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VOLUNTARY CONSOLIDATED SUSTAINABILITY STATEMENT ACCORDING TO THE ESRS STANDARD

SUSTAINABILITY STATEMENT

List of relevant disclosure requirements

[IRO-2 56]

[10] *Disclosure requirement subject to the phasing-in clause provided for in Delegated Regulation (EU) 2023/2772, based on the amendments introduced by Delegated Regulation (EU) 2025/1416.*

[11] Disclosure requirement subject to the phasing-in clause provided for in Delegated Regulation (EU) 2023/2772, based on the amendments introduced by Delegated Regulation (EU) 2025/1416.

List of information elements referred to in the cross-cutting and thematic principles deriving from other EU legislative acts

[IRO-2 56]

Disclosure requirement and corresponding information element	SFDR reference	Third pillar reference	Reference to the Benchmarks Regulation	EU climate legislation reference	Material	Document section
ESRS 2 GOV-1						
Gender diversity on the board, paragraph 21(d)	Annex I, Table 1, Indicator no. 13		Commission Delegated Regulation (EU) 2020/1816, Annex II		Yes	GOV-1 – Role of the administrative, management and supervisory bodies
Percentage of independent members of the board of directors, paragraph 21, letter e)			Commission Delegated Regulation (EU) 2020/1816, Annex II		Yes	GOV-1 – Role of the administrative, management and supervisory bodies
ESRS 2 GOV-4						
Due diligence statement, paragraph 30	Annex I, Table 3, Indicator no. 10				Yes	GOV-4 – Due diligence statement
ESRS 2 SBM-1						
Involvement in activities related to activities in the fossil fuel sector, paragraph 40, letter d), point i)	Annex I, Table 1, Indicator no. 4	Article 449 bis of Regulation (EU) no. 575/2013; Commission Implementing Regulation (EU) 2022/2453, Table 1 – Qualitative information on environmental risk and Table 2 – Qualitative information on social risk	Commission Delegated Regulation (EU) 2020/1816, Annex II		Yes	SBM-1 – Strategy, business model and value chain
Involvement in activities related to the production of chemicals, paragraph 40, letter d), point ii)	Annex I, Table 2, Indicator no. 9		Commission Delegated Regulation (EU) 2020/1816, Annex II		Yes	SBM-1 – Strategy, business model and value chain
Participation in activities related to controversial weapons, paragraph 40, letter d), point iii)	Annex I, Table 1, Indicator no. 14		Article 12, paragraph 1 of Delegated Regulation (EU) 2020/1818 and Annex II to Delegated Regulation (EU) 2020/1816		Yes	SBM-1 – Strategy, business model and value chain
Involvement in activities related to the cultivation and production of tobacco, paragraph 40, letter d), point iv)			Article 12, paragraph 1 of Delegated Regulation (EU) 2020/1818 and Annex II to Delegated Regulation (EU) 2020/1816		Yes	SBM-1 – Strategy, business model and value chain

Disclosure requirement and corresponding information element	SFDR reference	Third pillar reference	Reference to the Benchmarks Regulation	EU climate legislation reference	Material	Document section
ESRS E1-1						
Transition plan to achieve climate neutrality by 2050, paragraph 14				Article 2, paragraph 1 of Regulation (EU) 2021/1119	Yes	E1-1 Transition plan for climate change mitigation
Companies excluded from the Paris-aligned benchmarks, paragraph 16, letter g)		Article 449 bis of Regulation (EU) no. 575/2013; Commission Implementing Regulation (EU) 2022/2453, template 1: Banking book – Indicators of potential transition risk related to climate change: Credit quality of exposures by sector, emissions and residual maturity	Article 12, paragraph 1, letters d) to g) and paragraph 2 of Delegated Regulation (EU) 2020/1818		Yes	E1-1 Transition plan for climate change mitigation
ESRS E1-4						
GHG emission reduction targets, paragraph 34	Annex I, Table 2, Indicator no. 4	Article 449 bis of Regulation (EU) no. 575/2013; Commission Implementing Regulation (EU) 2022/2453, template 3: Banking book – Indicators of potential transition risk related to climate change: alignment metrics	Article 6 of Delegated Regulation (EU) 2020/1818		Yes	E1-4 Targets related to climate change mitigation and adaptation
ESRS E1-5						
Energy consumption from fossil fuels disaggregated by source (only sectors with a high climate impact), paragraph 38	Annex I, Table 1, Indicator no. 5 and Annex I, Table 2, Indicator no. 5				Yes	E1-5 Energy consumption and energy mix
Energy consumption and energy mix, paragraph 37	Annex I, Table 1, Indicator no. 5				Yes	E1-5 Energy consumption and energy mix
Energy intensity associated with activities in sectors with a high climate impact, paragraphs 40 to 43	Annex I, Table 1, Indicator no. 6				Yes	E1-5 Energy consumption and energy mix

Disclosure requirement and corresponding information element	**SFDR reference**	**Third pillar reference**	**Reference to the Benchmarks Regulation**	**EU climate legislation reference**	**Material**	**Document section**
ESRS E1-6						
Gross Scope 1, 2, 3 emissions and total GHG emissions, paragraph 44	Annex I, Table 1, Indicators nos. 1 and 2	Article 449 bis of Regulation (EU) no. 575/2013; Commission Implementing Regulation (EU) 2022/2453, template 1: Banking book – Indicators of potential transition risk related to climate change: Credit quality of exposures by sector, emissions and residual maturity	Article 5, paragraph 1, Article 6 and Article 8, paragraph 1 of Delegated Regulation (EU) 2020/1818		Yes	E1-6 Gross Scope 1, 2, 3 GHG emissions and total GHG emissions
Gross GHG emissions intensity, paragraphs 53 to 55	Annex I, Table 1, Indicator no. 3	Article 449 bis of Regulation (EU) no. 575/2013; Commission Implementing Regulation (EU) 2022/2453, template 3: Banking book – Indicators of potential transition risk related to climate change: alignment metrics	Article 8, paragraph 1 of Delegated Regulation (EU) 2020/1818		Yes	E1-6 Gross Scope 1, 2, 3 GHG emissions and total GHG emissions
ESRS E1-7						
GHG removals and carbon credits, paragraph 56				Article 2, paragraph 1 of Regulation (EU) 2021/1119	Yes	E1-7 GHG removals and GHG emission mitigation projects financed with carbon credits
ESRS E1-9						
Exposure of the benchmark portfolio to physical climate-related risks, paragraph 66			Annex II to Delegated Regulation (EU) 2020/1818 and Annex II to Delegated Regulation (EU) 2020/1816		No	
Breakdown of monetary amounts by acute and chronic physical risk, paragraph 66(a) Location of significant assets at material physical risk, paragraph 66(c)		Article 449 bis of Regulation (EU) no. 575/2013; points 46 and 47 of Commission Implementing Regulation (EU) 2022/2453; template 5: Banking book – Indicators of potential physical risk related to climate change: exposures subject to physical risk			No	

Disclosure requirement and corresponding information element	SFDR reference	Third pillar reference	Reference to the Benchmarks Regulation	EU climate legislation reference	Material	Document section
ESRS E1-9						
Breakdown of the carrying amount of its real estate assets by energy efficiency classes, paragraph 67, letter c)		Article 449 bis of Regulation (EU) no. 575/2013; point 34 of Commission Implementing Regulation (EU) 2022/2453; Template 2: Banking book – Indicators of potential transition risk related to climate change: loans secured by real estate – Energy efficiency of collateral			No	
Degree of exposure of the portfolio to climate-related opportunities, paragraph 69			Annex II to Delegated Regulation (EU) 2020/1818		No	
ESRS E2-4						
Quantity of each pollutant listed in Annex II to the E-PRTR (European Pollutant Release and Transfer Register) Regulation emitted into the air, water and soil, paragraph 28	Annex I, Table 1, Indicator no. 8; Annex I, Table 2, Indicator no. 2; Annex 1, Table 2, Indicator no. 1; Annex I, Table 2, Indicator no. 3				Yes	E2-4 Air, water and soil pollution
ESRS E3-1						
Marine waters and resources, paragraph 9	Annex I, Table 2, Indicator no. 7				Yes	E3-1 Policies related to water and marine resources
Dedicated policy, paragraph 13	Annex I, Table 2, Indicator no. 8				Yes	E3-1 Policies related to water and marine resources
Sustainability of the oceans and seas, paragraph 14	Annex I, Table 2, Indicator no. 12				Yes	E3-1 Policies related to water and marine resources
ESRS E3-4						
Total recycled and reused water, paragraph 28, letter c)	Annex I, Table 2, Indicator no. 6.2				Yes	E3-4 Water consumption
Total water consumption in m^3 compared to net revenues from own operations, paragraph 29	Annex I, Table 2, Indicator no. 6.1				Yes	E3-4 Water consumption

Disclosure requirement and corresponding information element	SFDR reference	Third pillar reference	Reference to the Benchmarks Regulation	EU climate legislation reference	Material	Document section
ESRS 2 IRO-1						
E4 paragraph 16, letter a), point i)	Annex I, Table 1, Indicator no. 7				Yes	Disclosure requirement subject to a phase-in clause as per Delegated Regulations (EU) 2023/2772 and 2025/1416.
E4 paragraph 16, letter b)	Annex I, Table 2, Indicator no. 10				Yes	Disclosure requirement subject to a phase-in clause as per Delegated Regulations (EU) 2023/2772 and 2025/1416.
E4 paragraph 16, letter c)	Annex I, Table 2, Indicator no. 14				Yes	Disclosure requirement subject to a phase-in clause as per Delegated Regulations (EU) 2023/2772 and 2025/1416.
ESRS E4-2						
Sustainable agricultural/land use policies or practices, paragraph 24, letter b)	Annex I, Table 2, Indicator no. 11				Yes	Disclosure requirement subject to a phase-in clause as per Delegated Regulations (EU) 2023/2772 and 2025/1416.
Sustainable sea/ocean use practices or policies, paragraph 24, letter c)	Annex I, Table 2, Indicator no. 12				Yes	Disclosure requirement subject to a phase-in clause as per Delegated Regulations (EU) 2023/2772 and 2025/1416.
Policies to address deforestation, paragraph 24, letter d)	Annex I, Table 2, Indicator no. 15				Yes	Disclosure requirement subject to a phase-in clause as per Delegated Regulations (EU) 2023/2772 and 2025/1416.

Disclosure requirement and corresponding information element	SFDR reference	Third pillar reference	Reference to the Benchmarks Regulation	EU climate legislation reference	Material	Document section
ESRS E5-5						
Non-recycled waste, paragraph 37, letter d)	Annex I, Table 2, Indicator no. 13				Yes	E5-5 Resource outflows
Hazardous waste and radioactive waste, paragraph 39	Annex I, Table 1, Indicator no. 9				Yes	E5-5 Resource outflows
ESRS 2 – SBM3 – S1						
Risk of forced labour, paragraph 14, letter f)	Annex I, Table 3, Indicator no. 13				Yes	SBM-3 Material impacts, risks and opportunities and their interaction with the strategy and business model
Child labour risk, paragraph 14, letter g)	Annex I, Table 3, Indicator no. 12				Yes	SBM-3 Material impacts, risks and opportunities and their interaction with the strategy and business model
ESRS S1-1						
Political commitments on human rights, paragraph 20	Annex I, Table 3, Indicator no. 9 and Annex I, Table 1, Indicator no. 11				Yes	S1-1 Policies related to the company's own workforce
Due diligence policies on issues covered by International Labour Organisation core conventions 1 to 8, paragraph 21			Commission Delegated Regulation (EU) 2020/1816, Annex II		Yes	S1-1 Policies related to the company's own workforce
Procedures and measures to prevent human trafficking, paragraph 22	Annex I, Table 3, Indicator no. 11				Yes	S1-1 Policies related to the company's own workforce
Prevention policy or management system for accidents at work, paragraph 23	Annex I, Table 3, Indicator no. 1				Yes	S1-1 Policies related to the company's own workforce
ESRS S1-3						
Mechanisms for handling complaints/grievances, paragraph 32, letter c)	Annex I, Table 3, Indicator no. 5				Yes	S1-3 Processes to remediate negative impacts and channels for company workers to raise concerns

Disclosure requirement and corresponding information element	SFDR reference	Third pillar reference	Reference to the Benchmarks Regulation	EU climate legislation reference	Material	Document section
ESRS S1-14						
Number of deaths and number and rate of work-related injuries, paragraph 88, letters b) and c)	Annex I, Table 3, Indicator no. 2		Commission Delegated Regulation (EU) 2020/1816, Annex II		Yes	S1-14 Health and safety metrics
Number of days lost due to injuries, accidents, fatal accidents or illnesses, paragraph 88, letter e)	Annex I, Table 3, Indicator no. 3				Yes	S1-14 Health and safety metrics
ESRS S1-16						
Adjusted gender pay gap, paragraph 97, letter a)	Annex I, Table 1, Indicator no. 12		Commission Delegated Regulation (EU) 2020/1816, Annex II		Yes	S1-16 Compensation metrics (pay gap and total compensation)
Excessive pay gap in favour of the CEO, paragraph 97, letter b)	Annex I, Table 3, Indicator no. 8				Yes	S1-16 Compensation metrics (pay gap and total compensation)
ESRS S1-17						
Incidents related to discrimination, paragraph 103, letter a)	Annex I, Table 3, Indicator no. 7				Yes	S1-17 Incidents, complaints and serious human rights impacts
Failure to comply with the United Nations Guiding Principles on Business and Human Rights and the OECD, paragraph 104, letter a)	Annex I, Table 1, Indicator no. 10 and Annex I, Table 3, Indicator no. 14		Annex II to Delegated Regulation (EU) 2020/1816 and Article 12, paragraph 1 of Delegated Regulation (EU) 2020/1818		Yes	S1-17 Incidents, complaints and serious human rights impacts
ESRS 2 SBM-3 – S2						
Serious risk of child labour or forced labour in the labour chain, paragraph 11, letter b)	Annex I, Table 3, indicators nos. 12 and 13				Yes	Disclosure requirement subject to a phase-in clause as per Delegated Regulations (EU) 2023/2772 and 2025/1416.
ESRS S2-1						
Political commitments on human rights, paragraph 17	Annex I, Table 3, Indicator no. 9 and Annex I, Table 1, Indicator no. 11				Yes	Disclosure requirement subject to a phase-in clause as per Delegated Regulations (EU) 2023/2772 and 2025/1416.

Disclosure requirement and corresponding information element	**SFDR reference**	**Third pillar reference**	**Reference to the Benchmarks Regulation**	**EU climate legislation reference**	**Material**	**Document section**
ESRS S2-1						
Policies related to workers in the value chain, paragraph 18	Annex I, Table 3, indicators nos. 11 and 4				Yes	Disclosure requirement subject to a phase-in clause as per Delegated Regulations (EU) 2023/2772 and 2025/1416.
Failure to comply with the United Nations Guiding Principles on Business and Human Rights and the OECD Guidelines, paragraph 19	Annex I, Table 1, Indicator no. 10		Annex II to Delegated Regulation (EU) 2020/1816 and Article 12, paragraph 1 of Delegated Regulation (EU) 2020/1818		Yes	Disclosure requirement subject to a phase-in clause as per Delegated Regulations (EU) 2023/2772 and 2025/1416.
Due diligence policies on issues covered by International Labour Organisation core conventions 1 to 8, paragraph 19			Commission Delegated Regulation (EU) 2020/1816, Annex II		Yes	Disclosure requirement subject to a phase-in clause as per Delegated Regulations (EU) 2023/2772 and 2025/1416.
ESRS S2-4						
Human rights issues and incidents in its upstream and downstream value chain, paragraph 36	Annex I, Table 3, Indicator no. 14				Yes	Disclosure requirement subject to a phase-in clause as per Delegated Regulations (EU) 2023/2772 and 2025/1416.
ESRS S3-1						
Political commitments on human rights, paragraph 16	Annex I, Table 3, Indicator no. 9 and Annex I, Table 1, Indicator no. 11				Yes	Disclosure requirement subject to a phase-in clause as per Delegated Regulations (EU) 2023/2772 and 2025/1416.
Failure to comply with the United Nations Guiding Principles on Business and Human Rights, the ILO principles or the OECD guidelines, paragraph 17	Annex I, Table 1, Indicator no. 10		Annex II to Delegated Regulation (EU) 2020/1816 and Article 12, paragraph 1 of Delegated Regulation (EU) 2020/1818		Yes	Disclosure requirement subject to a phase-in clause as per Delegated Regulations (EU) 2023/2772 and 2025/1416.
ESRS S3-4						
Human rights issues and incidents, paragraph 36	Annex I, Table 3, Indicator no. 14				Yes	Disclosure requirement subject to a phase-in clause as per Delegated Regulations (EU) 2023/2772 and 2025/1416.

Disclosure requirement and corresponding information element	SFDR reference	Third pillar reference	Reference to the Benchmarks Regulation	EU climate legislation reference	Material	Document section
ESRS S4-1						
Policies related to consumers and end users, paragraph 16	Annex I, Table 3, Indicator no. 9 and Annex I, Table 1, Indicator no. 11				No	
Failure to comply with the United Nations Guiding Principles on Business and Human Rights and the OECD Guidelines, paragraph 17	Annex I, Table 1, Indicator no. 10		Annex II to Delegated Regulation (EU) 2020/1816 and Article 12, paragraph 1 of Delegated Regulation (EU) 2020/1818		No	
ESRS S4-4						
Human rights issues and incidents, paragraph 35	Annex I, Table 3, Indicator no. 14				No	
ESRS G1-1						
United Nations Convention against Corruption, paragraph 10, letter b)	Annex I, Table 3, Indicator no. 15				Yes	G1-1 Business conduct policies
Protection of whistleblowers, paragraph 10, letter d)	Annex I, Table 3, Indicator no. 6				Yes	G1-1 Business conduct policies
ESRS G1-4						
Fines imposed for violations of laws against corruption and bribery, paragraph 24, letter a)	Annex I, Table 3, Indicator no. 17		Annex II to Delegated Regulation (EU) 2020/1816		Yes	G1-4 Confirmed incidents of corruption and bribery
Rules on tackling corruption and bribery, paragraph 24, letter b)	Annex I, Table 3, Indicator no. 16				Yes	G1-4 Confirmed incidents of corruption and bribery

14. ESRS 2 - General disclosures

SBM-1 – Strategy, business model and value chain

[ESRS 2 SBM-1 38]

Feralpi Group is one of the leading steel producers in Europe. Internationalisation, verticalisation and diversification are the strategic directives that have led the Group to become an entity present in Italy, Germany, France, Hungary, the Czech Republic, Spain and Algeria.

By developing the steel tradition over more than half a century of history, the Group has strengthened itself by diversifying its business within the steel sector, distinguished by its **constant and concrete commitment to a more sustainable future**. Innovation, responsibility and long-term vision are the guidelines along this path. The pillars on which Feralpi Group builds its development every day are its partners' trust, our employees' expertise, the relentless search for eco-friendly solutions, and the integration of circular economy principles, guiding us towards the steel of the future.

For Feralpi Group, sustainability means reducing emissions, improving energy efficiency, and maximising material recovery, while always keeping in mind the value of the people and communities it operates within. This is the greatest challenge, a goal that motivates innovation and growth, while respecting the planet's resources and future generations.

Consistently with this philosophy, and as one of the five key pillars of corporate strategy, sustainability is an essential tool for generating shared value among all stakeholders and, at the same time, ensuring the continuity of the business. This approach enables the Group not only to access specific market segments but also to **support its customers** in complying with the environmental standards they must meet, by providing **increasingly comprehensive, integrated, and sustainable steel solutions**.

[ESRS 2 SBM-1 40.a iii]

Feralpi Group's workforce, mainly employed at the operating sites in Italy and Germany, totals 2,173 employees as at 31 December 2025. For more information about this, refer to ESRS S1-6.

[ESRS 2 SBM-1 40.b; ESRS 2 SBM-1 40.c]

The breakdown of revenues for the significant ESRS sectors is not reported as it is subject to a phase-in period. The same applies to the list of significant additional ESRS sectors.

[ESRS 2 SBM-1 42.a]

With regard to the data used and the methods of collection, processing and protection, refer to sections ESRS 2 BP-1 and ESRS 2 BP-2 in addition to what is reported in the thematic ESRSs regarding the metrics.

[ESRS 2 SBM-1 40.a i; ESRS 2 SBM-1 40.a ii; ESRS 2 SBM-1 40.e; ESRS 2 SBM-1 40.f; ESRS 2 SBM-1 40.g; ESRS 2 SBM-1 42.b; ESRS 2 SBM-1 42.c]

For more information relating to Feralpi Group's strategy, business model and value chain, as referred to in this disclosure requirement, refer to sections 2 - The Group structure, 3 - The Feralpi Group's business and 4.1 - Strategic Guidelines of the Report on Operations, of which this Voluntary Sustainability Statement forms an integral part. The table in ESRS 2 BP-2 provides further, more detailed information on the cross-references between the Voluntary Sustainability Statement and the Report on Operations.

BP-1 – General basis for preparation of sustainability statements

Through its Sustainability Statement, Feralpi Group aims to provide its stakeholders with a true and fair view of the most significant commitments, practices and results of its sustainability journey.

[ESRS 2 BP-1 5.a]

This document, prepared voluntarily on a consolidated basis in accordance with the European Sustainability Reporting Standards (ESRSs), developed by the European Financial Reporting Advisory Group (EFRAG) and adopted by the European Commission with EU Delegated Regulation 2023/2772, forms an integral part of the Report on Operations included in the 2025 Integrated Report.

[ESRS 2 BP-1 5.b]

The scope of the report coincides with the Consolidated Financial Statements as at 31 December 2025. Unlike in previous years, it also includes the Alpifer Group, which is active in the processing and transformation of steel for the construction industry. Information on Feralpi Power On, Feralpi Villasor, Feralpi Cellere, Oriolo and Cosina, active in energy production, is reported in qualitative form as they lack production facilities and personnel.

Data consolidation includes subsidiaries, excluding associates.

The environmental indicators cover the main operating companies: Feralpi Siderurgica S.p.A. (Lonato del Garda, BS); Acciaierie di Calvisano S.p.A. (Calvisano, BS); Arlenico S.p.A. with Caleotto S.p.A. (Lecco, LC); ESF Elbe-Stahlwerke Feralpi GmbH with the associates Feralpi Stahlhandel GmbH and Feralpi-Logistik GmbH (Riesa, Saxony).

The environmental impacts of production units located in Italy (Alzate Brianza, Anzano del Parco, Borgaro Torinese, Nave, Pomezia, Misterbianco), France (Saint-Soupplets), the Czech Republic (Kralupy), Hungary (Csepel) and Spain (Barcelona, Girona) are also monitored. Companies lacking production plants and employing fewer than 15 employees, as well as Faeco Ambiente S.r.l. and Eco-Trading S.r.l., which are inactive, are excluded from environmental report.

Regarding the quantitative information pertaining to the Alpifer Group, this report includes only the data concerning its own workforce. Data of an environmental nature was not considered for the purposes of the material indicators, as they are not relevant since the company Unifer operates in cold processing, while Steelfer is an exclusively commercial company. In addition, the evaluations necessary for their integration into Feralpi Group's information flows are still ongoing.

For more information regarding the companies included in the perimeter, refer to Section 1 of the Report on Operations.

The following definitions are adopted in the document:

- Feralpi Group/Feralpi/the Group: all the companies included in the Consolidated Financial Statements of Feralpi Siderurgica S.p.A.
- Feralpi Siderurgica: the operations at the Lonato del Garda site.
- Acciaierie di Calvisano: the operations at the Calvisano site.
- Arlenico: the operations at the Lecco site.
- FERALPI STAHL: the operations at the Riesa, Kralupy and Csepel sites.
- Alpifer Group: the operations at the Unifer sites in Villanova sull'Arda and Ceprano and at the Steelfer sales company.

[ESRS 2 BP-1 5.c; ESRS 2 BP-1 5.d]

The information reported concerns the value chain to the extent necessary to report material impacts, risks and opportunities in accordance with the requirements of ESRS 1. The extent to which the policies, actions, metrics and targets reported go beyond Feralpi Group's own operations is reported, where relevant, in each thematic section. There are no omissions with regard to information on intellectual property, know-how and innovation results.

Approval of the Voluntary Consolidated Sustainability Statement

On 31 March 2025, the Board of Directors approved the Voluntary Consolidated Sustainability Statement, subsequently submitting it to the Shareholders' Meeting for approval and publication. This disclosure is subject to voluntary limited independent review by EY S.p.A., in accordance with the ISAE 3000 (Revised) standard of the International Auditing and Assurance Standards Board (IAASB).

The quantitative indicators relating to EU Regulation 852/2020 (Taxonomy Regulation) have not been the subject of limited voluntary review by EY S.p.A.

BP-2 – Disclosure in relation to specific circumstances

[ESRS 2 BP-2 9.a; ESRS 2 BP-2 9.b]

In accordance with ESRS 1, the time horizons have been defined as follows: the short term as one year; the medium term as one to five years; and the long term as more than five years. These definitions are consistent with those used in financial reporting.

[ESRS 2 BP-2 10.a; ESRS 2 BP-2 10.b; ESRS 2 BP-2 10.c]

This Sustainability Statement does not include value chain metrics estimated from indirect sources, with the exception of Scope 3 GHG emissions. For more information about this, refer to the relevant methodology note presented in ESRS E1-6.

[ESRS 2 BP-2 11.a; ESRS 2 BP-2 11.b]

For the purposes of reporting forward-looking information in accordance with the ESRSs, the preparation of such information is carried out on the basis of assumptions, described in the Sustainability Statement, regarding events that may occur in the future and possible future actions by the Company. Due to the uncertainty associated with the occurrence of any future event, both in terms of the event materialising and the extent and timing of its occurrence, the deviations between the final data and the forward-looking information could be significant.

Scope 3 greenhouse gas emission information is subject to greater inherent limitations than Scope 1 and 2 information, due to the limited availability and relative accuracy of the data used to define such information, both quantitative and qualitative, relating to the value chain.

Any uncertainties relating to the quantitative metrics and monetary amounts reported are described in the sections dedicated to the thematic ESRSs. The same applies to any calculation factors used and their references.

[ESRS 2 BP-2 13.a; ESRS 2 BP-2 13.b; ESRS 2 BP-2 13.c]

In this document, Feralpi Group voluntarily adopts for the first time the ESRS standards provided for by the European Commission's Delegated Regulation (EU) 2023/2772. The quantitative information relating to the 2024 financial year, where available, coincides with that reported in the 2024 Integrated Report, net of any reclassifications, indicated in the respective paragraphs, which are necessary to meet the ESRS disclosure requirements.

[ESRS 2 BP-2 14.a; ESRS 2 BP-2 14.b; ESRS 2 BP-2 14.c]

For the same reason, comparisons with the previous reporting period are reported only for the quantitative information for which the relevant data is available.
No material errors relating to the previous year were identified.

[ESRS 2 BP-2 15]

For the reconciliation between the disclosures reported in this document and the requirements of other regulations containing sustainability reporting obligations, refer to IRO-2.

[ESRS 2 BP-2 16]

With regard to the following disclosure requirements, Feralpi Group makes use of the option of inclusion by reference to other sections of the 2025 Integrated Report, of which this Sustainability Statement forms an integral part, as illustrated on the following page.

ESRS	Section
SBM-1 40.a. i	Section 3. The Feralpi Group's business (Report on Operations)
SBM-1 40.a.ii	Section 3. The Feralpi Group's business (Report on Operations)
SBM-1 40.e	Section 4.1. Strategic guidelines (Report on Operations)
SBM-1 40.f	Section 4.1. Strategic guidelines (Report on Operations)
SBM-1 40.g	Section 4.1. Strategic guidelines (Report on Operations)
SBM-1 42.a	Section 3. The Feralpi Group's business (Report on Operations)
SBM-1 42.b	Section 3. The Feralpi Group's business (Report on Operations)
SBM-1 42.c	Section 3. The Feralpi Group's business (Report on Operations)
SBM-3 19.a	Section 10. Risk management (Report on Operations)
SBM-3 19.b	Section 10. Risk management (Report on Operations)
SBM-3 19.c	Section 10. Risk management (Report on Operations)
IRO-1 20.b	Section 10. Risk management (Report on Operations)
IRO-1 20.c	Section 10. Risk management (Report on Operations)
IRO-1 21	Section 10. Risk management (Report on Operations)
E1-9	SBM-3 – Material impacts, risks and opportunities and their interaction with the strategy and business model
E2-6	SBM-3 – Material impacts, risks and opportunities and their interaction with the strategy and business model
E3-5	SBM-3 – Material impacts, risks and opportunities and their interaction with the strategy and business model
E4-6	SBM-3 – Material impacts, risks and opportunities and their interaction with the strategy and business model
E5-6	SBM-3 – Material impacts, risks and opportunities and their interaction with the strategy and business model

[ESRS 2 BP-2 17]

With regard to the disclosure requirements under the thematic standards *ESRS E4 Biodiversity and ecosystems, ESRS S2 Workers in the value chain, ESRS S3 Affected communities*, Feralpi Group makes use of the phase-in clause provided for in Delegated Regulation (EU) 2023/2772[12] Appendix C, based on the changes introduced by Delegated Regulation (EU) 2025/1416[13]. The same applies to specific information from ESRS S1 *Own workforce* indicated in the relevant section of the document.

[12] *https://eur-lex.europa.eu/legal-content/en/TXT/HTML/?uri=OJ:L_202302772*
[13] *https://eur-lex.europa.eu/legal-content/en/TXT/HTML/?uri=OJ:L_202501416*

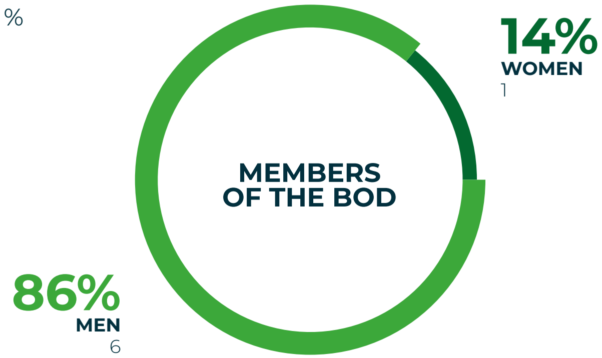
GOV-1 – Role of the administrative, management and supervisory bodies

[ESRS 2 GOV-1 19; ESRS 2 GOV-1 20.a; ESRS 2 GOV-1 21.a; ESRS 2 GOV-1 21.b; ESRS 2 GOV-1 21.d; ESRS 2 GOV-1 21.e]

The Board of Directors (BoD) of Feralpi Siderurgica S.p.A. consists of seven members, five of whom are non-executive and two executive. Board members also hold positions in Feralpi Group investees and external companies. Currently, there are no representatives of under-represented social groups or workers on the Board.

With the aim of adapting to new market challenges to ensure sustainable growth, the Group is working to integrate diversity, independence and ESG criteria more effectively.

COMPOSITION
OF THE BOD
%



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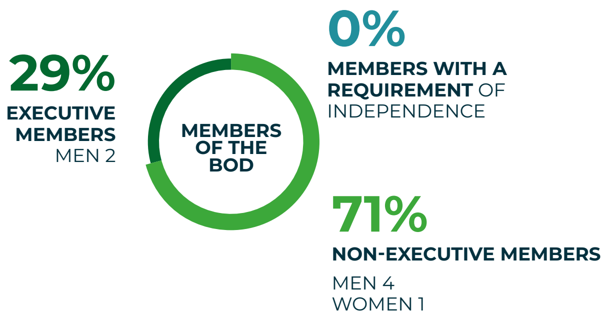


[ESRS 2 GOV-1 20.c; ESRS 2 GOV-1 21.c; ESRS 2 GOV-1 23.a; ESRS 2 GOV-1 23.b]

Board members have experience mainly in the steel sector in relation to the company's products and the geographical areas in which the Group carries out its activities, including aspects relating to environmental, energy, legal, commercial and supply chain topics, and in the financial sector.

Furthermore, with regard to sustainability issues, the Board of Directors is supported in its work by the Sustainability Management Committee, which, if necessary, makes use of specialist consultants.

Sustainability governance

[ESRS 2 GOV-1 20.b; ESRS 2 GOV-1 22.a; ESRS 2 GOV-1 22.c i; ESRS 2 GOV-1 22.c ii; ESRS 2 GOV-1 22.c iii]

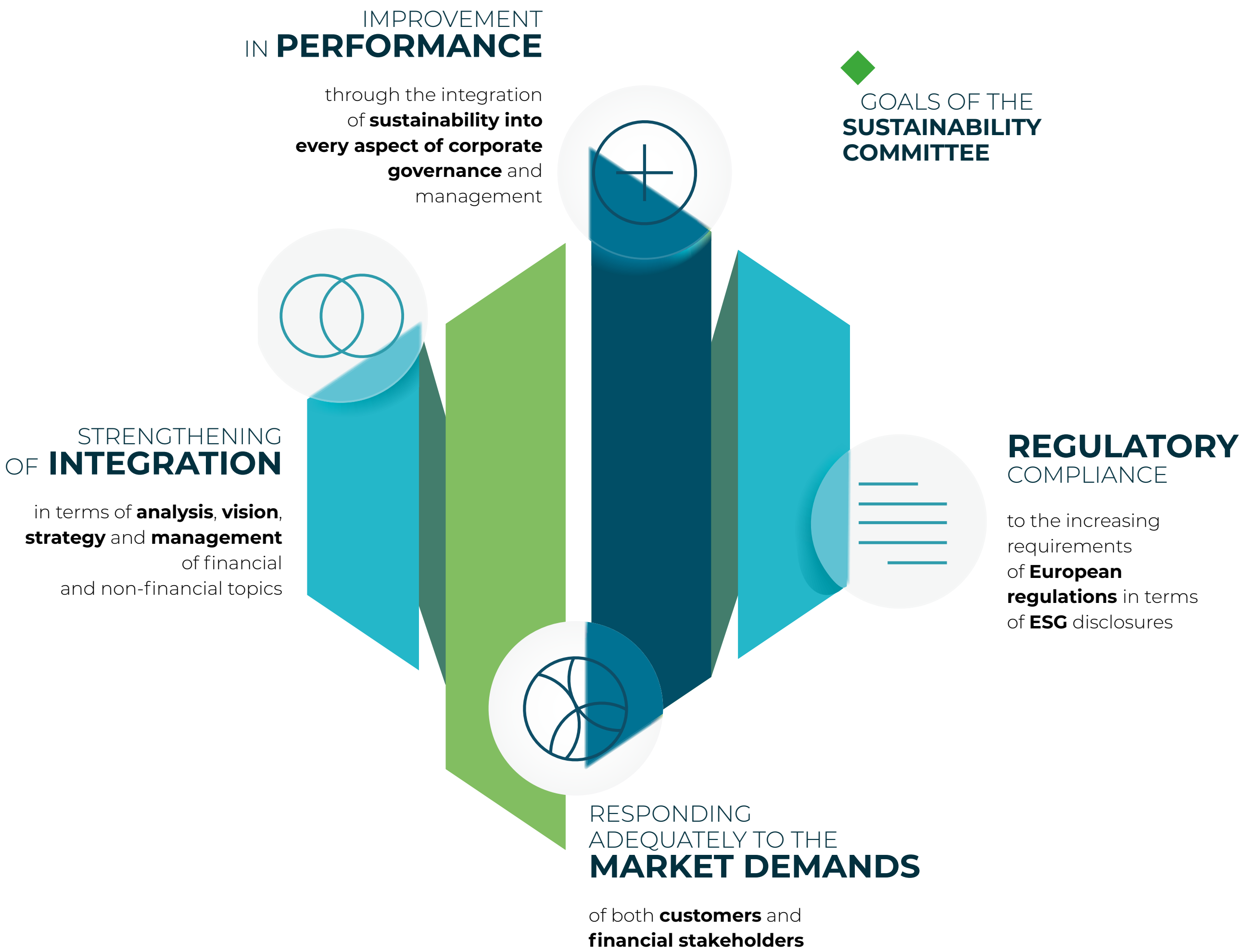
The monitoring of impacts, risks and opportunities involves the participation of various corporate bodies and functions, as indicated below.

The sustainability governance structure of Feralpi Group is led by the Board of Directors of the Parent Company, Feralpi Siderurgica S.p.A., supported by the Sustainability Management Committee and the Sustainability and Communications Department.

The Board of Directors of the Parent Company coordinates the development and implementation of the Group's ESG and sustainability strategy to create a resilient and flexible company capable of ensuring business continuity and generating shared value. It is entrusted with the responsibility of ensuring alignment between the organisation's goals and the UN SDGs through the approval and constant monitoring of ESG objectives, and it also has the task of promoting a culture of transparency and accountability within the organisation.

The Sustainability Management Committee has the task of assisting, with proposal-making and advisory functions, the Board of Directors in assessing and deciding on sustainability and corporate social responsibility issues, evaluating and proposing current and future activities related to ESG matters that are material to the organisation.

The Committee is currently composed of eight internal members (including the CFO and managers for HR, Environment, Health and Safety, and Sustainability) and one external member, who holds the position of Chairman of the Committee. All members are experts in environmental, social, and governance topics. With regard to the specific topics for discussion by the committees, participation is also extended to any other relevant roles involved, and there are four permanent invitees: three representatives of the majority shareholder and the Group Technical Manager.



The **Sustainability and Communications Department** supports the Parent Company's Board of Directors and the Sustainability Management Committee in defining the sustainability strategy and objectives, ensuring they are aligned with current and pending regulations, while also coordinating the Units and functions for their practical implementation. It manages the process of collecting data and information for the **Voluntary Consolidated Sustainability Statement** and the Taxonomy Regulation, while also coordinating and strengthening relationships with internal and external stakeholders in order to understand and meet their expectations, promote transparency, and ensure a continuous and constructive dialogue.

The results of the double materiality analysis, coordinated by the Sustainability and Communications Department, are approved by the Board of Directors after being shared with the Sustainability Management Committee and the Board of Statutory Auditors. For more information on the process of identifying and assessing material impacts, risks and opportunities, refer to ESRS SBM-3 and ESRS IRO-1.

In addition, Feralpi Group has adopted an Internal Control and Risk Management System (SCIGR) which, inspired by the best reference practices, enables the identification, measurement, management and monitoring of the main corporate risks, including those relating to sustainability matters. The administrative body is central to the risk management system, in terms of policy-making, evaluation of the process and of the systems in place, and is supported by all the risk owners in the main corporate functions, each according to their respective competencies. For more information, refer to Section 10 - Risk management of the Report on Operations.

[ESRS 2 GOV-1 22.b]

Management of material impacts, risks and opportunities is integrated into the main corporate documents, such as the mission, board mandates and corporate policies, ensuring a clear alignment between sustainability and governance.

Each function is responsible for defining and supervising the corporate policies related to sustainability matters material to its areas of competence. More information on these policies is available in the sections dedicated to the thematic ESRSs. In addition, sustainability is an integral part of Feralpi Group's overall strategy, as described in Section 4.1 - Strategic Guidelines of the Report on Operations.

[ESRS 2 GOV-1 22.d]

The Group's administrative, management and supervisory bodies define the sustainability objectives, aligning them with the company's priorities and the reference context. They are monitored through Feralpi's ESG Scorecard, which is updated and made public when the Integrated Report is published. For more information on the Scorecard, refer to Section 4.1 - Strategic Guidelines of the Report on Operations.

GOV-2 – Information provided to and sustainability matters addressed by administrative, management and supervisory bodies

[ESRS 2 GOV-2 26.a; ESRS 2 GOV-2 26.b]

The Board of Directors of Feralpi Siderurgica is informed about sustainability matters, including risks, impacts, opportunities (ESG), metrics and targets, through the work of the Sustainability Committee. In this way, the Board of Directors is able to take these topics into account in the performance of its activities.

The Committee has the specific task of updating the Board of Directors on material ESG topics and any emerging critical issues. The Chair of the Committee informs the Board at the earliest opportunity and, in any case, at least three times a year. To ensure a constant and adequate flow of information, the Committee itself meets at least six times a year.

In addition, as reported in ESRS 2 GOV-1, participation in the Sustainability Committee is extended to the relevant functions according to the topics under discussion. Permanent invitees include representatives of the majority shareholder and members of the Board of Directors. The results of the double materiality analysis, before being submitted to the Board of Directors for approval, are shared with both the Sustainability Committee and the Board of Statutory Auditors.

In line with the Code of Ethics, Feralpi Group's management is actively committed to pursuing a fair balance of recognised interests in its relationships with all stakeholders. Similarly, compromises that sacrifice the protection of the environment and people are not permitted, in line with the sustainable development goals that the Group has set itself.

[ESRS 2 GOV-2 26.c]

For more information regarding the material impacts, risks and opportunities addressed by the administrative, management and supervisory bodies during the reporting period, refer to ESRS 2 SBM-3.

GOV-3 – Integration of sustainability-related performance in incentive schemes

[ESRS 2 GOV-3 29.a; ESRS 2 GOV-3 29.b; ESRS 2 GOV-3 29.c; ESRS 2 GOV-3 29.d; ESRS 2 GOV-3 29.e]

As for the managerial level, **a formalised performance management system (MBO - Management By Objectives)** is in place for the Group's companies in Italy and Germany, based on objective quantitative and qualitative indicators, including ESG objectives. As a rule, ESG MBOs must cover at least 10% of the individual MBO and are approved by Feralpi Group's Top Management. The ESG MBOs are instrumental in achieving the targets of Feralpi Group's ESG Scorecard, without however precluding other KPIs that are functional or enabling for the Group's sustainability strategy. For information on the objectives of the ESG Scorecard, refer to Section 4.1 of the Report on Operations.

GOV-4 – Due diligence statement

[ESRS 2 GOV-4 30; ESRS 2 GOV-4 32]

Over the past few years, Feralpi Group has worked to integrate a process aimed at adopting structured due diligence procedures. With this in mind, a Supplier Code of Conduct has been drawn up which, once disseminated, will act as a clear guide for the Group's suppliers, establishing the principles that govern collaboration and setting clear expectations on key topics such as ethics, sustainability, safety, human rights, and environmental protection, thereby extending its responsibility throughout the entire supply chain. For more information, refer to ESRS G1-2.

The table below shows the elements integrated into the Disclosure Requirements that help illustrate the management of the impacts that Feralpi Group generates or could generate in the environmental, social and governance areas.

Fundamental elements of due diligence	Paragraphs in the Sustainability Statements
Integration of due diligence into governance, strategy and business model	ESRS 2 GOV-1 ESRS 2 GOV-2 ESRS 2 GOV-3 ESRS 2 SBM-3 ESRS G1-2
Stakeholder engagement at all key stages of due diligence	ESRS 2 GOV-1 ESRS 2 GOV-2 ESRS 2 SBM-2 ESRS 2 IRO-1 Thematic ESRSs
Identification and assessment of negative impacts	ESRS 2 IRO-1 ESRS 2 SBM-3
Interventions to address negative impacts	Thematic ESRSs
Monitoring the effectiveness of interventions and communication	ESRS 2 GOV-2 ESRS 2 SBM-3 Thematic ESRSs

GOV-5 – Risk management and internal controls on sustainability reporting

[ESRS 2 GOV-5 36.a; ESRS 2 GOV-5 36.b; ESRS 2 GOV-5 36.c; ESRS 2 GOV-5 36.d; ESRS 2 GOV-5 36.e]

In order to mitigate the risk associated with non-financial information, Feralpi Group has implemented a corporate procedure for the preparation and dissemination of the Sustainability Statement, which was shared internally with the company's front lines during a Technical Talk dedicated to the evolution of European ESG legislation.

Feralpi Group has defined a process that, at the same time as sharing sustainability information with the Sustainability Department, provides for its formal approval by the responsible functions. In addition, the reporting is subject to an external attestation process by a leading independent auditor.

The Group's sustainability information control and reporting system is subject to a continuous process of updating and maintenance in order to ensure that the preparation of the Sustainability Statement is aligned with non-financial reporting requirements and consistent over time.

SBM-2 – Interests and views of stakeholders

[ESRS 2 SBM-2 45.a; ESRS 2 SBM-2 45.b; ESRS 2 SBM-2 45.d]

Feralpi Group remains steadfast in its effort to build and reinforce a relationship of trust with its stakeholders, prioritising dialogue, collaboration, and the value of partnership.

To strengthen this commitment, the Group adopted a **Stakeholder Management Policy**[14] in 2021, which defines a structured approach to managing relationships with all involved parties, both internal and external. The aim is to guarantee transparency, inclusion, and accountability, responding to stakeholders' needs, preventing critical issues, and promoting sustainable development based on value sharing.

LISTENING

Listening to **stakeholders' needs** and anticipating possible critical issues.

RESPONSIBILITY

Building dialogue relationships based on **ethics**, **integrity** and **honesty**.

TRANSPARENCY

Creating and maintaining long-lasting, stable and transparent **relationships of trust**.

COLLABORATION

Promoting **partnerships** that **create value** for all partners involved.

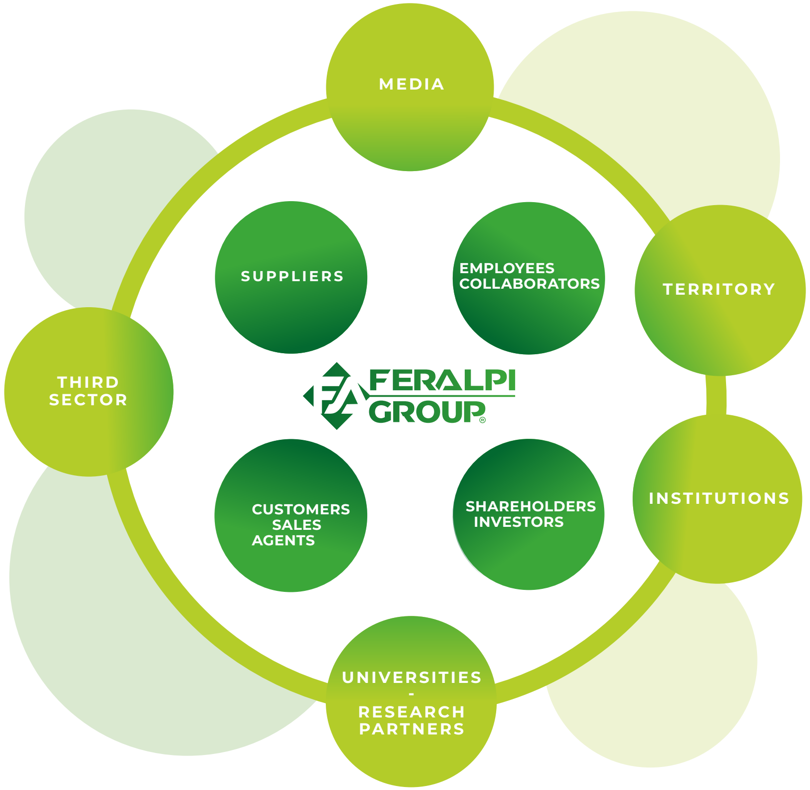
[14] *https://www.feralpigroup.com/en/group/governance/group-policy*

Internally, dialogue initiatives such as interviews and focus groups with the Group's managers are promoted, along with training sessions on specific topics, continuing the "Technical Talks" path launched in 2023. Externally, dialogue and collaborative activities are conducted with institutions, media, local communities, schools, and universities, with the aim of boosting a culture of work among young people and promoting entrepreneurship and the steel industry

The aim of these engagement activities is to foster an open and constructive dialogue, consolidating transparent, stable, and enduring relationships with all stakeholders. At the organisational level, the entire Group structure is involved in engagement initiatives, while the Sustainability and Communications Department coordinates and facilitates dialogue, ensuring a strategic and integrated approach.

In addition, Feralpi Group's stakeholders were involved in the double materiality analysis process in order to identify the priority topics for themselves and for their activities. The results of the double materiality analysis were presented to the Sustainability Management Committee and subsequently submitted to the Board of Directors for formal approval. For more information regarding the materiality analysis, refer to ESRS 2 IRO-1.

THE **RELATIONSHIP** WITH **STAKEHOLDERS**



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

Based on the experience gained in recent years, Feralpi Group has conducted a double materiality exercise on a voluntary basis according to the ESRS and in accordance with the requirements of the CSRD, to whose obligations it will be subject starting from the 2027 financial year.

The analysis identified the importance of ESG topics by assessing the significant negative or positive, current or potential impacts generated by the Group on the environment and society, and the risks and opportunities that may affect Feralpi's activities.

Below is the Feralpi Group's double materiality matrix for 2025, indicating the materiality of the ESRS thematic standards based on the impact and financial perspectives. A summary of the impacts, risks and opportunities that emerged from the analysis is presented on the following pages.

DOUBLE MATERIALITY

[ESRS SBM-3 48.a; ESRS SBM-3 48.b]

ESRS TOPIC	SUB-TOPIC	DESCRIPTION	IRO	VALUE CHAIN	TIME HORIZON
ESRS E1 Climate change	Climate change adaptation	Risk of exposure of company assets to acute weather events as a result of climate change	Risk	Feralpi operations	Short
		Risk of business interruptions due to extreme weather events	Risk	Feralpi operations	Short
		Business continuity and/or related activity risk linked to chronic climate risks	Risk	Feralpi operations	Long
	Climate change mitigation	Contribution to climate change through climate-changing emissions from the Group's activities	- Impact	Feralpi operations, Value chain	Short, Medium, Long
		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	Feralpi operations	Short, Medium, Long
		Risk that the achievement of decarbonisation goals is compromised by an unfavourable development of public policies and the economic environment	Risk	Feralpi operations	Medium, Long
		Business opportunities arising from the increasing focus on products with a low impact in terms of CO_2 emissions	Opportunity	Feralpi operations	Medium
	Energy	Undermining of the energy transition due to the continued use of fossil energy sources	(-) Impact	Feralpi operations, Value chain	Medium, Long
		Opportunities in terms of cost reduction resulting from energy efficiency and the use of renewables	Opportunity	Feralpi operations	Medium
		Risk in terms of costs to maintain the competitiveness of steel products with a reduced environmental impact	Risk	Feralpi operations	Medium
ESRS E2 Pollution	Air pollution	Pollutant emissions into the air from production activities	- Impact	Feralpi operations, Value chain	Short, Medium, Long
	Water pollution	Pollutant emissions into water from production activities	- Impact	Feralpi operations, Value chain	Short, Medium, Long
	Soil pollution	Soil pollution as a result of accidental events	(-) Impact	Feralpi operations	Long
ESRS E3 Water and marine resource	Water	Negative impact on the availability of water resources for all stakeholders, due to their use for production activities	- Impact	Feralpi operations, Value chain	Short, Medium, Long

IRO: **RISK** **OPPORTUNITY** **IMPACT**

VALUE CHAIN: **FERALPI OPERATIONS** **VALUE CHAIN**

TIME HORIZON: **SHORT** **MEDIUM** **LONG**

+ POSITIVE CURRENT
(+) POSITIVE POTENTIAL
- NEGATIVE CURRENT
(-) NEGATIVE POTENTIAL

ESRS TOPIC	SUB-TOPIC	DESCRIPTION	IRO	VALUE CHAIN	TIME HORIZON
ESRS E4 Biodiversity and ecosystems	Impacts on the extent and condition of ecosystems	Loss of natural areas and biodiversity and ecosystems due to the infrastructural expansion of production sites	- Impact	Feralpi operations, Value chain	Medium, Long
ESRS E5 Circular economy and use of resources	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.	+ Impact	Feralpi operations, Value chain	Short, Medium, Long
		Negative impact on the progressive depletion of natural resources, due to the consumption of raw materials necessary for the Group's steel activities	- Impact	Feralpi operations, Value chain	Short, Medium, Long
		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	Feralpi operations	Short
		Risk in terms of costs to maintain the competitiveness of steel products with a reduced environmental impact	Risk	Feralpi operations	Medium
		Opportunities for savings from more efficient use of raw materials in production processes	Opportunity	Feralpi operations	Medium
	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	(-) Impact	Feralpi operations, Value chain	Medium, Long
		Positive impact on circularity through the development of industrial products from by-products and waste	+ Impact	Feralpi operations, Value chain	Short, Medium, Long
		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	+ Impact	Feralpi operations, Value chain	Short, Medium, Long
		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	Feralpi operations	Short, Medium
		Opportunity to forge links with other companies to pursue joint research projects and expand existing networks for by-products	Opportunity	Feralpi operations	Medium
	Waste	Production of waste and residues due to production activities	- Impact	Feralpi operations, Value chain	Medium, Long
		Opportunities for savings from reduced waste generation through more efficient production processes	Opportunity	Feralpi operations	Medium

IRO: RISK, OPPORTUNITY, IMPACT

+ POSITIVE CURRENT
(+) POSITIVE POTENTIAL
- NEGATIVE CURRENT
(-) NEGATIVE POTENTIAL

VALUE CHAIN: FERALPI OPERATIONS, VALUE CHAIN

TIME HORIZON: SHORT, MEDIUM, LONG

ESRS TOPIC	SUB-TOPIC	DESCRIPTION	IRO	VALUE CHAIN	TIME HORIZON
ESRS S1 Own workforce	Working conditions	Negative impact on the health and safety of employees due to the risk of injuries/accidents and the development of occupational diseases inherent to the nature of the business	(-) Impact	Feralpi operations	Medium, Long
		Potential negative impact on well-being due to work environments that are not very welcoming and stimulating, failure to listen to needs and difficulties in work-life balance	(-) Impact	Feralpi operations	Short, Medium
		Potential negative impact on the performance of work activities and, consequently, on the well-being of the workforce resulting from excessively slow digitalisation and automation processes.	(-) Impact	Feralpi operations	Short, Medium, Long
		Positive impact on health and well-being through work-life balance measures and health and prevention initiatives	+ Impact	Feralpi operations	Short, Medium, Long
		The integration of digital technologies improves activities in terms of efficiency and speed, allowing staff to devote themselves to activities with greater added value and fostering their continuous development	+ Impact	Feralpi operations	Short, Medium
		Potential negative impact on general working conditions for staff if collaborative relations with trade union representatives are not maintained	(-) Impact	Feralpi operations	Short, Medium, Long
		Risk of being subject to legal proceedings and penalties as a result of non-compliance with occupational safety regulations or in the event of accidents due to non-compliance.	Risk	Feralpi operations	Medium
	Equal treatment and opportunities for all	Potential negative impact on staff well-being if a more inclusive and diversity-conscious working environment is not promoted	(-) Impact	Feralpi operations	Short, Medium, Long
		Positive impact on the sense of fulfilment and motivation of employees through the continuous development of their skills and professional growth paths	+ Impact	Feralpi operations	Short, Medium
		Opportunities arising from improving well-being in the workplace through attention to D&I topics in terms of improving attractiveness and retention	Opportunity	Feralpi operations	Medium
ESRS S2 Workers in the value chain	Working conditions	Negative impact on the health and safety of workers in the value chain due to the risk of injuries/accidents and the development of occupational diseases inherent to the nature of the business	(-) Impact	Value chain	Medium, Long
		Potential negative impact resulting from the possible presence, along the supply chain, of socially unsustainable practices, including labour exploitation and human rights violations, and their perpetuation in the absence of effective controls or adequate policies	(-) Impact	Value chain	Short, Medium
ESRS S3 Affected communities	Economic, social, and cultural rights of communities	Positive impact on the economic and social development of communities, through sourcing from local suppliers, employment, DEI awareness-raising initiatives and support for local associations and organisations	+ Impact	Feralpi operations, Value chain	Short, Medium, Long

IRO: RISK, OPPORTUNITY, IMPACT

VALUE CHAIN: FERALPI OPERATIONS, VALUE CHAIN

TIME HORIZON: SHORT, MEDIUM, LONG

\+ POSITIVE CURRENT
(+) POSITIVE POTENTIAL
\- NEGATIVE CURRENT
(-) NEGATIVE POTENTIAL

ESRS TOPIC	SUB-TOPIC	DESCRIPTION	IRO	VALUE CHAIN	TIME HORIZON
ESRS G1 Business conduct	Corporate culture	Potential negative impact resulting from a corporate culture not fully oriented towards principles of integrity and responsibility, which can result in unethical conduct and improper practices in relations with stakeholders	(-)	◆ ◆◆	◆ ◆◆ ◆◆◆
		Reputational risk arising from incorrect or out-of-context interpretations of sustainability information and its potential instrumental use		◆	◆◆
	Management of relations with suppliers, including payment practices	Possible presence along its supply chain of socially unsustainable practices and their continuation in the event of a lack of controls / absence of adequate policies	(-)	◆ ◆◆	◆ ◆◆
		Opportunity to strengthen corporate reputation through the progressive extension of sustainable qualification criteria to the entire supplier base, promoting more transparent relationships		◆	◆◆
	Corruption and bribery	Potential negative impact linked to inadequate governance models and internal procedures, which may encourage corrupt behaviour and other unethical practices in relations with stakeholders	(-)	◆ ◆◆	◆ ◆◆

IRO: RISK, OPPORTUNITY, IMPACT

\+ POSITIVE CURRENT
(+) POSITIVE POTENTIAL
\- NEGATIVE CURRENT
(-) NEGATIVE POTENTIAL

VALUE CHAIN: ◆ FERALPI OPERATIONS, ◆◆ VALUE CHAIN

TIME HORIZON: ◆ SHORT, ◆◆ MEDIUM, ◆◆◆ LONG

[ESRS 2 SBM-3 48.b]

Feralpi Group adopts an integrated approach that, with a view to creating shared value with all its stakeholders, takes into account the material impacts, risks and opportunities related to sustainability matters. The Board of Directors of Feralpi Siderurgica receives the relevant information through the Sustainability Committee, so that it can take it into account in the performance of its activities. These aspects, when necessary, may lead to adjustments to the Group's strategy, business model and organisation.

The actions related to these aspects are dealt with in the chapters relating to the thematic standards provided for by the ESRS.

[ESRS 2 SBM-3 48.c.i; ESRS 2 SBM-3 48.c.ii; ESRS 2 SBM-3 48.c.iii; ESRS 2 SBM-3 48.c.iv]

In the materiality analysis process, several aspects were considered, including the possible consequences of significant impacts on people and the environment, their position within the value chains of which Feralpi Group is a part, and the expected time horizons, in line with what is indicated in ESRS 2 BP-2. Since the production of steel from scrap is characterised by production processes that require considerable amounts of energy, constant inflows of scrap and other materials, and presents operational risks inherent in the necessary activities, these topics are intrinsically linked to the Group's business model.

[ESRS 2 SBM-3 48.d; ESRS 2 SBM-3 48.e]

The risks and opportunities identified were considered to be potential, and Feralpi Group therefore does not disclose the current financial effects for the reporting year. With regard to the expected ones, the Group makes use of the possibility of omitting the relevant information provided for by Delegated Regulation (EU) 2023/2772[15] and by the additional clauses introduced by Delegated Regulation (EU) 2025/1416[16].

[15] *https://eur-lex.europa.eu/eli/reg_del/2023/2772/oj*
[16] *https://eur-lex.europa.eu/eli/reg_del/2025/1416/oj*

[ESRS 2 SBM-3 48.f]

Within the Group, the Group HSE function, in coordination with the other business areas, carries out context analyses relating to risks and opportunities, including those related to sustainability aspects. These assessments are reviewed annually and reassessed in the event of organisational changes, regulatory changes, market trends and new collaborations or partnerships with relevant suppliers. In this way, it is possible to ensure the resilience of the strategy to impacts and risks, while also strengthening Feralpi Group's ability to seize significant opportunities.

[ESRS 2 SBM-3 48.g]

Unlike the previous reporting, which was drawn up in accordance with the requirements of the GRI Standards, this year Feralpi Group carried out a double materiality analysis aligned with the ESRSs. Specifically, the main differences from the analysis carried out in the previous report relate to the performance of the financial materiality analysis. To the extent that the two different methodologies can be compared, no significant discrepancies were found.

[ESRS 2 SBM-3 48.h]

Feralpi Group's 2025 voluntary Sustainability Statement also includes the disclosures "Direct economic value generated and distributed" and "Proportion of spending on local suppliers", referring respectively to material impacts, risks and opportunities for the communities concerned and for the management of relations with suppliers. This information has been prepared in accordance with GRI Standards 201-1 and 204-1, in continuity with the Group's previous reports and in line with the materiality of these topics for its stakeholders.

IRO-1 – Description of the processes to identify and assess material impacts, risks and opportunities

The double materiality analysis followed the following five phases:

1. **Analysis of the context**, internal and external to the organisation, through internal documentation and institutional economic, sustainability, and sector reports;
2. **Identification of IROs** through the involvement of expert internal stakeholders and the analysis of authoritative sources;
3. **Assessment of the materiality of IROs**;
4. **Prioritisation of the most significant IROs** for reporting purposes;
5. **Definition of the material ESRS topics** from the perspective of impact materiality, financial materiality, or both.

The first phase identified ten megatrends related to sustainability, a list and description of which can be found in Section 3.1 of the Report on Operations.

[ESRS 2 IRO-1 53.h]

Compared to the previous year, a new methodology was introduced for the analysis of financial materiality, aligned with the requirements of the reference standard and the related guidelines "EFRAG IG 1: Materiality Assessment Implementation Guidance"[17]. However, the methodology adopted does not yet allow precise determination of the financial materiality in economic-monetary terms of significant risks and opportunities. With regard to impact materiality, the relevant methodology has been further refined to ensure the correct prioritisation of any consequences on human rights in the event of potential negative impacts.

Feralpi Group updates its double materiality analysis annually. Over the next few years, the methodologies used, in particular that relating to financial materiality, may undergo further changes with a view to improving adherence to the ESRS standards and their evolution.

[ESRS 2 IRO-1 53.a; ESRS 2 IRO-1 53.b.i; ESRS 2 IRO-1 53.b.ii; ESRS 2 IRO-1 53.b.iii; ESRS 2 IRO-1 53.b.iv]

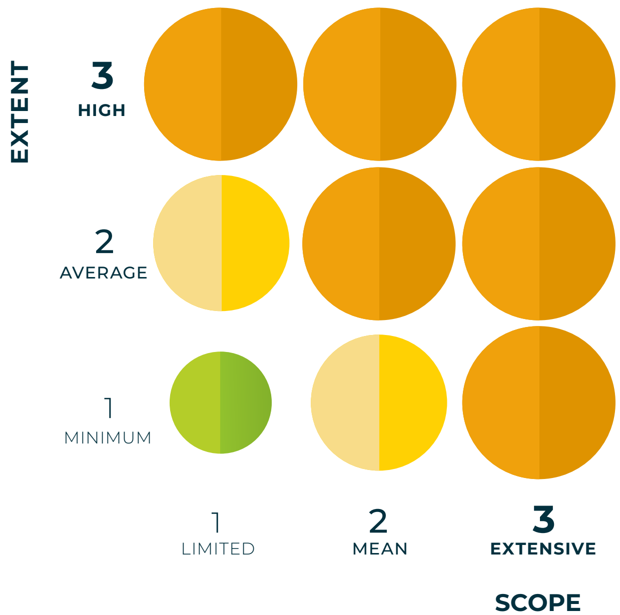
The internal contact persons of the Group companies have identified the actual and potential impacts generated by corporate operations on the environment and society, assessing their entity and extent and, for negative impacts, the degree of irremediability, as well as the probability of occurrence in t he case of potential impacts.

For each impact, the location along the value chain was analysed, distinguishing between the Group's own activities, upstream or downstream activities, or a combination of these. Finally, both the reference time horizon, in terms of the duration and persistence of the effects in the short, medium and long term, and any direct or indirect consequences on human rights were taken into account.

[17] *https://www.efrag.org/en/projects/esrs-implementation-guidance-documents*

To prioritise the current negative impacts, severity was first considered, i.e. the combination of the parameters of magnitude and scope, according to a scoring scale from one to three.

SEVERITY OF **IMPACTS**



The severity was obtained by combining the assessment of the severity, shown in the matrix, with the dimension of the remediability of the impact according to the following methods:

- in the case of simple or short-term remediability, the impacts corresponding to the orange cells were considered material;
- in the case of medium or medium-term remediability, the impacts corresponding to the yellow cells were also considered material;
- In the case of difficult or long-term remediability, as well as impossibility of being remedied, the negative impacts were considered material regardless of the extent and scope scores.

The assessment of potential negative impacts was based primarily on whether or not there were further consequences for human rights. In the first case, negative impacts with significant severity were considered material regardless of likelihood. If, on the other hand, these additional effects on human rights are not present, impacts with significant severity and assessed as more than likely were classified as material.

With regard to current and potential positive impacts that are more than likely, those corresponding to the orange cells of the matrix were considered relevant. As regards the less-than-likely potential positive impacts, they were classified as material in the case of at least medium-level magnitude and scope.

The impacts identified and assessed as material for the individual production sites were consolidated at Group level into twenty-seven significant impacts. For a full list of material impacts, refer to SBM-3.

In addition, according to the Group's stakeholder engagement policy, in 2025, Feralpi involved its external stakeholders in order to assess the perceived importance of ESG topics and to establish targeted objectives and engagement methods based on the identified areas of alignment or misalignment.

Through an on-line questionnaire, they were asked to prioritise the sustainability topics identified as material the previous year. Participants were also given the opportunity to supplement the assessments provided with open-ended, in-depth answers. The questionnaire was sent to **409 external stakeholders**, selected to ensure representativeness, by cluster, of all Group companies. The response rate of the questionnaire was 36%.

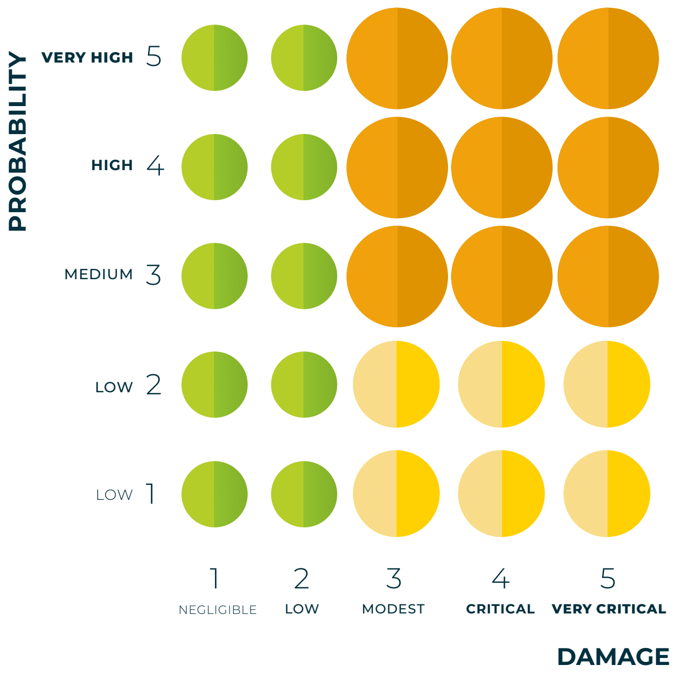
Although the results of the questionnaire did not contribute to the assessment of double materiality, Feralpi Group ensured continuity of dialogue with its external stakeholders in the current phase of regulatory transition. In preparation for the next reporting, the Group plans to review and update the questionnaire so as to make it functional for the requirements of the ESRS standards.

[ESRS 2 IRO-1 53.c; ESRS 2 IRO-1 53.c.i; ESRS 2 IRO-1 53.c.ii; ESRS 2 IRO-1 53.c.iii; ESRS 2 IRO-1 53.e; ESRS 2 IRO-1 53.f; ESRS 2 IRO-1 53.g]

As regards financial materiality, the identification and assessment process was based on the context analyses prepared internally by the HSE function as part of the certification processes, which take into account Feralpi's activities, business relationships, the context in which they take place and the main stakeholders. From these analyses, a number of risks and opportunities were identified, from which those relating to ESG topics were extrapolated for the purpose of assessing financial materiality.

The materiality of the risks thus identified was assessed as a combination of the magnitude and probability parameters, derived respectively from the "Damage" and "Probability" parameters used in the context analyses and which have a scoring scale from one to five.

MATERIALITY OF THE **RISKS AND OPPORTUNITIES**



The reference time horizon was integrated into the assessment of these parameters shown in the matrix in the following ways:

- in the case of short- or medium-term risks, those with damage and probability at least modest and possible respectively, corresponding to the orange cells, were considered material;
- for the long term, all risks with at least modest damage, corresponding to the orange and yellow cells of the matrix, were considered material.

Regarding opportunities, those classified as significant in the context analyses were considered material, and were associated with a magnitude and probability of three, corresponding respectively to "Modest" and "Possible", thus placing them in the orange section of the matrix.

The risks and opportunities identified and assessed as material were consolidated into eleven significant risks and seven significant opportunities. For a full list of material risks and opportunities, refer to SBM-3.

[ESRS 2 IRO-1 53.d]

At the end of the assessment and consolidation process, the outcome of the double materiality analysis and the related methodology were shared with the Sustainability Committee for review and, if necessary, the addition of further observations, and with the Board of Statutory Auditors for information and identification of any ideas for improvement. Finally, the results were formally approved by the Board of Directors of Feralpi Siderurgica, which, supported by the Sustainability Committee and the Sustainability and Communication Department, is responsible for the double materiality analysis.

IRO-2 – ESRS disclosure requirements covered by the undertaking's sustainability statement

[ESRS 2 IRO-2 58]

For the purposes of this report, the thematic standard "ESRS S4 Consumers and end users", a topic other than climate change, was not material in the context of the double materiality analysis. All disclosure requirements provided for therein are therefore omitted. This appears consistent with the nature of Feralpi Group's activities, which are exclusively Business-to-Business (B2B). Information on the qualitative characteristics of the Group's products is reported in "ESRS E5 Resource use and circular economy" as the production of steel from scrap is intrinsically linked to the circularity of resources.

[ESRS 2 IRO-2 59]

Feralpi Group has defined materiality thresholds based on the assessments of impacts, risks and opportunities, described in the IRO-1 53 disclosure requirement. The impacts, risks and opportunities have been associated with the topics and subtopics provided for in the thematic ESRS, in order to determine the material information to be disclosed for the purposes of this report. In addition, as described in SBM-3 48.h, this document includes the disclosures "Direct economic value generated and distributed" and "Proportion of spending on local suppliers", prepared according to GRI Standards 201-1 and 204-1, referring respectively to material impacts, risks and opportunities for the affected communities and for the management of relationships with suppliers.

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 CO_2 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 alternative[19].

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	Feralpi operations	Short
	Risk of business interruptions due to extreme weather events	Risk	Feralpi operations	Short
	Business continuity and/or related activity risk linked to chronic climate risks	Risk	Feralpi operations	Long
Climate change mitigation	Contribution to climate change through climate-changing emissions from the Group's activities	- Impact	Feralpi operations, Value chain	Short, Medium, Long
	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	Feralpi operations	Short, Medium, Long
	Risk that the achievement of decarbonisation goals is compromised by an unfavourable development of public policies and the economic environment	Risk	Feralpi operations	Medium, Long
	Business opportunities arising from the increasing focus on products with a low impact in terms of CO_2 emissions	Opportunity	Feralpi operations	Medium
Energy	Undermining of the energy transition due to the continued use of fossil energy sources	(-) Impact	Feralpi operations, Value chain	Medium, Long
	Opportunities in terms of cost reduction resulting from energy efficiency and the use of renewables	Opportunity	Feralpi operations	Medium
	Risk in terms of costs to maintain the competitiveness of steel products with a reduced environmental impact	Risk	Feralpi operations	Medium

IRO: RISK, OPPORTUNITY, IMPACT
+ POSITIVE CURRENT
(+) POSITIVE POTENTIAL
- NEGATIVE CURRENT
(-) NEGATIVE POTENTIAL

VALUE CHAIN: FERALPI OPERATIONS, VALUE CHAIN

TIME HORIZON: SHORT, MEDIUM, LONG

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 energy[20] 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 Ethics[21], 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 website[22].

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.

Feralpi Siderurgica

LEVER	ACTION
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.

[21] *https://www.feralpigroup.com/en/group/governance/governance-system*

[22] *https://www.feralpigroup.com/en/group/governance/governance-system*

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 boundary[23] 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.

	BASELINE 2022	2025	% change	TARGET 2030	SCOPE
Specific CO_2 emissions (Scope 1, 2 and 3 core boundary)[24]	0.540 tCO_2eq/tonne	0.230 tCO_2eq/tonne	-58%	-50%	Consolidated Feralpi Siderurgica[25]
Absolute CO_2 emissions (Scope 3 non-core boundary)	676,404 tCO_2eq	702,807 tCO_2eq	+3.9%	-25%	Consolidated Feralpi Siderurgica[25]
Renewable energy[26]	0.46%	56%	/	50%	Consolidated Feralpi Siderurgica[25]

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.

[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.

[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 i; 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

49% FROM **RENEWABLE** SOURCES

51% FROM **FOSSIL** SOURCES

2024

36% FROM **RENEWABLE** SOURCE

64% FROM **FOSSIL** SOURCES

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

[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.*

[ESRS E1-5 42]

According to the provisions of Commission Delegated Regulation (EU) 2022/1288[28], 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.

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

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_2eq	196,986	208,096
Gross GHG emissions from Emissions Trading Schemes (ETS)	tCO_2eq	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_2eq	440,024	546,212
Gross Scope 2 "market-based" GHG emissions	tCO_2eq	215,481	337,931
Gross Scope 3 GHG emissions	tCO_2eq	1,054,261	1,242,395
Total "location-based" GHG emissions	tCO_2eq	1,691,271	1,996,703
Total "market-based" GHG emissions	tCO_2eq	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_2eq	583,758	658,857
Capital goods	tCO_2eq	36,207	117,342
Fuel and Energy Related Activities Not Included in Scope 1 or Scope 2	tCO_2eq	75,214	96,213
Upstream transportation and distribution	tCO_2eq	196,660	195,697
Waste generated during operations	tCO_2eq	21,080	26,587
Downstream transportation and distribution	tCO_2eq	831	1,347
Processing of Sold Products	tCO_2eq	4,899	8,498
End-of-life treatment of products sold	tCO_2eq	135,612	137,854
Total	**tCO_2eq**	**1,054,261**	**1,242,395**

[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_2eq	1,691,271	1,996,703	-15.3
Total "market-based" GHG emissions	tCO_2eq	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_2eq/k€	0.99	1.21	-17.9
"Market-based" GHG emissions intensity	tCO_2eq/k€	0.86	1.08	-20.3

Methodology note

The calculation of CO_2 equivalent emissions (tCO_2 eq), which include CO_2, CH_4, N_2 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 CO_2, 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 CO_2 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 CO_2 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 CO_2e 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-1 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	- Impact	Feralpi operations; Value chain	Short; Medium; Long
Water pollution	Pollutant emissions into water from production activities	- Impact	Feralpi operations; Value chain	Short; Medium; Long
Soil pollution	Soil pollution as a result of accidental events	(-) Impact	Feralpi operations	Long

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 website[29].

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 NOx and CO_2 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
Powders[30]	t		
Feralpi Siderurgica		3.33	2.27
Acciaierie di Calvisano		2.66	1.86
Arlenico		0.35	0.23
Defim Orsogril		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
NOX[31]	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
CO[32]	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	gI-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
SOx[35]	t		
Feralpi Siderurgica		42.80	12.16
Acciaierie di Calvisano		29.06	19.25
FERALPI STAHL		45.27	48.90
Pcb[36]	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	- Impact	Feralpi operations; Value chain	Short; Medium; Long

IRO

RISK OPPORTUNITY IMPACT

\+ POSITIVE CURRENT
(+) POSITIVE POTENTIAL
\- NEGATIVE CURRENT
(-) NEGATIVE POTENTIAL

VALUE CHAIN

FERALPI OPERATIONS VALUE CHAIN

TIME HORIZON

SHORT MEDIUM LONG

[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 m^3, will enable the recovery and reintroduction of rainwater in the cooling and process circuits, saving about 6,000 m^3 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.

	BASELINE		2025	% change	TARGET		SCOPE
Specific water consumption	2022	1.38 m^3/tonne	1.02 m^3/tonne	-36.5%	2030	-50%	Consolidated Feralpi Siderurgica [37]

[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	m^3	2,607,209
Of which areas at water risk, including areas with high water stress[38]	m^3	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 ESRSs. 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	m^3	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	m^3/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	- Impact	Feralpi operations, Value chain	Medium, Long

IRO: **RISK** **OPPORTUNITY** **IMPACT**

+ POSITIVE CURRENT
(+) POSITIVE POTENTIAL
- NEGATIVE CURRENT
(-) NEGATIVE POTENTIAL

VALUE CHAIN: **FERALPI OPERATIONS** **VALUE CHAIN**

TIME HORIZON: **SHORT** **MEDIUM** **LONG**

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.

							Biodiversity and ecosystems value				
Company	**Site**	**Country**	**Coordinates**	**Activities**	**Dimensions**	**Distance to protected area**	**Area name**	**Code**	**Area type**	**No. Habitat**	**No. Species**
Arlenico	Lecco	ITA	45.85000134412464, 9.399545596508103	Steel production	0.106 km²	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 km²	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 km²	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 11.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.

SUB-TOPIC	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.	+ Impact	◆ ◆◆	◆ ◆◆ ◆◆◆
	Negative impact on the progressive depletion of natural resources, due to the consumption of raw materials necessary for the Group's steel activities	- Impact	◆ ◆◆	◆ ◆◆ ◆◆◆
	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	◆	◆
	Risk in terms of costs to maintain the competitiveness of steel products with a reduced environmental impact	Risk	◆	◆◆
	Opportunities for savings from more efficient use of raw materials in production processes	Opportunity	◆	◆◆
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	(-) Impact	◆ ◆◆	◆◆ ◆◆◆
	Positive impact on circularity through the development of industrial products from by-products and waste	+ Impact	◆ ◆◆	◆ ◆◆ ◆◆◆
	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	+ Impact	◆ ◆◆	◆ ◆◆ ◆◆◆
	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	◆	◆◆ ◆◆◆
	Opportunity to forge links with other companies to pursue joint research projects and expand existing networks for by-products	Opportunity	◆	◆◆
Waste	Production of waste and residues due to production activities	- Impact	◆ ◆◆	◆◆ ◆◆◆
	Opportunities for savings from reduced waste generation through more efficient production processes	Opportunity	◆	◆◆

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 (UTEE), 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 website[41].

[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]

Feralpi Group organises its production processes to minimise production waste, reduce landfill contributions, and decrease the use of raw materials, with an emphasis on substituting them with recycled materials and on recovering production waste within the production cycle or externally.

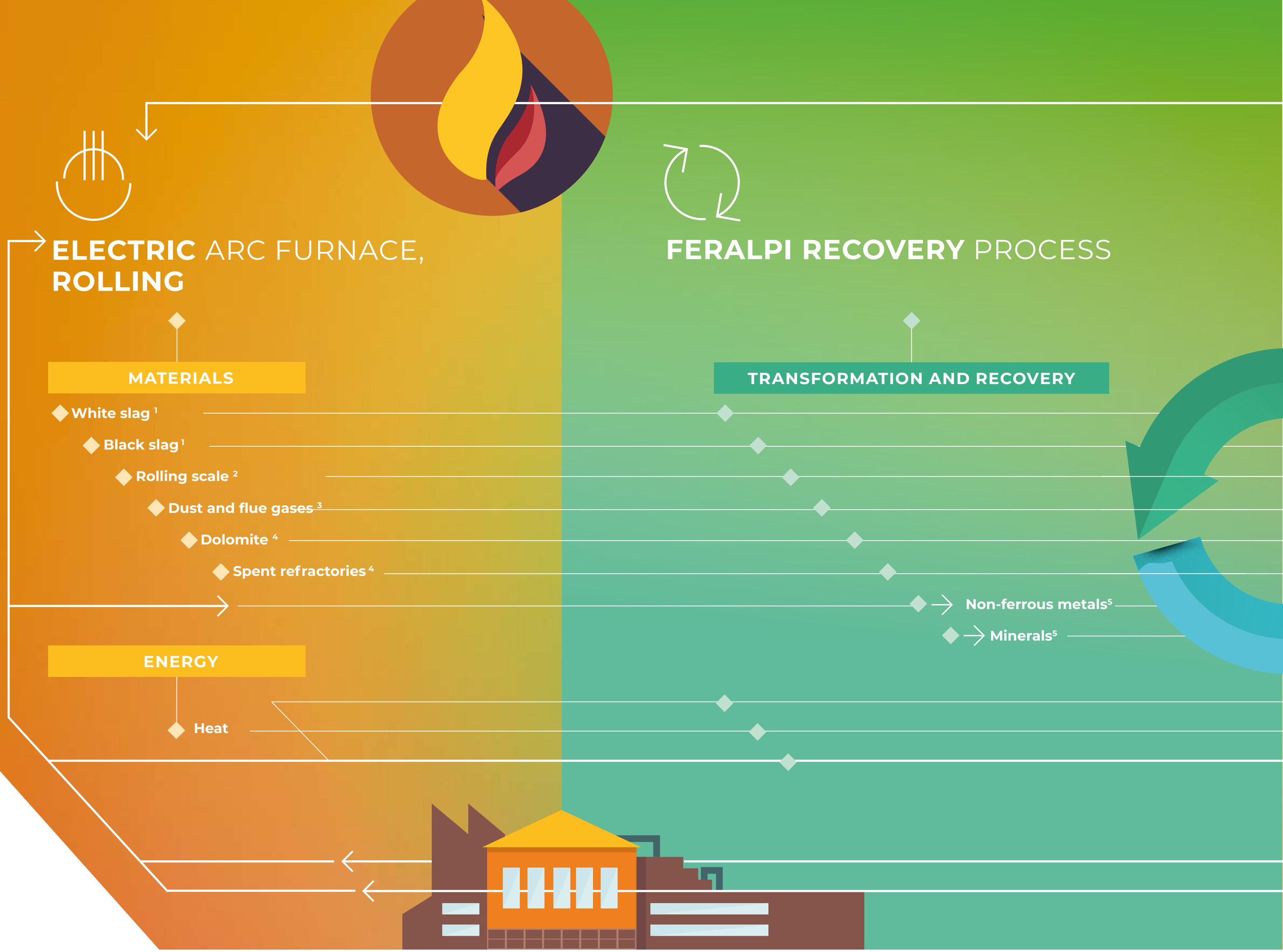
Enhancement of production residues within the production cycle or externally	
Recovery and reuse of spent refractories in the production cycle in the place of raw materials	Spent refractory materials from the ladle are returned to the production cycle to partially replace calcic and dolomite lime ("CaO 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 E1-3.

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.

[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.

		BASELINE	2025	% change		TARGET	SCOPE
Residues in circular processes	2022	88.45%	93.02%	/	2030	96%	Consolidated Feralpi Siderurgica [42]

[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	**Sm^3**	**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 Taxonomy[45] 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.

[45] *Regulation (EU) 2020/852*

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.

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 IPCC[46] 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.

[46] *IPCC - Sixth Assessment Report*

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.

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 2 17.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 2 17.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 transactions[47].

[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).*

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%).

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 Commission[48]. 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. The result of this analysis yielded a value of €72,896 thousand.
- *Numerator*: operating expenses associated with point A[49] 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.

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 Commission[50]. 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) 2026/73[51] on the simplification of the content and presentation of the information to be disclosed under the Taxonomy Regulation.

[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).*

[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).*

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

Financial Year (N)		2025													
					Breakdown by environmental objective of taxonomy-aligned activities										
KPI	Total	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 tp 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**

21. ESRS S1 - Own workforce

Feralpi Group considers people to be the key success factor and a fundamental element for sustainable development. It believes that a skilled and motivated workforce is essential for improving performance and achieving strategic objectives. This is why Feralpi honours the uniqueness and differences of its people, aiming for harmony and respect, true to our founding motto of "Produce and grow with respect for people and the environment".

COMMITMENT TO THE **GROWTH** AND **DEVELOPMENT OF INDIVIDUALS** → PILLARS

ENHANCING **POTENTIAL**

professional development plans with targeted training, **succession planning**, **performance management** tools and fair policies aligned with employee performance and contribution.

ENSURING A **POSITIVE WORKING ENVIRONMENT**: SAFE, INCLUSIVE AND RESPECTFUL

investments in **the safety**, **health and well-being** of its people, implementing effective management systems, offering **structured welfare** and work-life balance measures in an **inclusive context**.

DEVELOPING **SKILLS**

promoting a **culture of continuous learning** through **quality training** for employees and support for new generations for fully-informed growth.

ATTRACTING **TALENT**

diversified recruitment formats, offering **professional growth and development** in a safe and stimulating working environment.

SOCIAL

Strategy

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

[ESRS 2 SBM-3 14; ESRS 2 SBM-3 14.a]

For the purpose of this report, all individuals in the Feralpi Group's workforce who may be significantly influenced by the company are included. Specifically, this includes both personnel directly employed by the Group and non-employees, which consists of interns and temporary workers.

[ESRS 2 SBM-3 14.b; ESRS 2 SBM-3 14.c; ESRS 2 SBM-3 14.d]

The double materiality analysis led to the identification of the following impacts, risks and opportunities related to the Feralpi Group workforce:

SUB-TOPIC	DESCRIPTION	IRO	VALUE CHAIN	TIME HORIZON
Working conditions	Negative impact on the health and safety of employees due to the risk of injuries/accidents and the development of occupational diseases inherent to the nature of the business	(-) Impact	Feralpi operations	Medium, Long
	Potential negative impact on well-being due to work environments that are not very welcoming and stimulating, failure to listen to needs and difficulties in work-life balance	(-) Impact	Feralpi operations	Short, Medium
	Potential negative impact on the performance of work activities and, consequently, on the well-being of the workforce resulting from excessively slow digitalisation and automation processes	(-) Impact	Feralpi operations	Short, Medium, Long
	Positive impact on health and well-being through work-life balance measures and health and prevention initiatives	+ Impact	Feralpi operations	Short, Medium, Long
	The integration of digital technologies improves activities in terms of efficiency and speed, allowing staff to devote themselves to activities with greater added value and fostering their continuous development	+ Impact	Feralpi operations	Short, Medium
	Potential negative impact on general working conditions for staff if collaborative relations with trade union representatives are not maintained	(-) Impact	Feralpi operations	Short, Medium, Long
	Risk of being subject to legal proceedings and penalties as a result of non-compliance with occupational safety regulations or in the event of accidents due to non-compliance	Risk	Feralpi operations	Medium
Equal treatment and opportunities for all	Potential negative impact on staff well-being if a more inclusive and diversity-conscious working environment is not promoted	(-) Impact	Feralpi operations	Short, Medium, Long
	Positive impact on the sense of fulfilment and motivation of employees through the continuous development of their skills and professional growth paths	+ Impact	Feralpi operations	Short, Medium
	Opportunities arising from improving well-being in the workplace through attention to D&I topics in terms of improving attractiveness and retention	Opportunity	Feralpi operations	Medium

IRO: RISK · OPPORTUNITY · IMPACT

+ POSITIVE CURRENT
(+) POSITIVE POTENTIAL
- NEGATIVE CURRENT
(-) NEGATIVE POTENTIAL

VALUE CHAIN: FERALPI OPERATIONS · VALUE CHAIN

TIME HORIZON: SHORT · MEDIUM · LONG

[ESRS 2 SBM-3 14.e]

No material impacts on Feralpi Group's workforce have been identified in relation to the implementation of the climate transition plan.

[ESRS 2 SBM-3 14.f i; ESRS 2 SBM-3 14.f ii; ESRS 2 SBM-3 14.g i; ESRS 2 SBM-3 14.g ii]

Based on the analyses conducted for the purposes of the materiality assessment, no operations or specific geographical areas within the scope of the company's activities were identified that could be considered to be at high risk of forced, compulsory or child labour. It is specified that, as reported in ESRS S1-1, Feralpi Group operates in line with the main international guiding principles regarding the protection of human rights and is committed to promoting them in the value chain.

[ESRS 2 SBM-3 15; ESRS 2 SBM-3 16]

Furthermore, no specific categories of workers have been identified that are or may be particularly exposed to significant negative impacts. Consequently, interventions on significant impacts have been planned taking into account the entire workforce.

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 - General disclosures.

For information on how the interests, opinions and rights of Feralpi Group's stakeholders influence its strategy and business model, refer to paragraph ESRS 2 SBM-2 in Section 14. ESRS 2 - General disclosures.

Management of impacts, risks and opportunities

ESRS S1-1 Policies related to the company's own workforce

Feralpi Group has a structured system of policies and procedures to manage the impacts, risks and opportunities related to its workforce. These policies aim not only to mitigate and minimise potential negative impacts and related risks, but also to identify and exploit opportunities to continuously improve its practices and promote safe, healthy and inclusive working environments.

The **Group's Sustainability Policy**, which was drafted and approved in 2025 and will be disseminated during 2026, is aligned with the Code of Ethics and the Human Rights, Safety and Diversity, Equity and Inclusion policies. It recognises people as a strategic asset that the company is committed to enhancing through increasingly inclusive and safe working environments, the protection of mental and physical well-being, and the promotion of work-life balance. Commitments are monitored through the ESG Scorecard, which is updated by the Sustainability Committee.

Group policies and those relating to individual sites are available on the Feralpi Group website[52].

[ESRS S1-1 19]

Unless otherwise indicated, the policies and management methods relating to Feralpi Group's workforce apply to the entire scope of the Group, with the exception of the Alpifer Group. The Senior Management of Feralpi Group is responsible for implementing the policies.

[52] *https://www.feralpigroup.com/it/gruppo/governance/policy-di-gruppo*

Human Rights

[ESRS S1-1 20; ESRS S1-1 20.a; ESRS S1-1 20.b; ESRS S1-1 21; ESRS S1-1 22]

Feralpi Group operates in line with the International Charter of Human Rights, the ILO Conventions, the OECD Guidelines for Multinational Enterprises, the ten principles of the Global Compact and in compliance with its own Code of Ethics, which is the essential reference in defining the standards of conduct to be adopted with all stakeholders, including the workforce, to promote sustainable growth and the protection and promotion of human rights in daily activities within the value chain.

In Italy, the reference document is the Organisational Model drawn up pursuant to Legislative Decree no. 231/2001, while in Germany reference is made to the German Constitution and the Allgemeines Gleichbehandlungsgesetz law, incorporated into the Code of Ethics and the Diversity & Inclusion and Human Rights policies.

In line with the Code of Ethics, Feralpi Group has adopted a **Human Rights Policy**, through which it embraces the principles of human rights protection and is committed to ensuring that they are implemented and promoted in its day-to-day activities and within the value chain.

This document, which applies to the Group and to all persons and organisations that interact with it, is aligned with the Universal Declaration of Human Rights and the UN Guiding Principles on Business and Human Rights, with the International Labour Organisation's (ILO) Declaration on Fundamental Principles and Rights at Work and with the Ten Principles of the Global Compact.

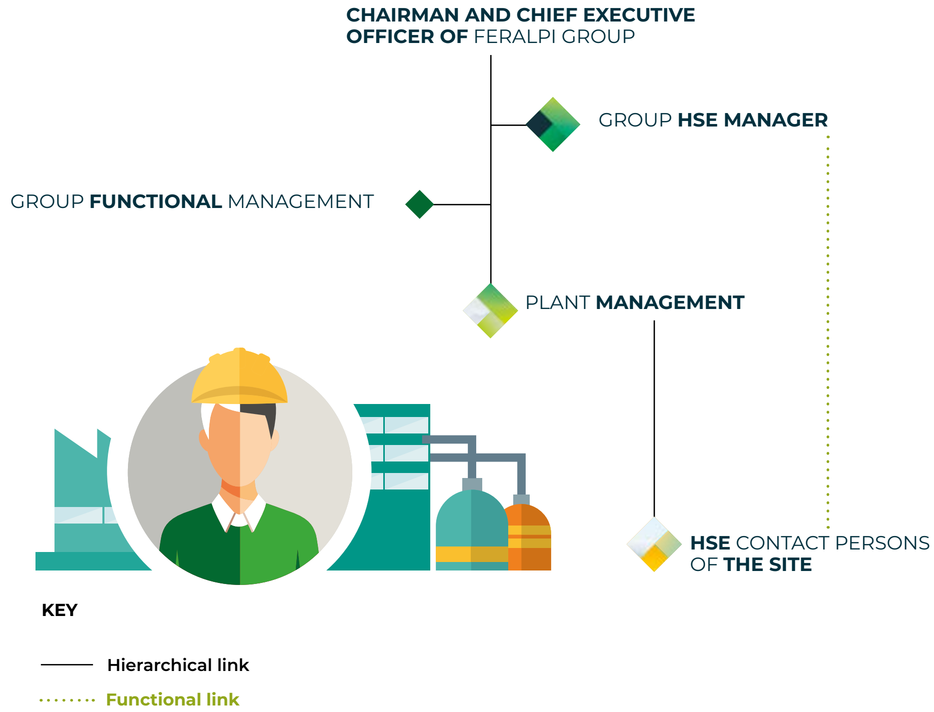
With regard to the human rights of its own workers, the Policy guarantees equal treatment and safe and healthy working conditions, including for workers operating in high-risk environments. In addition, it protects freedom of association, collective bargaining and fair remuneration, and enshrines Feralpi Group's commitment not to tolerate any form of child or forced labour.

The health and safety management at the workplace

[ESRS S1-1 23]

For Feralpi Group, worker safety is a top priority. In line with its Code of Ethics, the Group is constantly striving to improve its facilities, environments and work procedures to ensure a safe and secure environment for all personnel, internal and external. By adopting a preventive strategy, Feralpi Group identifies and defines investments and policies for worker safety, with the aim of promoting a safety culture within the organisation. The company is constantly committed to raising awareness of safety topics and reducing risk through training, constant monitoring and targeted initiatives that enable continuous improvement of working conditions.

The Group HSE Manager is tasked with guiding and coordinating safety, environment, and energy topics across all Group companies. This role involves supporting the formulation of relevant policies and strategies, ensuring these are communicated to subsidiaries, and overseeing the implementation of projects and strategic guidelines from the Sustainability Committee, of which they are a member. This figure functionally coordinates all internal contact persons in the Group companies who oversee environmental, safety and energy management systems where certified. In addition, it liaises with the plant management units and the contact persons of the environment and safety functions to ensure governance of the relevant topics is aligned to the Group's policies.



All choices and policies relating to the environment, safety and energy are therefore coordinated by exploiting synergies between the different companies, in order to standardise the application of strategies and the definition of objectives.

Safety management follows the regulations of the countries where the Group's sites operate and is functional to the various production processes in place. At the Lonato del Garda site, an ISO 45001 certified integrated safety, environment, and energy management system has been implemented, which ensures the constant monitoring of risks and the identification of improvement measures. Feralpi Group adopts an integrated policy for Environment, Safety, and Energy, ensuring that even sites without certification are managed according to the principles of the ISO 45001 standard.

The Group's goal, as reported in the ESG Scorecard, is to progressively extend the ISO 45001 certification to all its sites by 2030. In 2025, the Calvisano and Lecco sites obtained certification, while that of ESF Elbe-Stahlwerke Feralpi GmbH is scheduled for 2026 and, subsequently, will also be extended to Feralpi-Logistik and Feralpi Stahlhandel.

Finally, the Feralpi Siderurgica and Acciaierie di Calvisano sites are both equipped with a Policy, a Risk Management System and an assessment of relevant accident risk scenarios in line with the provisions of Legislative Decree no. 105/15.

Diversity, Equity, Inclusion

[ESRS S1-1 24.a; ESRS S1-1 24.b; ESRS S1-1 24.c]

Aligned with its Code of Ethics, which pledges to avoid any form of discrimination and harassment, Feralpi Group has adopted a **Diversity, Equity, Inclusion (DEI) Policy**, believing that the uniqueness of individuals represents an absolute value. Therefore, it is actively committed to the promotion and enhancement of diversity – in terms of age, sexual orientation, gender identity, ethnicity, religion, and ability – and in compliance with the Group's Human Rights policy.

The policy is structured around four pillars, which guide efforts to promote the principles of Diversity, Equity & Inclusion (DEI) both within and outside the Group.

In line with this vision, the Feralpi Group's ESG Scorecard includes objectives relating to the inclusion of female staff in production activities, which is particularly relevant since the steel sector is traditionally male-dominated, and to training on "Listening, Dialogue and Inclusion" topics. For more information, refer to ESRS S1-5.

Additionally, Feralpi Group is among the signatories of the **"Businesses for People and Society" Manifesto of the UN Global Compact Network Italy**, with the aim of increasing the private sector's commitment to the social dimension of sustainability in companies, along supply chains and in communities.

Finally, in 2025, Feralpi Siderurgica, in line with the Code of Ethics, the Human Rights policy, the DEI policy, in compliance with the United Nations Universal Declaration of Human Rights, and in adherence to the principles of the United Nations Global Compact, adopted a **Gender Equality Policy** and introduced a management system compliant with UNI/PdR 125:2022, so as to integrate gender equality into company strategies and decisions, promoting equity and respect at all stages of the working life cycle.

PILLARS OF DEI POLICY

[ESRS S1-1 20.b]

In line with its **Stakeholder Engagement Policy**, Feralpi Group places dialogue and collaboration at the centre of its relationships with stakeholders, both internal and external. The aim is to guarantee transparency, inclusion, and accountability, responding to stakeholders' needs, preventing critical issues, and promoting sustainable development based on value sharing.

The Group promotes internal dialogue via structured initiatives, including interviews and focus groups with managers and other key personnel in the organisation, addressing topics of corporate and strategic relevance. This approach allows for the gathering of feedback, stimulating discussion, and identifying shared solutions.

For more information, refer to ESRS S1-2.

ESRS S1-2 Processes for engaging with own workforce and workers' representatives regarding impacts

[ESRS S1-1 27; ESRS S1-1 27.a; ESRS S1-1 27.b; ESRS S1-1 27.c; ESRS S1-1 27.d; ESRS S1-1 27.e]

At Feralpi Group, the involvement of the workforce takes place through a structured approach, aimed both directly at its employees and at their representatives, in order to gather feedback, stimulate discussion, and identify shared solutions.

The **Company climate survey** is active in the sites in Italy, Germany, the Czech Republic and France. Characterised by a socio-cultural approach and conducted every three years, it involves the direct participation of the Group's employees. The survey focuses on measuring the level of satisfaction with work and the environment in which people work, the employees' sense of involvement, "commitment" and belonging, the perception of Feralpi Group's commitment on various macro-topics including environmental dynamics, well-being linked to the fulfilment of people's expectations, and the perception of listening in various areas, including welfare, health and safety. Specific elements of satisfaction with aspects of logistics and working environments are also surveyed.

Once the results of the latest edition, which took place in 2023, had been shared with the owners and executives, working parties were established, which included Plant Managers, HR and HSE representatives, RSPP, medical staff, and the Sustainability and Communications Department, with the objective of developing specific action plans for each company, integrated over the 2024-2025 period.

Trade union relations, based on sectoral collective agreements and company supplementary agreements guaranteed by free representation, rely on timely and transparent information sharing and are subject to evaluations during periodic meetings between the social partners, including consultations for the sharing of specific topics. In addition, the Works Council operates at the sites in Germany, actively participating in decision-making processes with rights of control, information, consultation and veto.

ESRS S1-3 Processes to remediate negative impacts and channels for company workers to raise concerns

[ESRS S1-1 20.c; ESRS S1-1 24.d; ESRS S1-3 32.a; ESRS S1-3 32.b; ESRS S1-3 32.c; ESRS S1-3 32.d; ESRS S1-3 32.e; ESRS S1-3 33]

Feralpi Group is committed to ensuring corrective measures in the event of negative impacts on human rights, by offering dedicated reporting channels. Within the Group, there is a Whistleblowing platform through which all stakeholders can submit reports of any violations of the Code of Ethics or the Organisational Model adopted pursuant to Legislative Decree no. 231/01, and alleged illegal activities, by persons inside and outside the Group. For more information on Whistleblowing and related investigative and information activities, refer to ESRS G1-1 and ESRS G1-3.

In addition to the Whistleblowing platform, the respective department managers and the human resources office are available to staff, both employees and non-employees, for any concerns or needs regarding these topics.

Finally, Feralpi promotes topics related to human rights, health, safety, diversity and inclusion of its workforce, thus implementing the commitments set out in the Code of Ethics through the actions described in ESRS S1-4.

ESRS S1-4 Actions on impacts material to the company's own workforce and approaches to mitigating material risks and pursuing material opportunities in relation to the company's own workforce, as well as the effectiveness of such actions

[ESRS S1-4 37; ESRS S1-4 38.a; ESRS S1-4 38.b; ESRS S1-4 38.d; ESRS S1-4 40.a; ESRS S1-4 40.b]

In relation to the material impacts, risks and opportunities identified by the double materiality analysis, described in ESRS 2 SBM-3, Feralpi Group acts through various actions aimed both at preventing and mitigating negative impacts and risks and at promoting positive impacts on its workforce.

Raising competencies: people growth and development

Feralpi Group values people's skills as a key factor for business success. For this reason, it actively promotes opportunities for professional growth and development by investing in top-notch continuing education programmes and offering learning opportunities tailored to various needs.

In 2025, the Group maintained its focus on the organisational evolution of the Technical Department, the integration of new personnel, and the development of internal skills to respond to an increasingly competitive and dynamic economic environment. At FERALPI STAHL, collaborations with agencies to recruit technical staff from abroad continue, promoting their integration into society and the workforce in Germany. In the coming years, the project will be extended to Latin America.

Group Technical Excellence activities continued in 2025, a project forming part of Feralpi Group's People Strategy in the 2021-2025 Business Plan, to **enhance internal technical skills** and align the corporate structure with the Group's strategy. The project is structured along three lines:

The **Group Technical Department** has structurally become the centre of expertise for Feralpi Group companies, taking on a central role for the incubation and dissemination of knowledge and solutions through the recruitment of highly qualified personnel. **MakeTheDiffHERence**, the first edition of the *Technical Graduate Programme* dedicated to the inclusion of eight female engineers, continued in 2025. Spanning twenty months, the training course provides participants with thorough horizontal instruction in all technical and production domains of primary steel plants and will also include engagement in the Group's upcoming investment initiatives.

With a view to **Talent Attraction & Development**, Feralpi Group has developed **eight recruitment and selection formats** to support the inclusion of young talents, followed by a specialised training course designed to create the skills required to operate in the sector.

TECHNICAL GRADUATE PROGRAMME:

development of **specialised skills** for young technicians with **engineering degrees**.

OPERATION GRADUATE PROGRAMME:

development of **technical team and soft skills.** The programme came to an end in 2025.

SIDER+:

transfer of **basic skills** to access **selection processes** for the company's **production areas**.

SIDER+ ADVANCED:

development of **intermediate technical skills** for the **steel industry** for candidates with basic skills.

FUTURE4STEEL (IFTS):

highly professional training by the **Steel Academy** to train "Experts in installation and maintenance techniques in civil and industrial plants".

ITS **MECCATRONICA**:

teaching and internships at the Group's facilities for students of the ITS - Istituto Tecnico Superiore per la Meccatronica - Fondazione ITS Lombardia Meccatronica course.

SPECIAL RECRUITMENT PROJECTS (FOR PROFESSIONAL CLUSTERS):

recruitment and selection targeted at **different professional clusters** at national level.

MEETINGS WITH **STUDENTS**:

promoting students' **awareness** of the world of work, the steel industry and career and **professional development opportunities**.

Feralpi Group is one of the founders of the **Academy Siderurgica**, which was founded in 2019 and currently has the participation of five other major players in the steel sector. It aims to promote the sharing of skills for the mutual growth of its employees. In 2025, a new course dedicated to Project Management was added, bringing the training catalogue to **fifteen modules** divided into five areas: Management Training, Personnel Management, Leadership Development, Technical-Specialist Training and IFTS Courses. Also in 2025, an additional module dedicated to employee onboarding was designed, which will be integrated into the training offer during 2026. The participation of staff is divided into specific programmes for Feralpi Group companies and intercompany training courses.

In addition to employee training, Feralpi Group is continually involved in activities focused on developing talent and the future generations.

INITIATIVES FOR **SKILLS DEVELOPMENT**

FERALPI BOOTCAMP

Through Feralpi Bootcamp, a series of autonomous but complementary initiatives, Feralpi Group promotes **training and orientation activities** for **conscious growth**

aimed at the **children of employees**, programmes for **work experience during the school year** and **higher education** through ITS and IFTS.

STEELWOMEN PROJECT

In 2025, the project to recruit **female staff in the production areas** continued, with a specific focus on the **primary steel sector**, with the goal in the next four years to include 10 times as many new entrants as the current figure in the primary steel sector in Italy (0.5% - source: Istat 2021).

At the **Lonato del Garda site**, in view of the extension of the project to the rolling mills, an in-depth analysis of the related reprotoxicity-related tasks has begun.

The activity, carried out with the support of the **Department of Occupational Medicine of the University of Brescia** in order to allow the **full integration** of female staff in the specific company context, will continue in 2026. At the **Riesa site**, planning activities took place with a view to the induction of female operators.

SUCCESSION PLANNING

In 2025, activities continued on the **Succession Planning** project, aimed at addressing possible planned and unplanned replacement needs of employees **in strategic roles** in the company.

The **Feralpi Corporate Executive Master in Business Administration** (EMBA), developed together with the **Graduate School of Management of the Milan Polytechnic**, saw the entry of two managers, who thus entered the succession pathway.

In addition, the activities of the **Corporate Managerial Training Program** began, which, carried out in collaboration with **TEHA - The European House – Ambrosetti**, involved nine employees.

FERALPI PRO

The Feralpi PRO system, which makes it possible to **map**, **monitor** and efficiently **manage the skills of staff**

through a dedicated management application, is operational in all Italian primary steel companies.

Protection of safety and workers

Since 2022, Feralpi Group has initiated the "**We Are Safety**" project, which is in the process of being gradually extended to all the companies within the Group. This project aims to promote a health and safety culture through a training and experiential approach involving all staff, from management to workers, developing key skills such as communication, conflict management, leadership and team management, in order to continuously improve safety standards and ensure a safe working environment for all.

As a result of these training activities, a Decalogue of **ten safety rules** was created. The "**Safety Observations**" process is based on these rules and is conducted by those in charge, using a mobile application specifically developed as part of the project, aiming to record and monitor compliance with the rules of the Decalogue and observe the progress trends.

In 2025, the development of the first phase of "We Are Safety" for Acciaierie di Calvisano and Arlenico was completed. The initial technical assessment for "We Are Safety" took place at Defim Orsogril, and the related proposals for activities will be defined in 2026. As far as Presider is concerned, the assessment is scheduled for the first months of 2026.

In 2025, Safety Meetings were introduced at the Lonato del Garda site. This initiative has made it possible to structure and formalise the discussion between supervisors and staff, starting with the reports received, with the aim of increasingly involving workers in the dissemination of the safety culture. In 2026, the Safety Meetings will also be extended to Acciaierie di Calvisano.

In addition, through a dedicated event and new appointments, the role of Safety Tutor was relaunched at Feralpi Siderurgica, and will be reintroduced at the Calvisano site in 2026.

In parallel with the awareness-raising and training actions, Feralpi Group continuously carries out improvement actions in all plants.

The updating of the **risk assessment of all production sites** is carried out according to the frequency imposed by regulatory aspects as regards the assessment of physical and chemical risks, and in relation to all plant developments determined by changes to environments and production facilities carried out during the year. In all plants, **proactive auditing activities** and the **analysis of incidents and near misses** are carried out, and **reports** are collected by staff. All investments by the Group involving changes, revamping, additions, or replacements of machinery and equipment at facilities, aimed at improving working environments and expanding plants and production plants, are carried out with the active and constant involvement of the Safety and Environment function. In this way, from the first design phases, plant evolution interventions are carried out with a focus on the constant improvement of the working conditions of the affected tasks. Furthermore, Feralpi Group is constantly engaged in the search for automation solutions aimed at limiting, as far as possible, the intervention of human operators in potentially critical areas.

As part of the Group strategy, a continuous improvement process is planned that includes initial testing on pilot sites. The goal is to create a virtuous model that, once the effectiveness of the solutions adopted has been proven, can be extended and replicated in all the Group's sites. In 2025, cameras equipped with Artificial Intelligence systems were introduced experimentally at Feralpi Siderurgica and Acciaierie di Calvisano in order to improve human-machine interaction within the two sites.

At the same time as the changes to the production layout at the Riesa site, **ESF Elbe-Stahlwerke Feralpi GmbH** continued updating the signage for the newly constructed buildings and plants and those under construction. Work also continued on improving the translations of the main health and safety documents into the languages spoken by the staff. This commitment responds to the increasing presence of non-German-speaking workers, visitors and contractors on the site. Also in 2025, staff were trained in the use of a new mobile app for reporting any safety or environmental incidents.

Feralpi Group ensures healthcare coverage at all major locations with both nursing and medical staff available. In entities with less staff, the activity of the occupational physician is guaranteed to conduct periodic health assessments related to exposure to potential occupational risks. Specific projects are initiated in collaboration with medical staff, the HSE Manager, the RSPP of the Group companies, the Human Resources Department, and the Sustainability & Communications Department, focusing on aspects most directly related to employees' health and well-being.

Welfare

Feralpi Group implements and annually updates a range of initiatives, services, and benefits dedicated to its staff, aiming to enhance their well-being and quality of life both at work and personally, promoting a balance between work and private life.

In addition to what is provided by the health and safety management systems, the Group is committed to health protection and safeguarding activities through prevention and awareness measures. Feralpi Group has been participating since 2013 in the **WHP Network - Workplace Health Promotion**, a European initiative implemented at a regional and provincial level, to which the Group's Lombardy and Piedmont companies are accredited. In this context, over the years, initiatives have been carried out in collaboration with competent local health authorities and Confindustria, initiatives aiming to improve the health and well-being of workers by reducing general risk factors, particularly those most closely associated with the development of non-transmissible chronic diseases. In 2025, the main actions concerned a nutrition campaign in Arlenico and oral cancer prevention activities at Presider's Borgaro Torinese site. At the Brescia sites, the focus was on preventing addictive behaviour and several company sports tournaments were held.

In 2025, Feralpi Siderurgica continued activities in the context of the international **Total Worker Health (TWH)** program, in collaboration with the Department of Occupational Medicine of the University of Brescia. At the Lonato del Garda site, a campaign was conducted aimed at analysing the blood of some of the company's employees who had a predisposition to chronic degenerative diseases, identified with the collaboration of the competent doctors. In addition, the possibility of contacting an external psychological help desk was introduced, in cooperation with a specialist body.

For work-life balance and support for parenthood, the Group's Italian companies provide paid leave for needs related to children's illness and benefits for female employees who, upon returning from maternity leave, have the option to work part-time, work from home, or reduce their canteen break.

For some staff, there are flexible working arrangements in terms of working hours and how these hours are accounted for. Furthermore, additional measures have been implemented, including the granting of permits for specialist medical visits for oneself, children, and parents, as well as the introduction of Short Friday, which allows personnel not directly involved in the technical-productive sector to enjoy days with reduced working hours. In 2025, these benefits were incorporated into second-level bargaining at Acciaierie di Calvisano and Presider, as was done in 2024 at Feralpi Siderurgica, at the same time as the relevant contract renewals.

Feralpi Group has also joined the **Local Conciliation Alliance**, a public-private partnership aimed at promoting work-life balance projects coordinated by the Brescia Health Protection Agency.

FERALPI STAHL organises annual **health days** for staff with the support of health insurance companies and other service providers. In Germany, employees are covered by workplace accident insurance, which also includes personal life, providing access not only to mandatory check-ups but also to other examinations. In Italy, workers can enjoy supplementary health insurance, guaranteed by the sector's collective bargaining agreement, which goes as far as including family members.

Attention to individuals' well-being also translates into initiatives aimed at making work environments more welcoming, modern, and functional. Modernisation extends beyond office spaces to include production and logistics areas, aiming to create a safe, efficient, and stimulating work environment.

All the Group's Italian companies offer a **flexible benefit** system that, through a platform based on welfare credits, allows access to goods and services. In addition, there are numerous **local agreements with commercial or service-providing businesses** that offer various kinds of benefits for staff.

Diversity, Equity, Inclusion

During 2025, Feralpi Group continued its commitment to promoting diversity, equity and inclusion (DEI) through several important initiatives.

FERALPI STAHL participates in the **NETZWERK Unternehmen integrieren Flüchtlinge**, an initiative organised by **the Chamber of Commerce for Industry (Deutschen Industrie - und Handelskammer (DIHK))** and the **Federal Ministry for Economic Affairs and Climate Protection** that supports German companies for refugee integration.

The Manager of Human Resources of FERALPI STAHL is ambassador of the initiative for the federal state of Saxony. In collaboration with ITKAM - Italian Chamber of Commerce of Frankfurt for Germany, an activity was carried out that saw girls from local schools visit the plant, where they had the opportunity to meet FERALPI STAHL role models, following on from what is done in Italy with Deploy Your Talents and STEM in Genere.

In order to achieve UNI/PdR 125:2022 certification for gender equality at Feralpi Siderurgica, personnel management procedures have been updated to better incorporate the principle of anti-discrimination. In addition, a specific policy was drafted and the associated communication plan was implemented.

MAIN INITIATIVES
DIVERSITY, EQUITY, INCLUSION

Internal campaigns dedicated to inclusion topics continued .

The **We Are Together - Getting to know and connect each other** campaign, which includes **awareness-raising and cultural growth** activities on the topics of inclusion, listening and internal dialogue aimed at all Feralpi Group staff.

WE ARE TOGETHER

In 2025, it continued at **FERALPI STAHL**, **Arlenico** and **Defim Orsogril** and will be completed in 2026. The same applies to Feralpi.

In 2025, **Deploy Your Talents** continued in collaboration with the **Sodalitas Foundation**.

The project is dedicated to the **dissemination of STEM subjects** with a view to **combating gender stereotypes**, in order to increase the number of **women employed in technical and scientific professions**, through meetings aimed at students of **secondary schools** in the regions where the Group operates.

DEPLOY YOUR TALENTS

During these events, **Feralpi Group engineers and experts** share their work experiences and answer questions and queries from students.

In 2025, Feralpi Group continued its participation, within the **Comunità Pratica network**, in the "**STEM in Genere**" project of **the University of Brescia** in collaboration with the **Chirone association**.

STEM IN GENERE

The project, with a view to overcoming gender stereotypes in the STEM field, includes **educational and awareness-raising meetings aimed at students** of primary schools in Brescia.

Metrics and targets

ESRS S1-5 Targets related to the management of significant negative impacts, the enhancement of positive impacts and the management of significant risks and opportunities

[ESRS S1-5 46]

With regard to diversity and inclusion topics, Feralpi Group has set itself the following objectives relating to the inclusion of female staff, both in the production areas of the main steel sites and in the corporate services of the Parent Company. In addition, there is a goal relating to the collective training of personnel on the topics of listening, dialogue and inclusion.

	BASELINE		2025	% change	TARGET		PERIMETRO
Inclusion of female staff (blue collar) in technical-production areas [53]	2022	0%	8%	/	2027	≥5% / year new entries primary steelmaking	Feralpi Siderurgica, Acciaierie di Calvisano, Arlenico, ESF
Collective training course on "Listening, Dialogue and Inclusion" topics		0%	62%	/		100% population affected	Consolidated Feralpi Siderurgica [54]
% female staff in Feralpi Siderurgica - Corporate Services		49%	52%	/		~50%	Feralpi Siderurgica - Corporate Services

With regard to the health and safety of personnel working at the Group's sites, two goals have been developed for 2030, which provide, respectively, for a reduction in the accident frequency index and the progressive extension of ISO 45001 certification to all Feralpi Group companies.

[ESRS S1-5 47.a; ESRS S1-5 47.b; ESRS S1-5 47.c]

	BASELINE		2025	% change	TARGET		PERIMETRO
Accident Frequency Index	2022	23.7 (average 2019-2022)	19.7	-17%	2030	7 (0-10)	Consolidated Feralpi Siderurgica [54]
% of staff working in ISO 45001 companies		25%	41%	/		100%	

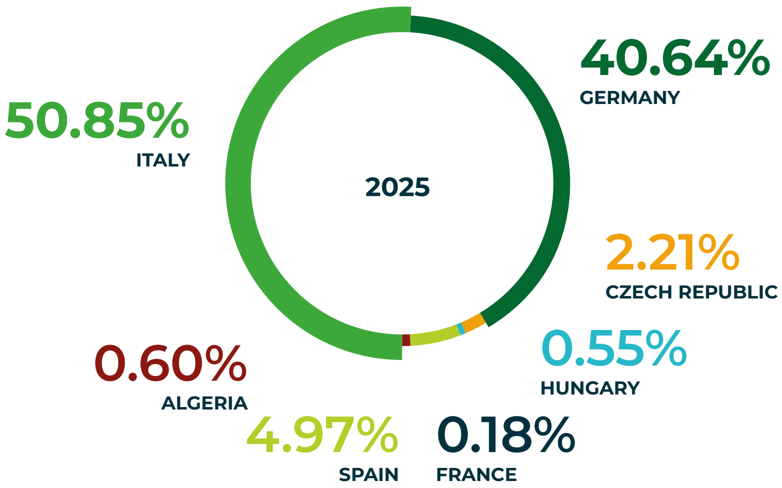
All the objectives described above are included in Feralpi Group's ESG Scorecard, and are therefore fully aligned with the Group's strategic guidelines. The process of defining the objectives, monitoring the related performance and identifying improvements is entrusted to the Sustainability Management Committee, which submits its assessments and proposals for approval by the Parent Company's Board of Directors. Therefore, the process did not involve the direct participation of the company's own workforce or workers' representatives.

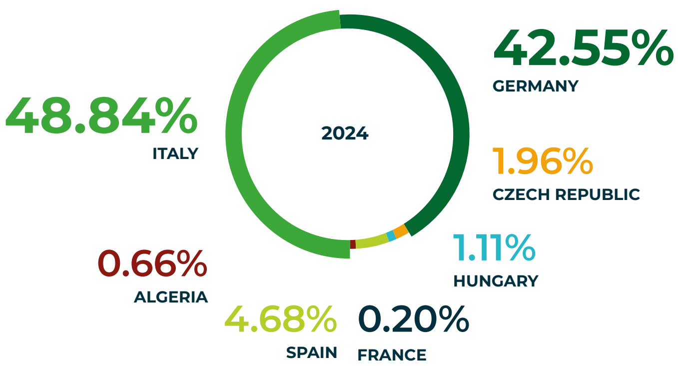
[53] *Including those administered.*
[54] *Alpifer Group and Feralpi Algérie not included.*

ESRS S1-6 Characteristics of company employees

[ESRS S1-6 50.a]

	2025			2024		
	Men	Women	Total	Men	Women	Total
Total	**1,934**	**239**	**2,173**	**1,773**	**213**	**1,986**
of which Italy	975	130	1,105	858	112	970
of which Germany	808	75	883	776	69	845
of which Czech Republic	39	9	48	31	8	39
of which Hungary	10	2	12	19	3	22
of which France	3	1	4	3	1	4
of which Spain	87	21	108	74	19	93
of which Algeria	12	1	13	12	1	13





[ESRS S1-6 50.b]

	2025			2024		
	Men	Women	Total	Men	Women	Total
Permanent	**1,884**	**233**	**2,117**	**1,666**	**200**	**1,866**
of which Italy	962	127	1,089	834	107	941
of which Germany	780	73	853	695	63	758
of which Czech Republic	30	8	38	29	6	35
of which Hungary	10	2	12	19	3	22
of which France	3	1	4	3	1	4
of which Spain	87	21	108	74	19	93
of which Algeria	12	1	13	12	1	13
Fixed-term	**50**	**6**	**56**	**57**	**7**	**64**
of which Italy	13	3	16	19	4	23
of which Germany	28	2	30	36	1	37
of which Czech Republic	9	1	10	2	2	4
of which Hungary	0	0	0	0	0	0
of which France	0	0	0	0	0	0
of which Spain	0	0	0	0	0	0
of which Algeria	0	0	0	0	0	0

[ESRS S1-6 52.a; ESRS S1-6 52.b]

	2025			2024		
	Men	Women	Total	Men	Women	Total
Full-time	**1,925**	**212**	**2,137**	**1,716**	**176**	**1,892**
of which Italy	972	121	1,093	850	101	951
of which Germany	803	60	863	727	47	774
of which Czech Republic	38	8	46	31	7	38
of which Hungary	10	1	11	19	1	20
of which France	3	0	3	3	0	3
of which Spain	87	21	108	74	19	93
of which Algeria	12	1	13	12	1	13
Part-time	**9**	**27**	**36**	**7**	**31**	**38**
of which Italy	3	9	12	3	10	13
of which Germany	5	15	20	4	17	21
of which Czech Republic	1	1	2	0	1	1
of which Hungary	0	1	1	0	2	2
of which France	0	1	1	0	1	1
of which Spain	0	0	0	0	0	0
of which Algeria	0	0	0	0	0	0
Total personnel employed	**1,934**	**239**	**2,173**	**1,723**	**207**	**1,930**

[ESRS S1-6 50.c]

Number and turnover rate of employees		2025				2024			
		< 30 years old	30 - 50 years old	> 50 years old	total	< 30 years old	30 - 50 years old	> 50 years old	total
Outgoing employees	Women	6	5	8	19	6	18	5	29
	Men	60	94	67	221	44	79	67	190
	Total	66	99	75	240	50	97	72	219
Turnover rate	Women	13.04	4.10	11.27	7.95	16.22	16.07	7.81	13.62
	Total	20.07	9.79	9.93	11.43	16.73	8.87	10.82	10.72
	Total	**19.13**	**9.15**	**10.05**	**11.04**	**16.67**	**9.67**	**10.54**	**11.03**

[ESRS S1-6 50.d; ESRS S1-6 50.f]

The figures are given in number of people as at 31 December 2025 and 2024. For this reason, they differ from what is indicated in Section 11.1 of the Report on Operations regarding the average number of employees.

[ESRS S1-6 50.e]

For 2024, the figure for Total personnel employed does not include apprentices (50 men and 6 women), which brings the total as at 31.12.2024 to 1,986 employees. For 2025, the figures include the personnel of the Alpifer Group.

Despite this expansion of the reporting scope, the number of employees employed on fixed-term contracts in 2025 is eight fewer than in the previous year. Part-time contracts also see a decrease of two from 2024 to 2025.

ESRS S1-7 Characteristics of workers who are not employees in the company's own workforce

	2025			2024		
	Men	Women	Total	Men	Women	Total
Workers who are not employees[55]	95	4	99	114	10	124

[ESRS S1-7 55.b]

The data is reported in number of people as at 31 December 2025.

[ESRS S1-7 55.c]

In 2025, the number of non-employee workers is down compared to 2024, despite the fact that, unlike the previous year, data relating to the Alpifer Group has been included.

[55] *"Workers who are not employees" means agency workers and interns.*

ESRS S1-8 Coverage of collective bargaining and social dialogue

[ESRS S1-8 60.a]

Collective bargaining applies to all personnel in companies based in Italy, Germany, Spain, and France, which, at 31 December 2025, corresponds to 96.64% of the Group.

[ESRS S1-8 60.b; ESRS S1-8 63.a]

The only countries that, based on the information reported in ESRS S1-6, have a significant level of employment, i.e. at least 50 employees representing at least 10% of the Group's total employees, within the European Economic Area (EEA) are Italy and Germany. In both countries, collective bargaining exceeds the 80% threshold. Workplace representation[56] in these countries also exceeds the 80% threshold.

[ESRS S1-8 60.c]

Based on the same criteria, there are no countries or regions outside the EEA with significant levels of employment.

[ESRS S1-8 63.b]

There are no agreements of European relevance.

[56] *For the purposes of assessing workplace representation, managers were not included in the number of employees covered by workers' representatives.*

ESRS S1-9 Diversity metrics

[ESRS S1-9 66.a]

Executives by gender	Men	Women	Total
Executives (no.)	38	4	42
Executives (%)	90	10	100

[ESRS S1-9 66.b]

Personnel employed by age and gender	2025			2024		
	<30	30-50	>50	<30	30-50	>50
Total	**345**	**1,082**	**746**	**300**	**986**	**700**
Women	46	122	71	37	110	66
Men	299	960	675	263	876	634
Total %	**15.88**	**49.79**	**34.33**	**15.11**	**49.65**	**35.25**
Women %	2.12	5.61	3.27	1.86	5.54	3.32
Men %	13.76	44.18	31.06	13.24	44.11	31.92

ESRS S1-10 Adequate wages

[ESRS S1-10 69]

The remuneration of employees working in Feralpi Group companies is in line with national legislation and any collective agreements in force in the countries in which they are based.

ESRS S1-11 Social protection

[ESRS S1-11 74]

All personnel working in Feralpi Group companies enjoy the social protection guaranteed by the laws in force in the respective countries where the Group companies are based.

ESRS S1-12 Persons with disabilities

[ESRS S1-12 79; ESRS S1-12 80]

	Men	Women	Total
Percentage of employees with disabilities	3.57	5.86	3.82

The data refers to workers who, due to certain physical or social conditions, benefit from specific protections and facilities in the workplace. These are people with disabilities recognised by a special medical committee or who belong to specific categories identified by the relevant regulations.

ESRS S1-13 Training and skills development metrics

[S1-13 83.a]

	Men (%)	Women (%)	Total (%)
Employees who participated in periodic performance and career development reviews	85.57	67.36	83.57

[ESRS S1-13 83.b]

As at 31.12.2025, the total number of training hours at Group level was 42,229.

Average training hours per capita by gender	Men	Women	Total
2025	19	21	19
2024	21	31	22

[ESRS S1-13 84]

Average training hours per capita by professional category	Blue-collars	White-collars and middle managers	Executives	Total
2025	17	25	13	19
2024	19	31	21	22

The changes in the data relating to the average training hours per capita are mainly attributable to the inclusion of Alpifer Group personnel in the reporting scope.

ESRS S1-14 Health and safety metrics

[ESRS S1-14 88.a]

With reference to the scope of the Group ESG Scorecard, the companies Feralpi Siderurgica, Acciaierie di Calvisano, Arlenico and Caleotto have an ISO 45001-certified worker health and safety management system, covering 41% of the company population, including employees and non-employees.

These systems are subject to periodic audits (on an annual basis for certification, renewal or maintenance) by the Certification Body, in addition to those carried out internally by the companies according to pre-established audit plans.

With reference to the overall scope of Feralpi Group:

Own workers covered by the health and safety management system	%
Company employees covered by the health and safety management system	97.54
Company employees covered by the audited and/or certified health and safety management system	49.21
Company employees covered by the health and safety management system not subject to audit and/or certification	48.33

[ESRS S1-14 88.b; ESRS S1-14 88.c; ESRS S1-14 88.e]

Accidents		2025	2024
Group	No. of accidents recorded	80	79
	No. of deaths due to occupational accidents	0	0
	Hours worked	3,737,155	3,463,585
	Rate of accidents at work	21.41	22.81
	Number of days lost due to accidents at work	2,348	-

During the reporting period, there were no fatal accidents involving workers from external firms operating at Feralpi Group sites.

[ESRS S1-14 89]

The above data includes both employees and non-employees, understood as temporary staff and other types of contract.

[ESRS S1-14 88.d]

With regard to the disclosure requirements concerning work-related illnesses, Feralpi Group makes use of the phasing-in clause provided for in Delegated Regulation (EU) 2023/2772, based on the amendments introduced by Delegated Regulation (EU) 2025/1416.

ESRS S1-15 Work-life balance metrics

[ESRS S1-15 93.a]

All personnel working in Feralpi Group companies are entitled to family leave in the manner provided for by the legislation in force in the countries in which they are based.

[ESRS S1-15 93.b]

Number of employees who took leave for family reasons	no.	%[57]
Women	20	8.37
Men	138	7.14
Total	158	7.27

[57] Calculated on the total number of employees.

ESRS S1-16 Compensation metrics (pay gap and total compensation)

[ESRS S1-16 97.a; ESRS S1-16 97.c]

The table alongside shows only the sites and categories where female personnel are present or where the breakdown by role concerns at least six members of female personnel.

Remuneration by professional category and by gender Average Gross Hourly Wage (€)	Category	Men	Women
Feralpi Siderurgica	Blue-collars	12.31	11.16
	White-collars and middle managers	14.13	13.08
Arlenico	White-collars and middle managers	13.99	12.72
Presider	White-collars and middle managers	13.88	12.77
Defim Orsogril	White-collars and middle managers	13.59	11.90
ESF Elbe-Stahlwerke Feralpi GmbH	Blue-collars	16.91	16.17
	White-collars and middle managers	29.85	24.03

[ESRS S1-16 97.b]

With reference to the scope of Feralpi Group's Italian companies, the ratio between the total annual remuneration of the person receiving the highest salary and the median total annual remuneration of all employees, excluding the person with the highest salary, is 7.28.

ESRS S1-17 Incidents, complaints and serious human rights impacts

[ESRS S1-17 103.a; ESRS S1-17 103.b; ESRS S1-17 103.c; ESRS S1-17 104.a; ESRS S1-17 104.b]

In 2025, Feralpi Group received no reports through the channels described in ESRS S1-3 relating to incidents of discrimination, harassment or serious human rights violations. As a result, it has not been subject to fines, penalties or claims for damages.

22. ESRS S2 - Workers in the value chain

[ESRS-2 17]

With regard to the disclosure requirements under the thematic standard ESRS S2 Workers in the value chain, 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 negative impacts relating to workers in the value chain 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.

SUB-TOPIC	DESCRIPTION	IRO	VALUE CHAIN	TIME HORIZON
Working conditions	Negative impact on the health and safety of workers in the value chain due to the risk of injuries/accidents and the development of occupational diseases inherent to the nature of the business	(-) Impact	Value chain	Medium, Long
	Potential negative impact resulting from the possible presence, along the supply chain, of socially unsustainable practices, including labour exploitation and human rights violations, and their perpetuation in the absence of effective controls or adequate policies.	(-) Impact	Value chain	Short, Medium

IRO: RISK · OPPORTUNITY · IMPACT
+ POSITIVE CURRENT · (+) POSITIVE POTENTIAL · - NEGATIVE CURRENT · (-) NEGATIVE POTENTIAL

VALUE CHAIN: FERALPI OPERATIONS · VALUE CHAIN

TIME HORIZON: SHORT · MEDIUM · LONG

The first impact is related to the occurrence of events limited to individual incidents, while the second, concerning practices along the supply chain, is considered potentially systemic.

The assessments did not go so far as to understand how workers with particular characteristics, those operating in particular contexts or performing certain activities, may be more exposed to risks.

Targets related to workers in the value chain

[ESRS-2 17.b]

Although Feralpi Group has not set specific targets related to workers in the value chain, the Group's ESG strategy is based on a concrete commitment to social responsibility.

Policies related to workers in the value chain

[ESRS-2 17.c]

With regard to human rights in the value chain, Feralpi Group's **Human Rights Policy** establishes the Group's commitment to protecting human rights, combating all forms of human rights violations along the supply chain and creating safe and healthy working conditions for suppliers, in particular contractors and subcontractors. Suppliers are required to accept the Code of Ethics, which promotes the protection of human rights in the value chain, undertaking to adhere to the values and principles indicated therein and to disseminate them among their own workers and contractors. For more information on the policy, refer to ESRS S1-1.

In addition, the **Supplier Code of Conduct**, approved in 2025 and to be disseminated during 2026, requires suppliers to ensure respect for human rights, avoiding any form of violence, abuse, discrimination and retaliation, and to ensure inclusive, merit-based and safe working environments, preventing accidents and occupational diseases through appropriate measures, ongoing training and improvement actions. The Code prohibits all forms of forced and child labour and calls for respect for the right to freedom of association and collective bargaining. Feralpi Group promotes a responsible supply chain, and therefore requires its suppliers to extend these ethical and social standards to their sub-suppliers, thus ensuring compliance with the fundamental principles throughout the entire supply chain.

The **whistleblowing** system, described in ESRS G1-1, allows for the confidential and, if necessary, anonymous reporting of violations, including those relating to human rights, in the manner described on the Feralpi Group website[58].

[58] *https://www.feralpigroup.com/en/group/governance/whistleblowing*

Actions related to workers in the value chain

[ESRS-2 17.d]

In 2025, Feralpi Group focused on drafting and approving the Supplier Code of Conduct. In the course of 2026, the document will be sent to all the Group's suppliers and will remain available on the website.

Metrics related to workers in the value chain

[ESRS-2 17.e]

As reported in ESRS G1-1, during 2025, no complaints were filed through the whistleblowing channels within Feralpi Group.

This report does not include other metrics relating to the issue. From next year, the measures and actions taken in any cases of non-compliance with the provisions of the Code of Conduct may be reported.

23. ESRS S3 - Affected communities

[ESRS-2 17]

With regard to the disclosure requirements set out in the thematic standard ESRS S3 Affected Communities, 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 negative impacts relating to workers in the value chain 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.

SUB-TOPIC	DESCRIPTION	IRO	VALUE CHAIN	TIME HORIZON
Economic, social, and cultural rights of communities	Positive impact on the economic and social development of communities, through sourcing from local suppliers, employment, DEI awareness-raising initiatives and support for local associations and organisations	+ Impact	Feralpi operations, Value chain	Short, Medium, Long

IRO: RISK, OPPORTUNITY, IMPACT
\+ POSITIVE CURRENT; (+) POSITIVE POTENTIAL; - NEGATIVE CURRENT; (-) NEGATIVE POTENTIAL

VALUE CHAIN: FERALPI OPERATIONS, VALUE CHAIN

TIME HORIZON: SHORT, MEDIUM, LONG

Targets related to affected communities

[ESRS-2 17.b]

Although Feralpi Group has not established specific targets related to the affected communities, the Group's ESG strategy is based on a concrete commitment to social responsibility, conceiving the company as a shared heritage of the community.

Feralpi Group's holistic approach, which includes support for social, cultural, and sporting initiatives, reflects a comprehensive perspective on corporate responsibility, promoting a lasting positive impact on the area and its community. The Group has always supported local organisations, trade associations[59], institutions and public administration, educational, university and research institutions, sports associations and national non-profit organisations.

In this vision, Feralpi Group creates value not only through the development and support of the community via social, cultural, and sports projects but also through the generation of both direct and indirect employment.

[59] *Details on the associations in which the Feralpi Group participates are available in the Appendix*

Policies related to affected communities

[ESRS-2 17.c]

Feralpi Group has a **Stakeholder Management Policy**, which defines relations with its stakeholders, both internal and external. The policy aims to promote sustainable development based on value sharing in the communities where the Group operates. For more information about this, refer to Section SBM-2.

Since 2019, Feralpi Group has adopted a specific **Policy for managing philanthropic, social, and cultural initiatives**, which defines the guidelines for supporting projects of significance to the community and the area. The policy aligns with the Group's values and its dedication to positively impact the realities operating in the areas where the companies are located, ensuring that both donations and sponsorships support initiatives consistent with the seven pillars of the sustainability strategy and the SDGs to which the Group is committed – particularly Goal 8 (Decent Work and Economic Growth), Goal 9 (Climate Action), and Goal 11 (Sustainable Cities and Communities).

Specifically, the Group's support is focused on two main areas: the social, aimed at promoting community welfare through initiatives related to the environment, education, health, and social inclusion, and the cultural, which aims to conserve and enhance historical and artistic heritage.

Areas of intervention in **the social sector**:

- Safeguarding and caring for the environment;
- Education, training and work as tools for change;
- Promotion of individual physical and mental well-being and safety at work;
- Social inclusion through sport and culture, and the creation of inclusive spaces;
- Community development;
- Global emergencies.

Areas of intervention in the **cultural sector**:

- Culture as an educational tool;
- Development of entrepreneurial culture;
- Publication and education on the world of steel;
- Preservation of the artistic and historical heritage of the community.

Actions related to affected communities

[ESRS-2 17.d]

In continuity with previous years, Feralpi Group has also confirmed its support for the **Brescia Musei Foundation** for the 2023-2025 period through the Alliance for Culture, which aims to enhance the city's artistic heritage and support major cultural communication events. The initiative is based on the sharing of a strategic cultural vision with the partners, in which events and shows represent the tool to enhance the social and economic development of the city of Brescia and its province.

In this context, in 2025 Feralpi Group was the main donor of the National Assembly of ICOM Italy, held in Brescia from 4 to 6 April at the Museo di Santa Giulia. The event, which focused on the topic "Museums and social innovation", was an important opportunity for the main cultural players to discuss the social impact of museum activity, confirming it as a decisive lever for sustainability and for strengthening relations with the territory.

The Group renewed its membership in the "Amici della Rocca" Club, an association promoted by the Fondazione Ugo da Como that unites private individuals and companies interested in culture and committed to supporting projects aimed at enhancing the monumental complex of the "Rocca Visconteo Veneta" of Lonato del Garda. The initiative also promotes forms of sustainable tourism, capable of stimulating culture and generating employment opportunities in the area.

FERALPI STAHL continues to support the Elbland Philharmonie Sachsen GmbH orchestra, contributing to the promotion of classical music. In addition, it actively supports the universities of Freiberg and Dresden, collaborating on research and development projects, with a focus on innovation and cultural and scientific growth.

Alongside its support for social and cultural initiatives, the Group also promotes sports sponsorships. Feralpi Group supports both professional and amateur athletes and sports clubs in a wide range of disciplines such as football, cycling, triathlon, rugby, skiing, tennis, and rowing. In this way, it contributes to the human and professional growth of the people involved and to the enhancement of their respective sporting fields.

2025 saw FERALPI STAHL play a leading role in an important process of stakeholder engagement on the occasion of the **inauguration of the new Rolling Mill B** in Riesa. The plant, the first in Germany to be equipped with K-Spooler technology for the production of up to 8-tonne coils, represents a pillar of the Group's innovation and competitiveness strategy.

To present the investment, a series of events was organised that saw the participation of representatives from Italian and German politics, the industrial world and the continental steel industry. At the same time, with a view to full transparency and inclusion, the production site opened its doors to employees, their families and the local community: the day dedicated to the region was attended by more than 3,000 people, who were able to learn more about the company through guided tours of the facilities.

This initiative reflects the Group's commitment to promoting a constant dialogue and consolidating the bond of trust with stakeholders and communities in the areas where it operates, transforming an industrial milestone into an opportunity for shared value.

In 2025, Feralpi Group consolidated its commitment to promoting a transparent and participatory entrepreneurial culture by giving the possibility of visiting its production sites to over 5,000 visitors. Guided tours of the various plants enabled students, institutions, partners, and local communities to witness the production processes up close, while also gaining insights into how the Group is tackling the challenges of energy transition, minimising environmental impact, and fostering a circular economy.

The Group is among the founding companies of **Comunità Pratica**, an initiative that unites eighteen business entities in the province of Brescia to promote a positive impact in the communities through sustainable projects. The community's primary goals are to encourage the exchange of knowledge and best practices in social, environmental, and cultural areas, focusing on sustainability, employee well-being, and relations with key communities and stakeholders. During the 2023-2025 period, a total of two hundred and thirty-one concrete actions were consolidated among the participating companies, sharing best practices that generate long-term value.

In 2025, the initiative - launched in 2020 - "**Sustainable Dialogues**", a network of people interested in maintaining a constant dialogue with the Group on topics related to sustainable development, continued. The purpose of this project is to encourage sustainable development across the entire value chain, offering all stakeholders interested in ESG topics the opportunity to participate voluntarily.

Metrics related to affected communities

[ESRS-2 17.e; GRI 204-1]

In 2025, considering the main production sites both in Italy and abroad, the Group **recognised 28.7% of its turnover to local suppliers**.

Proportion of spending on local suppliers[60] (GRI 204-1) - %	**2025**	**2024**
Province of Brescia	38.4	34.7
Province of Como	8.1	5.4
Province of Lecco	7.2	6.3
Province of Turin	1.7	2.0
District of Meißen/Dresden	17.3	14.2
District of Mělník	6.3	6.4
District of Csepel	9.8	14.5
Province of Barcelona	73.5	87.2

[60] *Ratio of local purchases from suppliers of materials, products and services to total purchases, for the main production facilities. By "local" we mean the Province or District of reference. For Feralpi-Praha and Feralpi-Hungária it is not possible to identify local suppliers. In calculating the indicator, it was considered the item related to other operating expenses in the Income Statement, which incorporate most of local suppliers out of total charges.*

[ESRS-2 17.e; GRI 201-1]

The following tables show the distribution of the economic value generated by Feralpi Group.

Direct economic value generated and distributed[61] (GRI 201-1) Figures in thousand euros	**2025**	**2024**
Revenues from sales and services	1,703,187	1,652,984
Changes in inventory of work-in-progress	-4,411	42,678
Increases in fixed assets for in-house work	4,253	6,227
Other revenues and income	20,809	28,570
A - VALUE OF PRODUCTION	1,723,838	1,730,459
Consumption of raw materials (scrap)	860,355	920,455
Energy	158,691	151,044
Consumable materials and supplies	233,444	255,581
Cost of services	211,831	215,518
Hire, purchase and leasing charges	10,774	10,486
Provisions for risks	268	236
Other provisions and write-downs	26	127
Other operating expenses	3,954	4,067
B - COST OF PRODUCTION	1,479,343	1,557,514
GROSS CHARACTERISTIC VALUE ADDED	**244,495**	**172,945**
Financial income	2,607	4,862
Adjustments to financial assets	531	3,069
Accessory items	3,138	7,931
Extraordinary items	0	0
GROSS OVERALL VALUE ADDED	**247,633**	**180,877**
Amortisation	71,637	70,179
NET OVERALL VALUE ADDED	**175,996**	**110,698**

Distribution of consolidated value added (GRI 201-1) Figures in thousand euros	**2025**	**2024**
Wages and salaries	110,806	101,763
Employee severance indemnity	3,620	2,862
Other charges	7,003	5,772
A - PERSONNEL	121,429	110,398
Taxes	3,272	-6,699
Social security contributions	31,636	27,755
B - PUBLIC ADMINISTRATION	34,908	21,056
Provisions	444	132
Non-distributed profit / loss	400	-37,741
C - RISK CAPITAL	844	-37,609
Distributed profit	0	0
Financial expenses	16,607	11,483
D - LENDERS	16,607	11,483
Charity	112	255
Sponsoring of sports/recreational activities	2,095	5,115
E - COMMUNITY	2,207	5,369
NET OVERALL VALUE ADDED	**175,996**	**110,698**

During 2025, Feralpi Group contributed **€2.2 million to support the communities** through charitable donations and sponsorships.

[61] *For the purposes of correct comparability with the 2025 financial year, the data relating to the 2024 financial year has been reclassified. In particular, an amount of €4.376 million was reversed from the item "Energy" and reclassified under the item "Cost of services". The reclassification ensures full comparability of trends without altering the overall value of the 2024 Value Added.*

24. ESRS G1 - Business conduct

Governance

[ESRS 2 GOV-1 5.a; ESRS 2 GOV-1 5.b]

Feralpi Siderurgica S.p.A. is controlled by stable family shareholders and has a traditional governance structure with corporate bodies such as the Shareholders' Meeting, the Board of Directors (BoD) and the Board of Statutory Auditors. Auditing and the review of the Sustainability Statement are entrusted to a renowned external company.

The ordinary and extraordinary management of the Company lies exclusively with the Board of Directors, among which the Chairman with executive powers and the Chief Executive Officer are appointed.

The Board has a three-year term and meets monthly. Members are selected on the basis of their expertise and business experience, following informal procedures based on trust between shareholders. Currently, all shareholders, including minority shareholders, participate in the process of nominating and selecting board members.

BOARD OF DIRECTORS

The Board of Directors appoints the Supervisory Body (SB) and the Sustainability Management Committee, which helps to integrate the ESG dimensions into the corporate mission and strategy. The Board of Directors receives any reports from the SB, receives updates from the Sustainability Committee, and develops the Group's economic, social, and environmental strategies with the help of specialist consultants. To avoid potential conflicts of interest, extraordinary decisions are always submitted to the Board of Directors for approval and deliberation.

The **Board of Statutory Auditors** consists of three members, supported by a secretary, appointed by the Shareholders' Meeting and is responsible for supervising compliance with the law and the articles of association, ensuring compliance with the principles of proper administration and the regulations.

The **Executive Team Committee** of Feralpi Group is responsible for defining, proposing to the Board of Directors and implementing the Group's strategy.

Feralpi Group is committed to generating value sustainably in the short, medium, and long term. With this in mind, the Executive Team Committee is responsible for the investment management process through which the Group aims to implement a competitive strategy that integrates ESG sustainability and risk management, while ensuring an adequate remuneration of funding sources. The Executive Team Committee oversees the main business processes, promoting an innovation-oriented and operationally efficient approach to maintain high competitiveness in the reference markets.

Feralpi Group has had a **Sustainability Management Committee** since 2014, a body that supports the Parent Company's Board of Directors in consolidating and developing the company's ESG strategies. Further information relating to the Committee and its composition can be found in ESRS 2 GOV-1.

The **Supervisory Body** (SB), as a collegiate body, primarily aims to oversee the operation and ensure compliance with the Organisational Models, and to receive and manage reports concerning critical issues in accordance with the Management and Control Model. The SB consists of two or three members, except in the cases of Acciaierie di Calvisano and Defim Orsogril, where it is single-member. As at 31 December 2025, there are six operating SBs: Feralpi Siderurgica, Acciaierie di Calvisano, Defim Orsogril, Presider, Caleotto, Arlenico. Feralpi Siderurgica's SB operates in collaboration with the others.

For the foreign companies, no Supervisory Bodies are in place, since the 231 Model is not applicable, and the monitoring system is entrusted to the national legal system and the competent authorities.

For further details on the responsibilities of the administrative, management and supervisory bodies with regard to business conduct, refer to ESRS 2 GOV-1.

GOVERNANCE

Management of impacts, risks and opportunities

G1 IRO-1 Description of the processes to identify and assess material impacts, risks and opportunities

[G1 ESRS 2 IRO-1]

In carrying out the double materiality analysis, the following impacts, risks and opportunities related to business conduct were identified as relevant. Information on the process that led to their identification and the assessment methodology is available in section ESRS 2 IRO-1 of this document.

SUB-TOPIC	DESCRIPTION	IRO	VALUE CHAIN	TIME HORIZON
Corporate culture	Potential negative impact resulting from a corporate culture not fully oriented towards principles of integrity and responsibility, which can result in unethical conduct and improper practices in relations with stakeholders.	(-) Impact	Feralpi operations, Value chain	Short, Medium, Long
	Reputational risk arising from incorrect or out-of-context interpretations of sustainability information and its potential instrumental use.	Risk	Feralpi operations	Medium
Management of relations with suppliers, including payment practices	Possible presence along its supply chain of socially unsustainable practices and their continuation in the event of a lack of controls / absence of adequate policies.	(-) Impact	Feralpi operations, Value chain	Short, Medium
	Opportunity to strengthen corporate reputation through the progressive extension of sustainable qualification criteria to the entire supplier base, promoting more transparent relationships	Opportunity	Feralpi operations	Medium
Corruption and bribery	Potential negative impact linked to inadequate governance models and internal procedures, which may encourage corrupt behaviour and other unethical practices in relations with stakeholders	(-) Impact	Feralpi operations, Value chain	Short, Medium

IRO: RISK · OPPORTUNITY · IMPACT

\+ POSITIVE CURRENT
(+) POSITIVE POTENTIAL
\- NEGATIVE CURRENT
(-) NEGATIVE POTENTIAL

VALUE CHAIN: FERALPI OPERATIONS · VALUE CHAIN

TIME HORIZON: SHORT · MEDIUM · LONG

G1-1 Business conduct policies

[ESRS G1-1 7; ESRS G1-1 9]

Feralpi Group has an organisational and corporate governance model that defines specific tasks and responsibilities for corporate bodies in order to integrate sustainability into processes and the business plan.

Code of Ethics

Feralpi Group's Code of Ethics is the main tool for the promotion, dissemination and management of work and business ethics within the Group. The Code defines the company's internal and external ethical and social responsibilities and its values. The principles and provisions it contains are binding on anyone working on behalf of Feralpi, regardless of their relationship with the company.

The document, available on the Group's website, refers to the following principles, which guide Feralpi's business activities: respect, transparency, truth, honesty, trust, loyalty, fairness, collaboration, diligence, professionalism, sustainable development, and protection of the environment, health and safety.

Organisation, Management and Control Model (MOG)

In addition, relevant Italian companies of the Group adopt an Organisation, Management and Control Model (MOG) in accordance with Article 6 of Legislative Decree no. 231/2001, approved by the Board of Directors. The MOG ensures transparency and fairness, preventing offences through planning, self-monitoring, and supervision of risk areas carried out by the Supervisory Body.

On 19 February 2025, the Board of Directors of Feralpi Siderurgica S.p.A. updated its Organisation, Management and Control Model (pursuant to Legislative Decree no. 231/2001) by including Procedure no. 11 relating to the "Management of the Use of Company Vehicles". Following this action, the Model now consists of thirteen procedures.

In Germany, Feralpi Group companies operate under the Business Constitution Act (BetrVG), which guarantees employees and works councils the right to participate in decision-making processes, with powers of control, information, consultation, and veto. In addition, Feralpi Group has signed collective agreements with the IG Metall union.

Anti-Trust Manual

Feralpi Group has structured an anti-trust compliance programme, appointing the Anti-trust Compliance Officer and preparing an industry-specific Anti-trust Manual, complete with an Operational Handbook containing principles and guidelines for personnel most exposed to anti-trust risk. The programme, updated every two years, provides for biennial training for all employees and, for top executives, calibrated audits. The programme was updated in the spring of 2025, so the next update with related training and audits is scheduled for 2027. In the three-year period 2023-2025, nothing was contested against Feralpi Group companies.

Whistleblowing

[ESRS G1-1 10.a; ESRS G1-1 10.c i; ESRS G1-1 10.c ii; ESRS G1-1 10.e; ESRS G1-3 20]

In accordance with Legislative Decree no. 24/2023, there is a dedicated channel for reporting offences, including confirmed incidents of corruption and bribery, which is managed by an independent external operator and accessible via an encrypted platform, for the following Italian companies of the Group: Feralpi Siderurgica, Acciaierie di Calvisano, Arlenico, Caleotto, Fer-Par, Defim Orsogril and Presider.

The procedure for handling whistleblowing and the protection of whistleblowers is made known to all interested parties through publication on the Group's website, in the section "Whistleblowing", and, for employees, also through the company Intranet. In addition, specific information is provided at the time of recruitment and a mandatory e-learning training course on these topics is activated.

For the receipt and handling of reports, a platform external to the company's information systems has been adopted, and the role of report handler has been entrusted to an independent law firm, which acts promptly to protect whistleblowers against any form of retaliation, discrimination or penalisation. The absolute confidentiality of the whistleblower's identity is ensured during each phase of the handling of the report, without prejudice to legal obligations.

FERALPI STAHL has a whistleblowing platform accessible to customers, suppliers, and employees, with the latter being informed via email. Similarly, the Alpifer Group is also equipped with dedicated channels. In 2025, no complaints were filed.

[ESRS G1-1 10.h]

Within the MOG, activities that could give rise to cases of corrupt conduct have been identified, including: Sponsorships, donations and gifts; Entertainment expenses; Extraordinary transactions; Relations with the Public Administration; Procurement of goods and services; Accounting management; Selection and recruitment of personnel.

Privacy management

In response to the rise of cyber threats due to digitalisation, Feralpi Group constantly works on improving its systems and internal procedures to ensure high levels of security in data management.

The Group has adhered to European Regulation 2016/679 (GDPR - General Data Protection Regulation) and, under the supervision of the Data Protection Officer (DPO), consistently prioritises the safeguarding of personal data, collaborating with representatives from individual operational entities and with a local DPO for Germany. Feralpi Group implements further technical and organisational measures when necessary, monitoring the evolution of European and Italian regulations and best practices.

Throughout 2025, requests from data subjects were also handled and the drafting of the policy for the use of artificial intelligence in the company was started and subsequently completed.

During 2025, no relevant data breach events or complaints related to privacy breaches were reported.

Supplier Code of Conduct

In 2025, the Feralpi Group **Supplier Code of Conduct** was approved. The document, which will be disseminated during 2026, seeks to act as a clear guide for all the Group's suppliers, establishing the principles that govern collaboration and setting clear expectations on key topics such as ethics, sustainability, safety, human rights, and environmental protection, thereby extending responsibility throughout the entire supply chain. Once fully disclosed to all business partners, compliance with these rules will be an essential contractual requirement, supported by the whistleblowing reporting system and periodic verification procedures. In the event that the latter reveal non-compliance with the provisions of the Code, Feralpi Group may take measures proportionate to the severity of the violations detected.

G1-2 Management of relations with suppliers

[ESRS G1-2 14]

The procurement process is carried out directly by Feralpi Group in compliance with the regulations in force in the countries in which it operates, with company procedures and, in line with its Code of Ethics, with the principles of equal opportunities and non-discrimination.

Sufficient competition is ensured in each tender, and procurement staff are required not to preclude anyone who meets the requirements from competing for contracts. Furthermore, the Group undertakes to respect the agreed payment terms, in accordance with the contracts entered into and the relevant legislation in force.

[ESRS G1-2 15.a]

By involving its suppliers in ESG strategies, Feralpi Group aims not only to reduce reputational risks but, above all, to help trigger a virtuous circle by considering sustainability as a shared value throughout the entire supply chain. The aim is to extend attention and the capacity for action along the value chain, with a focus on the supply chain, without being limited exclusively to the Group's internal activities.

When suppliers are entered into the system, they are provided with the Group's Human Rights Policy and the environmental, safety and energy policies relevant to their activities, while the Code of Ethics is attached to each order confirmation, which they are required to accept by undertaking to respect its values and principles.

Since 2018, Feralpi Group, in the context of the "**Feralpi Scrap Suppliers Dialogue**" project, has initiated a series of activities to generate an in-depth knowledge of suppliers, starting with **scrap** suppliers, and to **map sustainability aspects** related to quality, the environment, health, safety, and ethics. Through a questionnaire consisting of 7 sections and over 70 questions on general and specific aspects such as human rights, labour, environment, corruption, and quality, the Group qualified 95% of the scrap suppliers for Italy in 2025. For non-Italian scrap suppliers, Feralpi Group has implemented a procedure for collecting environmental information, in line with the integrated management system, to ensure that foreign suppliers also meet the standards required by the company.

In order to integrate "sustainability as standard" into the Feralpi Group's procurement processes, this initiative was extended in 2024 to **strategic suppliers** — covering ferro-alloys, electrodes, lime, aluminium, refractories, and plants — by involving them in a sustainable development journey. The commitment relating to ESG mapping, carried out in collaboration with the Open-ES partner, was included in the Group's ESG Scorecard.

In line with this vision, the **Feralpi Value Alliance** was established in 2025, a project that, through a collaborative approach with the Group's strategic suppliers, focuses on integrated sustainability throughout the entire value chain with the aim of improving the sustainability performance of the entire Feralpi Group ecosystem. In January 2025, the first official meeting of the Feralpi Value Alliance took place, during which the Group shared its sustainability strategy, with a focus on the supply chain, and presented the Open-ES platform. Also in 2025, in collaboration with the partner CSMT and Confindustria Brescia, an initiative was organised relating to the Organisation Carbon Footprint for Feralpi Group suppliers. On this occasion, participants were provided with the knowledge and methodologies to measure and manage their carbon footprint (Scope 1 and 2), with the aim of supporting them in aligning with regulatory requirements to improve their competitiveness and contribute to climate action. In this way, Feralpi's management of Scope 3 emissions will also be strengthened by the initiative.

	BASELINE 2023	2025	% change	TARGET 2030	SCOPE
% of strategic suppliers (raw materials and equipment) involved in ESG mapping aspects	0%	43%	/	75% of the suppliers involved	Feralpi Siderurgica, Acciaierie di Calvisano, Arlenico/Caleotto, FERALPI STAHL, Feralpi-Hungária, Feralpi-Praha

In addition, Feralpi Group's ESG strategy focuses on creating shared value with local suppliers, integrating this objective with social and cultural support for the communities in which the Group operates. In 2025, considering the main production sites both in Italy and abroad, 28.7% of turnover was recognised to local suppliers. For more information, refer to ESRS S3.

[ESRS G1-2 15.b]

At present, the ESG qualification criteria do not constitute barriers to entry for Feralpi Group suppliers. However, as illustrated in ESRS G1-1, Feralpi Group has adopted a Supplier Code of Conduct which, in addition to contributing to the creation of business relationships based on shared values, will allow better risk management within the supply chain, thanks to more controlled and qualified suppliers.

G1-3 Prevention and detection of corruption and bribery

[ESRS G1-3 16; ESRS G1-3 18.a]

Feralpi Group's companies have adopted an Organisation, Management and Control Model, in line with the provisions of Legislative Decree no. 231/2001, which includes the monitoring of risks related to corruption. For more information, refer to ESRS G1-1.

[ESRS G1-3 18.b; ESRS G1-3 18.c]

The investigative activities are entrusted exclusively to the external members of the Supervisory Body, so there is no overlap with the management chain affected by any reports. The SB reports to the Board of Directors and the Board of Statutory Auditors on the verification activities carried out on a six-monthly basis.

[ESRS G1-1 10.g; ESRS G1-3 21.a; ESRS G1-3 21.b; ESRS G1-3 21.c]

The training programmes provided for by Legislative Decree no. 231/2001, which also include corruption and bribery, involve the entire company workforce from the recruitment stage, as reported in ESRS G1-1, and are adapted to the users for whom they are intended and to the risks associated with their respective activities.

The general training illustrates the basic concepts of the legislation, the preventive purposes of the Organisational Model and the related ethical guidelines. For those working in activities identified as "at risk" by the MOG, targeted meetings are planned to illustrate the operational procedures and processes related to the performance of their duties.

The Supervisory Body ensures that training courses are constantly updated in line with changing regulatory and operational requirements, and monitors their use.

Digitalisation and cybersecurity

For Feralpi Group, digitalisation is a key element for ensuring business continuity and resilience, supporting the transition towards sustainable production. The use of IoT technologies and business intelligence tools enables the improvement of operational efficiency and real-time data monitoring, with a view to optimising resources and emissions, while also facilitating the accessibility and sharing of information both within and outside the organisation.

Feralpi Group has been on a path of digitalisation of its business processes for years, thanks to Google Cloud technology, which allows it to be at the forefront in the following aspects:

- Flexibility and scalability: faster adaptation of IT resources;
- Cost reduction: eliminates the need to maintain on-premise hardware infrastructure;
- Accessibility and mobility: facilitates remote working and collaboration;
- Security and reliability: ensures data protection and business continuity;
- Environmental sustainability: reduces ecological impact through increased energy efficiency;
- Innovation: provides immediate access to the latest technologies and software updates;
- Artificial Intelligence: immediate access to AI-enabled productivity tools and industry-leading development platforms.

In 2025, the first phase of implementation of the new digital solution dedicated to Sustainability Reporting was completed. The platform is already operational, but work is underway on the necessary adjustments based on the evolution of the relevant European legislation.

Cybersecurity

The increasing digitalisation of businesses, while improving operational efficiency, also poses risks to business continuity. The opening of digital infrastructure to the outside for diagnostic, maintenance, and remote support activities increases the exposed surface to potential external attacks, worsening the risk of compromises related to the supply chain.

Within the geopolitical context, shaped in particular by the ongoing Russian-Ukrainian conflict and the instability in the Middle East, there has been an uptick in DDoS attacks on institutional sites, banks, public transport, and utilities, aimed at destabilising and swaying public opinion. Moreover, espionage and data theft continue to threaten key sectors such as finance, government entities, critical infrastructure, technological innovation, and defence. At the local level, there has been an increase in attacks on customers and suppliers who have seen their email accounts compromised. This has led to increased surveillance and increased attention requested of Feralpi Group users.

In 2025, the trends of the previous year relating to the spread of generative AI technologies were consolidated, becoming increasingly pervasive in terms of both defence and the exploitation of vulnerabilities by malicious actors. In addition, 2025 saw the full transposition at national level of the NIS2 legislation through Legislative Decree no. 138/2024, and the adaptation of company procedures and policies is therefore in progress.

The Group adopts a proactive approach to cybersecurity, treating it as a strategic investment, and seeks to engage all employees by promoting a corporate culture of collective responsibility in cyber protection.

IT/OT Security Strategic Committee	
Chief Information Officer (CIO)	Chief Technology Officer (CTO)
Chief Information Security Officer (CISO)	Group Chief Financial Officer (CFO)
	Director of FERALPI STAHL

The committee is responsible for supporting the alignment between IT/OT Security risk response strategies and strategic business objectives through the involvement of the corporate organisation. Depending on the needs, it may be supported by specific people of primary importance in the management of the processes involved in the IT/OT Security events for which the Committee is held accountable.

Based on international standards ISO 31000, ISO 27005, and NIST 830 and in reference to NIS2, the Group's cyber risk management aims to heighten awareness of IT/OT risks, provide timely information to enable proactive actions, and ensure that the technological and organisational risk management solutions are effective. The IT/OT Security risk management process includes a structured methodology to identify and mitigate risks that exceed the acceptability threshold.

Feralpi Group has implemented an ICT Business Continuity and Disaster Recovery procedure to ensure data retention and the continuity of vital functions, supporting the ongoing execution of critical activities and allowing for the swift recovery of data in case of computer system disruption.

In the course of 2025, the activities dedicated to strengthening cybersecurity continued according to the three areas that characterise it: People, Processes, and Technologies.

MAIN **CYBERSECURITY** MEASURES

Training & Awareness

CONTINUATION AT GROUP LEVEL OF THE **TRAINING & AWARENESS PROGRAMME**,

aimed at enhancing employee awareness and skills **on cybersecurity risks** through **e-learning training** activities. The programme has been extended and strengthened compared to previous years in terms of **training hours provided**.

OT Security by design

CONTINUATION OF THE **OT SECURITY BY DESIGN** INITIATIVE,

which provides **for cybersecurity analyses** of the **Group's production facilities** as part of new installations or modifications to existing facilities according to **ISA 62443 standard**.

Cyber Threat Intelligence

ADOPTION OF THE **CYBER THREAT INTELLIGENCE SERVICE**,

aimed at **preventing attacks directed** at Feralpi Group, which, through **continuous data collection**, makes it possible to **identify threats** before they can cause significant damage.

Specific training

SPECIFIC TRAINING IS PLANNED FOR 2026

on the security of OT industrial networks aimed at the personnel in the Industrial Automation, Maintenance Engineering and Information Technology sectors.

In addition, the IT systems were updated to the latest available versions and the perimeter firewalls were renewed.

With a view to continuous improvement, Feralpi Group intends to consolidate operational continuity by continuing to promote cybersecurity education for employees, increasing awareness of third-party risks, and adopting new technologies to protect infrastructures. For this reason, a target in this regard was included in the 2025 ESG Scorecard, as described in Section 4.1 - Strategic Guidelines of the Report on Operations.

	BASELINE (2022)	2025	% change	TARGET (2030)	SCOPE
Cybersecurity training coverage - OT divisions (hours provided)	656	/	/	3,800	Feralpi Siderurgica Acciaierie di Calvisano Arlenico Presider Defim Orsogril FERALPI STAHL Saexpa Group

Attention will also be focused on strengthening relationships with customers, suppliers, and local businesses, while the expansion of facilities will extend the scope of monitoring relevant to the cyber context.

Industrial Automation and Operational Technology
Digitalisation and automation in operational technology (OT) not only improve production efficiency, but are also a driver for a sustainable ecological transition. The adoption of smart manufacturing practices, fuelled by digitalisation and automation, optimises the use of energy and resources, and consolidates the link between technological innovation, financial performance, and ESG objectives.

Feralpi Group is continuously working to refine its digital ecosystems to improve efficiency and flexibility. This commitment concerns all levels of automation: the field level where physical operations and data collection through instrumentation and sensors take place, the control level where processes are managed and monitored, the supervisory level where strategic decisions based on the analysis of collected data are made, as well as MES (Manufacturing Execution System) systems for production optimisation and ERP (Enterprise Resource Planning) systems for the integrated management of enterprise resources.

This approach, based on the adoption of BAT (Best Available Techniques), i.e. the most advanced technical solutions and technologies related to Industry 4.0, such as the Internet of Things (IoT), Artificial Intelligence, and Big Data, aims to optimise energy consumption, reduce greenhouse gas emissions, and promote the reuse of materials.

In 2025, Feralpi Group's efforts focused on the implementation of the MES for the new spooler production line at the Lonato del Garda site and on the completion of activities relating to the new Rolling Mill B at the Riesa plant, for which the modernisation of Rolling Mill A is planned in the coming years. At the Lecco site, work on the Garret line has been completed.

Metrics and targets

G1-4 Confirmed incidents of corruption and bribery

[ESRS G1-4 24.a; ESRS G1-4 24.b; ESRS G1-4 25.a; ESRS G1-4 25.b; ESRS G1-4 25.c; ESRS G1-4 25.d]

During the period under review, no reports of violations of the 231 Model, the Code of Ethics, or incidents relating to corruption, environment, human rights, health, safety, and privacy were reported. Therefore, there were no convictions or penalties related to corruption and bribery in 2025 and no remediation actions were required.

Appendix

Reconciliation table between GHG emissions and SBTi targets

Emissions (uom: tco_2eq)	2025				2024			
	Core boundary	Excluded from the core boundary	Not covered by targets	Total	Core boundary	Excluded from the core boundary	Not covered by targets	Total
TOTAL EMISSIONS	**589,843**	**705,066**	**171,819**	**1,466,728**	**816,033**	**717,192**	**255,196**	**1,788,421**
Scope 1	**196,986**	**0**	**0**	**196,986**	**208,096**	**0**	**0**	**208,096**
Scope 2 market-based	**213,223**	**2,258**	**0**	**215,481**	**335,518**	**2,412**	**0**	**337,930**
Scope 3	**179,634**	**702,807**	**171,819**	**1,054,261**	**272,419**	**714,780**	**255,196**	**1,242,395**
Purchased goods and services	*176,137*	*407,621*	*0*	*583,758*	*266,358*	*392,499*	*0*	*658,857*
Capital goods	*0*	*0*	*36,207*	*36,207*	*0*	*0*	*117,342*	*117,342*
Fuel and Energy Related Activities Not Included in Scope 1 or Scope 2	*0*	*75,214*	*0*	*75,214*	*0*	*96,213*	*0*	*96,213*
Upstream transportation and distribution	*0*	*196,660*	*0*	*196,660*	*0*	*195,697*	*0*	*195,697*
Waste generated during operations	*0*	*21,080*	*0*	*21,080*	*0*	*26,587*	*0*	*26,587*
Downstream transportation and distribution	*0*	*831*	*0*	*831*	*0*	*1,347*	*0*	*1,347*
Transformation of goods sold	*3,497*	*1,402*	*0*	*4,899*	*6,061*	*2,437*	*0*	*8,498*
End-of-life treatment of products sold	*0*	*0*	*135,612*	*135,612*	*0*	*0*	*137,854*	*137,854*

Membership of associations

	Trade associations	Technical associations	Sustainability associations
Italy	1. **AIDAF** Italian Association of Family Businesses 2. **Confindustria Brescia** Industrial Association of Brescia 3. **A.N.SAG.** National Association of Steel Shapers for Rebar 4. **Assogrigliati** National association among Italian manufacturers of electrowelded and pressed gratings made of steel and metal alloys 5. **Eurofer** European Steel Association 6. **Federacciai** Industry Federation 7. **Federmeccanica** Trade Union Federation 8. **Ramet** Consortium for Environmental Research for Metallurgy	◆ **AIM** Italian Metallurgy Association ◆ **ESTEP** European Steel Technology Platform ◆ **Fondazione Csr** National study centre for corporate risk control and management ◆ **ISFOR** Training organisation promoted by Confindustria Brescia ◆ **Riconversider** Federacciai consultancy firm that deals with business organisation, technological innovation and financial management ◆ **UNSIDER** Italian steel standards unification body for promoting the knowledge of national (UNI) and international (CEN and ISO) standards	1. **Global Compact of the United Nations (UNGC)** a global network that already includes more than 18,000 companies from over 173 countries around the world, as well as of the Italian network (Global Compact Network Italy) 2. **Sustainability Makers** An Italian association that brings together professionals dedicated to defining and implementing sustainability strategies and projects in businesses and other organizations 3. **Associazione Fabbrica Intelligente Lombardia** A technology cluster for advanced manufacturing in the Lombardy Region that brings together companies, research centres, universities and industrial associations 4. **Cluster Nazionale Fabbrica Intelligente (CFI)** Association with the aim of implementing a strategy based on research and innovation for the competitiveness of Italian manufacturing 5. **Associazione Infrastrutture Sostenibili (AIS)** Association with the aim of fostering the dissemination of a culture of sustainability and awareness of the value of having sustainable infrastructures 6. **Associazione Cluster Lombardo della Mobilità** System providing services for research project development, innovation, internationalisation and access to public funding opportunities 7. **SYMBOLA** Foundation for Italian Qualities 8. **SODALITAS** Foundation dedicated to the promotion of Corporate Sustainability
Germany	◆ **Regional Chamber of Commerce and Industry in Dresden** ◆ **SachsenMetall, Unternehmensverband der Metall-und Elektroindustrie Sachsen e. V.** Association representing employers in the metal and electrical industry in Saxony ◆ **Deutscher Ausschuss für Stahlbeton e.V., Berlin** Regional industrial association of Saxony. National committee for the setting of standards in German industry and the improvement and distribution of construction products ◆ **EWI, Energie- und Wasserstoffallianz im Industriebogen Meißen** Association of the Meißen industrial region dealing with the availability of energy and hydrogen for the region ◆ **Industrieverein Sachsen 1828 e.V., Chemnitz** Regional association of businesses of Saxony ◆ **Vereinigtes Wirtschaftsforum Riesa** Local economic association ◆ **Wirtschaftsvereinigung Stahl** German steel industry federation	◆ **BDSV, Bundesvereinigung Deutscher Stahlrecycling- und Entsorgungsunternehmen e. V., Düsseldorf** German business union for steel recovery and disposal ◆ **ESN, Entsorgergemeinschaft der Deutschen Stahl- und NE-Metall- Recycling -Wirtschaft e.V., Düsseldorf** German national association for the recycling of steel and non-ferrous material ◆ **ESTEP** European Steel Technology Platform ◆ **FEhS, Institut für Baustoff-Forschung e.V., Duisburg** Building materials research institute, focusing mainly on the reuse and recovery of slag ◆ **Sächsischer Hafen- und Verkehrsverein e.V., Dresden** Association for the management of harbours in the region of Saxony	◆ **Klimaschutzunternehmen e.V.** Initiative of the German Federal Environment Ministry exclusively for companies committed to climate and environmental protection

System certifications

Feralpi Siderurgica	UNI EN ISO 9001, 14001, 45001, 50001, EMAS
Acciaierie di Calvisano	UNI EN ISO 9001, 14001, 45001, 50001, EMAS
Presider	UNI EN ISO 9001, 14001
Presider Armatures	BS EN ISO 9001
Defim Orsogril	UNI EN ISO 9001
Arlenico	UNI EN ISO 9001, 14001, 45001 IATF 16949 - Automotive Quality Management System
ESF Elbe-Stahlwerke Feralpi GmbH	DIN EN ISO 9001, 14001, 50001, EMAS, Entsorgungsfachbetried
Feralpi Stahlhandel GmbH	DIN EN ISO 9001, 50001
Feralpi-Logistik GmbH	DIN EN ISO 9001, 50001
Feralpi-Praha S.r.o.	ISO 9001
Feralpi-Hungaria Kft.	ISO 9001

Product certifications

Feralpi Siderurgica	EPD – Environmental Product Declaration Certificate of minimum recycled/recovered/by-product content for: 1. Steel 2. Green stone 3. Green Lime 4. Green Iron SUSTSTEEL SYSTEM 2+ GREEN STONE
Acciaierie di Calvisano	EPD – Environmental Product Declaration UNI EN ISO 14067 TUV Certificate PED AD2000W 0 Risk and safety control for pressure equipment Certificate of minimum recycled/recovered/by-product content
Presider	EPD – Environmental Product Declaration EN ISO 17660-1 (load transmitting welds) and 17660-2 (non-load transmitting welds) AFCAB NF-Armatures
Presider Armatures	UK CARES - CERTIFICATION AUTHORITY FOR REINFORCING STEELS AFCAB NF-Armatures
Defim Orsogril	UNI EN ISO 1090-1
Arlenico	EPD – Environmental Product Declaration UNI EN ISO 14067
ESF Elbe-Stahlwerke Feralpi GmbH	EPD – Environmental Product Declaration Certification of minimum recycled content Certification of minimum recycled/recovered/by-product content

The up-to-date overview of system and product certifications for each Group company can be found in the Appendix and on the Product Certifications page of the website www.feralpigroup.com.