM

LONG

+

 POSITIVE CURRENT
(+) POSITIVE POTENTIAL

-

 NEGATIVE CURRENT
(-) NEGATIVE POTENTIAL

For further details on how the double materiality analysis was carried out and its results, refer to paragraphs [ESRS 2 SBM-3](#) and [ESRS 2 IRO-1](#) in [Section 14](#).

[ESRS 2 SBM-3 19.a; ESRS 2 SBM-3 19.b; ESRS 2 SBM-3 19.c]

In addressing the climate transition, Feralpi Group is committed to assessing and mitigating the associated risks as described in [Section 10 of the Report on Operations](#).

Management of impacts, risks and opportunities

ESRS 2 IRO-1 Description of the processes to identify and assess material impacts, risks and opportunities related to climate

[ESRS 2 IRO-1 20; ESRS 2 IRO-1 20a]

Feralpi Group's production process, based on **electric arc furnace (EAF)** and **ferrous scrap** as primary material, has an **approximately three times less impact** than the more common full-cycle process with blast furnace and iron ore, which makes up the bulk of steel production worldwide. Feralpi Group, as an *energy-intensive* and *hard-to-abate* steel company, is aware of its impact on the climate through the climate-altering emissions generated by its activities.

Greenhouse gas emissions, **both direct (Scope 1)** and from **energy purchases (Scope 2)** of the Group derive mainly from the steel melting and rolling processes. For Scope 1 emissions, the main source is **methane gas** used in the billet heating furnaces entering the Group's own rolling mills, while Scope 2 emissions are generated by the **electricity** required for the scrap melting process with the electric arc furnace and, to a lesser extent, other production processes.

This awareness guided the assessments made during the materiality analysis, which was conducted as described in paragraphs [ESRS 2 SBM-3](#) and [ESRS 2 IRO-1](#) in [Section 14](#).

[ESRS 2 IRO-1 20.b; ESRS 2 IRO-1 20.c; ESRS 2 IRO-1 21]

As part of its Internal Control and Risk Management System (SCIGR), Feralpi Group conducted an assessment of physical climate risks in 2023 based on different climate scenarios for the resilience of its business plan and sustainability strategy. In addition, the impact of the energy transition on the Group's operations was assessed.

For further details, refer to [Section 10](#) of the [Report on Operations](#).

ESRS E1-2 Policies related to climate change mitigation and adaptation

[ESRS E1-2 22; ESRS E1-2 25.a; ESRS E1-2 25.b; ESRS E1-2 25.c; ESRS E1-2 25.d; ESRS E1-2 25.e]

Although there is no Group policy specifically dedicated to climate change mitigation and adaptation, these topics are addressed within the policies related to the environment and energy²⁰ for the companies certified respectively ISO 14001 (Feralpi Siderurgica, Acciaierie di Calvisano, Presider, Arlenico, ESF Elbe-Stahlwerke Feralpi GmbH) and ISO 50001 (Feralpi Siderurgica, Acciaierie di Calvisano, ESF Elbe-Stahlwerke Feralpi GmbH, Feralpi Stahlhandel GmbH, Feralpi-Logistik GmbH). In 2026, Feralpi-Praha will also obtain ISO 14001 certification. Feralpi Siderurgica, Acciaierie di Calvisano, and ESF Elbe-Stahlwerke Feralpi GmbH are also EMAS registered.

These policies establish the commitment of the Group companies to reducing environmental impacts, reducing the consumption of raw materials and energy, and improving energy and environmental performance. At sites without certified systems, there are procedures in place to ensure the proper monitoring of environmental aspects based on the same principles. All system procedures for all sites are referred to in the 231 Model, present and operational in all Feralpi Group companies.



²⁰ <https://www.feralpigroup.com/en/group/governance/governance-system>

In 2025, the **Group's sustainability Policy** was drafted and approved. Once disseminated, it will constitute a further reference for all Feralpi Group companies, regardless of any certifications in place. The new policy is scheduled to be disseminated in 2026.

In addition, Feralpi Group, in its Code of Ethics²¹, is committed to the continuous improvement of technologies and production practices with a view to the utmost respect for the environment inside and outside its plants, to protect all stakeholders.

The environmental management of the production processes is entrusted to the individual sites, involving plant managers, management system managers, the Ecological and Energy Transition Unit, the Group HSE Manager, and the Sustainability and Communications Department. The Group Energy Department manages regulatory and strategic aspects for energy-intensive companies and supports the others on supply contracts and regulatory aspects.

Group policies and those relating to individual sites are available on Feralpi Group website²².



²¹ <https://www.feralpigroup.com/en/group/governance/governance-system>



²² <https://www.feralpigroup.com/en/group/governance/governance-system>

ESRS E1-3 Actions and resources related to climate change policies

[ESRS E1-3 26; ESRS E1-3 28; ESRS E1-3 29.a]

Feralpi Group annually adopts new energy efficiency measures, reducing the use of fossil fuels and increasing energy from renewable sources in order to reduce greenhouse gas emissions resulting from its production and transport processes.

In addition, operations in relation to the cleaning of the scrap continue constantly in order to improve the quality of the input material and consequently make the process even more efficient in terms of energy and material separation. Similarly, at the Lonato del Garda, Calvisano and Riesa sites, activities are being carried out to replace coal with polymeric materials.

LEVER	ACTION
Feralpi Siderurgica	
 Process electrification	Start-up of the new spooler line which, in addition to completing the product range, has lower CO ₂ emissions than the normal cold rewinding cycle as the contribution of the natural gas heating furnace is eliminated, replaced by induction furnaces.
 Heat recovery and energy efficiency	Start-up of a new secondary compressor room, serving the new spooler line, which has made it possible to lower the load on the main room, improving overall efficiency.
 Process electrification	At Rolling Mill 2, the necessary work has been completed for the new electrically conducted billet heating system, which will come on stream in 2026. Through electrification, the new system should lead to a reduction in methane consumption and a reduction in the associated emissions of CO ₂ and other pollutants.

Through constant dialogue and lasting relationships, Feralpi intends to collaborate with its partners in the transition to a low-emission economy. With regard to Scope 3 emissions, Feralpi Group has worked to raise awareness in its supply chain. Meetings were organised with a number of suppliers, selected on the basis of environmental impact criteria, in order to share the importance of environmental sustainability for the Group and to better understand the production and logistical characteristics of the different materials. From 2026, thematic working parties will be set up to address the reduction of Scope 3 emissions associated with raw materials and transport.

LEVER	ACTION
Acciaierie di Calvisano	
 Self-production from renewable plants	Two outdoor parks for photovoltaic power generation have been commissioned to achieve a total capacity of about 4.0 MW.
 Heat recovery and energy efficiency	A new regenerative burner was installed for drying and heating the ladles, which made it possible to reduce natural gas consumption by optimising the production and preheating cycles.
 Heat recovery and energy efficiency	The compressed air optimisation project was completed, which saw the replacement of the last compressor with the use of a modulating system, reducing the energy used.
Arlenico	
 Heat recovery and energy efficiency	In 2025, the new internal heat recovery system of the reheating furnace went into operation, which made it possible to optimise its cycles, improving energy consumption and reducing heat loss into the environment.
 Heat recovery and energy efficiency	In addition, the installation of a heat recovery exchanger was completed, which is used to transfer thermal waste to the district heating plant.
Presider	
 Self-production from renewable plants Purchase of GdO / Green PPA	Presider uses 100% renewable energy, guaranteed by a mix of self-production through photovoltaic panels and the purchase of guarantees of origin.
 Heat recovery and energy efficiency	New machinery with improved energy efficiency was installed at the Pomezia site, a Coil 20 stirrup bender and a Barwiser for shaping rebar in rolls.
Defim Orsogril	
 Heat recovery and energy efficiency	Installation of a new EVG welding plant, a machine intended to boost the production of gratings while improving the energy efficiency of the production process.
FERALPI STAHL	
 Process electrification	In 2025, the new Rolling Mill B was completed and inaugurated, the first with a K-Spooler plant in Germany capable of producing 8-tonne coils. The roller path was built with induction furnaces and, therefore, the rolling mill is totally free of direct emissions.
 Process electrification	Work continued on the new power plant that will provide the energy needed for the new production layout and will be operational in the first half of 2026. The blue GIS (Gas Insulated Switchgear) technology from Siemens was used for its construction, which involves replacing fluorinated gases with an insulator based on pure air that can be released directly into the atmosphere.

Heat recovery from waste for energy generation

The Lonato del Garda and Riesa plants recover heat from the cooling water and melting furnace respectively. Feralpi Siderurgica uses it to heat internal buildings and, in cooperation with the local administration, also public and private facilities.

The system at ESF Elbe-Stahlwerke Feralpi GmbH produces up to 30 t/h of steam, which is supplied to Goodyear Dunlop Tires through the Riesa town utility company (Stadtwerke Riesa - SWR) and partly used to generate electricity. Waste heat from the compressor stations is used to heat and supply hot water to the technical administration offices of Riesa. In 2025, further studies were conducted on the use of waste heat from the new spooler plant to generate district heating or, alternatively, cooling. In addition, in cooperation with SWR, a project is being considered to recover up to 4 MW of waste heat from the cooling tower for use in district heating managed by SWR. In 2025, the feasibility analysis and basic engineering phases were carried out, while in January 2026, the process for approval and implementation was launched in collaboration with the municipal utilities.

A district heating project is underway at the Arlenico site, which includes a plant to recover heat from the thermal waste from rolling, flanked by a second hub in Valmadrera, where heat from waste-to-energy will be reused instead of being dispersed.

Sustainable mobility

With a view to reducing atmospheric emissions, Feralpi Group believes it is essential to pursue actions aimed at developing increasingly sustainable mobility.

In recent years, the Group has focused on **gradually increasing the use of rail and intermodal transport** to manage the movement of products to and from its production sites, in order to reduce road travel. The aim is to provide the key facilities - Lonato del Garda, Calvisano, Lecco, and Riesa - with an efficient railway connection, gradually increasing rail freight volumes to decrease greenhouse gas emissions and lessen the traffic impact on the communities where the sites operate in terms of pollution and road safety. However, in recent years, uncertainties persisted in both the infrastructural and social spheres, largely because of numerous rail strikes and the train transport costs in Germany, making rail transport more challenging. The Group is also investigating the contribution that alternative fuels, such as e-fuels and biofuels, may have on the indirect emissions associated with the Group's inbound and outbound transport.

At the Lonato del Garda, Calvisano and Riesa sites, **recharging stations for electric vehicles** are available, as well as at Presider, at the Borgaro Torinese, Pomezia and Nave sites.

For Presider, at the Borgaro Torinese plant, the **Home-to-Work Travel Plan (PSCL)** is active, led by a **Mobility Manager**, in accordance with Interministerial Decree no. 179 of 12 May 2021, to reduce the environmental impact of private vehicular traffic in urban areas through the promotion of initiatives for the reorganisation of mobility demand. Both in Arlenico and in Feralpi Siderurgica, despite the fact that there are no obligations for the latter, there is a Mobility Manager, external for the Lecco site and internal for the Lonato del Garda site.

In 2025, the update of the PSCL for the three companies involved in the project was presented, while in 2026 the establishment of an **internal Group Mobility Manager** is planned. This person will be employed within the Parent Company and will coordinate their activities with the contact persons of the establishments for which the adoption of a PSCL is planned.

For **Feralpi-Logistik GmbH**, the only company in the Group that deals with logistics, sustainable mobility is a priority. All vehicles in the fleet meet EURO 6 emission standards as of 2018, and every new purchase must meet the more stringent emission standards with the aim of reducing diesel consumption by 8% by 2030. In 2025, nine trucks were replaced with new vehicles that meet the latest technical standards, equipped with state-of-the-art safety systems and maximum performance in terms of emissions. Further replacements of the vehicle fleet are planned in the coming years.

[ESRS E1-3 29.b]

Since Feralpi Group is evaluating how best to integrate the information necessary to describe the result of climate change mitigation actions in terms of GHG emission reductions, implemented or planned, at the level of detail required by the ESRS, this information is not available for the 2025 reporting year.

[ESRS E1-3 29.c]

Regarding information on the Feralpi Group's CapEx and OpEx action plans for the 2025 financial year, refer to [ESRS E1-1 16c](#) and [ESRS E1-1 16e](#). However, investments related to climate change mitigation and energy efficiency are reflected in the disclosure related to the European Taxonomy Regulation.

Targets and metrics

ESRS E1-4 Targets related to climate change mitigation and adaptation

[ESRS E1-4 30; ESRS E1-4 33; ESRS E1-4 34.a; ESRS E1-4 34.b; ESRS E1-4 34.c; ESRS E1-4 34.d; ESRS E1-4 34.e]

Feralpi Group has developed its 2030 GHG emission reduction targets following the SBTi guidelines for the steel sector. Their approval by the body in 2024 recognised their alignment with science to contribute to keeping global warming below 1.5°C.

The Group is committed to reducing its Scope 1, 2 and 3 GHG emissions covered by the core boundary²³ of the iron and steel sector by 50% per tonne of hot-rolled steel by 2030, starting from the baseline year 2022.

In addition, Feralpi Group is committed to reducing the remaining absolute Scope 3 GHG emissions from purchased goods and services, fuel and energy activities, upstream transportation and distribution, waste generated in operations, downstream transportation and distribution, and processing of products sold by 25% by 2030, starting from the base year 2022.

In addition to the decarbonisation targets described above, the Group's ESG Scorecard also includes a target relating to the use of renewable energy sources for at least 50% of total needs by 2030, starting from the base year 2022.

²³ In view of the different degrees of integration of the players operating along the steel supply chain and in order to ensure that they can set scientifically based and comparable targets, SBTi has defined the Core Boundary, a reporting scope that includes the most important emissions in the supply chain and makes it possible to harmonise the impacts of the different types of companies operating in the world of steel. Details of the emissions considered for SBTi purposes are available in the appendix.

	BASELINE	2025	% change	TARGET	SCOPE
	2022			2030	
Specific CO ₂ emissions (Scope 1, 2 and 3 core boundary) ²⁴	0.540 tonCO ₂ eq/tonne	0.230 tonCO ₂ eq/tonne	-58%	-50%	Consolidated Feralpi Siderurgica ²⁵
Absolute CO ₂ emissions (Scope 3 non-core boundary)	676,404 tonCO ₂ eq	702,807 tonCO ₂ eq	+3.9%	-25%	
Renewable energy ²⁶	0.46%	56%	/	50%	

With a view to improving the robustness of its decarbonisation commitments, Feralpi Group has prepared an emissions inventory in accordance with the GHG Protocol Corporate Standard, the initiative dedicated to the global standardisation of the calculation and reporting of greenhouse gas emissions for businesses.

In addition, Feralpi Group aims to strengthen the integration of ESG criteria into the qualification of suppliers, with the goal of improving the evaluation of their performance and promoting sustainable practices along its supply chain. For this reason, the Scorecard also includes a target relating to the ESG mapping of the Group's strategic suppliers. Through a questionnaire, they are asked for information regarding energy and climate performance, as well as the related objectives. For more information, refer to [ESRS G1-2](#).

[ESRS E1-4 34.f]

In order to be able to achieve the established commitments, Feralpi has defined a climate transition plan, which incorporates various levers as described in ESRS E1-1. At present, Feralpi Group is not able to describe the contribution of each of them to the achievement of the decarbonisation targets, at the level of detail required by the ESRS. In this regard, the Group is considering how best to integrate the necessary information, which is therefore not available for the 2025 reporting year.

²⁴ On the total production of hot rolled products.

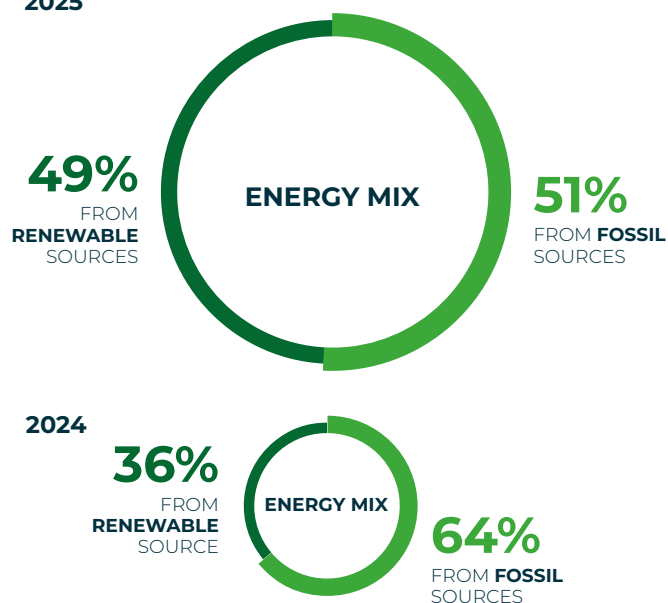
²⁵ Alpifer Group and Feralpi Algérie not included.

²⁶ Considering both electrical and thermal energy.

ESRS E1-5 Energy consumption and energy mix

[ESRS E1-5 37; ESRS E1-5 37.a; ESRS E1-5 37.b; ESRS E1-5 37.c; ESRS E1-5 37.c ii; ESRS E1-5 37.c iii; ESRS E1-5 38; ESRS E1-5 38.a; ESRS E1-5 38.b; ESRS E1-5 38.c; ESRS E1-5 38.d; ESRS E1-5 38.e]

ENERGY CONSUMPTION % 2025



²⁷ The 2024 figures coincide with those set out in the Feralpi Group's 2024 Integrated Report (GRI 302-1). These values have been converted from GJ to MWh and reclassified as required by the ESRS in the following ways: Fuel consumption from coal and coal products includes Charge Coal; Fuel consumption from crude oil and petroleum products includes Diesel and Petrol; Fuel consumption from natural gas coincides with Natural Gas; Fuel consumption from other non-renewable sources includes Foam Slag and Polymers; Consumption of self-produced renewable energy without the use of fuels corresponds to the item Photovoltaic. For the following information, not available in the 2024 report, the data on electricity consumption used for the Feralpi Group's GHG inventory was considered: Consumption of electricity, heat, steam and cooling from renewable sources, purchased or acquired includes electricity covered by Guarantees of Origin (GO); Consumption of electricity, heat, steam and cooling from fossil sources, purchased or acquired corresponds to the share of electricity from the residual mix.

Energy consumption and energy mix

	UoM	2025	2024 ²⁷
Fuel consumption from coal and coal products	MWh	70,163	66,127
Fuel consumption from crude oil and petroleum products	MWh	19,790	26,105
of which: Diesel	MWh	19,365	25,701
of which: Petrol	MWh	425	404
Fuel consumption from natural gas	MWh	601,850	710,281
Consumption of fuels from other non-renewable sources	MWh	78,355	100,017
Consumption of electricity, heat, steam and cooling from fossil sources, purchased or acquired	MWh	482,703	700,601
Total energy consumption from fossil sources	MWh	1,252,860	1,603,131
Share of fossil fuels in total energy consumption	%	51	64
Consumption from nuclear sources	MWh	0	0
Share of nuclear sources in total energy consumption	%	0	0
Consumption of fuels from renewable sources	MWh	0	0
Consumption of electricity, heat, steam and cooling from renewable sources, purchased or acquired	MWh	1,201,294	892,687
Consumption of self-produced renewable energy without the use of fuels	MWh	13,366	1,119
Total consumption of energy from renewable sources	MWh	1,214,661	893,806
Share of renewable sources in total energy consumption	%	49	36
Total energy consumption	MWh	2,467,521	2,496,936

[ESRS E1-5 40; ESRS E1-5 43]

Energy intensity of activities in sectors with a high climate impact

	UoM	2025	2024	% change
Total energy consumption from activities in sectors with a high climate impact	MWh	2,467,521	2,496,936	-1.18
Net revenues from activities in sectors with a high climate impact used to calculate energy intensity	k€	1,703,187	1,652,984	3.04
Net revenues (other)	k€	0	0	\
Total net revenues (Financial statements)	k€	1,703,187	1,652,984	3.04
Energy intensity associated with activities in sectors with a high climate impact	MWh/k€	1.45	1.51	-3.97

[ESRS E1-5 42]

According to the provisions of Commission Delegated Regulation (EU) 2022/1288²⁸, the activities of Feralpi Group fall within the sectors with a high climate impact, namely: Steel activities; Cold forming or folding; Manufacture of wire products; Wholesale of metals and metal ores; Wholesale of hardware; Production of electricity. The energy intensity was therefore calculated taking into account the Group's energy consumption and overall revenues.

ESRS E1-6 Gross Scope 1, 2, 3 GHG emissions and total GHG emissions

[ESRS E1-6 44.a; ESRS E1-6 44.b; ESRS E1-6 44.c; ESRS E1-6 44.d; ESRS E1-6 48a; ESRS E1-6 48b; ESRS E1-6 49a; ESRS E1-6 49b; ESRS E1-6 52.a; ESRS E1-6 52.b]

Greenhouse gas emissions (GHG)	UoM	2025	2024
Gross Scope 1 GHG emissions	tCO ₂ eq	196,986	208,096
Gross GHG emissions from Emissions Trading Schemes (ETS)	tCO ₂ eq	187,294	199,048
Percentage of gross Scope 1 GHG emissions from emissions trading schemes	%	95.08	98.65
Gross Scope 2 "location-based" GHG emissions	tCO ₂ eq	440,024	546,212
Gross Scope 2 "market-based" GHG emissions	tCO ₂ eq	215,481	337,931
Gross Scope 3 GHG emissions	tCO ₂ eq	1,054,261	1,242,395
Total "location-based" GHG emissions	tCO ₂ eq	1,691,271	1,996,703
Total "market-based" GHG emissions	tCO ₂ eq	1,466,728	1,788,422

[ESRS E1-6 50]

Both Scope 1 and Scope 2 emissions are entirely attributable to Feralpi Group.

[ESRS E1-6 51]

Greenhouse gas (GHG) emissions (Scope 3)	UoM	2025	2024
Purchased goods and services	tCO ₂ eq	583,758	658,857
Capital goods	tCO ₂ eq	36,207	117,342
Fuel and Energy Related Activities Not Included in Scope 1 or Scope 2	tCO ₂ eq	75,214	96,213
Upstream transportation and distribution	tCO ₂ eq	196,660	195,697
Waste generated during operations	tCO ₂ eq	21,080	26,587
Downstream transportation and distribution	tCO ₂ eq	831	1,347
Processing of Sold Products	tCO ₂ eq	4,899	8,498
End-of-life treatment of products sold	tCO ₂ eq	135,612	137,854
Total	tCO₂eq	1,054,261	1,242,395

²⁸ https://eur-lex.europa.eu/eli/reg_del/2022/1288/oj

[ESRS E1-6 53; ESRS E1-6 54; ESRS E1-6 55]

GHG intensity compared to net revenues	UoM	2025	2024	% change
Total "location-based" GHG emissions	tCO ₂ eq	1,691,271	1,996,703	-15.3
Total "market-based" GHG emissions	tCO ₂ eq	1,466,728	1,788,422	-17.9
Net revenues used to calculate GHG intensity	k€	1,703,187	1,652,984	3.04
Net revenues (other)	k€	0	0	/
Total net revenues (Financial statements)	k€	1,703,187	1,652,984	3.04
"Location-based" GHG emissions intensity	tCO ₂ eq/k€	0.99	1.21	-17.9
"Market-based" GHG emissions intensity	tCO ₂ eq/k€	0.86	1.08	-20.3

Methodology note

The calculation of CO₂ equivalent emissions (tCO₂ eq), which include CO₂, CH₄, N₂ O, HFCs and PFCs, was carried out in accordance with the provisions of the GHG Protocol using the "operational control" quantification approach. Therefore, all emissions directly and indirectly associated with the facilities over which the organisation exercises operational control have been accounted for, including upstream and downstream processes such as those related to transportation and suppliers.

It is specified that all the relevant emissions generated by Feralpi Group are anthropogenic. The contribution of emissions from the combustion or biodegradation of biomass, so-called biogenic CO₂, was therefore excluded from the reporting.

Both primary data, i.e. site-specific data, and secondary data, obtained from literature and estimates, are used to calculate emissions. Feralpi Group favours the use of primary data and, when these are not available, uses generic secondary data.

Two quantification methods were used in Feralpi's greenhouse gas inventory: calculation-based methods, which use company activity data and emission factors to estimate GHG emissions, and expenditure-based methods, in which emissions are estimated by collecting data on the monetary value of purchased goods and services and multiplying them by the relevant emission factors. The latter method was used exclusively for Scope 3 emissions relating to categories 1 and 2.

For the purposes of quantifying GHG emissions, the Ecoinvent 3.12 database was used and, for Scope 3 of energy carriers and in the case of an expenditure-based approach, the DEFRA 2022 database.

Direct greenhouse gas emissions (Scope 1) refer to the activities directly carried out by Feralpi Group. This category includes emissions from the use of fossil fuels, both in steel production processes and in the company fleet, from refrigerant gas leaks from air conditioning systems, and from process emissions related to steel production.

For the purposes of the calculations, the annual natural gas consumption from bills for all plants was taken into account. For plants that do not fall under the ETS, the methane emission factor from the table of national standard parameters was used, increased to also include the contribution of all other climate-altering gases required by the GHG Protocol. As far as fuel consumption is concerned, this is taken from internal records or from the mileage values of the vehicles, appropriately converted using the INEMAR ARPA Lombardia factors. In this case too, the values were increased as described above. For fugitive emissions, the maintenance reports of the air conditioning/refrigeration systems were used, while for process emissions, calculated according to the mass balance, reference was made to the relevant annual reporting forms of the EU ETS system for the Lonato del Garda, Calvisano and Riesa plants.

The national electricity emission factors were used to calculate indirect CO₂ emissions resulting from electricity consumption (Scope 2) at the Group's production sites using the location-based method for 2024. For 2025, reference was made to the AIB (Association of Issuing Bodies) production mix. For the calculation using the market-based method, reference was made to the AIB. For 2024, reference was made to the 2023 Residual Mix, while for 2025, reference was made to the 2024 Residual Mix. For Germany, the emission factor of the German energy supplier RWE was used for both years. For photovoltaic energy and the energy certified as renewable (e.g., green certificates) an emission factor of zero was used. For the calculation of the KPIs in the ESG Scorecard for the Specific CO₂ Emissions (Scope 1, 2, and 3 core boundary), the 2022 values for all companies included in the perimeter were calculated using the AIB 2022 Residual Mix.

With regard to Scope 3 indirect emissions, i.e., those emissions not included in the previous categories but still linked to Feralpi Group's value chain, the following methodologies were applied:

- ◆ **Purchased goods and services:** For each material code that was purchased and entered the plants from suppliers external to Feralpi Group, the total quantities for the reporting year were considered. With regard to intra-group flows, offsets were made in order to avoid double counting.
- ◆ **Capital goods:** Emissions from investments were calculated. The annual value was converted into emissions using the DEFRA spend-based factor discounted at the €/£ 2025 exchange rate.
- ◆ **Fuel and Energy Related Activities Not Included in Scope 1 or Scope 2:** The upstream emissions of fuels (natural gas, diesel, petrol) and F-GASES were calculated. For electricity, the emission factors differ according to origin: for energy covered by Guarantees of Origin (GO), the appropriate Ecoinvent factor was used, considering technology and country of origin as per cancellation certificates; for energy not covered by GO, the DEFRA database was used. The plant-specific emission factors were increased by network losses.
- ◆ **Upstream transportation and distribution:** The kilometres travelled by lorry, ship and train by materials entering the plants from external/internal suppliers to the group were considered; for each item, the goods receipts showing the incoming quantities and the supplier were extracted from the management system. For intra-group flows, transport was counted only once.
- ◆ **Waste generated during operations:** With reference to waste disposal, all the EWC codes produced in the reference year were considered, and a disposal scenario was defined for each of them. This category also includes transport from the plant to the recipient,

which is not counted in category 4. The data source is the quantity of waste produced together with the distance from the plant to the disposal/recovery site. For waste for which the indicated destination is disposal, different emission factors have been assigned according to the type of treatment undergone.

- ◆ **Downstream transportation and distribution:** The kilometres travelled for the shipment of finished products from all Feralpi plants to the recipient, both intra- and extra-group, were considered. In addition, the impacts of the transport of finished products sent from the other plants to external customers only were also calculated. Appropriate offsets were applied for intra-group transport.
- ◆ **Processing of Sold Products:** To estimate the CO₂e emissions generated by customers' processing of Feralpi products, mainly billets and wire rod, the following assumptions were made. The impact derives mainly from the consumption of natural gas, for pre-rolling heating, and electricity, for rolling and cold processing. The specific data for rolling furnace 2 and the Derivatives Area at the Lonato del Garda site were used as a reference for consumption. The emission factors considered are the individual customer's national mix for electricity and the national standard tables for natural gas. The quantities of outgoing semi-finished products come from the internal management system.
- ◆ **End-of-life treatment of products sold:** With regard to the end of life of the product, the total quantities sold during the reference year by each plant were considered. In this case, the end-of-life scenario was chosen in accordance with the definitions of the "PCR 2019:14 - Construction Products, Version 1.2.3" of the International EPD System, considering modules C1 (Deconstruction, Demolition), C2 (Waste Transport), C3 (Waste Treatment) and C4 (Disposal).

The categories that are not significant, as Feralpi Group has no control over them, nor do they directly affect the Group's business, based on the significance analysis conducted, are: Category 2 - Capital goods, which was nevertheless considered in the inventory in line with SBTi's reporting requirements; Category 6 - Business travel; Category 7 - Employee commuting; Category 8 - Upstream leased assets. The remaining Scope 3 categories were not considered relevant for the purposes of the Feralpi Group GHG inventory. These are: Category 11 - Use of goods sold; Category 13 - Downstream leased assets; Category 14 - Franchising; Category 15 - Investments.

At the date of approval and publication of this Sustainability Statement, there are no events or changes in circumstances after 31 December 2025 that could significantly impact the data on greenhouse gas emissions.

ESRS E1-7 GHG removals and GHG emissions mitigation projects financed with carbon credits

[ESRS E1-7 56.a; ESRS E1-7 56.b]

Feralpi Group, in the context of its climate transition plan, does not currently envisage the use of GHG absorption projects within its operations or in the value chain. Likewise, no carbon credits are purchased for offsetting GHG removals outside the value chain.

ESRS E1-8 Internal carbon pricing

[ESRS E1-8 62]

At present, Feralpi Group does not apply internal carbon pricing systems.



16. ESRS E2 - Pollution

E2 IRO-1 Description of processes to identify and assess material impacts, risks and opportunities related to pollution

[E2 IRO-11.a]

In carrying out the double materiality analysis, the following impacts related to pollution were identified as significant. Feralpi Group has considered all its production facilities and the entire value chain as described in section [ESRS 2 IRO-1](#) of this document, to which reference should be made for further details on the methodology adopted.

SUB-TOPIC	DESCRIPTION	IRO	VALUE CHAIN	TIME HORIZON
Air pollution	Pollutant emissions into the air from production activities	- 	◆ ◆	◆ ◆ ◆ ◆
Water pollution	Pollutant emissions into water from production activities	- 	◆ ◆	◆ ◆ ◆ ◆
Soil pollution	Soil pollution as a result of accidental events	(-) 	◆	◆ ◆ ◆

IRO

 RISK

 OPPORTUNITY

 IMPACT

VALUE CHAIN

 FERALPI OPERATIONS

 VALUE CHAIN

TIME HORIZON

 SHORT

 MEDIUM

 LONG

+

 POSITIVE CURRENT

(+)

 POSITIVE POTENTIAL

-

 NEGATIVE CURRENT

(-)

 NEGATIVE POTENTIAL

[E5 IRO-1 11.b]

The materiality analysis involved various stakeholders, as indicated in section IRO-1, to which reference should be made for more information. Specifically, with regard to the significance of the impact, an online questionnaire was administered to external stakeholders, including representatives of the local communities affected by Feralpi's activities, which did not, however, contribute to the calculation of the relevant score. As regards the risk and opportunity analysis, however, no direct consultations were conducted with the affected communities.

The topics relating to pollution are material for the activities of the following Feralpi Group companies:

- ◆ Feralpi Siderurgica, Acciaierie di Calvisano, Arlenico and FERALPI STAHL, with reference to hot processing;
- ◆ Presider, Defim Orsogril and Saexpa, with regard to cold processing.

E2-1 Policies related to pollution

[ESRS E2-1 14; ESRS E2-1 15.a; ESRS E2-1 15.b; ESRS E2-1 15.c]

The steel sector is subject to the EU Integrated Pollution Prevention and Control (IPPC) framework, introduced since 1996 with the first IPPC directive. Feralpi Group carries out its activities in compliance with current legislation: in Italy it operates in line with **Legislative Decree no. 152/2006** and with the specific authorisation requirements of the competent bodies; in Germany with the federal law on the protection of emissions (**BImSchG**), in whose areas they report on any monitoring carried out in accordance with the assigned regulations. Feralpi Group also applies the precautionary principle set out in Article 15 of the Rio Declaration on the environment and development, stating that "Where there are threats of serious or irreversible damage, lack of full scientific certainty shall not be used as a reason for postponing cost-effective measures to prevent environmental degradation".

Feralpi Siderurgica and Acciaierie di Calvisano sites are also among those at Risk of Major Accident, according to European Directive 2012/18/EU, regarding dust from steel mill fume abatement, in relation to the authorisation for temporary storage of the same within the site. Management of this risk is integrated into the Environment, Safety and Energy systems. As regards FERALPI STAHL, the Integrated Management System Department of the Riesa sites centrally coordinates and manages all aspects of quality, occupational health and safety, fire protection and explosion risk, environmental protection and waste management. At sites without certified systems, there are procedures in place to ensure the proper monitoring of environmental aspects that have an impact on the production site's performance. All system procedures for all sites are referred to in the 231 Model, which is operational in all Group companies.

Feralpi Group does not currently have a specific Group policy dedicated to pollution; however, these aspects are present **in the environment and energy policies** outlined in **ESRS E1-2**, to which reference should be made for more information not specified below. Within them, the objectives related to environmental protection and the reduction of environmental impacts on air, water and soil are emphasised.

Feralpi Group's **quality policy** refers to the commitment to reduce significant environmental impacts in all their aspects, while the **Code of Ethics** emphasises the commitment to the continuous improvement of technologies and production practices with a view to the utmost respect for the environment inside and outside the plants. The commitment to protect the environment, in all its forms, is also reflected in the new Group **Sustainability Policy**, which will be disseminated during 2026.

The environmental management of the production processes is entrusted to the individual sites, involving plant managers, management system managers, the Ecological and Energy Transition Unit (UTEE), the Group HSE Manager, and the Sustainability and Communications Department.

Group policies and those relating to individual sites are available on the Feralpi Group website²⁹.

E2-2 Actions and resources related to pollution

[ESRS E2-2 16; ESRS E2-2 18]

The production of steel inherently involves a risk of pollution due to process emissions released into the air and water, which can adversely affect the environment and local communities if not properly managed.

The Group's commitment to ensuring compliance with atmospheric emission limits is pursued through the use of high-performance technologies and pollutant abatement systems, with the aim of complying with the authorisation requirements and keeping emissions as low as possible with respect to the authorised limits. The plants are equipped with suction, filtration and dust reduction systems capable of alerting operators to any anomalies, enabling them to initiate the required checks and maintenance as per system procedures. In addition, the wastewater from the plants is subject to chemical analysis.

At the Lonato del Garda site, a study was conducted in 2025 on the hybridisation of the heating furnace at Rolling Mill 2 with the aim of reducing NO_x and CO₂ emissions, in line with the evolution of the new European reference regulations. In addition, work continued to improve the management of white slag with the construction of a new dedicated warehouse, which is scheduled to open in 2026.

²⁹ <https://www.feralpigroup.com/en/group/governance/group-policy>

The structure, located above the handling area, will effectively contain wind dispersion and preserve the quality characteristics of the material, protecting it from direct exposure to weathering and rainwater runoff.

Feralpi Group purifies the water from the plants before discharge into surface water bodies (Lonato del Garda, Calvisano) or sewers (Riesa, Lecco) and adopts emergency and monitoring procedures. Regular maintenance is carried out on pipelines and seals, and emergency kits are available at the storage sites of hazardous substances. Potentially polluting materials are collected and treated for recycling or disposal. Furthermore, the Group is engaged in the research of eco-friendly lubricants to replace petroleum-based ones with biodegradable alternatives. Substance management follows strict safety and environmental procedures, with regular drills in ISO 14001-certified plants.

Information on Feralpi Group's CapEx and OpEx plans has not been disclosed for the 2025 financial year. The actions listed above relate to the operations of the Group companies.

E2-3 Targets related to pollution

[ESRS E2-3 20; ESRS E2-3 22; ESRS E2-3 23; ESRS E2-3 25; ESRS 2 72]

Feralpi Group is committed to ensuring compliance with the authorisation requirements and to keeping emissions as low as possible below the authorised limits. Currently, the ESG Scorecard, which includes the sustainability targets integrated into the Group's overall strategy, does not contain specific objectives related to pollution. However, there are qualitative and quantitative targets at the level of individual plants in accordance with the relevant environmental management systems, which are not reported as they are not considered to be in line with the requirements of the ESRS for the purposes of this report.

E2-4 Air, water and soil pollution

[ESRS E2-4 26; ESRS E2-4 28.a]

In line with previous Sustainability Statements, Feralpi Group has focused the reporting of pollutant emissions on those into the atmosphere, which are predominant in the Group's steel-making processes.

In fact, emissions related to water and soil are not quantitatively significant, as is shown in particular by the EMAS declarations of the Lonato del Garda, Calvisano and Riesa steel mills, which show parameters below the legal limits.

Emissions into the atmosphere	UoM	2025	2024
Powders³⁰	t		
Feralpi Siderurgica		3.33	2.27
Acciaierie di Calvisano		2.66	1.86
Arlenico		0.35	0.23
Defim Orsogrill		0.08	0.19
FERALPI STAHL		3.70	1.99
Saexpa		0.03	0.07
PM10	t		
Feralpi Siderurgica		1.23	2.14
Acciaierie di Calvisano		1.32	0.75
FERALPI STAHL		3.14	1.69
NOX³¹	t		
Feralpi Siderurgica		158.73	91.01
Acciaierie di Calvisano		59.13	43.13
Arlenico		32.79	27.73
FERALPI STAHL		88.33	92.79

Emissions into the atmosphere	UoM	2025	2024
CO³²	t		
Feralpi Siderurgica		1,645.04	2,732.61
Acciaierie di Calvisano		581.67	542.00
Arlenico		0.52	1.67
FERALPI STAHL		1,264.76	960.72
Dioxins and Furans	gl-TOE		
Feralpi Siderurgica		0.02	0.03
Acciaierie di Calvisano		0.06	0.02
FERALPI STAHL		0.13	0.14
IPA	kg		
Feralpi Siderurgica		0.04	0.09
Acciaierie di Calvisano		0.09	0.09
FERALPI STAHL		-	-
COT	t		
Feralpi Siderurgica		59.14	47.33
Acciaierie di Calvisano		18.66	26.98
FERALPI STAHL		-	-
Pb	kg		
Feralpi Siderurgica		43.66	61.32
Acciaierie di Calvisano		9.76	13.66
Arlenico		5.74	1.50
FERALPI STAHL		31.78	34.32

Emissions into the atmosphere	UoM	2025	2024
Zn	kg		
Feralpi Siderurgica		509.21	635.67
Acciaierie di Calvisano		357.33	219.46
Arlenico ³³		248.27	4.44
FERALPI STAHL ³⁴		1,276.46	677.33
Hg	kg		
Feralpi Siderurgica		67.44	44.96
Acciaierie di Calvisano		27.58	18.67
Arlenico		0.09	0.08
FERALPI STAHL		107.15	117.23
SOx³⁵	t		
Feralpi Siderurgica		42.80	12.16
Acciaierie di Calvisano		29.06	19.25
FERALPI STAHL		45.27	48.90
Pcb³⁶	kg		
Feralpi Siderurgica		0.01	0.00
Acciaierie di Calvisano		0.37	0.17
FERALPI STAHL		0.00	0.00

³⁰ Figure for the site.

³¹ The variability of NOx values depends on the way the heating furnace is operated in relation to the product being rolled during sampling.

³² Figure for the facility.

³³ The variation detected is attributable to the discontinuous monitoring methodology (spot sampling), combined with the variability of the raw materials loaded into the furnace and the operating hours of the rolling mill in the reporting period.

³⁴ The increase in the estimated annual zinc load recorded in 2025 is normal and directly related to the increase in production volumes compared to the previous year.

³⁵ Figure for the facility.

³⁶ Dioxin-like without toxicity factor.

[ESRS E2-4 30.a; ESRS E2-4 30.b; ESRS E2-4 30.c]

The methodologies adopted for monitoring emissions include direct measurement and calculations based on site-specific data, in order to ensure accurate assessments. Emissions are reported by the sites that monitor the chimneys, which are equipped with systems that detect the concentration of dust in real time, while periodic measurement campaigns are conducted for the other air pollutants. Regarding diffuse emissions, monitoring is carried out indirectly through the assessment of outdoor air quality. Wastewater is subject to chemical analysis.

The process of accounting for and reporting environmental data is governed by the Environmental Management Systems in place at the individual production sites. The types of data required include production volumes, continuous readings from flue gas detection equipment, periodic analyses and waste traceability declarations. These sources of information are archived, validated by the Management System Manager and made available to the relevant corporate functions via IT tools.

[ESRS E2-4 28.b]

Microplastics were not considered material to Feralpi Group's activities as they do not constitute a significant environmental aspect for the steelmaking production cycle.

E2-5 Substances of concern and substances of very high concern

[ESRS E2-5 32]

As part of its operations, Feralpi Group does not use substances classified as of concern or of very high concern. For information on the flows of materials in and out of the companies in the Group, refer to [ESRS E5](#).

17. ESRS E3 - Water and marine resources

E3 IRO-1 Description of processes to identify and assess material impacts, risks and opportunities related to pollution

[ESRS E3 IRO-1 8.a]

In carrying out the double materiality analysis, the following impact related to water resources was identified as significant. Feralpi Group has considered all its production facilities and the entire value chain as described in section **ESRS 2 IRO-1** of this document, to which reference should be made for further details on the methodology adopted.

SUB-TOPIC		DESCRIPTION	IRO	VALUE CHAIN	TIME HORIZON
Water		Negative impact on the availability of water resources for all stakeholders, due to their use for production activities	- 	 	   
IRO  RISK  OPPORTUNITY  IMPACT VALUE CHAIN  FERALPI OPERATIONS  VALUE CHAIN TIME HORIZON  SHORT  MEDIUM  LONG + POSITIVE CURRENT (+) POSITIVE POTENTIAL - NEGATIVE CURRENT (-) NEGATIVE POTENTIAL					

[ESRS E3 IRO-1.8.b]

The materiality analysis involved various stakeholders, as indicated in section IRO-1, to which reference should be made for more information. Specifically, with regard to the significance of the impact, an online questionnaire was administered to external stakeholders, including representatives of the local communities affected by Feralpi's activities, which did not, however, contribute to the calculation of the relevant score. As regards the risk and opportunity analysis, however, no direct consultations were conducted with the affected communities.

E3-1 Policies related to water and marine resources

[ESRS E3-1 9; ESRS E3-1 12.a; ESRS E3-1 12.a i; ESRS E3-1 12.a ii; ESRS E3-1 12.a iii; ESRS E3-1 12.b; ESRS E3-1 12.c]

Feralpi Group does not currently have a specific Group policy dedicated to the use, management, procurement or treatment of water resources. However, these aspects are present **in the environment and energy policies** outlined in **ESRS E1-2**, to which reference should be made for more information not specified below.

Within them, the objectives related to optimising the use of resources and continuously improving performance, including from the perspective of water, are emphasised. These principles also inspire the practices adopted by companies without dedicated policies. In the 231 Model, present in all companies, all system procedures for all Group sites are referred to.

The new Group **Sustainability Policy**, which will be disseminated during 2026, also deals with environmental protection in all its forms, as well as environmental policies.

[ESRS E3-1 13]

Feralpi Group has assessed the risk of water stress for the sites that use water for production purposes, i.e. Feralpi Siderurgica, Acciaierie di Calvisano, Arlenico and ESF Elbe-Stahlwerke Feralpi GmbH. The relevant sites have their own environment and energy policies. The analysis was based on the **Aqueduct Water Risk Atlas** of the **World Resources Institute**, considering current data and projections to 2050. The risk was assessed on the basis of water stress, i.e. the ratio between human demand and water availability, without considering the specific business activities.

Site	Water Basin	Water Stress Risk (Current - 2025)	Water Stress Risk (Future - 2050)
Feralpi Siderurgica - Lonato del Garda	Oglio (Po)	High	High
Acciaierie di Calvisano - Calvisano	Oglio (Po)	High	High
Caleotto - Arlenico	Adda - Lake Como (Po)	Low	Low[1.1][1.2]
FERALPI STAHL - Riesa	Elba	Low-Medium	Medium-High

[ESRS E3-1 14]

Feralpi Group has not adopted policies or practices relating to the sustainability of the oceans and seas, as they are not related to its activities.

E3-2 Actions and resources related to water and marine resources

[ESRS E3-2 15; ESRS E3-2 17; ESRS E3-2 19]

The Group's activities that have an impact on water resources include withdrawal for both civil and industrial purposes, especially for cooling steel plants. In Italy, Feralpi Group guarantees the treatment and discharge of water according to Legislative Decree 152/06, thanks to dedicated systems and controls by accredited bodies. In Germany, it operates with specific permits for the

discharge into the public wastewater network. The Feralpi Siderurgica and Acciaierie di Calvisano sites are at risk of water stress based on the analysis conducted using the Aqueduct Water Risk Atlas.

The withdrawal at **Feralpi Siderurgica** and **Acciaierie di Calvisano** is taken from the water table by means of wells, while at the plant of **ESF Elbe-Stahlwerke Feralpi GmbH** it is taken from the municipal water network, in addition to the use of wells to supply small quantities for fire-fighting purposes. The plant of **Arlenico** draws water from the River Adda and constantly monitors the wastewater, recording and storing the data. A third party analyses water samples on a monthly basis for compliance with Legislative Decree no. 152/06. A de-oiling system ensures that rainwater is cleaned of polluting hydrocarbons.

At the Lonato del Garda site, evaluations are in progress to extend the sludge treatment facility at Rolling Mill 1 to Rolling Mill 2, which should be completed in 2026. The machinery will not only reduce the volume of solid waste needing recovery but also enhance internal water recycling and, consequently, decrease reliance on the aquifer.

At the Riesa site, construction of the cistern to capture rainwater from the roofs of the Rolling Mill B warehouses was completed in 2025, and it was put into operation at the same time. When fully operational, the facility, with a capacity of 350 m³, will enable the recovery and reintroduction of rainwater in the cooling and process circuits, saving about 6,000 m³ of potable water from the public network each year.

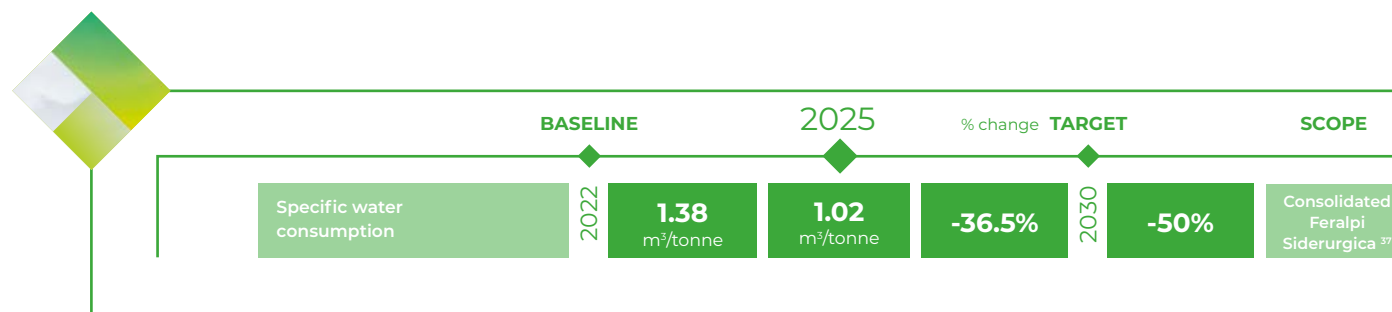
Information on Feralpi Group's CapEx and OpEx plans has not been disclosed for the 2025 financial year.

The actions listed above relate to the operations of the Group companies.

E3-3 Targets related to water and marine resources

[ESRS E3-3 20; ESRS E3-3 22; ESRS E3-3 23.a; ESRS E3-3 23.c; ESRS E3-3 25]

Within the ESG Scorecard, which contains Feralpi Group's voluntary ESG commitments, there is a voluntary target relating to the improvement of specific water consumption, understood as the total volume of water supplied by the Group's production plants, minus the portion returned locally to the environment and in relation to the total production of hot rolled products.



[ESRS E3-3 23.b]

The target relating to the improvement of specific water consumption does not concern marine resources as they are not related to the activities of Feralpi Group.

E3-4 Water consumption

[ESRS E3-4 28.a; ESRS E3-4 28.b]

Water consumption	UoM	2025
Total water consumption	m³	2,607,209
Of which areas at water risk, including areas with high water stress ³⁸	m³	1,845,622

[ESRS E3-4 28.e]

The figure relating to water consumption was calculated as the difference between withdrawals and consumption, obtained through the collection of data from the relevant bills and meter readings. The figure relating to water consumption from water-risk areas refers to the Lonato del Garda and Calvisano sites, the only ones among those that use water for production purposes that fall into this category based on the analysis conducted using the Aqueduct Water Risk Atlas.

[ESRS E3-4 28.c; ESRS E3-4 28.d]

As for recycled, reused and stored water, Feralpi Group is developing a methodology for evaluating the relevant data in accordance with the ESRs. For this reason, the requested information is not available for the 2025 reporting year.

[ESRS E3-4 29]

Water consumption intensity	UoM	2025
Total water consumption	m³	2,607,209
Net revenues used to calculate the intensity of water consumption	Mln. €	1,703.19
Net revenues (other)	Mln. €	0
Total net revenues (Financial statements)	Mln. €	1,703.19
Water consumption intensity	m³/Million €	1,530.78

³⁷ Alpifer Group and Feralpi Algérie not included.

³⁸ Referring to the Lonato del Garda and Calvisano sites.

18. ESRS E4 - Biodiversity and ecosystems

[ESRS-2 17]

With regard to the disclosure requirements under the thematic standard ESRS E4 Biodiversity and ecosystems, Feralpi Group makes use of the phase-in clause provided for in Delegated Regulation (EU) 2023/2772, based on the amendments introduced by Delegated Regulation (EU) 2025/1416.

Material impacts, risks and opportunities

[ESRS-2 17.a]

In carrying out the double materiality analysis, the following impact related to biodiversity and ecosystems was identified as significant. Feralpi Group has considered all its production facilities and the entire value chain as described in section [ESRS 2 IRO-1](#) of this document, to which reference should be made for further details on the methodology adopted.

SUB-TOPIC	DESCRIPTION	IRO	VALUE CHAIN	TIME HORIZON
Impacts on the extent and condition of ecosystems	Loss of natural areas and biodiversity and ecosystems due to the infrastructural expansion of production sites	-		
RISK OPPORTUNITY IMPACT FERALPI OPERATIONS VALUE CHAIN SHORT MEDIUM LONG + POSITIVE CURRENT (+) POSITIVE POTENTIAL - NEGATIVE CURRENT (-) NEGATIVE POTENTIAL				

Targets related to biodiversity and ecosystems

[ESRS-2 17.b]

Feralpi Group has not currently set specific targets related to biodiversity and ecosystems. However, in line with the new Sustainability Policy, the Group has set itself the objective of assessing possible actions to be implemented in relation to these topics.

Policies related to biodiversity and ecosystems

[ESRS-2 17.c]

Feralpi Group does not currently have a specific Group policy dedicated to the use, management, procurement or treatment of biodiversity and ecosystems. However, these aspects are present **in the environment and energy policies** outlined in **ESRS E1-2**, to which reference should be made for more information not specified below.

Within them, the targets related to the reduction of all environmental impacts are emphasised. In addition, the

principles underlying the policies inspire the practices adopted by companies without dedicated policies. In the 231 Model, present in all companies, all system procedures for all Group sites are referred to.

The new Group **Sustainability Policy**, which will be disseminated in 2026, also highlights the need to safeguard biodiversity and ecosystems in order to achieve sustainable development, encouraging their conservation and setting the objective of promoting appropriate initiatives in its value chain.

Actions related to biodiversity and ecosystems

[ESRS-2 17.d]

In line with the Taxonomy Regulation, the Group has examined the position of its sites concerning protected areas. The analysis revealed that none of the Group's sites fall within protected natural areas. However, the sites at Arlenico (Lecco), FERALPI STAHL (Riesa), and Feralpi-Hungária (Budapest) are located less than one kilometre from the perimeter of such areas.

The Biodiversity Working Group, established in 2024, includes representatives from all Feralpi Group companies and aims to craft a unified strategy to address the issue and ensure consistent action across the board.

In addition, biomonitoring activities through pollinating insects continue at the Lonato del Garda site, where there are eight hives and a Honey Factory to carry out bio-educational activities.

Metrics related to biodiversity and ecosystems

[ESRS-2 17.e]

The following table shows the Feralpi Group's production sites located less than one kilometre from protected areas, with an indication of their biodiversity and ecosystems value in terms of the number of protected habitats and species. To carry out the study, the "European protected sites"³⁹ and "Natura 2000 Viewer"⁴⁰ databases of the European Environmental Agency were used, which provide a comprehensive overview of protected sites in Europe.

Company	Site	Country	Coordinates	Activities	Dimensions	Distance to protected area	Biodiversity and ecosystems value				
							Area name	Code	Area type	No. Habitat	No. Species
Arlenico	Lecco	ITA	45.85000134412464, 9.399545596508103	Steel production	0.106 km ²	459.51 m 792.47 m	Adda Nord Nature Park Monte Barro	390486 IT2030003	Site of National Interest (CDDA) Habitats Directive Birds Directive	5	86
ESF Elbe-Stahlwerke Feralpi	Riesa	GER	51.31293984265011, 13.284907508448773	Steel production Cold processing/ Derivatives	0.604 km ²	430 m	Elbtal zwischen Schöna und Mühlberg	DE4545452	Birds Directive Site of National Interest (CDDA)	0	69
Feralpi-Hungária	Budapest	HU	47.43372836282799, 19.062947942285895	Cold processing/ Derivatives	0.018 km ²	773.38 m	Duna és ártere	HUDI20034	Habitats Directive	14	30

³⁹ <https://www.eea.europa.eu/en/analysis/maps-and-charts/european-protected-areas-1>

⁴⁰ <https://natura2000.eea.europa.eu/>

19. ESRS E5 - Resource use and circular economy

E5 IRO-1 Description of the processes to identify and assess material impacts, risks and opportunities related to the use of resources and the circular economy

[ESRS E5 IRO-1.1.a]

In carrying out the double materiality analysis, the following impacts, risks and opportunities related to the use of natural resources and the circular economy were identified as material. Feralpi Group has considered all its production facilities and the entire value chain as described in section [ESRS 2 IRO-1](#) of this document, to which reference should be made for further details on the methodology adopted.

		DESCRIPTION	IRO	VALUE CHAIN	TIME HORIZON
Resource inflows, including the use of resources		Positive impact on the circularity of economic activities through the production of steel from scrap, contributing to the reuse of resources and the extension of their life cycle.	+	◆ ◆	◆ ◆ ◆ ◆
		Negative impact on the progressive depletion of natural resources, due to the consumption of raw materials necessary for the Group's steel activities	-	◆ ◆	◆ ◆ ◆ ◆
		Risk of disruption to production processes caused by external shocks to the supply chain that could lead to instability in the supply of raw materials and scrap		◆	◆
		Risk in terms of costs to maintain the competitiveness of steel products with a reduced environmental impact		◆	◆ ◆
		Opportunities for savings from more efficient use of raw materials in production processes		◆	◆ ◆
Outflows of resources related to products and services		Potential negative impact on the ecological transition due to possible products or services with inadequate quality standards	(-)	◆ ◆	◆ ◆ ◆ ◆
		Positive impact on circularity through the development of industrial products from by-products and waste	+	◆ ◆	◆ ◆ ◆ ◆
		Positive impact on the circularity of economic activities thanks to the reduction of resource outflows, through the recovery and optimisation of residues generated in production processes	+	◆ ◆	◆ ◆ ◆ ◆
		Risk that the market is not yet ready to guarantee rewards to the steel industry on the basis of the environmental performance of products		◆	◆ ◆ ◆ ◆
		Opportunity to forge links with other companies to pursue joint research projects and expand existing networks for by-products		◆	◆ ◆
Waste		Production of waste and residues due to production activities	-	◆ ◆	◆ ◆ ◆ ◆
		Opportunities for savings from reduced waste generation through more efficient production processes		◆	◆ ◆

IRO

RISK

OPPORTUNITY

IMPACT

+ POSITIVE CURRENT
(+) POSITIVE POTENTIAL

- NEGATIVE CURRENT
(-) NEGATIVE POTENTIAL

VALUE CHAIN

◆ FERALPI OPERATIONS ◆ VALUE CHAIN

TIME HORIZON

◆ SHORT ◆ MEDIUM ◆ ◆ LONG

[ESRS E5 IRO-1 11.b]

The materiality analysis involved various stakeholders, as indicated in section IRO-1, to which reference should be made for more information. Specifically, with regard to the significance of the impact, an online questionnaire was administered to external stakeholders, including representatives of the local communities affected by Feralpi's activities, which did not, however, contribute to the calculation of the relevant score. As regards the risk and opportunity analysis, however, no direct consultations were conducted with the affected communities.

E5-1 Policies related to the use of resources and the circular economy

[ESRS E5-1 12; ESRS E5-1 15.a; ESRS E5-1 15.b]

Feralpi Group does not currently have a specific Group policy dedicated to the use of resources and the circular economy; however, these aspects are present in the **environmental and energy policies** outlined in **ESRS E1-2**, to which reference should be made for more information not specified below.

Within them, emphasis is placed on targets related to reducing the consumption of raw materials, optimising

the use of resources and continuously improving performance, principles that also inspire the practices adopted by companies without dedicated policies. In the 231 Model, present in all companies, all system procedures for all Group sites are referred to.

Feralpi Group's **quality policy** refers to the commitment to reduce significant environmental impacts in all their aspects, while the **Code of Ethics** emphasises the commitment to the continuous improvement of technologies and production practices with a view to the utmost respect for the environment inside and outside the plants.

In line with the relevant policy, quality, understood as the set of characteristics and properties of products, processes, or services that are able to create value for the customer, is ensured by monitoring procedures that check incoming raw materials, the production process, and finished products. The Group companies adopt a quality management system based on the ISO 9001:2015 standard and, in Caleotto for the Arlenico production site, in accordance with the IATF 16949 standard to guarantee the Automotive sector.

During 2026, both the new Group **Sustainability Policy**, which also deals with environmental protection in all its forms, and the **Supplier Code of Conduct** will also be disseminated. The latter document requires all Feralpi Group suppliers to operate by favouring the use of renewable or recycled raw materials, optimising production processes to reduce waste, and ensuring waste management in accordance with current regulations.

The environmental management of the production processes is entrusted to the individual sites, involving plant managers, management system managers, the Ecological and Energy Transition Unit (UTE), the Group HSE Manager, and the Sustainability and Communications Department.

Quality management is in the hands of the Group Quality Department and plant management, cascading to other functions where necessary. With regard to any complaints, the Quality Department decides on technical acceptance, while the Sales Department decides on resolution with the customer.

Group policies and those relating to individual sites are available on the Feralpi Group website⁴¹.



⁴¹ <https://www.feralpigroup.com/en/group/governance/group-policy>

E5-2 Actions and resources related to the use of resources and the circular economy

[ESRS E5-2 17; ESRS E5-2 19]

Enhancement of production residues within the production cycle or externally



Recovery and reuse of spent refractories in the production cycle in the place of raw materials

Spent refractory materials from the ladle are returned to the production cycle to partially replace calcic and dolomite lime ("CaO cubes" and "40% CaO"), whose use does not have negative impacts on the environment or human health.



Recovery of dust and fumes to reduce the demand for mineral zinc

The dust resulting from flue gas removal in the melting process is mostly treated at external plants to recover metallic zinc, while the dust from the ferro-alloy plant is reintroduced into the production cycle. At the Riesa site, the construction of a new system has been started that allows the filtering dust containing zinc to be conveyed directly into wheeled silos. In this way, it will be possible to reduce the amount of dust sent to landfill by about 650 tonnes per year.



Recovery of mill scale, to replace iron ore in the construction supply chain

Rolling scale is recovered for external use. Green iron is the by-product obtained from the rolling scale that is sold to plants for the production of ballasts and concrete.



Recovery of non-ferrous metals from scrap sorting

The residual fraction produced by the scrap selection plant is sent to external plants for the recovery through mechanical sorting of non-ferrous metals such as aluminium, brass and copper.



Sludge recovery

The Feralpi Siderurgica's Lonato del Garda site has a sludge filtration plant, which allows the production of a residue with lower moisture content and therefore more suitable for recovery in construction.



Slag recovery to replace materials of natural origin in the construction industry

The recovery, processing and marketing of black and white slag are outsourced to external companies. At Lonato del Garda, the black slag is processed into "Greenstone", a product with CE 2+ marking and an Environmental Product Declaration EPD, which is used in construction as a replacement for materials of natural origin. Also in Calvisano, the black slag is recovered for products CE 2+ certified. The enhancement of the white slag residue has allowed it to be recovered in the cement production process.



Heat recovery for energy generation

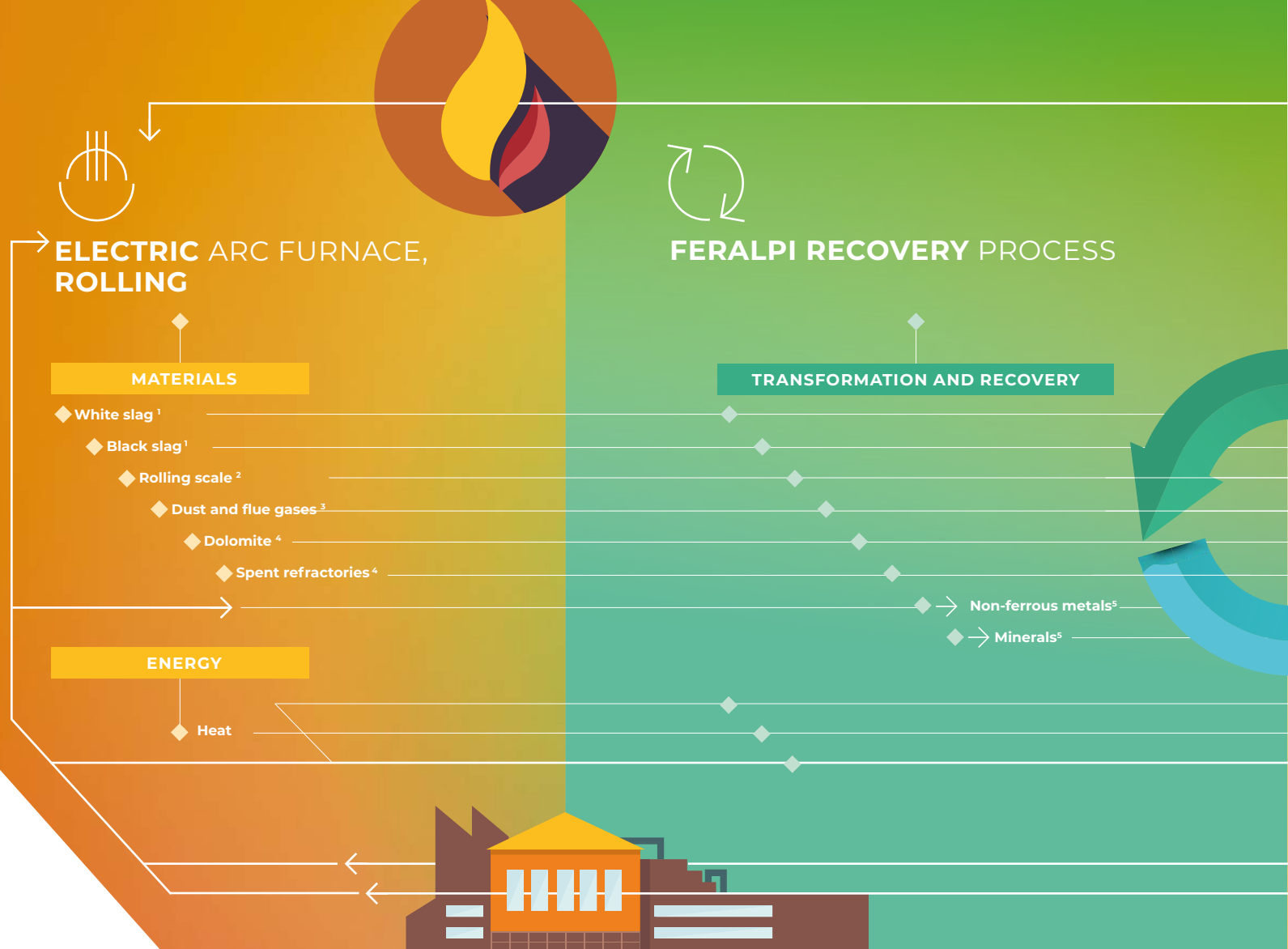
The Lonato del Garda and Riesa plants recover heat from the cooling water and melting furnace respectively. At the Arlenico site, a district heating project is underway that includes a plant to recover heat from the thermal waste from rolling. For more information, refer to **ESRS EI-3**.

CIRCULAR PROCESSES

IN FERALPI GROUP

Feralpi Group organises processes and facilities to **minimise production residues, landfilling and raw material handling**, investing in its replacement and circularity.

98.6% The **steel** produced by Feralpi is made **from recycled material**



¹ BLACK AND WHITE SLAG

Feralpi is conducting further studies aimed at the reuse of white slag in processes that use raw materials containing calcium oxide.

² ROLLING SCALE

Rolling scale is recovered for external use. Green iron is the by-product obtained from the rolling scale that is sold to plants for the production of ballasts and concrete.

³ DUST AND FLUE GASES

The metal zinc contained in the dust resulting from flue gas removal in the melting process is mostly recovered at external plants in replacement of natural mineral. The dust produced by the ferro-alloy plant is fed directly into the production cycle, the amount of which equals that of the materials from which dust originates.



MARKET



NATIONAL ECONOMY



⁴ DOLOMITE AND SPENT REFRACTORIES

Spent refractory materials coming from the ladle are returned to the production cycle, as partial raw material substitutes. The raw material to be replaced is calcic lime and dolomite lime ("CaO cubes" and "40% CaO") to be used as a slagging agent in the EAF (electric-arc furnace). Their reuse in the furnace does not entail any negative impact on the environment or human health.

⁵ NON-FERROUS METALS AND MINERALS

The residual fraction produced by the scrap selection plant is sent to external plants for the recovery through mechanical sorting of non-ferrous metals (such as aluminium, brass and copper).

⁶ HEAT

Heat is recovered from the cooling water systems of the Feralpi Siderurgica and the Riesa steel mills, preventing it from being released into the atmosphere.

⁷ POLYMERS

The polymers - sourced only from plastic packaging from separate waste collection - are subjected to sophisticated sorting and classification processes at modern, qualified industrial plants and then to technological treatment for recycling. Such processes transform treated plastic materials into new "circular raw materials" that comply with regulations and quality standards, becoming important resources for various industrial applications.

To address the need for low-carbon products to support decarbonisation efforts both internally and at the European and global levels, Feralpi Group, through the **"Green Go-to-market"** project, has developed a systematic strategy aligned with its transition plan to offer a full range of these products, collaborating with leading international partners.

In 2025, Feralpi Group launched **FERGreen**, a range that encompasses all construction products in both Italy and Germany, ensuring, through appropriate certifications, compliance with the requirements of construction standards that promote the use of materials with a reduced environmental impact.

Feralpi adopts the **Life Cycle Assessment** methodology, in accordance with ISO 14040 and ISO 14044, to assess the environmental impact of its products throughout all stages of their life cycle and to identify appropriate mitigation measures. In this way, for each product category of Feralpi Siderurgica, Acciaierie di Calvisano, Presider and Caleotto, it was possible to obtain the **Environmental Product Declaration (EPD)** in accordance with ISO 14025 and EN 15804 standards. In addition to the EPD, the Group has also conducted **Product Carbon Footprint (CFP)** studies for the products of Acciaierie di Calvisano and Caleotto, certifying them through the standard ISO 14067. All studies were subject to verification by recognised external bodies to ensure the accuracy and reliability of the results obtained.

In 2025, Feralpi Group focused on activities related to the spooler product, obtaining certifications for the main target markets and supporting customers in the adoption and use of the new product. In Germany, FERALPI STAHL obtained certification for FWR geometry for all countries and all products.

In addition, an assessment is underway regarding the updating of the Group's production mix in order to improve the balance of products available on the market.

Information on Feralpi Group's CapEx and OpEx plans has not been disclosed for the 2025 financial year.

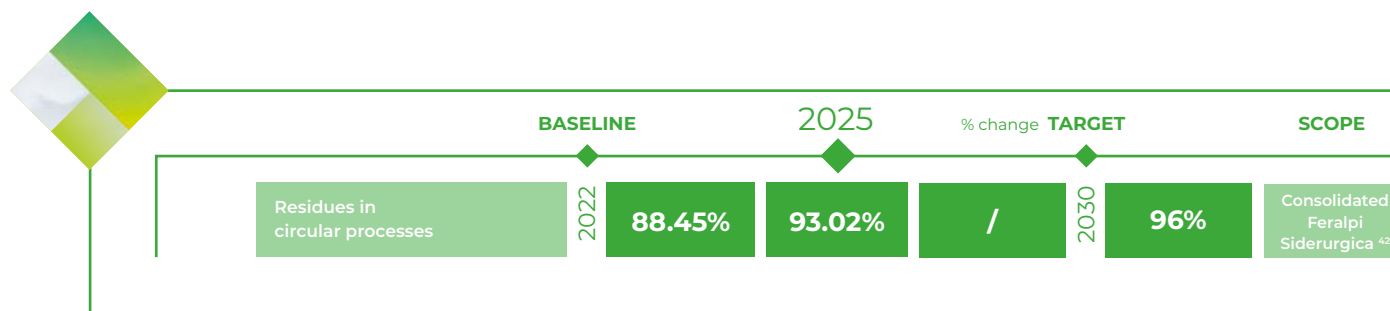
The above actions concern the operations of the Group companies, except for materials destined for external recovery.

E5-3 Targets related to the use of resources and the circular economy

[ESRS E5-3 21; ESRS E5-3 24; ESRS E5-3 25; ESRS E5-3 27]

Within the ESG Scorecard, which contains Feralpi Group's voluntary ESG commitments, there is a target relating to the improvement of process circularity, understood as the share of waste produced in the reporting period in business processes that is sent externally for recovery or as a by-product. With respect to the layers of the waste hierarchy, this objective is of a hybrid nature, covering the "prevention" level with regard to by-products and the "recycling" and "other recovery" levels with regard to the share diverted from disposal.

In addition, Feralpi Group aims to strengthen the integration of ESG criteria into the qualification of suppliers, with the goal of improving the evaluation of their performance and promoting sustainable practices along its supply chain. For this reason, the Scorecard also includes an objective relating to the ESG mapping of the Group's strategic suppliers, which also includes aspects related to the circular economy. Specifically, the questionnaire requires the suppliers involved to share information relating to the adoption of formal policies, the definition of objectives, the monitoring of resource inflows and outflows and the use of secondary or recyclable materials. For more information, refer to [ESRS G1-2](#).



⁴² Alpifer Group and Feralpi Algérie not included.

E5-4 Resource inflows

The Group's steel production, based on the recycling of ferrous scrap, is intrinsically circular, preventing waste dispersion and limiting the consumption of additional natural resources. Scrap, coming from different sources, can be supplied as waste or non-waste according to **EU Regulation 333/2011 "End of Waste"** and reintegrated into the production cycle. In addition to scrap, additives such as lime, ferro-alloys, oxygen and inert gases and reducing agents such as polymers are used. Some materials, like scrap and polymers, are fully reclaimed from other supply chains, whereas others, such as lime and refractories, are recycled or recovered internally in smaller proportions.

In order to guarantee scrap quality and reduce the risks of inadequate supplies that could compromise the final product, suppliers are continuously monitored by means of specific indicators that assess the quality of the material delivered.

The scrap delivered can be of two types:

- ◆ scrap comprised of scraps or processing residues: new scrap is collected by third parties and delivered directly to steel mills or sold to companies that market them;
- ◆ scrap from steel structures of all kinds (cars, ships, disused power stations, nets, railings, etc.): this type of scrap may need further treatment to separate it from the waste that is landfilled or from materials that can be recovered.

The incoming scrap undergoes visual and radiometric controls, the latter aimed at searching for possible radioactive sources, in order to verify its conformity from a safety point of view before it is sent to the melting process. At the facilities in Lonato del Garda, Calvisano and Riesa, there are advanced plants for the selection and treatment of scrap allowing the removal of **non-ferrous aggregates**, i.e. materials other than steel that would negatively affect the energy efficiency of the melting process and the quality of the product itself.

For other product classes such as ferro-alloys and lime, a control is performed on the chemical analysis of the incoming product. The ingot moulds are checked for the required dimensions, both before and during their use, to ensure the efficiency of heat exchange during the steel solidification process. The dimensions and hardness of the rolling cylinders, which are used to give the product its final shape, are checked to ensure that the requirements of the order are met.

The detection of any non-compliance involves promptly notifying the concerned supplier and recording it in the "Register of non-compliant scrap events". If material that has been contaminated with radiation is detected through the appropriate portals, the procedures require the vehicle to be stopped, decontaminated, and the level of risk evaluated by a qualified external expert. In the event that the material is actually radioactive, the report is made to the competent authorities, followed by the consequent seizure of the material. The awareness of suppliers regarding compliance with the requirements set by Feralpi Group is fundamental, in order to reduce inefficiencies and maximise the volumes of product marketed.

For all other product classes, incoming checks are carried out and, in the event of non-compliance with the specified analytical limits, non-compliance is notified to the purchasing department, which will contact the supplier for appropriate management.

[ESRS E5-4 31.a, ESRS E5-4 31.b, ESRS E5-4 31.c]

Resource inflows		2025			2024		
Material ⁴³	UoM	Used	of which Recycled or reused	% Recycled or Reused	Used	of which Recycled or reused	% Recycled or Reused
Scrap	t	2,993,342	2,993,342	100.00	2,841,584	2,841,584	100.00
Additives	t	20,094	240	1.19	19,197	308	1.60
Lime	t	107,025	1,244	1.16	114,100	3,197	2.80
Ferro-alloys	t	40,297	66	0.16	36,208	72	0.20
Refractory materials	t	19,200	717	3.73	18,802	804	4.27
Polymers	t	4,103	4,103	100.00	6,718	6,718	100.00
Total	t	3,184,062	2,999,712	94.21	3,036,609	2,852,683	93.94
Oxygen	Sm ³	74,552,444	0	0.00	74,595,658	0	0.00
Inert gases	Sm ³	2,713,124	0	0.00	2,358,214	0	0.00
Total gas	Sm³	77,265,567	0	0.00	76,953,872	0	0.00

[ESRS E5-4 32]

The data relating to incoming materials is recorded on the basis of the quantities reported on the purchase documents. Reporting is based on direct measurements and no estimates have been used.

⁴³ No biological materials are used in the production processes.

E5-5 Resource outflows

Products and materials

The production of steel is intrinsically circular, as it is a material that, at the end of its life cycle, can be reintroduced into the production process as a secondary raw material without losing its mechanical properties.

The steel produced by Feralpi Group consists of **98.6%⁴⁴ recycled, recovered, or by-product material**. The calculation is also made for the aggregates produced by the Group, which have the following values:

Product name	Total recycled, recovered, by-product content
GREEN STONE (black slag)	≥ 96.6%
GREEN LIME (white slag)	≥ 100%
GREEN IRON (scale)	≥ 100%

These figures have been subjected to validation, by a third party, with positive results produced by the checks on the percentage content of recycled material according to the UNI EN ISO 14021 and UNI/PdR 88:2020 standards.

⁴⁴ The figure refers to the minimum value of recycled, recovered, or by-product content among the values of the Group's three steelworks sites: Feralpi Siderurgica in Lonato del Garda (≥ 98.8%); Acciaierie di Calvisano (special steels ≥ 98.6%; construction steels ≥ 98.8%); ESF Elbe-Stahlwerke Feralpi GmbH (≥ 98.6%).

Products are named according to national and European technical standards and are identified by a label that includes an ID code, quality class, normative and dimensional references, a bar code, and certification logos. The compliance of labelling is verified by inspection and certification bodies. The company provides the **certificate of control 3.1 in accordance with UNI EN 10204:2005** for the various types of products and, for construction steel, the **certificate of qualification** in accordance with the regulations of each country of reference. **Products are tracked** through package labelling and delivery documents. In addition, on Italian products or on request according to the country of reference, a distinctive hot marking is applied to guarantee their origin. A **card embedded with a QR code** for the products provides instant access to the relevant technical and quality specifications.

At the Group level, all products are evaluated to ensure compliance with technical regulations or customer specifications. In 2025, **there were no instances of non-compliance** with regulations or voluntary guidelines and codes related to information and labelling, nor were there any losses of certifications or reports from certification bodies.

Feralpi Group production	UoM	2025	2024
Steel in billets	t	2,705,667	2,584,227
Finished product (rebar in bars - rebar in coil - wire rod)	t	2,565,397	2,476,077
Cold processing - Derivatives	t	1,499,057	1,343,571

For more information regarding the quantities of steel produced by Feralpi Group, refer to [Section 6](#) of the [Report on Operations](#).

Waste

[ESRS E5-5 40]

Feralpi Group implements specific monitoring and control systems in its facilities to measure and monitor the waste generated and its final destination. This data is collected and analysed in order to identify opportunities for improvement on the topic.

[ESRS E5-5 37.a; ESRS E5-5 37.b i; ESRS E5-5 37.b ii; ESRS E5-5 37.b iii; ESRS E5-5 37.c i; ESRS E5-5 37.c ii; ESRS E5-5 37.c iii; ESRS E5-5 37.d]

Waste generated by destination	UoM	2025	2024
HAZARDOUS WASTE	t	43,588	43,158
Diverted from disposal	t	41,224	40,018
Preparation for Reuse	t	0	0
Recycling	t	29	22
Recovery	t	41,195	39,997
Composting	t	0	0
Other treatment	t	0	0
Directed to disposal	t	2,364	3,140
Incineration	t	39	36
Landfilling	t	1,110	1,685
Other disposal operations	t	1,215	1,419
NON-HAZARDOUS WASTE	t	581,087	540,250
Diverted from disposal	t	539,129	490,146
Preparation for Reuse	t	11,853	25
Recycling	t	15,614	12,693
Recovery	t	511,598	477,418
Composting	t	64	11
Other treatment	t	0	0
Directed to disposal	t	41,958	50,104
Incineration	t	1	1
Landfilling	t	41,904	50,064
Other disposal operations	t	53	40
TOTAL WASTE	t	624,676	583,408
Diverted from disposal	%	92.90	90.87
Intended for disposal (not recycled)	%	7.10	9.13

[ESRS E5-5 38.a; ESRS E5-5 38.b; ESRS E5-5 39]

Waste generated by composition	UoM	2025	2024
HAZARDOUS WASTE	t	43,588	43,158
Fume abatement dust	t	43,229	42,250
Other (hazardous) waste	t	359	908
NON-HAZARDOUS WASTE	t	581,087	540,250
Mill scale	t	40,482	35,699
Black slag	t	307,264	286,251
White slag	t	82,636	71,844
Residues from scrap processing	t	73,490	-
Sludge	t	6,874	-
Other waste (non-hazardous)	t	70,342	146,187
TOTAL WASTE	t	624,676	583,408

Since any incoming radioactive materials are intercepted in advance according to the monitoring procedures outlined in [ESRS E5-4](#), there is no radioactive waste in Feralpi Group's operations.

20. Disclosure pursuant to Article 8 of Regulation (EU) 2020/852 (Taxonomy Regulation)

The European Taxonomy⁴⁵ is one of the initiatives promoted by the European Commission to achieve the objectives of the European Green Deal and make Europe "carbon neutral" by 2050. It consists of a classification system aimed at identifying **environmentally sustainable economic activities**.

Despite not being bound by the CSRD disclosure requirements, Feralpi Group has nonetheless reviewed its activities to confirm their adherence to the European Taxonomy for the 2025 financial year. In this way, it was possible to identify eligible, ineligible, and aligned activities with the Taxonomy Regulation criteria, also verifying compliance with the Group-level minimum social protection safeguards.

Eligibility analysis

Feralpi Group, through its analysis of activities listed in Delegated Regulation (EU) 2021/2139, Delegated Regulation (EU) 2023/2485, and Delegated Regulation (EU) 2023/2486, has identified the following activities as eligible under the Taxonomy for the climate change mitigation objective (CCM):

- ◆ CCM 3.9 Manufacture of iron and steel;
- ◆ CCM 4.1 Power generation using photovoltaic solar technology;
- ◆ CCM 4.25 Production of heat/cooling using waste heat.

⁴⁵ Regulation (EU) 2020/852

For CCM activity 3.9, the Group, after examining the EU guidelines for the inclusion of steel activities in the Taxonomy, decided to include as eligible both steel production and subsequent processing phases, provided that the material exclusively originates from companies within the Group. This includes the processing activities that comply with the NACE codes listed in the Taxonomy (C24.1, C24.20, C24.31, C24.32, C24.33, C24.34, C24.51 and C24.52). The companies that depend mainly on external steel suppliers have been excluded from the scope of the evaluation.

Compared to last year's report, additional analyses have clarified that the *CE 2.7 activity - sorting and recovery of materials from non-hazardous waste* - does not pertain to the activities of Feralpi Group and, therefore, was not considered in the calculation of the KPIs required by the Taxonomy Regulation.

Alignment analysis

In order to be defined as aligned, eligible activities for the purposes of the Taxonomy must fulfil the following criteria:

- ◆ meet **the substantial contribution criteria (SCC)** related to the identified economic activity;
- ◆ **Do Not Significant Harm (DNSH)**, i.e. do not lead to adverse effects on other environmental objectives to which the economic activity does not substantially contribute;
- ◆ take place in compliance with the **minimum social safeguard (MS)** recognising the importance of human rights and labour standards.

Analysis of substantial contribution criteria

Regarding CCM activity 3.9, the activities of all the Feralpi Group steel mills comply with the criteria of substantial contribution for the production of iron and steel, meeting criterion b) (the ratio between incoming steel scrap and outgoing product not being less than 96%) as outlined in Annex I of the Delegated Regulation (EU) 2021/2139.

For the CCM activity 4.1, the Regulation does not require specific technical screening criteria; therefore, the criterion of substantial contribution is considered met by Feralpi Power On, the Group's company dedicated to renewable energy projects.

For CCM activity 4.25, the Regulation does not require specific technical screening criteria; therefore, the heat recovery operations at the Lonato del Garda and Riesa facilities are regarded as contributing to the climate change mitigation objective.

Analysis of Do Not Significant Harm criteria

Climate change adaptation

The Group performed an exposure risk assessment of its assets based on the climate scenarios presented in the IPCC⁴⁶ assessment reports in cooperation with an external partner. In this way, it was possible to confirm that the Group's assets are able to withstand the expected climate change during their life cycle, and Feralpi therefore considers that its eligible activities meet the criteria set out in Delegated Regulation 2021/2139. Further information is available in [Section 10](#) of the [Report on Operations](#).

Sustainable use and protection of water and marine resources

For CCM activity 3.9, the environmental analyses carried out by the Group for the purposes of the EMAS Environmental Statement (Feralpi Siderurgica S.p.A., ESF Elbe-Stahlwerke Feralpi GmbH, Acciaierie di Calvisano S.p.A.) and the context analysis for the purposes of ISO 14001 certification (Feralpi Siderurgica S.p.A., Acciaierie di Calvisano S.p.A., ESF Elbe-Stahlwerke Feralpi GmbH, Presider, Arlenico) allow it to be reasonably considered that the DNSH criterion is met for these companies. On the other hand, for those Group companies (Presider Armatures, Feralpi-Praha and Feralpi-Hungária) that do not have an EMAS Environmental Statement or ISO 14001 certification, it cannot be said that the criterion is met.

Transition to a circular economy

For CCM activities 4.1 and 4.25, the Group has assessed the availability and uses, where possible, equipment and components that are highly durable, recyclable, and easy to dismantle and retrofit.

Pollution prevention and reduction

Feralpi Group complies with the applicable regulations and undertakes to pursue the provisions of the EMAS statement or the BAT alignment documentation. Therefore, for the CCM activity 3.9, the DNSH criterion is deemed satisfied for the operations of companies possessing both BAT alignment documentation and an EMAS statement (Feralpi Siderurgica, ESF Elbe-Stahlwerke Feralpi GmbH, Acciaierie di Calvisano) or, as an alternative to the latter, an ISO 14001 certification (Presider, Arlenico). Regarding companies with only BAT-alignment documentation (Presider Armatures, Feralpi-Praha, Feralpi-Hungária), the DNSH criterion is not considered met.

For CCM activity 4.25, in addition to what is described for CCM activity 3.9, equipment is used that complies, where applicable, with the requirements of the highest energy labelling class set out in Regulation (EU) 2017/1369 and the implementing regulations of Directive 2009/125/EC and represents the best available technology.

⁴⁶ IPCC - Sixth Assessment Report

Protection and restoration of biodiversity and ecosystems

The Group has conducted environmental analyses within the scope of the EMAS Environmental Statement (Feralpi Siderurgica S.p.A., ESF Elbe-Stahlwerke Feralpi GmbH, Acciaierie di Calvisano S.p.A.) and context analysis for the purposes of ISO 14001 certification (Feralpi Siderurgica S.p.A., Acciaierie di Calvisano S.p.A., ESF Elbe-Stahlwerke Feralpi GmbH, Presider and Arlenico), analyses that consider territorial, geographical and ecosystem-related aspects in general.

For companies situated within one kilometre of sensitive and/or protected areas (such as ESF Elbe-Stahlwerke Feralpi GmbH, Arlenico, and Feralpi-Hungária), the DNSH criterion is considered satisfied if they possess an EMAS statement (ESF Elbe-Stahlwerke Feralpi GmbH). For Arlenico and Feralpi-Hungária, no specific environmental impact assessments have been carried out, so their activities do not meet the criterion.

With regard to CCM activity 4.1, all photovoltaic installations have obtained an EIA in accordance with Directive 2011/92/EU; therefore, the criterion is considered to be met.

Minimum safeguards

The Group conducted an in-depth analysis to assess the compliance of its business activities with the EU Taxonomy Minimum social safeguards requirements. This assessment, based on the criteria specified in Article 18 of the Taxonomy Regulation and the recommendations of the Report on Minimum Safeguards (EU Platform on Sustainable Finance, October 2022), allowed the Group to fully understand the level of compliance with regulations to improve its performance in this area.

Compliance with the minimum safeguards was established through a criteria evaluation, which considered nine categories of requirements related to:

- ◆ Human rights, including workers' rights;
- ◆ Corruption;
- ◆ Taxation;
- ◆ Unfair competition.

Feralpi Group applies the principles of human rights protection in accordance with the Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, the International Labour Organisation's (ILO) Declaration on Fundamental Principles and Rights at Work and the Ten Principles of the Global Compact. The Group is equipped with a number of instruments to implement these commitments:

- ◆ Code of Ethics, which establishes the rules, values and fundamental principles that guide the Group's work by promoting ethical behaviour and responsible actions by all stakeholders. For more information, refer to paragraph [ESRS G1-1](#) in [Section 24. ESRS G1 Business Conduct](#).
- ◆ Human Rights Policy, which aims to promote and protect respect for human rights in the value chain and in the day-to-day activities of the company. For more information, refer to paragraph [ESRS S1-1](#) in [Section 21. ESRS S1 Own Workforce](#) and paragraph [ESRS 217.e](#) in [Section 22. ESRS S2 Workers in the value chain](#).
- ◆ Whistleblowing Procedure, which governs the process of reporting and handling offences and irregularities. For more information, refer to paragraph [ESRS G1-1](#) in [Section 24. ESRS G1 Business Conduct](#).

- ◆ Stakeholder Management Policy, which regulates the Group's relations with its stakeholders. For more information, refer to paragraph [ESRS 217.e](#) in [Section 23. ESRS S3 Affected communities](#).
- ◆ Group DPO (Data Protection Officer), whose presence ensures compliance with the highest standards of security and privacy of customers' personal data. For more information, refer to paragraph [ESRS G1-1](#) in [Section 24. ESRS G1 Business Conduct](#).

Furthermore, the Group undertakes to prepare and send tax declarations to the competent Authorities that are complete, truthful and free from any form of falsity, doctored information or omission, in order to ensure full transparency of activities and to avoid any attempt at tax evasion. This commitment reflects the Group's willingness to act with the utmost integrity and responsibility in all its activities. For more information, refer to [Section 11.3](#) of the [Report on Operations](#).

Starting in 2023, Feralpi Group started a process aimed at adopting structured Due Diligence procedures, moving in advance of the evolution of the European regulatory framework (Corporate Sustainability Reporting Directive - CSRD and Corporate Sustainability Due Diligence Directive - CSDDD) and also taking into account the German Law on Due Diligence along the Supply Chain (Lieferkettensorgfaltspflichtengesetz - LkSG). Following the recent changes introduced by the **Omnibus Decree** on the criteria for the applicability of the CSDDD, Feralpi Group is no longer among the companies subject to the regulatory obligation.

Despite this, the Group has chosen to continue its monitoring and sustainability activities along its value chain on a voluntary basis. Therefore, in 2025 it approved its Supplier Code of Conduct, a document that is intended to act as a clear guide for all Feralpi Group suppliers. For more information on this, refer to section [ESRS G1-1](#) in [Section 24. ESRS G1 Business Conduct](#).

Since the implementation of these structured Due Diligence procedures is still ongoing, Feralpi Group conservatively considers that it is not yet fully aligned with the minimum safeguards. Therefore, at present, all of the Group's eligible activities are to be considered non-aligned with the requirements of the Taxonomy Regulation. The completion and adoption of these procedures is, however, a crucial objective for Feralpi Group.

Contextual information and KPI calculation methodology (Accounting Policy)

For the purpose of preparing the consolidated financial statements, the Group adopts international accounting standards. As stipulated in the Delegated Act "Disclosures", for the calculation of the KPIs required by the European Taxonomy, companies must use the same accounting standards as for the preparation of the consolidated annual financial statements, with the objective of comparability to the turnover disclosed in the consolidated financial statements. Consequently, when a consolidated non-financial statement is prepared, consolidation accounting standards would exclude intra-group transactions⁴⁷.

Turnover

In line with the Disclosure Delegated Act, the Group considered the following values for the calculation of the Turnover Ratio:

- ◆ *Denominator*: net turnover is defined as the amount derived from the provision of services after deduction of sales discounts and value-added taxes directly related to turnover. It is also specified that, in order to avoid any possible double counting, intercompany items have been eliminated and do not contribute to the determination of the KPI. Consequently, the denominator of the KPI corresponds to the item "Revenues from ordinary operations" of the perimeter under analysis, identifying a value of €1,703,187 thousand, and is in line with the provisions of IAS 1, par. 82 (a), mentioned in Annex I to the Delegated Act § 1.1.1.
- ◆ *Numerator*: the share of net turnover (taken into account for the calculation of the denominator) associated with eligible and aligned activities. For this assessment, the approach adopted was to identify all legal entities, included in the perimeter, generating turnover associated with the following eligible taxonomy activities:
 - ◆ 3.9 - Iron and steel production (95.81%);
 - ◆ 4.1 - Power generation using photovoltaic solar technology (0%);
 - ◆ 4.1 - Production of heat/cooling using waste heat (0%).

Almost all of the turnover of the perimeter under analysis (95.81%) can therefore be considered eligible for the purposes of the European Taxonomy, and refers mainly to revenues from steel production and further processing of steel.

CapEx

In calculating the denominator of the CapEx KPI, the Group considered the additions incurred in the reporting period relating to tangible assets (development and restructuring of company assets) and intangible assets (patents, software and capitalised research and development costs). The approach used for the extraction of the above-mentioned figures involved a detailed analysis of Report on Operations showing the investments made during the year by all the companies within the scope of the analysis. In line with the Disclosure Delegated Act, the Group considered the following values for the calculation of the CapEx share:

- ◆ *Denominator*: in line with national and international accounting standards, as well as the provisions of Annex I to the Delegated Act 2178/2021, the Group considered tangible assets accounted for in accordance with IAS 16, intangible assets (excluding goodwill) accounted for in accordance with IAS 38, and the right of use in accordance with IFRS 16. This analysis yielded a value of €124,167 thousand.
- ◆ *Numerator*: for the purpose of determining the numerator, investments relating to assets associated with eligible and aligned activities were considered, in line with the provisions of point A of Annex I to the Disclosure Delegated Act, § 1.1.2.2. Below is a breakdown of the eligible taxonomy activities:
 - ◆ 3.9 - Iron and steel production (96.75%);
 - ◆ 4.1 - Power generation using photovoltaic solar technology (0.14%);
 - ◆ 4.1 - Production of heat/cooling using waste heat (0.02%).

⁴⁷ Communication from the Commission on the interpretation of certain legal provisions of the Delegated Act concerning disclosure under Article 8 of the EU Taxonomy Regulation as regards the reporting of eligible economic activities and assets (2022/C 385/01).

OpEx

In line with the Disclosure Delegated Act, the Group considered the following values for the calculation of the OpEx share:

- ◆ *Denominator:* the approach used was to proceed with a precise analysis of the Group's plan of accounts, considering the share of costs falling specifically into the categories indicated in Annex I to the Delegated Act 2178/2021. Specifically:
 - ◆ Non R&D costs relating to internal and external projects, from which the cost component relating to the "managing" of R&D projects carried out has been eliminated, as recommended by the European Commission⁴⁸. As expenses related to project management activities, all costs incurred during the year related to project managers were identified and eliminated from the calculation;
 - ◆ Short-term leases, whereby, according to Annex I to the Disclosure Delegate Act, leases recognised in the Income Statement relating to contracts with a term of less than 12 months must be considered as exempt from recognition in the Balance Sheet, in accordance with IFRS 16.
 - ◆ Costs related to maintenance and repairs, incurred during the year, on buildings and IT equipment. Costs related to employees involved in maintenance and repair activities were considered for this category, together with maintenance commissioned to third-party companies. Within the accounts for maintenance and repairs, renovations to buildings that can be assimilated into the concept of "building renovation measures", mentioned in the Annex to Delegated Act 2178/2021, were also taken into

⁴⁸ Communication from the Commission on the interpretation of certain legal provisions of the Delegated Act concerning disclosure under Article 8 of the EU Taxonomy Regulation as regards the reporting of eligible economic activities and assets (2022/C 385/01).

account. The result of this analysis yielded a value of €72,896 thousand.

- ◆ *Numerator:* operating expenses associated with point A⁴⁹ have been identified, in line with the indications of paragraph 1.1.3.2 of Annex I to the "Disclosure Delegated Act" and the clarifications provided by the European Commission, relating to assets or processes associated with taxonomy-aligned economic activities, derived in a timely manner from management systems. Below is a breakdown of operating expenses by eligible activity:
 - ◆ 3.9 - Iron and steel production (98.83%);
 - ◆ 4.1 - Power generation using photovoltaic solar technology (0%);
 - ◆ 4.1 - Production of heat/cooling using waste heat (0%).

The operating expenses taken into account include direct non-capitalised costs related to maintenance and repair, leases and rentals, cleaning, expenses incurred for building renovation measures and non-capitalised R&D costs.

The approach used was to proceed with a precise analysis of the Group's plan of accounts, considering the share of costs falling specifically into the categories indicated in Annex I to the Delegated Act 2178/2021.

⁴⁹ Paragraph 1.1.3.2 Annex I Commission Delegated Regulation (EU) 2021/2178 of 6 July 2021.

⁵⁰ Communication from the Commission on the interpretation of certain legal provisions of the Delegated Act concerning disclosure under Article 8 of the EU Taxonomy Regulation as regards the reporting of eligible economic activities and assets (2022/C 385/01).

Specifically:

- ◆ Non R&D costs relating to internal and external projects, from which the cost component relating to the "managing" of R&D projects carried out has been eliminated, as recommended by the European Commission⁵⁰. As expenses related to project management activities, all costs incurred during the year related to project managers were identified and eliminated from the calculation;
- ◆ Short-term leases, whereby, according to Annex I to the Disclosure Delegate Act, leases recognised in the Income Statement relating to contracts with a term of less than 12 months must be considered as exempt from recognition in the Balance Sheet, in accordance with IFRS 16;
- ◆ Costs related to maintenance and repairs, incurred during the year, on buildings and IT equipment. Costs related to employees involved in maintenance and repair activities were considered for this category, together with maintenance commissioned to third-party companies. Within the accounts for maintenance and repairs, renovations to buildings that can be assimilated into the concept of "building renovation measures", mentioned in the Annex to Delegated Act 2178/2021, were also taken into account.

It should be noted that since the activities in the gas and nuclear sectors, which are included in the Complementary Delegated Act (Delegated Regulation 2022/1214), were not eligible, the relevant tables are not published.

The following tables incorporate the changes introduced by Delegated Regulation (EU) 2026/73⁵¹ on the simplification of the content and presentation of the information to be disclosed under the Taxonomy Regulation.

⁵¹ https://eur-lex.europa.eu/eli/reg_del/2026/73/oj/eng

Financial Year (N)		2025													
KPI	Total	Breakdown by environmental objective of taxonomy-aligned activities													
		Share of eligible activities to taxonomy	Activities aligned to taxonomy	Share of activities aligned to taxonomy	Climate change mitigation	Climate change adaptation	Water	Circular economy	Pollution	Biodiversity and ecosystems	Share of enabling activities	Share of transitional activities	Activities not assessed considered not material	Activities aligned to taxonomy in the previous financial year (N-1)	Share of activities aligned to taxonomy in the previous financial year (N-1)
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)	(15)	(16)
	k€	%	k€	%	%	%	%	%	%	%	%	%	%	Currency	%
Turnover	1,703,187	95.81	0	0	0	0	0	0	0	0	0	0	0	0	0
CapEx	124,167.11	96.89	0	0	0	0	0	0	0	0	0	0	0	0	0
OpEx	72,895.61	98.83	0	0	0	0	0	0	0	0	0	0	0	0	0

Turnover 2025														
Economic activities	Code	KPI eligible for taxonomy (Share of eligible turnover)	KPI aligned to taxonomy (Aligned turnover monetary value)	KPI aligned to taxonomy (Share of aligned turnover)	Climate change mitigation	Climate change adaptation	Water	Circular economy	Pollution	Biodiversity and ecosystems	Enabling activity	Transitional activity	Taxonomy-aligned share of the total eligible for the taxonomy	
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)	
Text		%	k€	%	%	%	%	%	%	%	(A where applicable)	(T where applicable)	%	
Manufacture of iron and steel	CCM 3.9	95.81	0	0	0	0	0	0	0	0		T	0	
Power generation using photovoltaic solar technology	CCM 4.1	0	0	0	0	0	0	0	0	0			0	
Production of heat/cooling using waste heat	CCM 4.25	0	0	0	0	0	0	0	0	0			0	
Sum of alignment by objective					0	0	0	0	0	0				
Total KPI Turnover		95.81	0	0	0	0	0	0	0	0			0	

CapEx 2025

Economic activities	Code	KPI eligible for taxonomy (Share of eligible CapEx)	KPI aligned to taxonomy (Aligned CapEx monetary value)	KPI aligned to taxonomy (Share of aligned CapEx)	Climate change mitigation	Climate change adaptation	Water	Circular economy	Pollution	Biodiversity and ecosystems	Enabling activity	Transitional activity	Taxonomy-aligned share of the total eligible for the taxonomy
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)
Text		%	k€	%	%	%	%	%	%	%	(A where applicable)	(T where applicable)	%
Manufacture of iron and steel	CCM 3.9	96.75	0	0	0	0	0	0	0	0		T	0
Power generation using photovoltaic solar technology	CCM 4.1	0.14	0	0	0	0	0	0	0	0			0
Production of heat/cooling using waste heat	CCM 4.25	0.02	0	0	0	0	0	0	0	0			0
Sum of alignment by objective					0	0	0	0	0	0			
Total KPI CapEx		96.89	0	0	0	0	0	0	0	0			0

OpEx 2025

Economic activities	Code	Taxonomy-eligible KPI (Share of eligible OpEx)	KPI aligned to taxonomy (Aligned OpEx monetary value)	KPI aligned to taxonomy (Share of aligned OpEx)	Climate change mitigation	Climate change adaptation	Water	Circular economy	Pollution	Biodiversity and ecosystems	Enabling activity	Transitional activity	Taxonomy-aligned share of the total eligible for the taxonomy
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)
Text		%	k€	%	%	%	%	%	%	%	(A where applicable)	(T where applicable)	%
Manufacture of iron and steel	CCM 3.9	98.83	0	0	0	0	0	0	0	0		T	0
Power generation using photovoltaic solar technology	CCM 4.1	0	0	0	0	0	0	0	0	0			0
Production of heat/cooling using waste heat	CCM 4.25	0	0	0	0	0	0	0	0	0			0
Sum of alignment by objective					0	0	0	0	0	0			
Total KPI OpEx		98.83	0	0	0	0	0	0	0	0			0