VOLUNTARY CONSOLIDATED SUSTAINABILITY REPORT

Consolidated Sustainability Report

General information

Sustainability in Feralpi Group

14

A global player, an organisation of passionate people, a sustainable community of steel.

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 our 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.

14.1 Foreword

In 2024, the European steel industry experienced modest growth, with a total production of approximately 130 million tonnes of crude steel, marking a 2.6% increase compared to the previous year. However, despite increased output in major countries such as Germany, France, and the Netherlands, Italy saw a 5% reduction, reflecting the struggles of its local market.

In this context of volatility, Feralpi Group has continued to pursue its commitment to sustainability, confirming the principle of an integrated approach that merges technological innovation with environmental responsibility. The company has made substantial investments in reducing CO_2 emissions by employing cutting-edge technologies and optimising resource utilisation.

At the same time, it has consistently pursued both the improvement of energy efficiency through increased use of renewable sources and the optimisation of consumption, as well as the continuous evolution of production processes with a particular focus on digitalisation and automation.

At the core of this transformation are people, the true catalyst of corporate innovation: this is why the Group invests in education, skill development, and organisational well-being, valuing internal talent and promoting a corporate culture oriented towards sustainable and responsible growth.

At the governance level, Feralpi Group confirms the adoption of the best international standards in terms of sustainability and transparency.

The company is continuing with the voluntary adoption of the new major regulatory frameworks, including the European Taxonomy and the CSRD Directive on sustainability reporting. By implementing more sophisticated ESG measurement and reporting models, the Group can effectively track its progress towards environmental, social, and governance goals, thereby enhancing accountability to stakeholders.

To summarise, in spite of the economic and geopolitical challenges of recent years, Feralpi Group is resolutely pursuing sustainable growth, bolstering its dedication to innovation, decarbonisation, and environmental responsibility. Thanks to long-term strategic vision and targeted investments, the Group establishes itself as a point of reference in the steel sector for the transition towards a greener, more efficient, and resilient industry.

14.1.1. Methodology note

Feralpi Group, including the subsidiaries of the parent company Feralpi Siderurgica S.p.A., operates through a sectoral structure that also includes sub-holdings. Feralpi Siderurgica S.p.A. has its registered office in Brescia, Via Aurelio Saffi 15, and its administrative headquarters in Lonato del Garda, Via Carlo Nicola Pasini 11.

This document represents the Group's voluntary Sustainability Report for the year 2024 (1 January - 31 December) and follows the publication schedule of the Consolidated Financial Statements of Feralpi Siderurgica S.p.A. The Integrated Report, published annually, were made available in June 2025.

Drafted in accordance with the GRI Reporting Standards, the statement incorporates the October 2021 revision of the GRI Universal Standards, applicable from 1 January 2023. Material topics follow the GRI 2016 standards, with some exceptions: GRI 303 (Water and Wastewater) and GRI 403 (Occupational Health and Safety) of 2018, GRI 207 (Taxes) of 2019 and GRI 306 (Waste) of 2020.

To provide a more complete overview of the sector in which it operates, the Voluntary Consolidated Sustainability Report incorporates specific KPIs defined by the *Sustainability Accounting Standards Board* (SASB), as highlighted in the Reconciliation Table between Material Issues | GRI - SASB found in the Appendix of the Voluntary Consolidated Sustainability Report.

The structure of the document, optimised compared to previous editions, follows what is outlined by the *Corporate Sustainability Reporting Directive* (CSRD) and the related ESRS standards. The scope of the report coincides with the Consolidated Financial Statements as at 31 December 2024. Information on Feralpi Power On and Feralpi Villasor, 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 its subsidiaries Feralpi Stahlhandel GmbH and Feralpi Logistik GmbH (Riesa, Saxony)

The environmental impacts of production units located in Italy (Alzate Brianza, Anzano al Parco, Borgaro Torinese, Nave, Pomezia, Rivoli[3]), 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.

The following definitions are adopted in the document:
- Feralpi Group/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.

On 31 March 2025, the Board of Directors approved the Voluntary Consolidated Sustainability Report, 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).

Quantitative indicators that do not relate to any general or topic-specific disclosures of the GRI Standards, which are reported on the pages indicated in the Content Index, are not subject to limited review by the party responsible for the voluntary review.

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.

How to consult this section

As with the previous edition of the document, the company's introduction, its history, and its industrial strategy are incorporated into the Report on Operations. Next, the pillar of sustainability is presented, which for Feralpi Group is an integral part of its business plan.

Since its establishment, the Group has placed the commitment to the well-being of people, environmental protection, and the creation of a long-term positive impact for all the communities it operates in at the centre of its core values. This vision translates into a robust sustainability strategy that permeates every level of the organisation and integrates into the industrial plan.

In comparison to previous years, the document's structure has been redefined, with a reorganisation of the report's chapters, thereby improving the integration between the Voluntary Consolidated Sustainability Report and the Report on Operations.

This section covers environmental, social, personnel-related, human rights, anti-corruption, and local community issues.

Two types of references

- References to external websites or resources;
- References to another section of the report or the Content Index.

The document is available in the Sustainability section of the website *www.feralpigroup.com*. For further information, please contact *sustainability@it.feralpigroup.com*.

14.1.2. Approach to CSRD and transposition of Legislative Decree no. 125/2024

The company has decided to continue sustainability report in 2024, using the GRI (*Global Reporting Initiative*) standard. This approach will continue to ensure transparency and accountability in the communication of results, allowing Feralpi Group to constantly monitor and improve its environmental, social, and governance (ESG) performance.

The Company's aim is to gradually align with the new *European Sustainability Reporting Standards* (ESRS), which will be compulsory for the Group from 2026. The ESRS represent a set of disclosure requirements and obligations envisaged by the European Union, developed within the framework of the CSRD (Corporate Sustainability Reporting Directive).

These standards are designed to offer companies clear guidance on identifying, monitoring, and reporting material sustainability aspects, using an approach that considers not only the impact of corporate activities on the environment and society but also the risks and opportunities related to climate change, resources, people, and corporate governance. Anticipating the adoption of the new legislation, Feralpi Group has decided to integrate the principles of double materiality into its reporting processes as early as 2024.

[3] Azienda Metallurgica Piemontese Lavorazioni S.r.l. is present in the reporting scope only for 2022 data.

This proactive approach enables the company to be prepared for the enforcement of ESRS and gain an in-depth understanding of the areas that require long-term improvement, which will be addressed through the implementation of processes oriented towards continuous improvement. The analysis of material issues according to the Double Materiality method is not subject to limited review by EY S.p.A. For the purposes of the review activities, the impact materiality analysis performed according to GRI Standards was considered, based on which the document's contents and the relevant GRI indicators were defined.

The efforts undertaken by the Group are not limited to mere regulatory compliance, but represent a strategic opportunity to strengthen its governance and further improve the company's approach to sustainability.

The presence of agile governance, capable of quickly responding to changes and new demands, has allowed us to immediately identify areas for improvement, which will be monitored and developed in the years to come. In doing so, the company not only braces itself for the challenges presented by the new legislation but also reaffirms its dedication to generating shared value for stakeholders and embracing sustainable practices that demonstrate its enduring commitment to people and the environment.

14.2 Feralpi Group's sustainability strategy and objectives

The **Group's sustainability strategy**, founded on **seven pillars**, is based on a holistic approach that places it at the centre of business processes and is realised through:

- ethical and responsible culture,
- technological investments and process improvements,
- definition of strategic ESG targets and KPIs,
- transparent dialogue with stakeholders.

By incorporating the UN **Sustainable Development Goals (SDGs)** into its strategy, Feralpi Group aims to outline its ambitions, bolster sustainability efforts, and enhance the comprehension and management of the impacts of its activities. The Group contributes to the achievement of the relevant SDGs through:

- ethical and responsible practices,
- innovation in its products and services,
- job creation,
- support for skills development and training of young people.

The Group aims to increasingly integrate the industrial plan with its sustainability strategy, to gain a better understanding of the socio-economic dynamics in which it operates and, in alignment with the expectations of its stakeholders, to improve its impact on the environment and society.

The ESG Scorecard

Feralpi Group has devised an **ESG Scorecard** that, through the annual monitoring of **14 objectives**, aims to strengthen its sustainability journey and meet communication needs with stakeholders. Internally, the tool supports the integration of ESG criteria into decision-making processes, the proactive management of risks and opportunities, and the engagement of employees in promoting a responsible culture.

Externally, it enables transparent communication of ESG performance, attesting to the commitment to sustainability and promoting cooperation with external stakeholders, with a view to continuous improvement.

	PILLARS	AMBITIONS				BASELINE	2024	% CHANGE	TARGET	SCOPE	SDGs
Environmental	CONTRIBUTING TO REDUCING CONSUMPTION AND IMPACTS MULTIPLYING THE USE OF MATERIALS	**Countering climate change** through the decarbonisation of production processes Investing in solutions to improve **energy efficiency** and develop clean energy Increasing the quantity of waste sent to recovery and reuse processes, **substantially reducing the production of waste**	ESG Scorecard		Specific CO_2 Emissions (Scope 1, 2 and 3 core boundary)[1]	2022 **0.540** $tonCO_2eq$/tonne	**0.330**	**-39%**	2030 **-50%**	Feralpi Siderurgica Consolidated[2]	
					Absolute CO_2 emissions (Scope 3 non-core boundary)	2022 **676,404** ton CO_2eq	**714,780**	**+6%**	2030 **-25%**		
					Renewable energy[3]	2022 **0.46%**	**48.67%**	\	2030 **50%**		
					Residues in Circular Processes	2022 **88.45%**	**91.32%**	\	2030 **96%**		
					Specific water consumption	2022 **1.38** m^3/tonne	**1.08**	**-22%**	2030 **-50%**		
Social	CARE, SAFETY AND DEVELOPMENT OF INDIVIDUALS WORK CULTURE AND EDUCATION OF NEW GENERATIONS INCLUSION AND LOCAL DEVELOPMENT	**Addressing inequalities**, ensuring equal opportunities and adequate wages, while respecting labour and human rights **Supporting the economic growth** of the national economy **Promoting a safe, secure working environment** for all the group's workers with constant attention to accidents at work		HR	Inclusion of female staff (blue collar) in production areas[4]	2022 0%	9%	\	2027 **≥5% / yearnew entries primary steelmaking**	Feralpi Siderurgica, Acciaierie di Calvisano, Arlenico, ESF	
					Collective training course on "Listening, Dialogue and Inclusion" issues	2022 0%	45%	\	2027 **100% population affected**	Consolidated Feralpi Siderurgica[2]	
					% female staff in Feralpi Siderurgica - Corporate Services	2022 49%	52%	\	2027 ~50%	Feralpi Siderurgica - Corporate Services	
				Safety	Accident frequency index	2022 **23.7** (average 2019-2022)	22.7	\	2030 **7 (0-10)**	Consolidated Feralpi Siderurgica[2]	
					% of staff working in ISO 45001 companies	2022 25%	28%	\	2030 100%		
				Supply chain	% of strategic suppliers (raw materials and equipment) involved in ESG mapping aspects	2023 0%	21%	\	2030 **75% suppliers involved**	Feralpi Siderurgica, Acciaierie di Calvisano, Arlenico, Feralpi Stahl, Feralpi-Hungária, Feralpi-Praha	
Governance	ETHICAL BUSINESS MANAGEMENT	**Integrating ESG** (Environment, Social, Governance) aspects into the Group's business model Defining **unambiguous and measurable improvement** paths at plant level, in line with national and international targets **Guiding change in the steel sector** by encouraging companies in the supply chain to adopt sustainable policies			% of time the Board devotes to ESG issues (in meetings and induction sessions)/year	2022 **23.7%**	**42.0%**	\	2030 **35.0%**	Feralpi Siderurgica	
					ESG Financing % / Total Mid-Long Term facilities	2022 **74.4%**	**82.0%**	\	2030 **>80.0%**	Feralpi Siderurgica Consolidated	
					% of strategic investments with ESG content	2022 **>80.0%**	**>80.0%**	\	2030 **>80.0%**		
Industrial Commitment	PRODUCT AND SERVICE QUALITY	Improving **product and service quality** by optimising processes through inclusive and sustainable industrialisation Enhancing **technological capabilities** through research and development activities Creating **value for the community** by valuing work, safeguarding the cultural and natural heritage and contributing to sustainable urban development									

[1] On the total production of hot rolled products.
[2] Feralpi Algérie not included.
[3] Considering both electrical and thermal energy.
[4] Including those administered

14.3 The materiality analysis process

For Feralpi Group, stakeholder engagement is a fundamental aspect of its strategy for creating shared value, as it enables the Group to understand and meet stakeholders' needs and expectations.
The materiality analysis, through the contributions of various internal and external stakeholder categories, enables the Group to identify the most relevant environmental, social, and governance issues, thereby guiding strategic decisions and contributing to the overall success of the organisation.

For the 2024 financial year, the materiality analysis process has been developed using the experience gained over recent years and the most up-to-date international guidelines, with the objective of **aligning with the requirements *of the Corporate Sustainability Reporting Directive* (CSRD)**, to which the Group will be subject starting from the 2025 financial year reporting, according to the legislation currently in place. With this view, a partial alignment methodology was developed and applied[4] to the **guidelines *"EFRAG IG 1: Materiality Assessment Implementation Guidance"***, published in May 2024, which made it possible to identify, evaluate, aggregate and prioritise **impacts, risks and opportunities (IROs)** related to material ESG issues according to the two perspectives of dual materiality:

- **Impact materiality**: evaluation of the significant negative or positive, current or potential impacts generated by the Group on environmental, economic, and social issues in the short, medium, or long term;

- **Financial materiality**: evaluation of the impacts and dependencies, both in terms of risks and opportunities for the Group, that may influence strategy, financial performance and corporate objectives.

The 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 relevance of IROS** according to the perspective of Double Materiality;
4. **Prioritisation** of the most significant IROs for reporting purposes;

- **Definition of the list of material topics** from the perspective of impact materiality, financial materiality, or both.

The analysis covered both the activities directly carried out by Feralpi Group and the operations in the upstream and downstream value chain, adopting a "forward-looking" perspective. Compared to 2023, the number of material topics remained unchanged.

For the next financial year, the Group plans to complete aligning its double materiality process with the ESRS standards and to harmonise its pertinent issues with the classifications provided by these standards.

The impact materiality

In 2024, the impact assessment conducted in the previous year for the specific context of the Group companies was updated. The internal contact persons have identified the impacts of corporate operations on the environment and society, assessing their *severity*, given by *entity*, *extent*, and, if *negative*, *irremediability*, and the *probability* for potential ones. Compared to 2023, they were asked to indicate the position of impacts along the value chain, i.e., whether they relate to Feralpi Group's own activities, occur upstream or downstream, or represent a combination of these possibilities. The impacts identified for the individual production sites were aggregated at Group level and summarised into seventeen relevant themes.

The financial materiality

Regarding financial materiality, the risks and opportunities qualitatively identified in 2023 were reviewed with internal stakeholders who are experts in the financial domain.

To assess their relevance, a process was developed that utilised an internal algorithm based on the CSRD and EFRAG guidelines, allowing the combination of *magnitude*, *probability*, and *time horizon parameters* to create a scoring system capable of determining the relevance of the analysed risks and opportunities.

The perception of external stakeholders

According to the Group's stakeholder engagement policy ***[Section 14.4.]***, in 2024, external stakeholders were involved in the materiality analysis process to gauge their perception of the significance of ESG issues and to establish targeted objectives and engagement methods based on the identified areas of alignment or misalignment.

Within this context, participants were asked to prioritise the list of issues identified from the internal dual materiality process using an online questionnaire, which also allowed them to elaborate on their responses through open-ended questions.
The questionnaire was sent to **429 external stakeholders**, representative of the clusters of all Group companies. The response rate of the questionnaire was **42%**, thus confirming the validity of the results obtained.

[4] Methodological limitations: with the aim of gradually aligning with the methodology specified by the reference standard, Feralpi Group has developed a process that, at present, does not yet allow precise determination of financial relevance in quantitative and economic-monetary terms.

The next steps

In the coming years, the Group aims to improve the identification and assessment of its impacts on the environment and society by fostering greater stakeholder engagement and using analysis methodologies that are as objective as possible. Furthermore, it aims to strengthen its financial materiality methodology by integrating assessments of the importance of risks and opportunities in quantitative economic-financial terms. For the upcoming reporting exercise, Feralpi Group intends to work on enhancing the techniques and quality of its stakeholder engagement processes concerning materiality analysis. The Group's objective is both to develop additional tools and channels for engagement targeted at different stakeholder categories and to organise opportunities for dialogue dedicated to sharing the results of the materiality analysis. By doing so, the Group will be able to further strengthen its relationship with its stakeholders, making them increasingly active participants in creating shared value between the company and the communities in which it operates.

Feralpi's material topics

MATERIAL TOPIC	SDGS	MAIN IMPACT	TYPE OF IMPACT	RISKS AND OPPORTUNITIES		RELEVANCE
Climate change and energy efficiency *[Section 15.1.1.]*	7, 9, 13	Climate-altering emissions from the Group's production activities (Scope 1 and 2) and along the value chain (Scope 3). **Mitigation actions**: Reducing emissions through electrification, energy efficiency and use of renewables.	**Negative**	Increased costs due to greenhouse gas emissions. Competitive advantage in the market and the Group's financial position.	**R** **O**	
Circular economy, waste and use of materials *[Section 15.1.4.]*	9, 12, 17	Waste and residues from the group's production activities. **Mitigation actions**: Contribution to the circularity of economic activities through the production of electric furnace steel (EAF), using recycled, virgin ferrous materials, and the development of new industrial products from by-products and waste, preventing further extraction of raw materials.	**Negative**	Maintenance of management costs and compliance needs of the waste produced. Opening of new markets interested in by-products generated by the steel process.	**R** **O**	
Management of water resources *[Section 15.1.2.]*	6	Negative impact on the availability of water resources, both for the Group and for all stakeholders with whom they are shared, due to the Group's steelmaking activity. **Mitigation actions**: Adoption of practices and technologies to optimise water flows and their use in production cycles with a view to reducing withdrawals.	**Negative**	Possible conflicts with local communities and potential future criticality due to climate change in monetary and operational terms. Cost reduction and protection from possible penalties due to misuse of water resources.	**R** **O**	
Pollutant emissions *[Section 15.1.1.3.]*	9	Pollutant emissions from the group's steel activity. **Mitigation actions**: Reduction of emissions through the adoption of new technologies, the use of materials that do not require surface treatment and improved internal handling logistics (pollutant emissions from thermal combustion of vehicles).	**Negative**	Possible penalties for exceeding the emission limits of the regulations. Reputational improvement and maintaining a positive relationship with local communities by reducing emissions.	**R** **O**	
Nature and biodiversity *[Section 15.1.3.]*	14, 15	Negative impact on ecosystems and biodiversity due to air and noise pollution from the Group's production activities and site expansion operations. **Mitigation actions**: Expansion through the reclamation of disused local industrial sites leads to less land consumption, and the reduction of road transport.	**Negative**	Possible occurrence of tensions with affected stakeholders and reputational damage. Opportunities to rehabilitate brownfield sites and improve relationships and partnerships with local communities and environmental organisations.	**R** **O**	

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MATERIAL TOPIC	SDGS	MAIN IMPACT	TYPE OF IMPACT	RISKS AND OPPORTUNITIES		RELEVANCE
Development and empowerment of individuals *[Section 16.1.]*		Positive impact on people's professional growth through their enhancement and continuous development of their skills, leading to greater fulfilment.	**Positive**	Deterioration of employee retention and the ability to attract new talent in case of inadequate development of professionals and lack of attention to their well-being.	**R**	
				Improved productivity, internal organisational skills and talent attraction through growth opportunities and guaranteed work-life balance.	**O**	
Well-being, health and quality of life *[Section 16.3.]*		Positive impact on workers' health and well-being through the promotion of healthy habits, with screening activities and the dissemination of a culture of prevention and early diagnosis.	**Positive**	Deterioration of employee retention and the ability to attract new talent if diversity is not recognised.	**R**	
				Improved productivity, internal organisational skills and talent attraction through growth opportunities and guaranteed work-life balance.	**O**	
Safety and prevention culture *[Section 16.2.]*		Negative impact on the health and safety of employees due to the risk of accidents/incidents and the development of occupational diseases. **Mitigation actions**: Reducing the risk of accidents at work through training and prevention activities, adopting certified safety management systems, improving the safety of environments and plants by adapting to best available technologies.	**Negative**	Reputational loss and the occurrence of possible criminal proceedings.	**R**	
				Improving relations with workers' representative associations.	**O**	
Diversity, Equity & Inclusion *[Section 16.4.]*		Stimulation of innovation with positive economic repercussions due to different perspectives, increased well-being and sense of belonging, promotion of a more inclusive and productive working environment.	**Positive**	Deterioration of employee retention and the ability to attract new talent if diversity is not recognised.	**R**	
				Improvements in productivity and staff satisfaction through the enhancement of different perspectives.	**O**	
Human rights and responsibilities along the supply chain *[Section 16.5.2.]*		Possible presence of non-socially sustainable practices along the supply chain and their continuation in case of lack of controls / absence of adequate policies. **Mitigation actions**: Feralpi is committed to promoting human rights along its supply chain through a dedicated policy, requiring suppliers to adhere to its Code of Ethics and working with customers to ensure sustainability and shared responsibility throughout the supply chain.	**Potential negative**	Reputational damage and sanctions due to human rights violations along the supply chain.	**R**	
				Improved supply chain resilience through the dissemination and sharing of practices aimed at achieving climate, environmental and social objectives.	**O**	
Community development *[Section 16.6.]*		Contribution to the economic and social development of local communities by sourcing from local suppliers and supporting local associations and organisations.	**Positive**	Reputational damage due to tensions with local communities.	**R**	
		Potential negative impact, in terms of social tensions in local communities, that could result from Feralpi's actions and choices if insufficient attention is paid to these dynamics. **Mitigation actions**: Feralpi, as set out in its human rights policy, engages in dialogue with surrounding local communities in order to prevent any negative impacts from its activities.	**Potential negative**	Improving relations with local communities by supporting their economic, social and cultural development.	**O**	

MATERIAL TOPIC	SDGS	MAIN IMPACT	TYPE OF IMPACT	RISKS AND OPPORTUNITIES		RELEVANCE
Dialogue with the social partners *[Section 16.5.1.]*		Potential negative impact on working conditions if relations with employees and their representatives deteriorate. **Mitigation actions**: Feralpi works to maintain open and constant dialogue with the associations representing employees, with a view to improving the economic and working conditions of its staff.	**Potential negative**	Possible impacts on the Group's business continuity caused by conflictual relations with social partners.	**R**	
				Improving relations with all social partners and maintaining the social licence to operate.	**O**	
Product and service quality *[Section 17.4.]*		Potential negative impact on communities, in terms of spill-over effects on employment and inefficiencies for end users, in case of low or inadequate quality standards leading to deterioration of customer relations. **Mitigation actions**: Feralpi works constantly to ensure high quality standards, in terms of both product and service, in order to develop trusting relationships with customers.	**Potential negative**	Deterioration of customer relations due to substandard products.	**R**	
				Building long-lasting relationships through products that meet their needs in terms of quality and sustainability.	**O**	
Creation of economic and financial value *[Section 8.]*		The Group's activities, through the creation of job and employment opportunities along the entire value chain, transaction investments, payment of social security contributions and taxes, generate a positive economic impact on the economic situation of employees and non-employees, and consequently of their communities.	**Positive**	Cost increases due to rapid energy transition imposed by regulators.	**R**	
				Strengthening market demand by contributing to the overall economic growth of the countries in which the Group operates.	**O**	
Integrity of governance and transparency of business *[Section 17.]*		Negative impact resulting from potential non-compliance with the principles of good governance, ethics and integrity along one's value chain. **Mitigation actions**: Feralpi pursues fair and transparent communication, supported by third-party certified performance and regulatory-compliant procedures, with a view to disseminating ethical governance principles along the value chain.	**Potential negative**	Reputational damage and possible sanctions due to antitrust violations or possible misconduct in breach of the principles of ethical governance and integrity.	**R**	
				Contribution to the creation of more resilient value chains and improved reputation through proper communication with stakeholders.	**O**	
Business evolution *[Section 3., Section 14., Section 15.1., Section 15.2.]*		The absence of clear legislation and a shared global policy on the issue of sustainability, together with the lack of certification and markets for '*green*' steel, hinder the spread of products with a low environmental impact, thus slowing down the contribution that Feralpi can make to the objectives of the ecological and energy transition in the sectors in which it operates. **Mitigation actions**: The capacity for vision and the continuous updating of its organisational processes enable Feralpi to adapt to changes in the environment.	**Negative**	Changes in market dynamics due to changing and evolving customer needs with regard to ESG issues.	**R**	
				Competitive advantage due to a leading position in the production of products that satisfy customers in terms of both quality and sustainability aspects.	**O**	
Digital and technological innovation and cybersecurity *[Section 4.3.]*		Potential negative impact on stakeholders in terms of data loss and/or sharing of sensitive information in the event of cybersecurity breaches. **Mitigation actions**: Feralpi Group takes a proactive approach to cybersecurity as a strategic investment, promoting a culture of collective responsibility and aiming to strengthen business continuity, risk awareness and collaboration with external partners for a shared defence.	**Negative**	Possible business continuity impacts in the event of the occurrence of cyber attacks.	**R**	
				Productivity improvements through digitalising procedures and improving staff awareness of cybersecurity risks.	**O**	

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14.4 The relationship with stakeholders

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** 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.

Responsability

Building dialogue relationships based on ethics, integrity and honesty.

Trasparency

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

Collaboration

Promoting partnerships that create value for all partners involved.

In 2024, Feralpi Group reinforced its commitment to managing relationships with stakeholders by adopting **bespoke engagement tools** to integrate into a strategy based on dialogue and listening. 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.

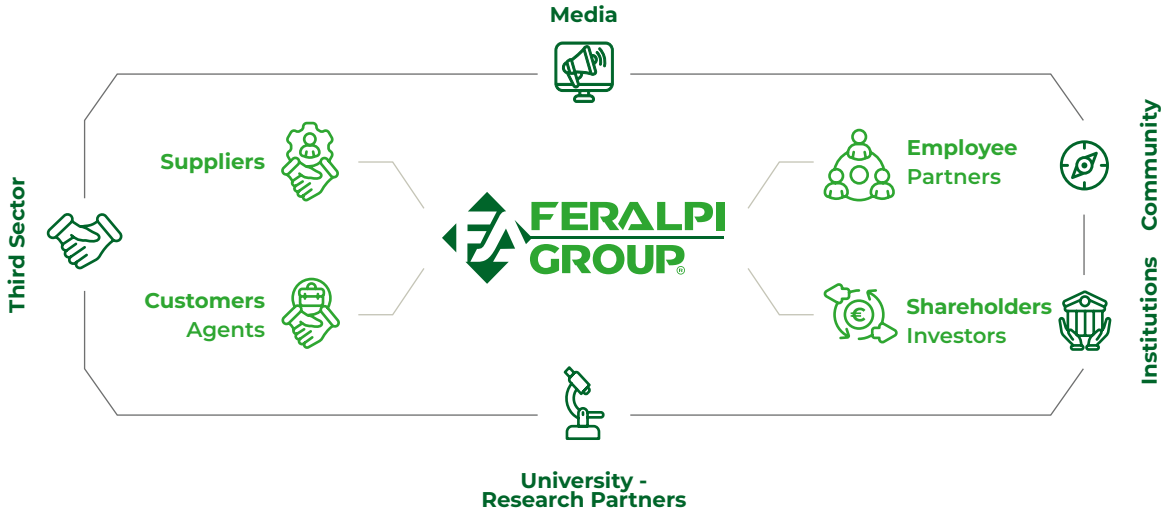
Feralpi Group also publishes **VerdeFeralpi**, the company magazine available in both print and digital formats. It addresses topics such as training, innovation, and sustainability, as well as the Group's role in the region and its engagement in cultural, artistic, and sports sectors.

With over 3,000 copies printed in Italian and German, the magazine serves as an important tool for both internal and external dialogue, contributing to the sharing of values and objectives among its stakeholders. In 2024, it was awarded "Best Print Magazine" at the Ascai Media Awards, recognising its effectiveness as a corporate communication tool.

In 2024, the initiative - launched in 2020 - "**Sustainable Dialogues**", a network of people interested in maintaining a constant dialogue with the Group on issues 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.

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.

Relationship with stakeholder



14.4.1. Internal Stakeholder Engagement

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

In 2024, the project "**From Listening to Dialogue to Action**" continued. Introduced in 2023 alongside the ninth edition of **the biennial Business Climate Survey**, the initiative included facilities in Italy, Germany, the Czech Republic, and France, with a focus on identifying the primary needs of individuals within Feralpi Group, particularly regarding their satisfaction with their work and environment, their sense of belonging, and their perception of the Group's commitment to environmental concerns, well-being, health, and safety.

Once the results had been shared with the owners and executives, working groups 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 to be integrated over the 2024-2025 period.

Furthermore, cross-functional activities at the Group level continued to meet needs related to work-life balance and work flexibility by introducing additional company-funded leave and leave for employees and their families to attend medical appointments. The structured training course "Listening, Dialogue, and Inclusion", started in 2023 following the survey relating to the previous two years, also continued.

14.4.2. External Stakeholder Engagement

Externally, Feralpi Group continues to develop and consolidate the dialogue and collaboration with institutions, media, and local communities. Special focus is placed on the education sector through initiatives targeted at schools and universities, with the goal of fostering a culture of work among young people, enhancing entrepreneurship, and increasing awareness of the steel industry. Priority is also given to initiatives for dialogue with suppliers and customers, strategic partners for the sustainable growth of the entire supply chain.

In 2024, in Düsseldorf, the Group participated in **Wire & Tube**, the leading international trade fair for the wire, cable, and tube sector and the related supply industries. The event, of particular relevance for trade relations, saw the participation of 2,700 exhibitors from 60 countries, and visitors from 135 countries.

Feralpi Group was among the protagonists in Brussels at the **event-exhibition "Steel: at the Heart of Europe - Stronger with European Steel"**, organised by Eurofer at the **European Parliament**.

The initiative highlighted the necessity for common action towards a sustainable European steel industry, providing a direct dialogue between the sector and European institutions. Through the Interactive Hub, the Group presented its vision of an innovative, decarbonised, and competitive steel industry.

As in previous years, Feralpi Group took part in the twelfth edition of the **CSR and Social Innovation Exhibition** - one of Italy's key events focusing on sustainability, social innovation, and corporate social responsibility. The 2024 edition, entitled "*Challenging contradictions*", saw the Group's contributions in the tables "*Communicating sustainability, a strategic lever*" and "*Reducing emissions towards carbon neutrality*". Regarding initiatives targeting younger generations, focusing on school guidance and job placement, Feralpi Group took part in the Smart Future Brescia events in Brescia - an orientation project dedicated to young people, ranging from middle and high school students to undergraduates and graduates - and also in Domani Lavoro, a fair dedicated to employment and human resources, serving as a dynamic meeting point for companies, institutions, training bodies, and candidates.

In November 2024, Acciaierie di Calvisano hosted the "**InnovAZIONI sostenibili**" meeting to present to local institutional stakeholders the investments made to strengthen the ecological and energy transition strategy - the installation of a new extraction hood and the completion of a new photovoltaic system. They also announced the achievement of the EMAS (Eco-Management and Audit Scheme) environmental declaration. It also served as an opportunity to further solidify the dialogue with the local community through an open day, aiming to enhance awareness of strategic investments bridging sustainable development and social responsibility.

In Riesa, FERALPI STAHL organised the eighth edition of the Bella Gröba Festival, a celebration for the families of the local community of Gröba, in Riesa.

The annual event, first promoted by Feralpi in 2016, sees the participation of around 3,000 visitors each year. 2025 will see FERALPI STAHL busy on the occasion of the **inauguration of the new Rolling Mill B**, the first equipped with a K-Spooler plant in Germany, capable of producing 8-tonne coils. A series of events intended for institutional stakeholders, employees, their families, and the local community will be held at the Riesa site to present the investment.

In 2024, Feralpi Group continued to promote direct knowledge of its industrial model, fully integrated with the strategy and commitments of sustainability. Guided tours of the production facilities 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 initiative highlighted the importance of open dialogue and transparency and engaged approximately 1,200 visitors over the year.

The Group is among the founding companies of **Comunità Pratica**, an initiative that unites thirteen 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 2023-2024 period, a total of 90 concrete actions were consolidated among the participating companies, sharing best practices that generate long-term value.


FERALPI
FERALPI STAHL
STAHL FERALPI

Environmental information

15

ENVIRONMENTAL INFORMATION

15.1 The ecological and energy transition

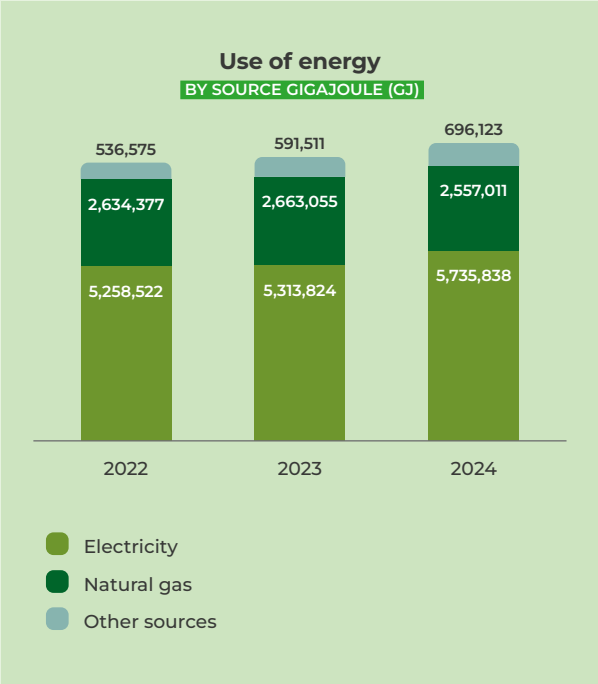
15.1.1. Energy and emissions

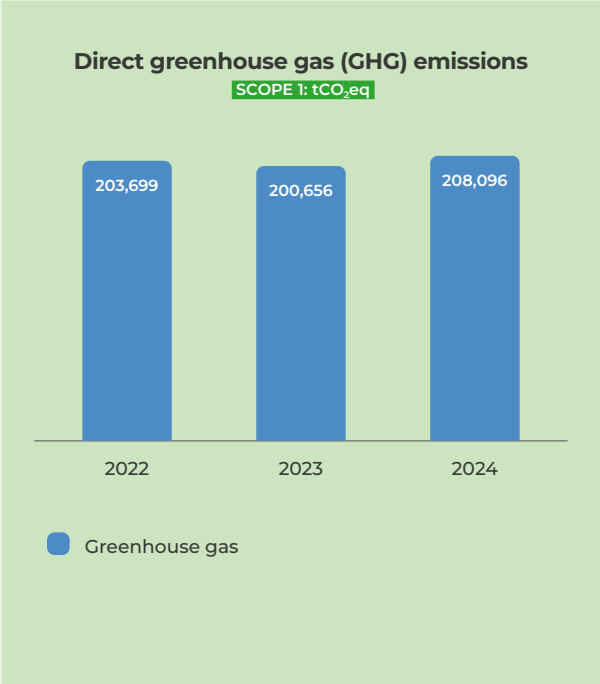
The **steel sector** generates a significant impact on climate, contributing about **8%** [5] **of global emissions**. It is considered a "**hard-to-abate**" sector, i.e. a sector where reducing greenhouse gas emissions is challenging due to complex production processes that require large amounts of high-temperature energy. Finally, 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.

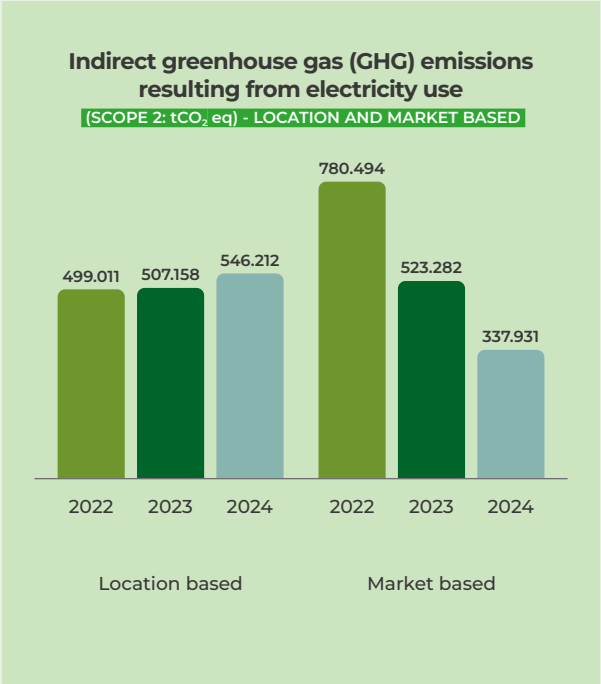
Feralpi Group's production process, based on **electric arc furnace (EAF)** and **ferrous scrap** as primary material, has an approximately **three times less impact** than the more common full-cycle process with blast furnace and iron ore, which accounts for the bulk of steel production worldwide. Feralpi Group is aware of its impact on the climate, which occurs at different stages of the value chain. 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.

[5] International Energy Agency (IEA) - https://www.iea.org/energy-system/industry/steel







In 2024, energy consumption **increased by 4.91% compared to 2023, in line with the change in the total production of the Group**, while they increased by 6.64% compared to 2022. *(See table above).*

With regard to greenhouse gas emissions, **direct emissions (Scope 1) show an increase of 3.71% compared to 2023**, an increase justified by the higher production of the year 2024 (+6.6% on 2023).

In fact, upon examining the specific emissions (Scope 1 emissions relative to the total tonnes of hot-rolled steel), a 2.3% decrease was identified in comparison to 2023.

Regarding indirect **emissions from energy purchase (Scope 2)**, calculated according to the **Location-based methodology, they show an increase of 7.70%** from 507,158 tCO_2eq in 2023 to 546,212 tCO_2eq in 2024. Regarding the calculation according to the **Market-based methodology**, emissions **decreased by 35.42%** from 523,282 tCO_2eq in 2023 to 337,931 tCO_2eq in 2024.

This reduction was possible thanks to the acquisition of certified renewable electricity through the purchase of Guarantee of Origin (GO) certificates. This form of energy is composed of an assortment of renewable sources, including solar, wind and hydroelectric.

As part of the decarbonisation process, Feralpi Group has further reinforced the collection and analysis of data related to Scope 3 emissions, expanding the boundary and the level of detail of the information considered. To this end, a **new emissions inventory** was compiled, which is more comprehensive and timely than that published in previous sustainability reports. Its processing occurred 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, with the objective of improving the robustness of the Group's commitments to transitioning to a low-carbon economy.

SCOPE 3 CATEGORIES tCO_2eq	2024	2023	2022
Purchased goods and services	658,857	502,346	594,385
Capital goods	117,342	86,486	57,621
Activities related to fuels and energy, not included in Scope 1 or Scope 2	96,213	89,284	169,059
Upstream and downstream transportation and distribution	197,044	179,272	145,368
Waste produced in operations	26,587	23,097	23,147
Transformation of goods sold	8,498	22,709	18,514
End-of-life treatment of products sold	137,854	258,329	222,452
TOTAL	**1,242,395**	**1,161,523**	**1,230,545**

Further information on how the above-mentioned Scope 3 categories contribute to determining SBTi targets is available in the ***Appendix [Section "Environmental Sustainability Indicators"]***.

15.1.1.1. The climate transition plan

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 significant 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). Feralpi Group has divided the climate transition plan into two time horizons, short and long term, with the aim of helping to limit the global temperature increase to within 1.5°C:

Short-term objectives (2030):
- Reduction of specific CO_2 emissions (Scope 1, 2 and 3 core boundary) in relation to the total production of hot rolled products by 50% compared to the baseline year 2022.
- Reduction of absolute CO_2 emissions (Scope 3 non-core boundary) by 25% compared to the baseline year 2022.

Long-term objectives (2050):
- Achieving the Net-Zero target through a decarbonisation strategy based on long-term objectives and the neutralisation of residual emissions. The possibility of reaching this extremely challenging goal will depend on the Group's ability to forge strong partnerships with suppliers to intervene in the supply chain and on the support of government policies and subsidies for the development of low- or zero-carbon impact technologies.

For the definition of these objectives, linked to the Group's overall sustainability plan and included in the ESG Scorecard ***[Section 14.2.]***, the guidelines relating to the steel sector published in July 2023 by the **Science-based Targets Initiative (SBTi)**[6], an organisation that independently evaluates and approves the company's greenhouse gas objectives, ensuring their alignment with the objectives of the Paris Agreement, were followed. In July 2024, Feralpi Group's short-term targets received approval from the Science-Based Targets initiative (SBTi), positioning the Group as one of the first European steel companies to have its climate change mitigation efforts acknowledged by this prestigious organisation.

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. The detail of the solutions identified is available in the Report on Operations ***[Section 4.1.]***.

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.

In addition, the Group is engaged in numerous **Research and Development** activities to contribute to the development of new technologies capable of further mitigating its environmental impacts ***[Section 5.]***.

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 the Report on Operations ***[Section 4.2.]***.

[6] www.sciencebasedtargets.org

PHOTOVOLTAIC INITIATIVES APPROVED AND IN CONCLUSION		COMPLETION OF WORKS	POWER (MW)	TYPE	NUMBER OF MODULES
Feralpi Siderurgica	Lonato del Garda	April 2024	3.47	Roof-mounted	8,399
Acciaierie di Calvisano	Calvisano	July 2024	3.90	Roof-mounted + ground-based	7,127
Presider	Nave	May 2023	1.07	Roof-mounted	2,527
Nuova Defim	Anzano del Parco	August 2023	0.45	Roof-mounted	1,124

Physical and transitional climate risks

In addressing the climate transition, Feralpi Group is committed to assessing and mitigating the risks associated with the path described above. An in-depth description of these risks is presented in the Report on Operations ***[Section 10]***.

15.1.1.2. Measures for improving energy efficiency and greenhouse gas emissions

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.

COMPANY	ACTIONS AND MEASURES FOR ENERGY EFFICIENCY AND GHG EMISSIONS
Feralpi Siderurgica	In 2024, the start-up of the new roller way was completed, which, thanks to the efficient transport of billets to Rolling Mill 2, allowed a reduction in the energy required to heat them to the required rolling temperature. Operations to improve the cleanliness 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.
Acciaierie di Calvisano	In 2024, two ground-mounted photovoltaic parks were built on owned land for self-consumption, which will be connected to the grid during 2025. In addition, a new ladle heating system with regenerative burners was installed, reducing the specific consumption of methane gas. At the same time, preparatory work started on the installation of a second heating station with the same characteristics, which will be installed in 2025. Also in 2024, the compressor overhaul campaign, with a view to reducing energy consumption, was concluded with the replacement of the last compressor.
Presider	In 2024, the 1 MW photovoltaic plant on the roof of the Nave factory was connected to the grid and started up. A new warehouse has been completed at the Pomezia site, and evaluations are underway for the installation of a photovoltaic system of approximately 400 kW on its roof, in addition to the existing 347 kW system. In 2025, work is scheduled to start on the roof of the Borgaro Torinese plant for the construction of a 2MW photovoltaic plant. At the same time, work will also take place to re-roof the plant to accommodate the new system.
Arlenico	In 2024, the internal heat recovery system of the rolling mill's reheating furnace was replaced. The new recuperator, which came into operation in 2025, will optimise the furnace cycles by improving energy consumption and reducing heat loss to the environment.
Nuova Defim Orsogril	At the Anzano al Parco site, activities for the installation of the photovoltaic system on the roof of the plant were completed in January 2024. In addition, efficiency work continued on the use of hydraulic power unit oils. In 2025, possible actions to improve the efficiency of the compressed air distribution network at the Anzano al Parco and Alzate Brianza sites will be evaluated.
ESF Elbe-Stahlwerke Feralpi GmbH	In 2024, work continued on the new Rolling Mill B, the first K-Spooler plant in Germany capable of producing 8-tonne coils, whose roller with induction furnaces was created. The plant will be completed and commissioned in early 2025. The new scrap sorting and preparation plant went into operation in February 2024, enabling both the efficiency of steel production through EAF and the reduction of waste production. The next steps in the process are currently being defined. Work continued on the new power plant, which will provide the necessary energy for the new production layout and will be completed in the first half of 2025. For its construction, Siemens' blue GIS (*Gas Insulated Switchgear*) technology was used, which involves replacing fluorinated gases with a pure air-based insulator that can be directly released into the atmosphere. Activities continued related to the logistics of the new layout of the site, with the construction of new internal road and rail links with the aim of optimising the flow of materials and improving safety at work. The project will continue in the coming years. Testing activities concerning the possible use of hydrogen in its production processes have been postponed due to the dynamics of the relevant market. In 2024, the German government took the decision to connect the Riesa plant to Germany's hydrogen backbone network; the connection should be completed by the end of 2027.

15.1.1.3. Emissions into the atmosphere

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.

Feralpi Group's production activities are regulated by air emission regulations at the local, national, and European levels. Aware of the environmental impact of its operations, the Group is committed to managing these emissions correctly, in line with European pollution reduction objectives[7]. This commitment translates into strict compliance with current regulations and constant monitoring of the emissions generated at all Group plants.

Specifically, the chimneys at the steelworks are equipped with 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 2024, at Acciaierie di Calvisano, a new suction hood for the electric furnace was installed, leading to improved efficiency in capturing waste fumes and separating the dusty fraction, thus contributing to enhanced plant performance in terms of emissions.

15.1.1.4. 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 2024, uncertainties persisted in both the infrastructural and social spheres, largely because of numerous rail strikes and the significant increase in 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 and, for Presider, related installation work is in progress 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.

In 2024, despite not being subject to the decree, a Mobility Manager was appointed for the Feralpi Siderurgica site in Arlenico, and the associated PSCL was drafted, in addition to the external Mobility Manager already present.

[7] With the action plan "Towards zero pollution for air, water and soil", the European Union has set itself the ambitious goal of reducing pollution to sustainable levels for the planet by 2050. https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A52021DC0400

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.

15.1.2. Management of water resource

Water management is essential for the steel industry, especially for plant cooling. Feralpi Group implements stringent monitoring and reporting standards for the responsible use of water resources, reducing withdrawal and consumption and promoting reuse in industrial processes. In Italy, the treatment and discharge of water are guaranteed 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 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, the new sludge treatment facility at rolling mill 1 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 a cistern began in 2024 to capture rainwater from the roofs of warehouses built for the new rolling mill B. This facility, with a capacity of 350 m^3, will enable the recovery and reintroduction of rainwater in the cooling and process circuits, allowing savings of about 6,000 m^3 of potable water from the public network each year. The new cistern is scheduled to come into operation in 2025.

In 2024, the volume of water withdrawn and discharged from sites with hot works was 3,131.75 ML (3,131,750 m^3) and 480.09 ML (480,090 m^3). The 2023 data indicate a 72% reduction in the discharged volume, attributed to the new direct cooling water treatment circuit that started operating at the Arlenico site in January 2024.

Hydrological context

Feralpi Group has assessed the risk of water stress in its facilities that use water for production purposes (Feralpi Siderurgica, Acciaierie di Calvisano, Arlenico, ESF Elbe-Stahlwerke Feralpi GmbH).

The analysis was based on the **Aqueduct Water Risk Atlas** of the **World Resources** Institute and on **GCM-RCM climate models**, 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.

Soil and groundwater protection

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.

SITE	WATER BASIN	WATER STRESS RISK (CURRENT - 2024)	WATER STRESS RISK TO 2050
Feralpi Siderurgica *Lonato del Garda, Brescia*	Oglio (Po)	High	High
Acciaierie di Calvisano *Calvisano*	Oglio (Po)	High	High
Caleotto *Arlenico*	Adda - Lake Como (Po)	Low	Medium-High
Feralpi Stahl *Riesa*	Elba	Low-Medium	Medium-High

● High ● Medium-High ● Low-Medium ● Low

15.1.3. Biodiversity

Aware of the importance of biodiversity and ecosystems for the well-being of present and future society, as well as their rapid decline which threatens both nature and people, Feralpi Group has initiated a process to assess the impacts and risks to biodiversity and ecosystems in the areas in which it operates. Through climate change mitigation and adaptation actions, the Group is committed to actively contributing to the conservation of biodiversity by addressing the main causes of its loss.

Thanks to its international presence, the company aims to promote initiatives not only within its own value chain but also beyond, encouraging a widespread and shared commitment.

In line with the Taxonomy Regulation ***[Section 15.3]***, the Group has examined the position of its sites concerning protected areas. The analysis revealed[8] 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 complete information can be found in the ***Appendix [Section "Environmental Sustainability Indicators"]***.

In 2024, a working group was established at the Group level dedicated to this topic, which in the coming years will delve into the analyses and assess the opportunity for potential further improvements, in order to reduce the impact of the Group's activities on biodiversity.

The working group, which includes representatives from all Feralpi Group companies, aims to craft a unified strategy to address the issue and ensure consistent action across the board: therefore, by 2025, it plans to develop guidelines to guide the actions of the various companies within the Group.

In addition, biomonitoring activities through pollinating insects continue at the Lonato del Garda site: in 2024, the number of hives has doubled, increasing from four to eight.

The objectives of reducing the impact of the Group's activities on biodiversity can be achieved through two main enabling factors:

- **Strategic collaborations** with customers, suppliers, universities, institutions and research organisations, to identify new opportunities, develop innovative methodologies, and promote useful tools within the sector.
- **Active involvement of employees and communities** through training, communication, and awareness-raising on sustainable behaviours, as well as local development initiatives with a focus on climate adaptation.

15.1.4. Circularity and zero waste: material and energy management and enhancement

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. 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.

The steel produced by Feralpi Group consists of **98.6%[9] recycled, recovered, or by-product material**. The calculation is also made for the aggregates produced by the Group, which have the following values:

[8] To carry out the study, the "European protected sites" database of the European Environmental Agency was used, which provides a comprehensive overview of protected sites in Europe. The database is available at the following web address https://www.eea.europa.eu/data-and-maps/explore-interactive-maps/european-protected-areas-1.

[9] 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 (≥ 98.9%); Acciaierie di Calvisano (special steels ≥ 98.6%; construction steels ≥ 98.9%); ESF Elbe Stahlwerke Feralpi GmbH (≥ 98.7%).

≥ 96.6%

GREEN STONE (BLACK SLAG)

≥ 100%

GREEN LIME (WHITE SLAG)

≥ 100%

GREEN IRON (SCALE)

Total recycled, recovered, by-product content

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.

15.1.4.1. Measures to improve circularity

The process of steel production is continually advancing due to the adoption of increasingly sophisticated solutions that optimise resource utilisation and reduce the environmental impact of production processes. An essential aspect of Feralpi Group's strategy is the repurposing of waste materials, not only from its own productions but also from other supply chains, thereby promoting a circular approach that values residues as new resources.

Feralpi Siderurgica

In 2024, the **new sludge treatment plant at Rolling Mill 1** went into operation, which allows sludge to be obtained with less moisture, thus favouring the recovery and saving of water and reducing the amount of solid residues to be sent for recovery. Refinement activities of the plant, which will be fully operational in 2025, are ongoing.

In line with the Group's strategy to reduce the use of virgin raw materials, the **use of manufactured products containing artificial aggregates in the plant and in resurfacing operations continues**. Investments continue targeted at the continuous streamlining of scrap processing in order to boost the efficiency of the electric furnace.

In September 2024, the Lombardy Regional Council approved the guidelines for the management of white waste from secondary metallurgy, the result of the work of the related working group within the Observatory for Climate, Circular Economy and Ecological Transition, which saw the involvement of various stakeholders including the Feralpi Group.

Acciaierie di Calvisano

During 2024, the **silo for the furnace-blowing of technopolymers** derived from the processing of plastic waste came into operation, almost completely replacing coal for slag swelling.

Arlenico

Work continued on the **district heating project**: construction of the plant was completed in 2024 and it is expected to receive the necessary permits for start-up in 2025. Also in 2025, the installation of an external heat recovery boiler for the district heating system is planned for early in the year.

In addition, the replacement of the internal heat recovery system of the rolling mill's reheating furnace will optimise furnace cycles by improving energy consumption and reducing heat loss to the environment.

ESF Elbe-Stahlwerke Feralpi GmbH

Work continued on the **reuse of white slag**, which, thanks to the optimisation of the internal treatment process (screening, crushing, multi-stage magnetic separation), is now completely redirected to the concrete industry. Tests to replace hard coal with bio-coal also continue.

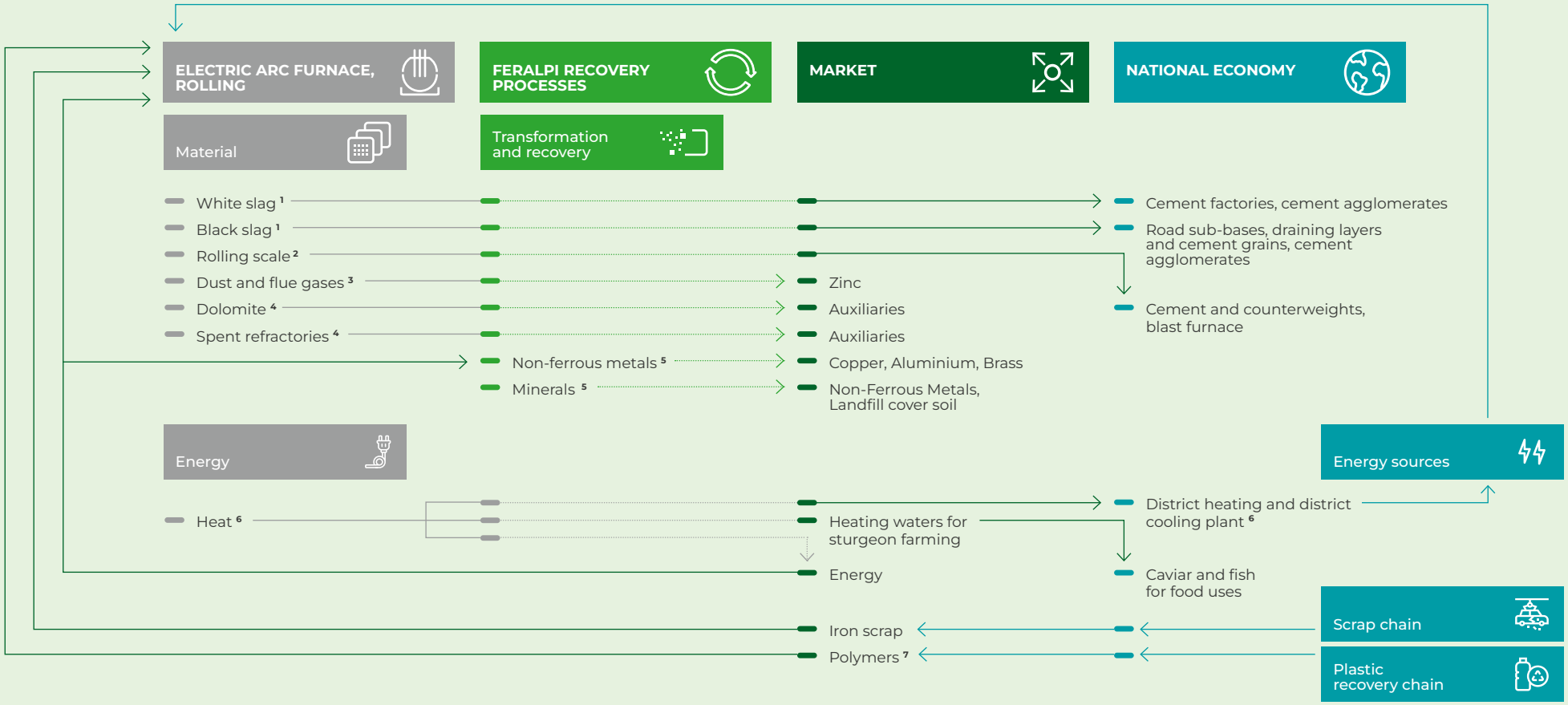
A project to recover about 3MW of waste heat from the cooling tower of the Riesa plant is being evaluated.

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.

FERALPI STEEL

The steel produced by Feralpi is **98.6%** recycled material.



[1] **BLACK AND WHITE SLAG:** Feralpi is conducting further studies to develop processes for the reuse of white slag in building limes, plastics and within production processes.

[2] **ROLLING SCALE:** La scaglia di laminazione viene avviata : 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 minerals. The dust produced by the ferro-alloy plant are fed directly into the production cycle, the amount of which equals that of the materials from which dust originates.

[4] **DOLOMITE AND SPENT REFRACTORIES:** I refrattari esausti provenienti da demo- 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.

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 refractories from ladle demolition are fed back into the production cycle to partially replace lime and dolomitic lime ("CaO lump' and 'CaO 40%"), the use of which has no negative impact on the environment or human health.
Recovery of dust and fumes to reduce the demand for mineral zinc	Fume abatement dust from the smelting process is largely treated at external plants to recover zinc metal, while that from the ferroalloy plant is reintroduced into the production cycle.
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 new 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 is outsourced. In Lonato del Garda, black slag is processed into '*Greenstone*', a CE 2+ marked product with Environmental Product Declaration EPD, used in construction to replace materials of natural origin. Also at the Calvisano plant, the black slag is recovered for the production of CE 2+ certified products. The utilisation of the white slag residue 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 cooling water and the melting furnace, respectively. Feralpi Siderurgica uses it to heat indoor buildings and, in cooperation with the local administration, also public and private facilities. The plant in ESF Elbe-Stahlwerke Feralpi GmbH produces up to 30 t/h of steam, which is supplied to Goodyear Dunlop Tires via the municipal company 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. At the Arlenico site, a district heating project is underway that includes a plant to recover heat from the thermal waste from the rolling mill, flanked by a second hub in Valmadrera, where heat from waste-to-energy will be reused instead of being dispersed.

15.2 The environmental sustainability of Feralpi Group products

Feralpi Group's industrial strategy integrates a responsible approach to social and environmental issues, with the aim of **providing increasingly comprehensive, integrated, and sustainable steel solutions**.

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. In fact, this approach not only enables access to specific market segments but also **aids their customers in** adhering to the environmental standards they must meet, thereby fostering the dissemination of progressively higher environmental performance across the entire value chain, up to reaching the final customer.

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 ***[Section 15.1.1]*** to offer a full range of these products, collaborating with leading international partners.

This is why, over the years, the Group has implemented methodologies to assess the environmental impact of its products, so as to be able to identify the main drivers and evaluate the most appropriate mitigation measures along its supply chains. The studies were performed employing the **Life Cycle Assessment** methodology, in accordance with ISO 14040 and ISO 14044 standards and known as the "cradle to gate" framework, which examines all stages of the product life cycle from raw materials to when it exits the company site.

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 - *Environmental Product Declaration*)** 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 Feralpi Siderurgica, Acciaierie di Calvisano, Presider 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.

Both tools, **EPD and CFP, provide a comprehensive assessment of environmental impact**, allowing the environmental performance of products to be transparently communicated and gaining a competitive advantage in the market. While the EPD provides a holistic view of a product's environmental performance, the CFP allows for an in-depth examination of the climate impact stemming from greenhouse gas emissions associated with the product's life cycle.

15.3 Taxonomy Regulation

The European Taxonomy[10] 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 2024 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.

The full results of this analysis, a summary of which is presented in the table below, are available in ***Appendix [Section "The Taxonomy Regulation: Evaluation and KPI Tables"]***.

TURNOVER	UdM	2024	2023	Δ
Taxonomy-aligned	**%**	**0**	**0**	**-**
Taxonomy-eligible	**%**	**95.92**	**96.11**	**-0.19**
Manufacture of iron and steel	%	95.91	96.10	-0.19
Power generation using photovoltaic solar technology	%	0.01	0.01	-
Taxonomy non-eligible	**%**	**4.08**	**3.89**	**+0.19**
CAPEX				
Taxonomy-aligned	**%**	**0**	**0**	**-**
Taxonomy-eligible	**%**	**98.89**	**97.97**	**+0.92**
Manufacture of iron and steel	%	97.43	93.72	+3.71
Power generation using photovoltaic solar technology	%	1.45	4.23	-2.78
Production of heat/cooling using exchange heat	%	0.02	0.02	-
Taxonomy non-eligible	**%**	**1.11**	**2.03**	**-0.92**
OPEX				
Taxonomy-aligned	**%**	**0**	**0**	**-**
Taxonomy-eligible	**%**	**98.24**	**98.01**	**+0.23**
Manufacture of iron and steel	%	98.24	98.01	+0.23
Taxonomy non-eligible	**%**	**1.76**	**1.99**	**-0.23**

[10] Regulation (EU) 2020/852

Social information

16

SOCIAL INFORMATION

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. We honour the uniqueness and differences of our people, aiming for harmony and respect, true to our founding motto of “growing with respect for people and the environment”.

Commitment to the growth and development of people | Pillars

Attracting talent
Diverse recruitment formats, offering professional growth and development in a safe and stimulating working environment.

Developing competencies
Promoting a culture of continuous learning through quality training for employees and supporting the younger generation for conscious growth.

Ensuring a positive working environment: safe, inclusive and respectful
Investing in the safety, health and well-being of its people, implementing effective management systems, offering structured welfare and reconciliation measures in an inclusive environment.

Valuing potential
Professional development plans with targeted training, succession planning, performance management tools and fair policies aligned to employee performance and contribution.

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:

Technical area organisational development
GROUP TECHNICAL DEPARTMENT

Inclusion of new staff
TALENT ATTRACTION PROJECTS

Technical skills development
TALENT DEVELOPMENT

16.1 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 2024, 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. As at 31 December 2024, Feralpi Group's staff reached 1,986 people, an increase of 3.3% compared to 2023, with a balanced distribution between Italy and Germany and a lower presence of workers from other countries.

In particular, in 2024, FERALPI STAHL continued its efforts in researching and recruiting mechanics and electricians to support the expansion of the production site with the new Mill B. The company continued to hire Ukrainian refugees with technical skills, reaching a total of 40 people by the end of the financial year, and strengthened collaborations with agencies to recruit technical staff from abroad, promoting their integration into society and the workforce in Germany.

To promote a shared corporate culture and a sense of belonging within Feralpi Group, the new **Induction Training** module for newly hired staff at the Group's Italian companies became operational in 2024.

The one-day module ends with the delivery of a **welcome kit**, a symbol of the company's values and vision.

Group Technical Excellence

Group Technical Excellence activities continued in 2024, a project forming part of Feralpi Group's

Group Technical Department

The Group Technical Department is the central structure for the implementation of strategic investments, including those dedicated to the management and development of personnel skills, and is the heart of the Group's technological expertise.

MakeTheDiffHERence was launched in 2024 as a new edition of the *Technical Graduate Programme*, the first dedicated to the inclusion of new female engineers. Spanning 20 months, the training course will deliver 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.

Talent Attraction & Development

With the aim of attracting talent, 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.

Active recruitment formats

1. **Technical Graduate Programme**: development of specialised skills for young technicians with engineering degrees.
2. **Operation Graduate Programme**: development of technical team and soft skills.
3. **Sider+**: transfer of basic skills to access selection processes for the company's production areas.
4. **Sider+ Advanced**: development of intermediate technical skills for the steel industry for candidates with basic skills.
5. **Future4Steel (IFTS)**: highly professional training by the Steel Academy to train "Experts in installation and maintenance techniques in civil and industrial plants".
6. **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.
7. **Special recruitment projects (for professional clusters)**: recruitment and selection targeted at different professional clusters at national level.
8. **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. Through the collaboration of the different actors, the Academy promotes the sharing of skills for the mutual growth of its collaborators. The training catalogue is continually evolving and consists of **thirteen modules** that are regularly updated and divided into five areas: Management Training, Personnel Management, Leadership Development, Technical-Specialist Training and IFTS Courses. The participation of the Group's staff takes place both in specific programmes dedicated to Feralpi Group companies and intercompany programmes.

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

Main training initiatives

FERALPI BOOTCAMP

Through **Feralpi Bootcamp**, a series of autonomous but complementary initiatives, Feralpi Group promotes **training and orientation initiatives for conscious growth aimed at employees' children, work experience programmes and advanced training through ITS and IFTS**.
In 2024, Alternanza Scuola Lavoro (work experience during the school year) projects were implemented, with a total of six weeks spent at a company for each participant, enriched by 52 hours of classroom-based training also related to soft skills aspects for personal growth.

PROJECT STEELWOMEN

Feralpi Group is committed to recruiting female staff in all company areas, including technical areas. In 2024, a project to recruit operators in the production areas continued in 2024, with a specific focus on primary steelmaking, with the objective, 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). This objective was extended to FERALPI STAHL. The SteelWomen project received the following awards: SDGs Leader Awards, the Winning Equality Award at the Lombardy Region, with specific mention for women's empowerment, and the Mention Award at the SIMA Management Conference, a major international management conference.

SUCCESSION PLANNING

In 2024, 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, came to an end and the new Corporate Managerial Training Programme was designed in cooperation with TEHA - The European House - Ambrosetti.

FERALPI PRO

The **Feralpi PRO** system, which a**llows personnel skills to be mapped**, monitored and efficiently managed through a dedicated management application, is now operational in all Italian primary steel companies.

16.2 The health and safety management at the workplace

For Feralpi Group, worker safety is a top priority. 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.

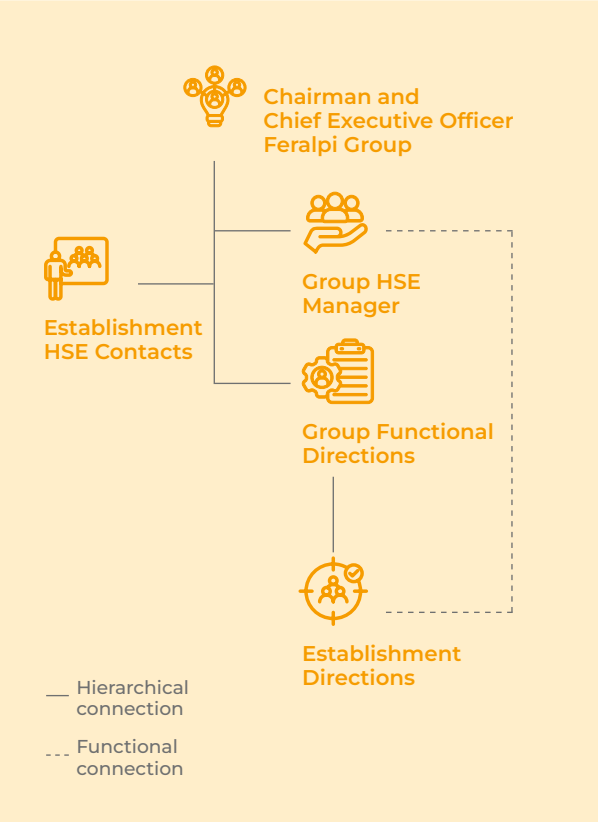
The company is constantly committed to raising awareness of safety issues and reducing risk through training, constant monitoring and targeted initiatives that enable continuous improvement of working conditions.

The Group HSE Manager is tasked with guiding and coordinating safety, environment, and energy issues 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 issues 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.

Feralpi Group ensures healthcare coverage at all major locations with both nursing and medical staff available. In 2024, due to the substantial occupational presence, the service at the Riesa site was extended to include a nurse available throughout the entire day. Furthermore, 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.

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 integrated safety, environment, and energy management system certified according to the ISO 45001 international standard has been implemented, which ensures the constant monitoring of risks and the identification of improvement measures.

The goal of Feralpi Group for the coming years is to extend the ISO 45001 certification to all its sites: the certification of the Calvisano and Lecco sites is expected in 2025, after completing the first step in January. The Riesa site is undergoing a management system enhancement process, with the goal of securing the ESF Elbe-Stahlwerke Feralpi GmbH Safety Management System certification in 2026. Subsequently, it will also be extended to Feralpi Logistik and Feralpi Stahlhandel.

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.

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.

With regard to contract work, all companies have specific procedures for the technical and professional assessment of contractors and the management of interference risks. Before any activity is contracted out, a check is conducted on the possession of the technical and professional requirements of the chosen company and its subcontractors, if any, by acquiring a series of documents attesting to the correct obligations required by the competent bodies, and coordination meetings are held with supervisors/employers of the parties, to eliminate or reduce any risks identified.

In January 2024, a fatal accident occurred at the Lonato del Garda site involving a worker of an external company that has contracted out, with its own staff and equipment, the entire activity of handling slag from steel melting. The event occurred during slag container handling operations. Due to causes which are being looked into by the investigating bodies, during one phase of the operation, the crate containing the incandescent slag tipped over towards the vehicle used for transport, resulting in it catching fire and the death of the driver of the vehicle.

Companies located in Riesa adopt an external companies management manual signed by the Top Management of ESF Elbe-Stahlwerke Feralpi GmbH and the workers' representative that encompasses all procedures pertaining to safety, and an information sheet with rules of conduct for visitors and the workers themselves is prepared in each company, presenting safety equipment, directions in case of emergency, signs and emergency exits.

Feralpi Group maintains constantly monitored and updated information on reported accidents, emergencies, and near misses by processing and disseminating data on the indicators of the frequency and severity of accidents that have occurred through tools set up for periodic internal reporting.

16.2.1. We Are Safety

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 **10 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, to record and monitor compliance with the rules of the Decalogue and observe the progress trends.

In 2024, the "We Are Safety" project was extended to the Acciaierie di Calvisano and Arlenico sites, based on a similar format to that adopted at Lonato del Garda. At FERALPI STAHL, the efforts to enhance safety culture have come together under the "We Are Safety" banner, and methods of replicating the format to adapt it to the needs of the German sites are being assessed.

In 2024, a strategic decision was made to extend cultural safety training activities to the main external companies operating at the Group's plants, starting with the site at Lonato del Garda. In 2025 this approach will be extended to the Calvisano and Lecco sites.

16.2.2. Interventions in sites to protect safety and the workers

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.

As part of the Group strategy, a continuous improvement process was initiated, initially tested on pilot sites. In 2024, several sites, including Lonato del Garda and Calvisano, embarked on experimental projects focused on optimising logistics and ground handling.

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.

At the same time as the changes to the production layout at the Riesa site, **ESF Elbe-Stahlwerke Feralpi GmbH** continues updating the signage for the newly constructed buildings and plants and those under construction. Steps are also being taken to improve translations of relevant health and safety documents into the different languages of the site's staff, given the increasing presence of non-German-speaking workers, visitors, and contractors on the site (in particular contractor management documents).

16.3 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 in the **WHP network - Workplace Health Promotion** - a European initiative implemented at a regional and provincial level since 2013. In this context, over the years, initiatives have been carried out in collaboration with competent local health authorities and Confindustria, 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 2024, **Presider's Turin headquarters received accreditation from the WHP Network, the first in the province of Turin**, thus joining the Group's Lombard companies.

Total Worker Health (TWH)

In 2024, Feralpi Group began 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. The programme consists of a comprehensive three-year evaluation of the impact on the health and safety of its people, encompassing the analysis of various social, political, and economic factors: residence location, workplace, quality of the surrounding environment, genetics, lifestyle, income situation, and education level. Following the formation of the project's Steering Committee, which includes representatives from the workforce, the company, and the University of Brescia, all Feralpi Siderurgica staff were given a questionnaire to investigate the psychophysical health of the employees. At the moment, the findings of the investigation are being analysed to identify the most appropriate actions to undertake.

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 2024, these benefits were incorporated into second-level bargaining at Feralpi Siderurgica.

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, which allows staff to obtain social vouchers to cover care expenses specified in the calls.

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.

16.4 Diversity, Equity, Inclusion

Aligned with its Code of Ethics, which pledges to avoid any form of discrimination, Feralpi Group regards it as imperative to address matters related to diversity and inclusion (D&I), believing that the **uniqueness of individuals** represents an absolute value. The integration of varying perspectives from its people acts as a leverage point that stimulates innovation and the promotion of a more inclusive, attractive, and consequently, productive work environment.

This belief has prompted the Group to adopt a dedicated policy structured around four pillars, guiding its efforts to promote the principles of Diversity, Equity, and Inclusion (DEI) both internally and externally.

DEI Policy | Pillars

Global Culture
Integration of different backgrounds.

Gender balance
Equal opportunities between genders and encouraging women to pursue scientific careers.

Inclusive leadership
Inclusion of people in their uniqueness.

Collective responsibility
Partnership with the territory to increase the values of inclusion.

Main Diversity, Equity and Inclusion initiatives

WE ARE TOGETHER

Internal campaigns dedicated to inclusion issues continued. The **We Are Together - Getting to Know Each Other** campaign provides for awareness-raising and cultural growth activities on the topics of inclusion, listening and internal dialogue aimed at all Feralpi Group personnel. In 2024, it was completed in Acciaierie di Calvisano and Presider, while in 2025 it is scheduled for completion in Feralpi Siderurgica and will continue in FERALPI STAHL. The second campaign **We Are Together - Inclusive Leadership**, which offers specific insights for managers and corporate leaders on D&I issues, involved all Italian Group locations in 2024, and will be extended to FERALPI STAHL in 2025, once the first campaign is completed.

DEPLOY YOUR TALENTS

In 2024, Deploy Your Talents continued in cooperation with Fondazione Sodalitas. The project is dedicated to the dissemination of STEM subjects with a view to combatting gender stereotypes, in order to increase the number of women employed in technical-scientific professions, through meetings aimed at students at local high schools, who have the opportunity to meet Feralpi Group engineers and experts during which they share their work experiences and answer students' questions and curiosities.

STEM IN GENDER

In 2024 Feralpi Group participated in the 'STEM in Gender' project of the University of Brescia in cooperation with the Chirone association as part of the Practical Community network ***[Section 14.4.2.]***. The project, with a view to overcoming gender stereotypes in the STEM field, envisages educational and awareness-raising meetings aimed at male and female students from primary schools in Brescia.

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.

In 2024, the **Ambassador D&I Group**, dedicated to the active promotion of D&I principles within Feralpi Group, reached 39 members, representing all the Group's companies, and was selected as a **best practices** by the UN Global Compact Network Italy.

In 2024, FERALPI STAHL participated 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 has been appointed ambassador of the initiative for the federal state of Saxony.

16.5 Human rights in the workplace and along the supply chain

16.5.1. Human rights in the workplace: protection, recruitment, pay

The **Code of Ethics** defines the corporate moral and behavioural rules. 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. Collective bargaining applies to all personnel in companies based in Italy, Germany, Spain, and France, which corresponds to **96.27%** of the Group. In Germany, the Works Council is in charge of protecting workers' rights, promoting the inclusion of foreign workers, and the integration of people with disabilities.

For its Talent Attraction activities, Feralpi Group operates according to the principles of equal opportunities and, more generally, diversity inclusion. In Italy and Germany, the remuneration structure includes, in addition to the basic remuneration provided for by the national collective agreement, company supplementary agreements that improve conditions for **98.13%** of employees, excluding only managerial roles.

16.5.2. Human Rights along the value chain

Respect for human rights along the value chain is a fundamental issue for Feralpi Group, as it involves a range of activities and relationships that can have significant impacts on the lives and well-being of the people involved at each stage of the production process.

For this reason, in 2021, the Group established its own **Human Rights Policy**, committing to promote and implement human rights principles throughout its supply chain, consistent with the Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, the Ten Principles of the Global Compact, and the ILO Declaration on Fundamental Principles and Rights at Work.

In particular, Feralpi Group is committed to creating safe and healthy working conditions for contractors and subcontractors. To this end, it asks suppliers, with whom the Policy is shared at the contractual stage, to recognise the importance the Group attaches to human rights, requiring them to accept the **Code of Ethics** and to undertake to respect its values and principles. Likewise, Feralpi Group collaborates with its clients to ensure respect for human rights throughout the entire downstream chain, combating all forms of violations.

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.

Since 2018, Feralpi Group 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 96.6% of the scrap suppliers for Italy in 2024. 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.

The initiative continued with the "**Feralpi Scrap Suppliers Dialogue**" project, aimed at sharing the Group's sustainability strategy through dedicated company meetings, the planned investments in the business plan, and the stakeholder engagement policies and worker relations, including the aspect of human rights. In 2024, additional internal audits were conducted to evaluate the practices of scrap suppliers, while also enhancing their awareness of the impact of their actions in terms of sustainability and the strategic role they play within Feralpi Group value chain.

The goal of this pathway is to integrate "sustainability as standard" into procurement processes, reducing ESG risks and identifying opportunities for continuous improvement. Therefore, in 2024, the Group expanded this initiative to its **strategic suppliers** - covering ferro-alloys, electrodes, lime, aluminium, refractories, and plants - by involving them in a sustainable development journey, beginning with ESG mapping in collaboration with the Open-ES partner.

This vision gave rise to the **Feralpi Value Alliance**, a project focused on integrated sustainability throughout the entire value chain, transforming the relationship with strategic suppliers into a partnership based on ESG (environmental, social, and governance) criteria. Through a collaborative and strategic approach, the initiative aims to improve 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. The latter embodies a digital alliance involving the industrial, financial, associative, and institutional realms, supporting companies in their pursuit of sustainability and fostering collaboration and progress across the entire value chain.

16.5.3. The path to Due Diligence process along the value chain

In 2023, Feralpi Group, in collaboration with its strategic partners, undertook two fundamental projects to implement a structured Due Diligence process, in line with forthcoming European directives - includ-

ing the *Corporate Sustainability Reporting Directive (CSRD)* and the *Corporate Sustainability Due Diligence Directive* (CSDDD, which will affect Feralpi Group starting in 2029) - in addition to the German law on due diligence along the supply chain (Lieferkettensorgfaltspflichtengesetz - LkSG). In response to these new regulations, the Group adopted a proactive approach, completing an in-depth gap analysis in 2023. This activity identified the crucial areas of improvement needed to align with the currently discussed text of the Due Diligence Directive, creating a solid basis for the development and implementation of an effective action plan.

In 2024, the Group started implementing some areas of improvement identified in the 2023 assessment, adopting a proactive approach in preparation for the new directive. The initiatives undertaken reflect Feralpi Group's continual commitment to strengthening its management practices along the entire value chain, anticipating regulatory changes, and promoting increasingly integrated sustainability.

During the year, the Human Rights Policy was updated and the Supplier Code of Conduct was drafted. Both documents will be approved in the first half of 2025. In particular, the **Code of Conduct seeks** to act as a clear guide for the Group's suppliers, establishing the principles that govern collaboration and setting clear expectations on key issues such as ethics, sustainability, safety, human rights, and environmental protection, thereby extending its responsibility throughout the entire supply chain.

The adoption of the Code, in addition to creating business relationships based on shared values, improves risk management within the supply chain, thanks to more controlled and qualified suppliers.

Throughout the year, the Group also collaborated with the *Working Group on Sustainable Procurement*, promoted by the **Global Compact Italia Network**, which involved 54 leading Italian companies in their respective sectors to draft a guide intended to help Italian companies steer their supply chains towards integrating sustainability in all its dimensions. The document "The drafting of a Supplier Code of Conduct" provides guidelines for the drafting of a tool to provide suppliers with a framework for governance and integrity, human rights, labour and the environment.

16.6 Creating value for the territory

Feralpi Group 's ESG strategy is based on a concrete commitment to social responsibility, conceiving the company as a shared heritage of the community. 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. In 2024, considering the main production sites both in Italy and abroad, the Group recognised 25.47% of its turnover to local suppliers.

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, institutions and public administration, educational, university and research institutions, sports associations and national non-profit organisations. During 2024, Feralpi Group contributed €5.4 million to support the communities through charitable donations and sponsorships.

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

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

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

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.

Continuing the collaboration with the Brescia Musei Foundation, the initiatives related to the work "***Steel World***" by the master Emilio Isgrò have continued. Following the December 2023 inauguration of the piece donated by the master, along with Feralpi Group, to the city of Brescia as a material bequest for the Italian Capital of Culture 2023, and placed in the sculpture park of the Viridarium, in 2024 the Group inaugurated a second, identical piece, installed within the Lonato del Garda production site. "*Steel World*" represents the terrestrial globe with the network of parallels and meridians, on which the artist erases the names of nations and cities, leaving only Brixia, to emphasise the Roman origins of the city. The project is the result of a synergy between art and business, with the aim of promoting culture and strengthening the bond with the community.

In line with the enhancement of the work, the Group has organised a cultural event, in cooperation with the Municipality of Brescia and the Brescia Musei Foundation, exclusively for its collaborators. During the meeting, actor and author Marco Paolini proposed a dialogue that, starting with his show "*We all live by the sea*", created a bridge to the "*Steel World*" of Isgrò, combining two artistic and cultural visions. The shared objective of inspiring reflection and change, by connecting culture and art with social behaviours and commitments to the environment, has sparked a moment of significant cultural value.

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.

Centenary of the birth of Carlotto Pasini, founder of Feralpi

In 2024, the Group marked the centenary of the birth of Carlo Nicola (Carlotto) Pasini, the founder of Feralpi Siderurgica and the entire Group, with a series of initiatives involving employees, the community, and those who continue to carry on his legacy. Throughout the year, gatherings have occurred both within and outside the group's companies, blending social and festive occasions with more personal moments dedicated to honouring the individual and the entrepreneur.

The common theme of these initiatives was the sharing of Feralpi Group's identity: an opportunity to revisit the company's roots, the journey and the transformations that have shaped the Group into what it is today, along with the values that have characterised its evolution. The whole year was based on the founder's motto: "*Producing and growing while respecting people and the environment*", a principle that continues to guide the Group's vision and strategic choices.

On 25 May, a commemorative celebration within the company (on the anniversary of his death) provided an opportunity to rediscover and share the foundational characteristics of Feralpi Group through the memory of the person who, along with other partners, brought the organisation to life. The event, enriched by personal testimonies and anecdotes from those fortunate enough to have known his human and professional qualities, served as an opportunity for the business community to come together. Local institutional and association representatives actively participated in the celebration, in recognition of Carlotto Pasini's contribution to the area's development and community.

The celebrations provided an occasion to honour the Valsabbine origins of the Group, with a walk in Odolo that brought together Feralpi Group members and their families, underscoring the importance of "family" as a central aspect of the Group's identity. In keeping with the past, a cycling event was organised from Lonato del Garda to Odolo, involving the Feralpi Cycling Group and the company's cycling enthusiast employees.

The initiatives were not aimed only at internal stakeholders within the organisation. In celebration of the centenary, an initiative was promoted to fund scholarships for young individuals, also with the aim of strengthening connections with universities in the regions where the Group operates - collaborating with the University of Brescia, the Milan Polytechnic (Lecco campus), and the Freiberg University of Mining and Technology - to support the professional development and academic excellence of graduates. The latter was the first to deliver certificates of merit and cheques to students during a ceremony held in December 2024.

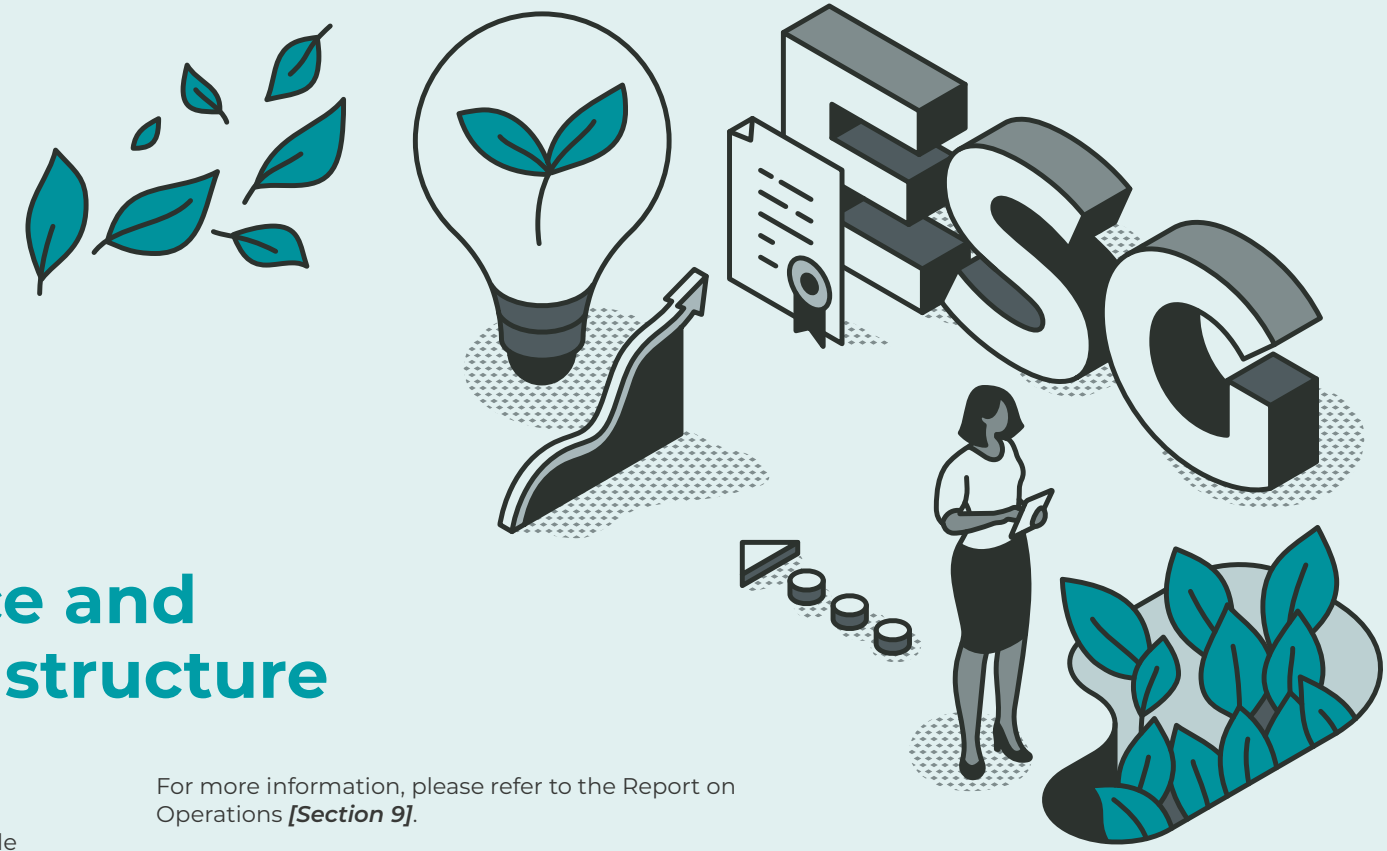
The bond with the community and the passion for sport are deeply rooted in the history of Feralpi Group and its founder. Upon the completion of the refurbishment of the Paul VI Oratory in Lonato del Garda, to which Feralpi Group contributed to support part of the extraordinary renovation works, a plaque was dedicated to Carlotto Pasini in memory of the contribution that he was able to generate, through the company, for the new generations and for the local community. A strengthened bond also through sport: local sports clubs in the area have similarly commemorated the founder through initiatives that celebrated his passions for cycling and football.

In cycling, the Feralpi Trophy has brought together young athletes from all over Italy, reaffirming the values of sacrifice and commitment typical of this discipline. After a four-year absence, the event took on special significance as it celebrated both the 50th anniversary of the Feralpi Cycling Group and the centenary of Pasini's birth, solidifying the bicycle as a symbol of passion and the transmission of values to future generations.

Football is also confirmed as a strong aggregation tool. Feralpi Group continues to support local teams A.C. Feralpi Lonato and Virtus Feralpi Lonato, strengthening the bond between the company and the territory. In addition, the professional club Feralpisalò, which has always been close to the community, has paid tribute to the founder by keeping alive the tradition of the "Steel Cup" Trophy dedicated to Carlotto Pasini.

Governance information

17



GOVERNANCE INFORMATION

17.1. Governance and organisational structure

17.1.1. Organisational Model

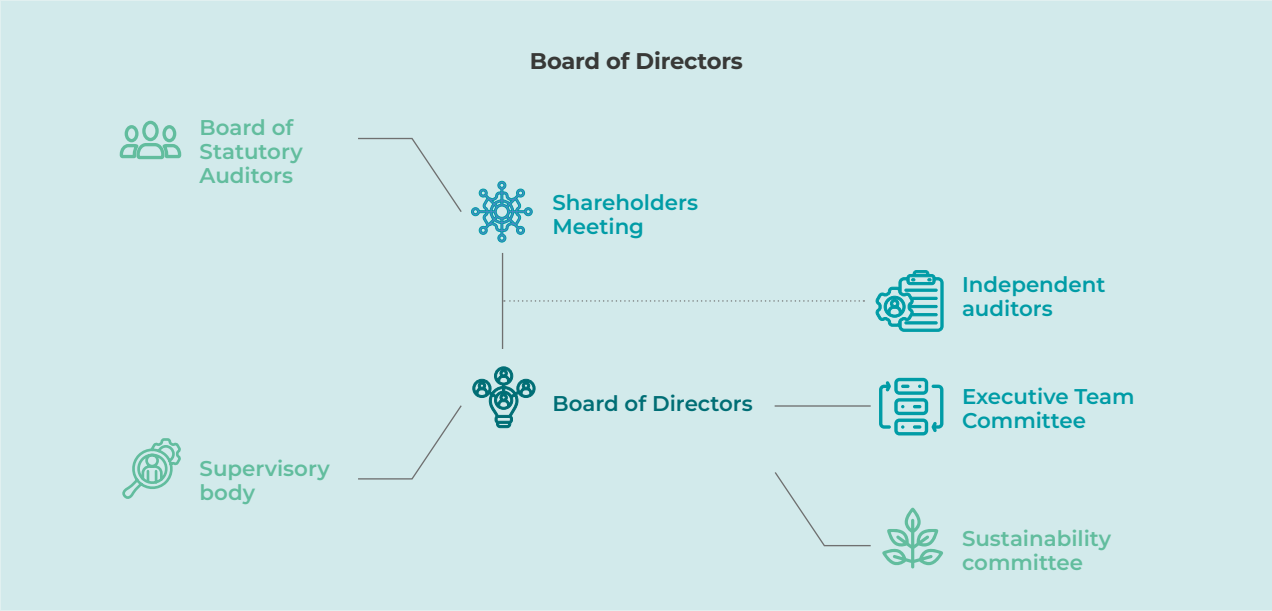
Feralpi Siderurgica S.p.A. is controlled by stable family shareholders and follows a traditional governance structure with corporate bodies such as the Shareholders' Meeting and the Board of Directors (BoD) of Feralpi Siderurgica S.p.A. and the Board of Statutory Auditors. Auditing is entrusted to a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

During 2024, the corporate reorganisation was completed, with Feralpi Siderurgica S.p.A. assuming the role of the Parent Company for the steel sector, without any significant changes in the management of operational activities.

For more information, please refer to the Report on Operations ***[Section 9]***.

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.



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.

The Board of Directors consists of nine members, seven 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 social groups represented on the Board. Details of the composition of the Board of Directors can be found in the ***Appendix (GRI 2-9)***.

The remuneration of board members is mainly fixed, but work is being done to introduce a more significant variable component. A specific procedure for the remuneration of members is being defined.

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.

Executive Team Committee

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

The Sustainability Management Committee

Feralpi Group has had a **Sustainability Management Committee** since 2014, which works in support of the Parent Company's Board of Directors with a view to continuous improvement of the sustainability path undertaken by the Group. Further information relating to the Committee and its composition can be found in ***[Section 17.5]***.

Supervisory Body (SB)

The 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 Nuova Defim, where it is single-member. As at 31 December 2024, the operating SBs are seven: Feralpi Siderurgica, Acciaierie di Calvisano, Nuova Defim, Presider, Caleotto, Arlenico and Fer-Par. 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. During the period under review, the Supervisory Bodies received no reports of violations of the 231 Model, the Code of Ethics, or incidents relating to corruption, environment, human rights, health, safety, and privacy.

17.2. Code of Ethics and Management Models

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. Feralpi Group's Code of Ethics, available on the Group's website, defines the company's internal and external ethical and social responsibilities and its values.

17.2.1. Organisation, Management and Control Model (MOG)

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. In 2024, the MOGs of Caleotto and Arlenico were updated.

On 19 February 2025, Feralpi Siderurgica S.p.A.'s Board of Directors updated its Organisation, Management, and Control Model in accordance with Legislative Decree 231/2001 by including the management of Procedure Number 11, "Management of the Use of Company Vehicles".
Following this update, the Organisation, Management and Control Model pursuant to Legislative Decree 231/2001 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.

17.2.2. Anti-trust Manual

Feralpi Group has prepared a specific Anti-trust Manual, complete with an Operational Handbook, containing principles and guidelines for personnel most exposed to antitrust risk. The antitrust programme is updated every two years, with annual training for all employees and calibrated audits on top executives. ESF Elbe-Stahlwerke Feralpi GmbH in Germany participates in the national industry association Wirtschaftsvereinigung Stahl to promote fair competition, whereas the other foreign subsidiaries adhere to Feralpi Group's principles and comply with local regulations. In the three-year period 2022 to 2024, nothing was contested against Feralpi Group companies. The next audit and training sessions have already been planned for 2025.

17.2.3. Whistleblowing

In accordance with Legislative Decree no. 24/2023, there is a dedicated channel for reporting offences, 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, Nuova Defim 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 2024, FERALPI STAHL launched a whistleblowing platform accessible to customers, suppliers, and employees, with the latter being informed via email. In 2024, no complaints were filed.

17.2.4. Managing and combating corruption

Feralpi Group rejects all forms of illegal activities and takes measures to prevent corrupt practices, in accordance with both national and international legislation. It aligns with its Code of Ethics, which underscores the values of transparency, truth, and honesty, alongside the standards for dealings with the Public Administration. For Italian companies, specific references can be found in the 231 Model. Throughout 2024, there were no incidents of corruption by the Group.

The Group adopts an internal procedure to regulate relations with the Public Administration and offers dedicated training to the sales staff. Companies operating in Germany follow local regulations, which require detailed communications to the state about risks of corruption and money laundering. Feralpi Group enforces the principle of double verification, involving multiple internal personnel for cross-examinations, and encourages combating corruption within the supply chain by urging suppliers to adhere to the Code of Ethics.

17.2.5. 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.

In 2024, the DPO of Feralpi Group coordinated initiatives to ensure compliance with data protection regulations, thereby supporting internal governance. During 2024, no relevant data breach events or complaints related to privacy breaches were reported.

17.3 Digitalisation and Cybersecurity

17.3.1. Digitalisation at Feralpi Group

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.

Feralpi Group has confirmed its dedication to creating sustainable value by planning further developments in activities related to sustainability, the reporting process, and wider ESG themes within its digital ecosystem.

17.3.2. Cybersecurity

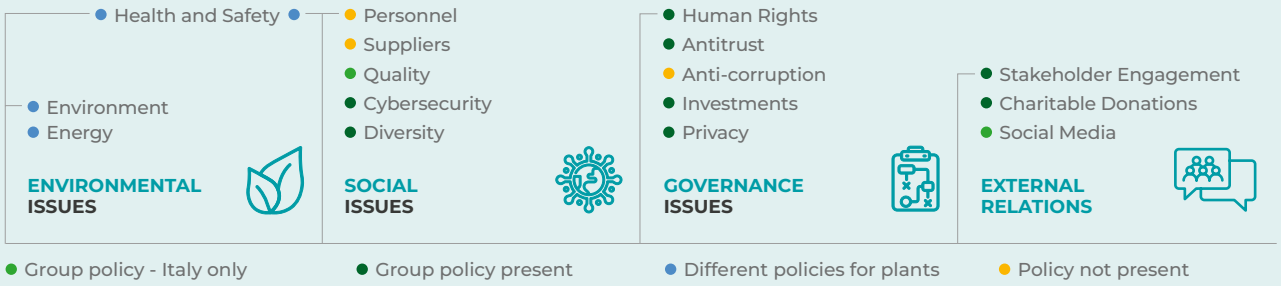
The increasing digitalisation of businesses, while improving operational efficiency, also poses risks to business continuity.

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 by the Russian-Ukrainian conflict, ongoing Middle Eastern turmoil, and elections across Western countries, 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.

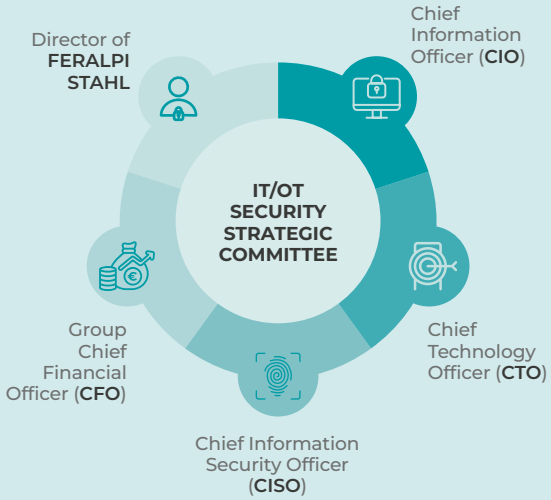
In 2024, the swift spread of generative AI technologies was facilitated by the adoption of *Large Language Models (LLMs)* by leading technology companies, extending into the consumer and mobile markets.

Group Policies



This dissemination has increased the risks of exposure of personal and corporate data, facilitating possible malicious uses of AI models.

At the regulatory level, regulations were introduced in 2024, such as Directive (EU) 2022/2555 (NIS2) and Regulations (EU) 2024/2847 (*Cyber Resilience Act* - CRA) and 2023/1230 (New Machinery Regulation), aimed at strengthening the resilience of national and supranational ecosystems against security incidents. Feralpi Group is evaluating the implications of these regulations for its activities. 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.



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, 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.

Cybersecurity measures

In the course of 2024, the activities dedicated to strengthening cybersecurity continued according to the three areas that characterise it: People, Processes, and Technologies.

Main cybersecurity measures

Group-wide continuation of the Training & Awareness programme, aimed at raising employee awareness and skills on cybersecurity risks through e-learning training activities.

Adoption of a Cyber Threat Intelligence service, aimed at preventing attacks directed at Feralpi Group, which, through continuous data collection, allows threats to be identified before they can cause significant damage.

The OT Security by Design initiative continues, 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.

Specific training on the security of industrial OT networks to personnel from the Industrial Automation, Maintenance Engineering and Information Technology sectors.

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. 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.

17.3.3. 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.

Main Automation measures

FERALPI SIDERURGICA	In 2024, automation activities focused on the energy efficiency of the production processes, working on the induction coils of Rolling Mill 1: modelling the relevant operating process made it possible to activate the furnaces according to the temperature of the incoming metal, instead of the passage of material. The first phase of the implementation of the Manufacturing Execution System (MES) at the bar line of the Lonato del Garda site was completed in 2024, while the new production line dedicated to the spooler is scheduled for completion in 2025. The aim is to achieve a more efficient analysis of diagnostic data and an acceleration of predictive analysis.
ARLENICO	The implementation of activities necessary for the development and integration of advanced automation systems for the new Garret line continues.
ESF ELBE-STAHLWERKE FERALPI GMBH	The burner control system of Rolling Mill A was replaced and new pressure measurement sensors were installed. Work also continued and is still in progress on the necessary automation systems for the new Rolling Mill B. The latter represents a key element in the Feralpi Group's development strategy, which in 2025 will focus its efforts on this plant with the aim of optimising its performance, increasing production efficiency and guaranteeing high standards of quality and sustainability. The integration of automation systems will be crucial to improve process control, increase operational safety and make the entire supply chain even more competitive in the context of the steel industry.

17.4 Governance and management of products and services

17.4.1. Product and service quality

The production of electric arc furnace (EAF) steel involves the use of scrap and other materials, including lime, ferro-alloys and refractories.

Quality, understood as the set of characteristics and properties of products, processes, or services that enable the customer's requirements to be met, is ensured by monitoring procedures that check incoming raw materials, the production process, and finished products.

The Group manages quality through specific KPIs for each business process. Management is in the hands of the Quality Department and plant management, cascading to other functions where necessary. The **Group Quality Manager**, together with the quality managers of the individual production units act to address quality aspects on the basis of the set objectives. All Group companies share the same **quality policy**. Complaints are handled by the **Quality Office**, which decides on technical acceptance, and the Sales Department on resolution with the customer.

Feralpi Group is committed to harmonising and integrating the various Quality Management Systems

of its companies in order to progressively develop a ***Group Total Quality Management (TQM) system***. The quality management systems of the Group's companies are ISO 9001 certified and are currently being aligned with the new guidelines published in 2024, which include the integration of risks due to climate change.

Through designated **representatives, Feralpi Group actively participates in the definition** of both national (UNI, DIN) and international (EN, ISO) standards and, through participation in sub-committees and/or working groups, keeps itself constantly updated on standardisation activities in the steel industry.

In 2024, Feralpi Group focused on the regulatory process necessary for marketing the **new product, Spooler**. During the first months of 2025, activities will take place to obtain the necessary certifications for its market release, initially in Italy and subsequently in the United Kingdom and France.

17.4.2. Qualification of suppliers

Scrap suppliers

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 qualification of suppliers is essential to guarantee compliance with contractual requirements and to satisfy customer expectations. A high quality of suppliers helps ensure transparency and regulatory compliance, improves market oversight, and enables more incisive and targeted business operations.

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 ***[Section 16.5.2.]***.

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 Group's scrap suppliers are traders and intermediaries who acquire materials from collection centres, demolitions, industries and car manufacturers, in compliance with current regulations. To address management and purchasing risks arising from the highly fragmented Italian scrap market, Feralpi Group focuses on establishing stable, long-term relationships with intermediaries specialising in scrap supply. In Germany, the strategic position of ESF Elbe-Stahlwerke Feralpi GmbH and the lower level of local competition for raw materials facilitate procurement, including from neighbouring countries such as Poland and the Czech Republic, thanks also to more structured suppliers who ensure safer and more efficient management.

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.

In 2024, internal audits continued at a selection of strategic scrap suppliers, where they were evaluated on various aspects such as the state of the facilities, the kind and amount of material handled, resources and operational procedures, as well as sustainability-related aspects.

The audit outcomes are collected into a technical report, which not only allows the Group to assess supplier practices but is also shared with them to identify potential areas for improvement and to raise their awareness of the importance of their actions in terms of sustainability, also in relation to the role of these topics in commercial relations with the Group. The objective is to gradually extend this practice to more and more suppliers.

Furthermore, the internal policy concerning scrap suppliers has been revised to incorporate EU Regulation 2023/2878, which has supplemented EU Regulation 833/2014 regarding the procurement of scrap from Russia.

Other supplier categories

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.

Reporting non-compliance

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.

17.4.3. Compliance with labelling regulations and information transparency

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.

Ongoing dialogue with customers, focused on understanding and **meeting their needs**, has resulted in all Group companies adopting a **card embedded with a QR code**, aimed at enhancing transparency by providing instant access to the product's technical and quality specifications as indicated on the label.

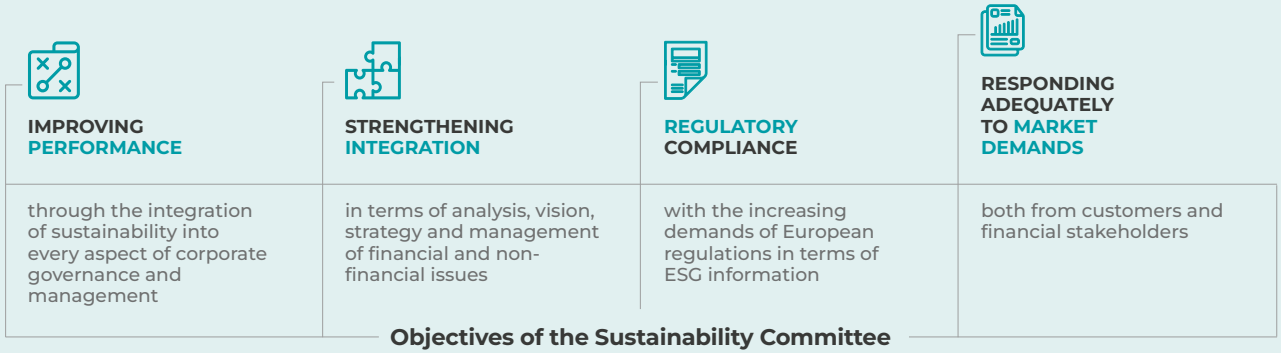
At the Group level, all products are evaluated to ensure compliance with technical regulations or customer specifications. Between 2022 and 2024, there were **no instances of non-compliance** with regulations or voluntary guidelines and codes related to information and labelling, nor were there any losses of certifications or reports from certification bodies.

17.5 Sustainability governance

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.

After its reorganisation in 2024, the Committee is currently composed of eight internal members (including the CFO and managers for HR, Environment, Health and Safety, and Sustainability) and three external members, including the Chairman of the Committee, who are experts in environmental, social, and governance issues. 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. In addition, 2024 saw the formal adoption of a regulation dedicated to the Committee, which was approved by the Parent Company's Board of Directors.



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 Report** 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.

17.6 Governance and management of environmental aspects

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.

The Group Energy Department manages regulatory and strategic aspects (e.g. energy procurement, renewable development, sale of white certificates) for energy-intensive companies and supports the others on supply contracts and regulatory aspects. Plant managers, together with EMS managers, coordinate the management of waste materials.

At the Italian sites, plant-specific procedures are followed, whereas at the Riesa sites, integrated and centralised management is adopted. The Scrap Purchasing and Environmental Protection Departments collaborate in the management of incoming waste.

17.6.1. Environmental management policies and systems

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 Group's facilities with the most significant energy consumption and environmental impact levels, given their process type and high production volumes are: Feralpi Siderurgica, Acciaierie di Calvisano, and ESF Elbe-Stahlwerke Feralpi GmbH, which are ISO 14001 and ISO 50001 certified, and EMAS registered. The Arlenico site, whose rolling mill is considered energy intensive due to the high consumption of methane gas needed to heat and process the billets, obtained ISO 14001 certification in 2024. Presider's Environmental Management System is certified according to the UNI EN ISO 14001 standard.

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. 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.

The management of waste and production residues mainly involves recovery and/or qualification as by-products, with only residual disposal in landfills. Processes and facilities are organised to minimise the volumes to be landfilled. Feralpi Group is also committed to reducing the handling of raw materials and production residues, to reducing inputs and to raw material substitution.

At the Italian sites, specific operating and management procedures are applied for the various plants. At the Riesa site, the waste produced in the various companies is delivered to the central collection points within the site, where the differentiation, recovery and residual transfer to landfill is managed. For all operational sites, managers inspect the sites on a weekly basis and manage communications with the authorities and with recyclers and disposers (e.g. application for certificates such as EMAS; ISO 14001, etc.).

The "Research and Development" function works with managers and environmental contacts, constantly searching for new solutions. The circular economy involves actors in the supply chain, public and private, outside the organisation.

External awareness of environmental issues is raised through annual reporting tools (Integrated Report, EMAS Environmental Statement) as well as digital communication tools and external reports ***[Section 14.4]***.

17.7 Governance and management of social aspects

Human resources management

The Human Resources department has two integrated organisational structures: the first focused on the plants in Italy, France, Spain and Algeria. The second on plants in Germany and Eastern Europe.

In this regard, the first structure reports hierarchically to the Group Chairman, while the other, concerning management, organisational, and union negotiation matters, reports to the Top Management of ESF Elbe-Stahlwerke Feralpi GmbH.

The strategic themes and special projects are under the functional responsibility of the Italian structure. In addition to the HR functions, the HSE function for Safety and the Sustainability & Communications Department for well-being, human rights, Diversity & Inclusion, and relations with the territory and stakeholders also provide support.

The management of human resources at Feralpi Group follows the national provisions of the countries in which it operates, in accordance with its Code of Ethics, provided to every newly hired employee. In FERALPI STAHL, there is a company policy to support the Code of Ethics.

The Group favours permanent employment relationships, ensuring economic growth, enhancement of human capital, adequate pay above the minimum wage, safe working environments, psycho-physical well-being, and corporate welfare initiatives.

Human Rights

Feralpi Group operates in line with the International Charter of Human Rights, the International Labour Organisation (ILO) Conventions, the Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises, the ten principles of the United Nations Global Compact, and in compliance with its own Code of Ethics.

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.

Diversity, Equity, Inclusion and Welfare

Feralpi Group has a DEI & Welfare Manager who develops projects and strategies for diversity, inclusion and the well-being of employees, in line with the D&I Policy (Diversity & Inclusion).

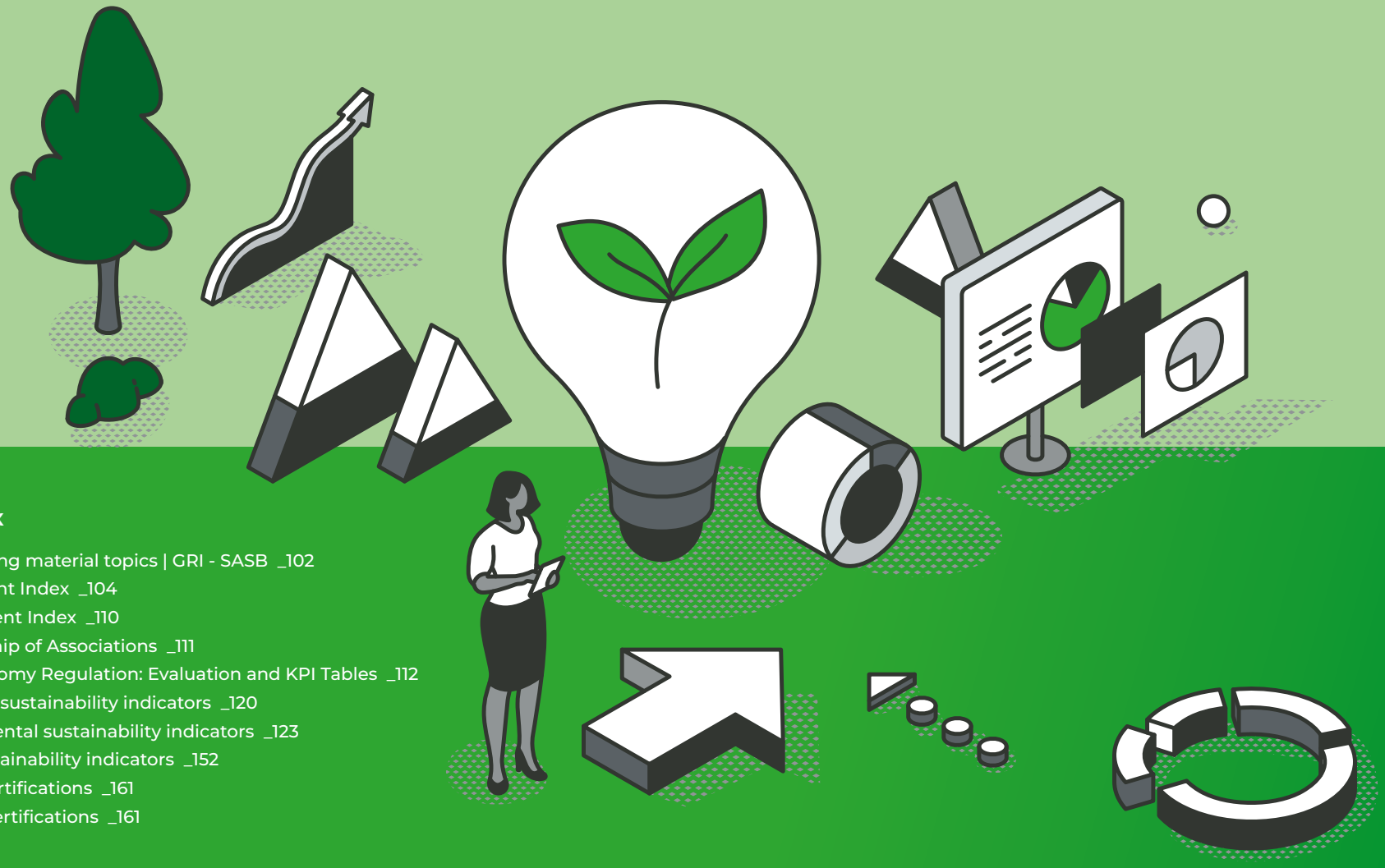
Welfare and well-being activities are managed in collaboration with the relevant occupational physicians, local health authorities, and dedicated working groups and have a dedicated budget.

Performance management system

As for the managerial level, a **formalised performance management system (MBO)** is in place for the Group’s companies in Italy and Germany, based on objective quantitative and qualitative indicators, including ESG objectives. In 2024, the MBO system in place in the Group’s German companies was aligned with the Performance Management System in force in Italian companies since 2018.

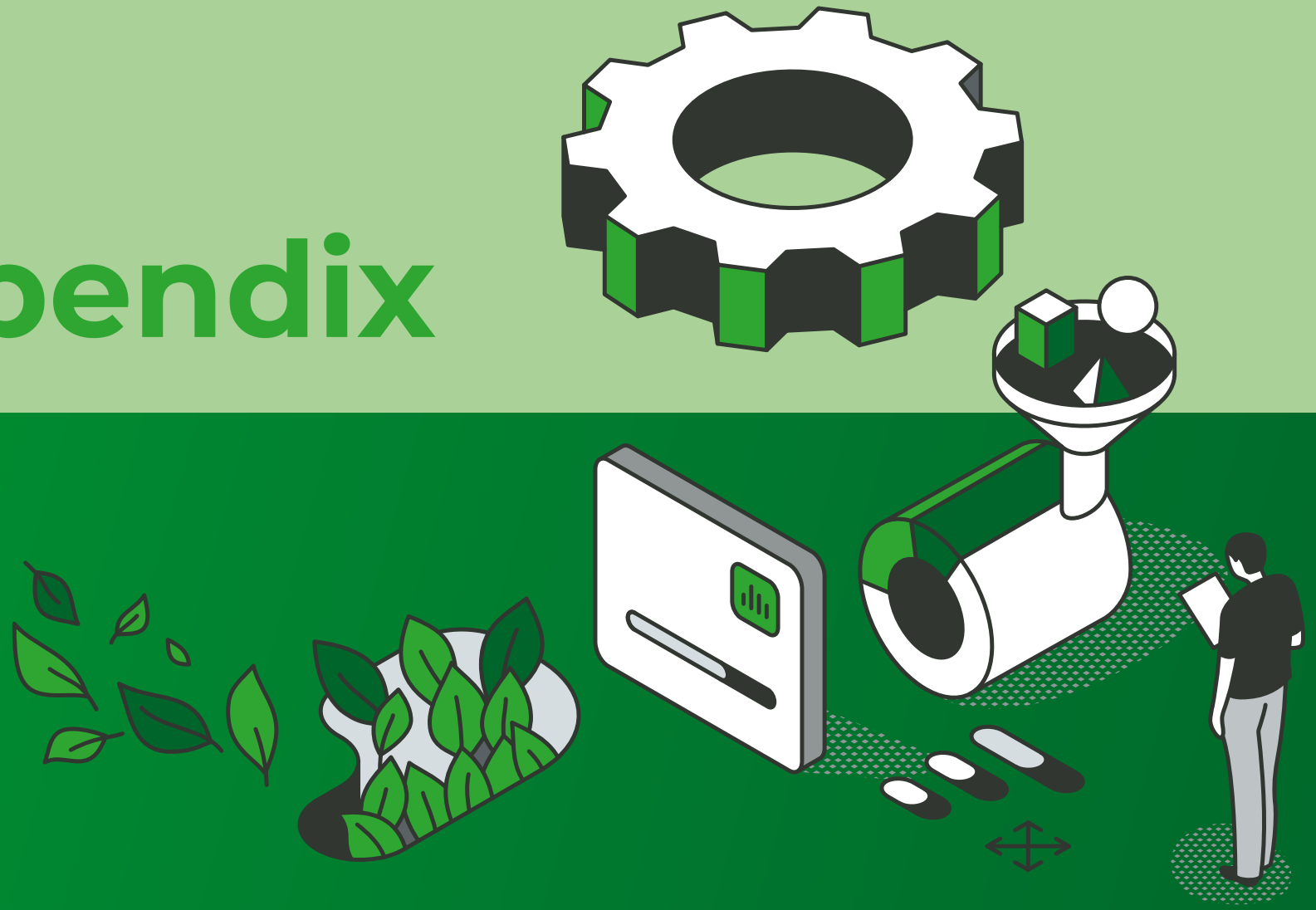
Relations with the territory

The management of relations with the territory is entrusted to the management of each site, in coordination with the Sustainability & Communications Department. Donations and sponsorships are governed by a Group policy that identifies its areas of action in six pillars, with an additional focus on cultural aspects.



APPENDIX

Appendix



APPENDIX

Table linking material topics | GRI - SASB

MATERIAL TOPIC	GRI	SASB
Climate change and energy efficiency Feralpi Group constantly monitors the negative impact on climate change resulting from its production activities. This impact is mitigated by the energy efficiency of production processes and the reduction of climate-changing emissions through innovative technological solutions and the progressive use of energy from renewable sources, so as to contribute to international targets for the energy transition.	**302** - Energy **305** - Emissions	EM-IS-110a.1 EM-IS-110a.2 EM-IS-130a.1 EM-IS-130a.2
Circular economy, waste and use of materials The Group's activities have a negative impact on the environment from the production of waste and residues. This impact is mitigated through responsible management of these and raw materials, encouraging their recycling and reuse along the value chain, in order to preserve natural resources by preventing further extraction of raw materials and reducing waste generation.	**301** - Materials **306** - Waste	EM-IS-150a.1
Water resource management The Group's activities have a negative impact on the availability and quality of the water resource for itself and for the stakeholders with they are shared. This impact is mitigated through responsible use and sustainable management in terms of consumption, use and recovery, also with a view to reducing or eliminating potential negative impacts on aquatic ecosystems.	**303** - Water and Effluents	EM-IS-140a.1 (only for withdrawals and discharges)
Pollutant emissions Feralpi Group manages the pollutant emissions due to its production activities with a view to reducing them, mitigating their negative impact on the environment and people through the containment and abatement actions envisaged by current legislation and permitted by current technological solutions.	**305** - Emissions **2-27** - Compliance with laws and regulations	EM-IS-120a.1
Nature and biodiversity Feralpi Group is aware that its activities have a negative impact on natural ecosystems both in direct terms, due to the expansion of production sites and their proximity to protected areas, and in indirect terms, due to the negative impact on climate change. For mitigation purposes, Feralpi Group has adopted management systems that take these aspects into account, such as EMAS, and intends to enhance its assessments of these issues.	**304** - Biodiversity	-
Development and enhancement of people Ability of Feralpi Group to enhance professional figures through the continuous development of their skills in order to increase opportunities for professional growth and enhance their value, to encourage alignment with corporate objectives and prevent talent drain.	**401** - Employment **404** - Training and education **405** - Diversity and equal opportunities	-
Wellness, health and quality of life Feralpi Group constantly strives to improve the well-being of its people, by implementing policies and projects aimed at encouraging healthy lifestyles, ensuring a work-life balance, and creating suitable working spaces and environments, seeking to mitigate any burnout caused by workloads	**403** - Occupational health and safety	-
Culture of safety and prevention To mitigate its negative impact on the health and safety of workers, Feralpi Group implements and maintains certified systems for the management of employees and collaborators, infrastructure and machinery. Training and prevention activities are also carried out to make staff aware of the importance of safety and prepare them for emergency situations. Environments and facilities are subject to improvement activities through adaptation to best available technologies.	**403** - Occupational health and safety	EM-IS-320a.1
Diversity, Equity & Inclusion Feralpi Group is committed to recognising the diversity of its people, so that there is no unequal treatment and that different perspectives can act as a stimulus to innovation and team spirit, enhancing well-being and a sense of belonging and thus promoting a more inclusive, attractive and productive working environment.	**405** - Diversity and equal opportunities	-

MATERIAL TOPIC	GRI	SASB
Human rights and responsibilities along the supply chain Through its code of ethics and the adoption of policies shared with its suppliers, Feralpi Group contributes to the dissemination of sustainable practices along its supply chain, seeking to prevent human rights violations from occurring and implementing any mitigation measures.	-	-
Community development Through its activities and the choice of local suppliers, Feralpi Group contributes directly and indirectly to the economic development of the communities in which it operates, guaranteeing local employment and economic well-being. It also contributes to their socio-cultural development by supporting associations, organisations and educational institutions in the areas.	-	-
Dialogue with the social partners Feralpi Group operates by developing open and constant dialogue with the social partners in order to improve workers' working and wage conditions and ensure compliance with contractual terms.	**2** - General disclosures	-
Product and service quality Feralpi Group's ability to have a positive impact on society and the environment by guaranteeing high quality standards in terms of the product and service offered. By avoiding possible negative impacts on customers, the company is able to develop relationships of trust with them, targeted at loyalty and satisfaction with the service rendered and not just the product sold.	**417** - Marketing and labelling	EM-IS-000.A (100% EAF)
Creation of economic and financial value Feralpi Group operates in compliance with current regulations to ensure the creation of economic value, contributing to the economic growth of the regions and countries in which it operates, through its production activities and investments that benefit society and the environment as a whole.	**201** - Economic performance **204** - Procurement practices	-
Integrity of governance and transparency of the business Ability of the company to bring a positive impact throughout the value chain and towards its stakeholders by managing its business and governance in a correct, ethical and integral manner in terms of regulatory compliance (from antitrust to corruption), internal management and reporting in a transparent and honest manner.	**205** - Anti-corruption **206** - Anti-competitive behaviour **207** - Tax	-
Business evolution Through its vision and the continuous updating of its organisational processes, Feralpi Group is able to adapt to changes and risks related to sustainable development, new technologies and geopolitical tensions, in order to avoid or limit potential negative impacts on stakeholders along the entire value chain.	-	-
Digital and technological innovation and cybersecurity Feralpi Group 's ability to create innovation through planned research activities, the development of new technologies and the promotion of digitalisation helps to have a positive impact on the environment, climate and society through technologies that enable the safe production of environmentally sustainable and low-carbon products, while ensuring the protection of sensitive data.	-	-

APPENDIX

GRI Content Index

GRI STANDARDS	SECTION IN THE DOCUMENT	OMISSIONS		
		REQUIREMENT OMITTED	REASONS	EXPLANATION
GRI 2 - GENERAL DISCLOSURES (2020)				
◇ The organisation and its reporting practices				
2-1 Organisational Details	14.1.1. Methodology note 2. The Group structure			
2-2 Entities included in the organisation's sustainability reporting	14.1.1. Methodology note			
2-3 Reporting Period, Frequency and contact point	14.1.1. Methodology note			For information, please contact sustainability@it.feralpigroup.com
2-4 Restatements of information	14.1.1. Methodology note			
2-5 External assurance	14.1.1. Methodology note Independent Auditor's report			
◇ Activities and workers				
2-6 Activities, value chain and other business relationships	3. The Feralpi Group's business			
2-7 Employees	16. Social information Social sustainability indicators			
2-8 Workers who are not employees	16. Social information Social sustainability indicators			
◇ Governance				
2-9 Governance structure and composition	17.1. Governance and organisational structure			
2-10 Nomination and selection of the highest governance body	17.1.1. Organisational Model			
2-11 Chair of the highest governance bodies	17.1.1. Organisational Model			
2-12 Role of the highest governance body in overseeing the management of impacts	17.1.1. Organisational Model 17.5. Sustainability governance			
2-13 Delegation of responsibility for managing impacts	17.1.1. Organisational Model 17.5. Sustainability governance			
2-14 Role of the highest governance bodies in sustainability reporting	17.1.1. Organisational Model 17.5. Sustainability governance			
2-15 Conflicts of interest	17.1.1. Organisational Model			

GRI STANDARDS	SECTION IN THE DOCUMENT	OMISSIONS		
		REQUIREMENT OMITTED	REASONS	EXPLANATION
2-16 Communication of critical concerns	17.1.1. Organisational Model			https://www.feralpigroup.com/it/gruppo/governance/whistleblowing
2-17 Collective knowledge of the highest governance body	17.1.1. Organisational Model			
2-18 Evaluation of the performance of the highest governance body	17.1.1. Organisational Model			
2-19 Remuneration policies	17.1.1. Organisational Model			
2-20 Process to determine remuneration	17.1.1. Organisational Model			
2-21 Annual total compensation ratio	n.d.	2-21. a 2-21. b 2-21. c	Confidentiality constraints	It is not possible to report on the indicator for reasons of confidentiality and competitive advantage of the information it requires.
◇ Strategy, policy and practices				
2-22 Statement on sustainable development strategy	Letter from the Chairman			
2-23 Policy commitments	17.2. Code of Ethics and Management Models 17.5. Sustainability governance			
2-24 Embedding policy commitments	17.2. Code of Ethics and Management Models 17.5. Sustainability governance			
2-25 Processes to remediate negative impacts	17.2. Code of Ethics and Management Models			
2-26 Mechanisms for seeking advice and raising concerns	17.2. Code of Ethics and Management Models			https://www.feralpigroup.com/it/gruppo/governance/whistleblowing
2-27 Compliance with laws and regulations	17.2. Code of Ethics and Management Models			
2-28 Membership associations	Appendix - Membership of Associations			
◇ Stakeholder engagement				
2-29 Approach to stakeholder engagement	14.4. The relationship with stakeholders			
2-30 Collective bargaining agreements	17.7. Governance and management of social aspects			
MATERIAL TOPICS				
3-1 Process to determine material topics	14.3. The materiality analysis process			
3-2 List of material topics	14.3. The materiality analysis process			

		OMISSIONS		
GRI STANDARDS	SECTION IN THE DOCUMENT	REQUIREMENT OMITTED	REASONS	EXPLANATION
SPECIFIC DISCLOSURE				
ECONOMIC PERFORMANCE				
◇ **GRI 201 - Economic performance (2016)**				
3-3 Management of material topics	8. Analysis of the economic and financial situation			
201-1 Direct economic value generated and distributed	Economic sustainability indicators			
201-4 Financial assistance received from government	The value of public funding received by the government is €63,546,962			
◇ **GRI 204 - Procurement practices (2016)**				
3-3 Management of material topics	17.4.2. Qualification of suppliers			
204-1 Proportion of spending on local suppliers	16.6. Creating value for the territory Economic sustainability indicators			
◇ **GRI 205 - Anti-corruption (2016)**				
3-3 Management of material topics	17.2.4. Managing and combating corruption			
205-3 Confirmed incidents of corruption and actions taken	17.2.4. Managing and combating corruption			Throughout 2024, there were no incidents of corruption by the Group.
◇ **GRI 206 - Anti-competitive behaviour (2016)**				
3-3 Management of material topics	17.2.2. Anti-trust Manual			
206-1 Legal actions for anti-competitive behaviour, anti-trust, and monopoly practices	17.2.2. Anti-trust Manual			In the three-year period 2022-2024, nothing was contested against Feralpi Group companies.
◇ **GRI 207 - Tax (2019)**				
3-3 Management of material topics	11.3. National tax consolidation, Group VAT and Tax liability			
207-1 Approach to tax	11.3. National tax consolidation, Group VAT and Tax liability			
207-2 Tax governance, control, and risk management	11.3. National tax consolidation, Group VAT and Tax liability			
207-3 Stakeholder engagement and management of concerns related to tax	11.3. National tax consolidation, Group VAT and Tax liability			
207-4 Country-by-country reporting	Economic sustainability indicators			
ENVIRONMENTAL PERFORMANCE				
◇ **GRI 301 - Materials (2016)**				
3-3 Management of material topics	17.6. Governance and management of environmental aspects			

GRI STANDARDS	SECTION IN THE DOCUMENT	OMISSIONS		
		REQUIREMENT OMITTED	REASONS	EXPLANATION
301-1 Materials used by weight and volume	Environmental sustainability indicators			
301-2 Recycled input materials used	Environmental sustainability indicators			
◇ GRI 302 - Energy (2016)				
3-3 Management of material topics	17.6. Governance and management of environmental aspects			
302-1 Energy consumption within the organisation	15.1.1. Energy and emissions Environmental sustainability indicators			
302-2 Energy consumption outside the organisation	15.1.1. Energy and emissions Environmental sustainability indicators			
302-3 Energy intensity	15.1.1. Energy and emissions Environmental sustainability indicators			
◇ GRI 303 - Water and effluents (2018)				
3-3 Management of material topics	17.6. Governance and management of environmental aspects			
303-1 Interaction with water as a shared resource	15.1.2. Management of water resource			
303-2 Management of water discharge related impacts	15.1.2. Management of water resource			
303-3 Water withdrawal	15.1.2. Management of water resource Environmental sustainability indicators			
303-4 Water discharge	15.1.3. Management of water resource Environmental sustainability indicators			
◇ GRI 304 - Biodiversity (2016)				
3-3 Management of material topics	17.6. Governance and management of environmental aspects			
304-1 Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas	15.1.3. Biodiversity Environmental sustainability indicators			
304-2 Significant impacts of activities, products and services on biodiversity	15.1.3. Biodiversity			
◇ GRI 305 - Emissions (2016)				
3-3 Management of material topics	17.6. Governance and management of environmental aspects			
305-1 Direct (Scope 1) GHG emissions	15.1.1. Energy and emissions Environmental sustainability indicators			
305-2 Indirect (Scope 2) GHG emissions	15.1.1. Energy and emissions Environmental sustainability indicators			
305-3 Other indirect (Scope 3) GHG emissions	15.1.1. Energy and emissions Environmental sustainability indicators			
305-4 GHG emissions intensity	15.1.1. Energy and emissions Environmental sustainability indicators			
305-7 Nitrogen oxides (NOx), sulphur oxides (SOx), and other significant emissions	15.1.1.3. Emissions into the atmosphere Environmental sustainability indicators			

GRI STANDARDS	SECTION IN THE DOCUMENT	OMISSIONS		
		REQUIREMENT OMITTED	REASONS	EXPLANATION
◇ GRI 306 - Waste (2020)				
3-3 Management of material topics	17.6. Governance and management of environmental aspects			
306-1 Waste generation and significant waste-related impacts	15.1.4. Circularity and zero-waste: material and energy management and enhancement			
306-2 Management of significant waste-related impacts	15.1.4. Circularity and zero-waste: material and energy management and enhancement			
306-3 Waste generated	15.1.4. Circularity and zero-waste: material and energy management and enhancement Environmental sustainability indicators			
306-4 Waste diverted from disposal	15.1.4. Circularity and zero-waste: material and energy management and enhancement Environmental sustainability indicators			
306-5 Waste directed to disposal	15.1.4. Circularity and zero-waste: material and energy management and enhancement Environmental sustainability indicators			
SOCIAL PERFORMANCE				
◇ GRI 401 - Employment (2016)				
3-3 Management of material topics	17.7. Governance and management of social aspects			
401-1 New employee hires and employee turnover	Social sustainability indicators			
◇ GRI 403 - Occupational Health and Safety (2018)				
3-3 Management of material topics	17.7. Governance and management of social aspects			
403-1 Occupational health and safety management system	16.2. The health and safety management at the workplace			
403-2 Hazard identification, risk assessment, and incident investigation	16.2. The health and safety management at the workplace			
403-3 Occupational health services	16.2. The health and safety management at the workplace			
403-4 Worker participation, consultation, and communication on occupational health and safety	16.2. The health and safety management at the workplace			
403-5 Worker training on occupational health and safety	16.2. The health and safety management at the workplace			
403-6 Promotion of worker health	16.3. Welfare			
403-7 Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	16.2. The health and safety management at the workplace			
403-9 Accidents at work	Social sustainability indicators			
◇ GRI 404 - Training and education (2016)				
3-3 Management of material topics	17.7. Governance and management of social aspects			

		OMISSIONS		
GRI STANDARDS	SECTION IN THE DOCUMENT	REQUIREMENT OMITTED	REASONS	EXPLANATION
404-1 Average hours of training per year per employee	16.1. Raising competencies: people growth and development Social sustainability indicators			
◇ **GRI 405 - Diversity and equal opportunities (2016)**				
3-3 Management of material topics	17.7. Governance and management of social aspects			
405-1 Diversity of governance bodies and employees	16.4 Diversity, Equity, Inclusion Social sustainability indicators			
405-2 Ratio of basic salary and remuneration of women to men	16.5.1. Human rights in the workplace: protection, recruitment, pay Social sustainability indicators			
◇ **GRI 417 - Marketing and labelling (2016)**				
3-3 Management of material topics	17.4. Governance and management of products and services			
417-1 Requirements for product and service information and labelling	17.4.3. Compliance with labelling regulations and information transparency			
417-2 Incidents of non-compliance concerning product and service information and labelling	17.4.3. Compliance with labelling regulations and information transparency			During the three-year period 2022-2024, there were no cases of non-compliance.
OTHER TOPICS NOT COVERED BY GRI STANDARDS				
◇ **Digital and technological innovation and cybersecurity**				
3-3 Management of material topics	5. Research and development activities 17.3. Digitalisation and Cybersecurity 17.4. Governance and management of products and services			
◇ **Business evolution**				
3-3 Management of material topics	3. The Feralpi Group's business 13. Business outlook 15.2. The environmental sustainability of Feralpi Group products			
◇ **Community development**				
3-3 Management of material topics	16.6. Creating value for the territory			
◇ **Human rights and responsibilities along the supply chain**				
3-3 Management of material topics	16.5. Human rights in the workplace and along the supply chain			

APPENDIX

SDG Content Index

AGENDA 2030	RELEVANT TOPICS	DOCUMENT SECTION
SDG 1 - No poverty	Community development	4. Strategy and investments of Feralpi Group 8. Analysis of the economic and financial situation 11.3. National tax consolidation, Group VAT and Tax liability 16.6. Creating value for the territory
SDG 2 - End hunger	Community development	4. Strategy and investments of Feralpi Group 8. Analysis of the economic and financial situation 11.3. National tax consolidation, Group VAT and Tax liability 16.6. Creating value for the territory
SDG 3 - Good health and well-being	Well-being, health and quality of life	16.3. Welfare
SDG 4 - Quality education	Development and empowerment of individuals Community development	16.1. Raising competencies: people growth and development
SDG 5 - Gender equality	Diversity, Equity & Inclusion	16.4 Diversity, Equity, Inclusion
SDG 6 - Clean water and sanitation	Management of water resources	15.1.2. Management of water resource
SDG 7 - Affordable and clean energy	Climate change and energy efficiency	4. Strategy and investments of Feralpi Group 15.1.1. Energy and emissions
SDG 8 - Decent work and economic growth	Safety and prevention culture Human rights and responsibilities along the supply chain Dialogue with the social partners Development and empowerment of individuals Creation of economic and financial value	16. Social information
SDG 9 - Industry, innovation and infrastructure	Digital and technological innovation and cybersecurity Product and service quality Creation of economic and financial value	15.2. The environmental sustainability of Feralpi products 17.3. Digitalisation and Cybersecurity 17.4. Governance and management of products and services
SDG 10 - Reduced inequalities	Community development	16.6. Creating value for the territory
SDG 11 - Sustainable cities and communities	Pollutant emissions Circular economy, waste and use of materials Climate change and energy efficiency Management of water resources Community development	15. Environmental information 16.6. Creating value for the territory
SDG 12 - Responsible consumption and production	Pollutant emissions Circular economy, waste and use of materials Climate change and energy efficiency Management of water resources	15. Environmental information
SDG 13 - Climate action	Climate change and energy efficiency	15. Environmental information
SDG 14 - Life below water	Management of water resources	15.1.2. Management of water resource
SDG 15 - Life on land	Nature and biodiversity	15.1.3. Biodiversity
SDG 16 - Peace, justice and strong institutions	Integrity of governance and transparency of business	17.1. Governance and organisational structure 17.2. Code of Ethics and Management Models
SDG 17 - Partnership for the goals	Integrity of governance and transparency of business	5. Research and development activities 11.3. National tax consolidation, Group VAT and Tax liability 14.2. Feralpi Group's sustainability strategy and objectives

Membership of Associations

	TRADE ASSOCIATIONS	TECHNICAL ASSOCIATIONS	SUSTAINABILITY ASSOCIATIONS
ITALY	◇ **AIDAF** > Italian Association of Family Businesses ◇ **Confindustria Brescia** > Industrial Association of Brescia ◇ **A.N.SAG.** > National Association of Steel Shapers for C.A. ◇ **Assogrigliati** > National association among Italian manufacturers of electrowelded and pressed gratings made of steel and metal alloys ◇ **Eurofer** > European Steel Association ◇ **Federacciai** > Industry federation ◇ **Federmeccanica** > Trade union federation ◇ **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	◇ **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) ◇ **Sustainability Makers** > Professional network of Fondazione Sodalitas and Fondazione Symbola, organisations committed to the promotion and enhancement of corporate sustainability ◇ **Associazione Fabbrica Intelligente Lombardia** > A technology cluster for advanced manufacturing in the Lombardy Region that brings together companies, research centres, universities and industrial associations ◇ **Cluster Nazionale Fabbrica Intelligente (CIF)** > Association with the aim of implementing a strategy based on research and innovation for the competitiveness of Italian manufacturing ◇ **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 ◇ **Associazione Cluster Lombardo della Mobilità** > System providing services for research project development, innovation, internationalisation and access to public funding opportunities ◇ **Green Economy Observatory of the GREEN Research Centre - Bocconi University** > Platform for research and trend analysis of the Green and Circular Economy ◇ **SYMBOLA** >Foundation for Italian Qualities ◇ **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

APPENDIX

The Taxonomy Regulation: Evaluation and KPI Tables

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 (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 (minimum social safeguard - MS)** recognising the importance of human rights and labour standards.

Analysis of substantial contribution criteria

Regarding CCM activity 3.9, the steel mills in Lonato del Garda and Riesa meet both criterion a) (0.209 tCO_2/t product) and 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, whereas the mills in Calvisano comply only with the second criterion. Therefore, all the Group's steel mills comply with the criteria of substantial contribution for the production of iron and steel.
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[11] 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 Group therefore considers that its eligible activities meet the criteria set out in Delegated Regulation 2021/2139. Further information is available in the Report on Operations ***[Section 10]***.

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.

[11] IPCC - Sixth Assessment Report.

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 ***[Section 17.2.]***;
- 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 ***[Section 16.5.2.]***;
- Whistleblowing Procedure, which governs the process of reporting and handling offences and irregularities ***[Section 17.2.3.]***;
- Stakeholder Management Policy, which regulates the Group's relations with its stakeholders ***[Section 14.4.]***;
- Group DPO (Data Protection Officer), whose presence ensures compliance with the highest standards of security and privacy of customers' personal data ***[Section 17.2.5.]***.

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 ***[Section 11.3.]***.

In 2023, Feralpi Group started a process aimed at adopting structured Due Diligence procedures on a voluntary basis, in advance of forthcoming European directives such as the Corporate Sustainability Reporting Directive (CSRD) and the Corporate Sustainability Due Diligence Directive (CSDD), and also taking into account the recent German Law on Due Diligence along the Supply Chain (Lieferkettensorgfaltspflichtengesetz - LkSG) ***[Section 16.5.3.]***.

Since the activities aimed at adopting a Due Diligence process are still ongoing, Feralpi Group conservatively considers that it is not aligned with the minimum safeguards, and therefore all of the Group's eligible activities are to be considered not-aligned with the requirements of the Taxonomy Regulation. The adoption of structured Due Diligence procedures represents a crucial objective for Feralpi Group for the immediate future.

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[12].

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 €1,724,219 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 (95.91%);
  - 4.1 - Power generation using photovoltaic solar technology (0.01%);
  - 4.1 - Production of heat/cooling using waste heat (0%).

Almost all of the turnover of the perimeter under analysis (95.92%) 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 the 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 €187,165 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. In this regard, the Group has identified increases in the following eligible taxonomic activities:
  - 3.9 - Iron and steel production (97.43%);
  - 4.1 - Power generation using photovoltaic solar technology (1.45%);
  - 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[13]. 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

[12] 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).
[13] 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).

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 €60,344 thousand.

- *Numerator*: operating expenses associated with point A[14] 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 (98.24%);
  - 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 Commission15. 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.

[14] Paragraph 1.1.3.2 Annex I Commission Delegated Regulation (EU) 2021/2178 of 6 July 2021.
[15] 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

FY 2024	YEAR			SUBSTANTIAL CONTRIBUTION CRITERIA						"DO NOT SIGNIFICANT HARM" CRITERIA									
Economic activities (1)	**Code(s) (2)**	Absolute turnover (3)	Share of expenses invoiced (4)	Climate change mitigation (5)	Climate change adaptation (6)	Marine waters and resources (7)	Pollution (8)	Circular Economy (9)	Biodiversity and ecosystems (10)	Climate change mitigation (11)	Climate change adaptation (12)	Marine waters and resources (13)	Pollution (14)	Circular economy (15)	Biodiversity and ecosystems (16)	Minimum safeguards (17)	Share of taxonomy-aligned turnover, Year 2023 (18)	Category (enabling activity) (19)	Category (transitional activities) (20)
		k €	%	S; N; N/AM	S; N; N/AM	S; N; N/AM	S; N; N/AM	S; N; N/AM	S; N; N/AM	S/N	S/N	S/N	S/N	S/N	S/N	S/N	%	A	T
A. ACTIVITIES ELIGIBLE FOR TAXONOMY																			
A.1 ENVIRONMENTALLY SUSTAINABLE ACTIVITIES (TAXONOMY-ALIGNED)																			
Manufacture of iron and steel	**3.9**		0%																
Power generation using photovoltaic solar technology	**4.1**		0%																
Production of heat/cooling using waste heat	**4.25**		0%																
Turnover of environmentally sustainable activities (taxonomy-aligned) (A.1)		**- €**	**0.00%**	**0.00%**	**0.00%**	**0.00%**	**0.00%**	**0.00%**	**0.00%**								**0.00%**		
of which enabling																	**0.00%**	**A**	
of which transitional																	**0.00%**		**T**
A.2 ACTIVITIES ELIGIBLE FOR THE TAXONOMY BUT NOT ENVIRONMENTALLY SUSTAINABLE (ACTIVITIES NOT TAXONOMY-ALIGNED)																			
Manufacture of iron and steel	**3.9**	€1,585,329	95.91%		**AM**												96.10%		
Power generation using photovoltaic solar technology	**4.1**	€180	0.01%		**AM**												0.01%		
Production of heat/cooling using waste heat	**4.25**	- €	0.00%		**AM**														
Turnover from activities eligible for the taxonomy but not environmentally sustainable (activities not taxonomy-aligned) (A.2)		**€1,585,509**	**95.92%**														**96.11%**		
Total (A.1 + A.2)		**€1,585,509**	**95.92%**	**0.00%**	**0.00%**	**0.00%**	**0.00%**	**0.00%**	**0.00%**								**96.11%**		
B. ACTIVITIES NOT ELIGIBLE FOR TAXONOMY																			
Turnover from activities not eligible for taxonomy (B)		**€67,475**	**4.08%**																
TOTAL (A + B)		**€1,652,984**	**100.00%**																

CAPEX

FY 2024	YEAR			SUBSTANTIAL CONTRIBUTION CRITERIA						"DO NOT SIGNIFICANT HARM" CRITERIA									
Economic activities (1)	**Code(s) (2)**	Absolute capital expenditures (3)	Share of capital expenditure (4)	Climate change mitigation (5)	Climate change adaptation (6)	Marine waters and resources (7)	Pollution (8)	Circular Economy (9)	Biodiversity and ecosystems (10)	Climate change mitigation (11)	Climate change adaptation (12)	Marine waters and resources (13)	Pollution (14)	Circular Economy (15)	Biodiversity and ecosystems (16)	Minimum safeguards (17)	Share of capital expenditure aligned (A1) or eligible for taxonomy (A2), Year 2023 (18)	Category (enabling activity) (19)	Category (transitional activities) (20)
		k €	%	S;N;N/AM	S;N;N/AM	S;N;N/AM	S;N;N/AM	S;N;N/AM	S;N;N/AM	S/N	S/N	S/N	S/N	S/N	S/N	S/N	%	A	T
A. ACTIVITIES ELIGIBLE FOR TAXONOMY																			
A.1 ENVIRONMENTALLY SUSTAINABLE ACTIVITIES (TAXONOMY-ALIGNED)																			
Manufacture of iron and steel	**3.9**		0																
Power generation using photovoltaic solar technology	**4.1**		0																
Production of heat/cooling using waste heat	**4.25**		0																
Capital expenditures of environmentally sustainable activities (taxonomy-aligned) (A.1)		**- €**	**0.00%**														**0.00%**		
of which enabling																		**A**	
of which transitional																			**T**
A.2 A.2 ACTIVITIES ELIGIBLE FOR THE TAXONOMY BUT NOT ENVIRONMENTALLY SUSTAINABLE (ACTIVITIES NOT TAXONOMY-ALIGNED)																			
Manufacture of iron and steel	**3.9**	€221,355	97.43%														93.72%		
Power generation using photovoltaic solar technology	**4.1**	€3,285	1.45%														4.23%		
Production of heat/cooling using waste heat	**4.25**	€48	0.02%														0.02%		
Capital expenditures of activities eligible for the taxonomy but not environmentally sustainable (activities not taxonomy-aligned) (A.2)		**€224,688**	**98.89%**														**97.97%**		
TOTAL (A.1 + A.2)		**€224,688**	**98.89%**	**0.00%**	**0.00%**	**0.00%**	**0.00%**	**0.00%**	**0.00%**								**97.97%**		
B. ACTIVITIES NOT ELIGIBLE FOR TAXONOMY																			
Capital expenditure of activities not eligible for taxonomy (B)		**€2,514**	**1.11%**																
TOTAL (A + B)		**€227,201**	**100.00%**																

OPEX

FY 2024	YEAR			SUBSTANTIAL CONTRIBUTION CRITERIA						"DO NOT SIGNIFICANT HARM" CRITERIA									
Economic activities (1)	**Code(s) (2)**	Absolute capital expenditures (3)	Share of capital expenditure (4)	Climate change mitigation (5)	Climate change adaptation (6)	Marine waters and resources (7)	Pollution (8)	Circular Economy (9)	Biodiversity and ecosystems (10)	Climate change mitigation (11)	Climate change adaptation (12)	Marine waters and resources (13)	Pollution (14)	Circular Economy (15)	Biodiversity and ecosystems (16)	Minimum safeguards (17)	Share of capital expenditure aligned (A1) or eligible for taxonomy (A2), Year 2023 (18)	Category (enabling activity) (19)	Category (transitional activities) (20)
		k €	%	S;N;N/ AM	S;N;N/ AM	S;N;N/ AM	S;N;N/ AM	S;N;N/ AM	S;N;N/ AM	S/N	S/N	S/N	S/N	S/N	S/N	S/N	%	A	T
A. ACTIVITIES ELIGIBLE FOR TAXONOMY																			
A.1 ENVIRONMENTALLY SUSTAINABLE ACTIVITIES (TAXONOMY-ALIGNED)																			
Manufacture of iron and steel	**3.9**		0																
Power generation using photovoltaic solar technology	**4.1**		0																
Production of heat/cooling using waste heat	**4.25**		0																
Capital expenditures of environmentally sustainable activities (taxonomy-aligned) (A.1)		**- €**	**0.00%**														**0.00%**		
of which enabling																		**A**	
of which transitional																			**T**
A.2 ACTIVITIES ELIGIBLE FOR THE TAXONOMY BUT NOT ENVIRONMENTALLY SUSTAINABLE (ACTIVITIES NOT TAXONOMY-ALIGNED)																			
Manufacture of iron and steel	**3.9**	€58,550	98.24%														98.01%		
Power generation using photovoltaic solar technology	**4.1**	- €	0.00%														0.00%		
Production of heat/cooling using waste heat	**4.25**	- €	0.00%														0.00%		
Capital expenditures of activities eligible for the taxonomy but not environmentally sustainable (activities not taxonomy-aligned) (A.2)		**€58,550**	**98.24%**														**98.01%**		
TOTAL (A.1 + A.2)		**€58,550**	**98.24%**	**0.00%**	**0.00%**	**0.00%**	**0.00%**	**0.00%**	**0.00%**								**98.01%**		
B. ACTIVITIES NOT ELIGIBLE FOR TAXONOMY																			
Capital expenditure of activities not eligible for taxonomy (B)		**€1,048**	**1.76%**																
TOTAL (A + B)		**€59,598**	**100.00%**																

◇ **SHARE OF TURNOVER / TOTAL TURNOVER**

	TAXONOMY-ALIGNED BY OBJECTIVE	ELIGIBLE FOR TAXONOMY BY OBJECTIVE
Climate change mitigation	0%	95.92%
Climate change adaptation	0%	0%
Water and marine resources	0%	0%
Pollution	0%	0%
Circular Economy	0%	0%
Biodiversity and ecosystems	0%	0%

◇ **SHARE OF CAPEX / TOTAL CAPEX**

	TAXONOMY-ALIGNED BY OBJECTIVE	ELIGIBLE FOR TAXONOMY BY OBJECTIVE
Climate change mitigation	0%	98.89%
Climate change adaptation	0%	0%
Water and marine resources	0%	0%
Pollution	0%	0%
Circular Economy	0%	0%
Biodiversity and ecosystems	0%	0%

◇ **SHARE OF OPEX / TOTAL OPEX**

	TAXONOMY-ALIGNED BY OBJECTIVE	ELIGIBLE FOR TAXONOMY BY OBJECTIVE
Climate change mitigation	0%	98.24%
Climate change adaptation	0%	0%
Water and marine resources	0%	0%
Pollution	0%	0%
Circular Economy	0%	0%
Biodiversity and ecosystems	0%	0%

Economic sustainability indicators

DIRECT ECONOMIC VALUE GENERATED AND DISTRIBUTED *(GRI 201-1)*

FIGURES IN THOUSAND EUROS	2024	2023	2022
Revenues from sales and services	1,652,984	1,724,219	2,385,577
Changes in inventory of work-in-progress	42,678	(86,549)	20,674
Increases in fixed assets for in-house work	6,227	6,541	5,464
Other revenues and income	28,570	23,519	12,473
A - VALUE OF PRODUCTION	**1,730,459**	**1,667,730**	**2,424,188**
Consumption of raw materials (scrap)	920,455	877,025	961,028
Energy	155,420	161,734	361,811
Consumable materials and supplies	255,851	194,194	270,626
Cost of services	211,141	204,766	211,455
Hire, purchase and leasing charges	10,486	9,082	5,658
Provisions for risks	236	2,050	142
Other provisions and write-downs	127	0	0
Other operating expenses	4,067	8,572	3,473
B - COST OF PRODUCTION	**1,557,514**	**1,457,423**	**1,814,192**
GROSS CHARACTERISTIC VALUE ADDED	**172,945**	**210,307**	**609,996**
Financial income	4,862	2,446	1,201
Adjustments to financial assets	3,069	3,122	4,461
Accessory items	7,931	5,568	5,662
Extraordinary items	0	0	0
GROSS OVERALL VALUE ADDED	**180,877**	**215,876**	**615,658**
Amortisation	70,179	65,391	58,275
NET OVERALL VALUE ADDED	**110,698**	**150,485**	**557,383**

DISTRIBUTION OF CONSOLIDATED VALUE ADDED *(GRI 201-1)*

FIGURES IN THOUSAND EUROS	2024	2023	2022
Wages and salaries	101,763	93,393	81,082
Employee severance indemnity	2,862	2,511	1,835
Other charges	5,772	4,608	4,942
A - PERSONNEL	**110,398**	**100,513**	**87,859**
Taxes	-6,699	(2,031)	102,440
Social security contributions	27,755	25,895	22,835
B - PUBLIC ADMINISTRATION	**21,056**	**23,864**	**125,275**
Provisions	132	445	1,525
Non-distributed profit / loss	-37,741	12,897	335,194
C - RISK CAPITAL	**-37,609**	**13,341**	**336,719**
Distributed profit	0	0	0
Financial expenses	11,483	7,916	3,968
D - LENDERS	**11,483**	**7,916**	**3,968**
Charity	255	186	242
Sponsoring of sports/recreational activities	5,115	4,665	3,320
E - COMMUNITY	**5,369**	**4,851**	**3,562**
NET OVERALL VALUE ADDED	**110,698**	**150,485**	**557,383**

PROPORTION OF SPENDING ON LOCAL SUPPLIERS[16] *(GRI 204-1)*

GEOGRAPHICAL AREA %	2024	2023	2022
Province of Brescia	34.7	39.9	36.4
Province of Como	5.4	6.3	3.9
Province of Lecco	6.3	6.5	3.0
Province of Turin	2.0	2.6	2.4
District of Meißen/Dresden	14.2	12.6	7.2
District of Mělník	6.4	7.2	6.1
District of Csepel	14.5	7.9	5.0
Province of Barcelona	87.2	28.7	29.4

[16] 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.

TAXES: COUNTRY-BY-COUNTRY REPORTING *(GRI 207-4)*

COUNTRY[17]	NUMBER OF EMPLOYEES	REVENUE FROM SALES TO THIRD PARTIES (€MLN)	REVENUE FROM INTRA-GROUP TRANSACTIONS WITH OTHER TAX JURISDICTIONS (€ MLN)	PRE-TAX PROFIT/LOSS (€ MLN)	PROPERTY, PLANT AND EQUIPMENT OTHER THAN CASH AND CASH EQUIVALENTS (€ MLN)	CORPORATE INCOME TAXES PAID ON A CASH BASIS (€ MLN)	CORPORATE INCOME TAXES ACCRUED ON PROFITS/LOSSES (€ MLN)
2024							
Italy	970	626.6	-	(61.7)	(554.7)	0.0	(22.3)
Germany	906	389.8	43.2	15.5	528.8	6.6	4.9
Other	110	636.5	12.7	-	25.9	-	0.1
TOTAL	**1,986**	**1,653.0**	**55.8**	**(46.2)**	**-**	**6.6**	**(17.4)**
2023							
Italy	937	658.3	-	5.5	(478.4)	13.2	(6.0)
Germany	875	487.7	28.5	3.9	451.9	5.6	2.4
Other	110	578.2	11.0	-	26.5	0.1	0.0
TOTAL	**1,922**	**1,724.2**	**39.5**	**9.4**	**-**	**18.9**	**(3.6)**
2022							
Italy	931	881.5	-	265.8	1,072.0	8.8	50.2
Germany	824	776.3	94.2	171.0	438.2	22.8	52.3
Other	101	740.3	26.0	-	29.9	0.1	0.0
TOTAL	**1,856**	**2,398.1**	**102.2**	**436.8**	**1,540.1**	**31.6**	**102.5**

[17] The figure for Germany includes Feralpi-Praha and Feralpi-Hungária.

Environmental sustainability indicators

USE OF MATERIALS AND % RECYCLED *(GRI 301-1, 301-2)*

MATERIAL	UNIT	2024 USED	2024 % RECYCLED	2023 USED	2023 % RECYCLED	2022 USED	2022 % RECYCLED
Scrap	**t**	**2,841,584**	**100.00**	**2,657,177**	**100.00**	**2,719,283**	**99.98**
Feralpi Siderurgica		1,305,183	100.00	1,182,816	100.00	1,270,953	100.00
Acciaierie di Calvisano		450,308	99.97	454,140	100.00	499,291	99.87
FERALPI STAHL		1,086,093	100.00	1,020,221	100.00	949,039	100.00
Additives	**t**	**19,197**	**1.60**	**16,796**	**2.54**	**15,830**	**1.63**
Feralpi Siderurgica		8,232	0.00	6,018	0.00	5,158	0.00
Acciaierie di Calvisano		3,670	0.00	3,706	0.00	2,573	0.00
FERALPI STAHL		7,295	4.22	7,072	6.03	8,098	3.18
Lime	**t**	**114,100**	**2.80**	**105,176**	**3.35**	**108,561**	**4.51**
Feralpi Siderurgica[18]		57,828	2.91	50,781	3.51	56,289	3.97
Acciaierie di Calvisano		19,549	0.00	21,285	0.00	19,700	0.00
FERALPI STAHL		36,722	4.12	33,109	5.25	32,572	8.19
Ferro-alloys	**t**	**36,208**	**0.20**	**33,899**	**0.20**	**32,955**	**0.00**
Feralpi Siderurgica		15,854	0.00	14,651	0.00	15,900	0.00
Acciaierie di Calvisano		5,734	0.00	5,823	0.00	4,892	0.00
FERALPI STAHL		14,621	0.49	13,425	0.49	12,163	0.00
Refractory materials	**t**	**18,802**	**4.27**	**17,373**	**0.00**	**16,976**	**5.71**
Feralpi Siderurgica		7,707	0.00	6,419	0.00	6,833	0.00
Acciaierie di Calvisano		4,093	0.00	4,254	0.00	4,052	0.00
FERALPI STAHL		7,002	11.48	6,700	0.00	6,092	15.91
Polymers	**t**	**6,718**	**100.00**	**4,885**	**100.00**	**3,925**	**100.00**
Feralpi Siderurgica		3,886	100.00	3,228	100.00	3,220	100.00
Acciaierie di Calvisano		2,832	100.00	1,657	100.00	705	100.00

[18] The figure includes internally recovered lime and dolomite: 2,233 t for 2022.1, 783 t for 2023 and 1,684 t for 2024.

MATERIAL	UNIT	2024		2023		2022	
		USED	% RECYCLED	USED	% RECYCLED	USED	% RECYCLED
Oxygen	**Sm³**	**74,595,658**	**0.00**	**70,921,189**	**0.00**	**69,537,814**	**0.00**
Feralpi Siderurgica		36,037,184	0.00	33,100,160	0.00	33,055,552	0.00
Acciaierie di Calvisano		11,361,482	0.00	11,796,351	0.00	10,025,168	0.00
FERALPI STAHL		27,196,992	0.00	26,024,678	0.00	26,457,094	0.00
Inert gases	**Sm³**	**2,358,214**	**0.00**	**2,249,467**	**0.00**	**2,196,320**	**0.00**
Feralpi Siderurgica		1,220,494	0.00	1,071,089	0.00	1,105,252	0.00
Acciaierie di Calvisano		593,362	0.00	561,836	0.00	417,682	0.00
FERALPI STAHL		544,358	0.00	616,543	0.00	673,385	0.00

USE OF ENERGY BY SOURCE *(GRI 302-1)*

	UNIT	2024	2023	2022
Energia elettrica	**MWh**	**1,593,288**	**1,476,062**	**1,460,700**
Feralpi Siderurgica		721,286	635,133	660,761
Acciaierie di Calvisano		253,995	253,455	254,012
Arlenico		41,050	37,625	39,214
Nuova Defim		2,835	2,942	2,948
Presider		1,621	1,717	1,662
MPL		-	-	626
FERALPI STAHL		568,846	541,630	497,820
Feralpi-Praha		1,475	1,437	1,882
Feralpi-Hungária		534	479	486
Presider Armatures		474	502	495
Saexpa		1,079	1,045	745
P.R. Soldadura		93	96	51
Gas Naturale	**Sm^3 - Standard mc**	**66,575,756**	**67,639,919**	**71,307,784**
Feralpi Siderurgica		29,018,448	33,170,607	38,434,909
Acciaierie di Calvisano		4,097,865	4,264,955	4,413,306
Arlenico		9,792,096	8,745,301	8,974,456
Nuova Defim		98,567	68,600	147,449
Presider		43,411	42,557	39,325
FERALPI STAHL		23,517,288	21,330,956	19,288,451
Feralpi-Hungária		8,081	7,972	9,888
Saexpa		0	8,971	5,711
Benzina	**Litres**	**45,520**	**45,478**	**33,588**
FERALPI STAHL		30,653	27,704	18,068
Feralpi-Praha		12,525	13,328	11,770
Feralpi-Hungária		2,342	2,946	3,750
Saexpa		0	1,500	1,456

	UNIT	2024	2023	2022
Diesel	**Litres**	**2,520,593**	**2,475,082**	**2,498,701**
Feralpi Siderurgica		427,250	394,450	381,000
Acciaierie di Calvisano		153,500	110,240	108,755
Arlenico		82,183	84,556	86,482
Nuova Defim		37,639	62,457	57,047
Presider		11,326	16,402	12,900
FERALPI STAHL		1,769,806	1,745,784	1,802,392
Feralpi-Praha		14,226	19,459	22,172
Feralpi-Hungária		4,763	5,819	2,651
Presider Armatures		2,999	2,000	2,000
Saexpa		12,193	29,155	21,753
P.R. Soldadura		4,708	4,760	1,549
Charge carbon	**t**	**8,167**	**6,972**	**6,597**
Feralpi Siderurgica		3,113	1,628	1,028
Acciaierie di Calvisano		3,006	2,652	733
FERALPI STAHL		2,048	2,692	4,836
Waste foam	**t**	**4,705**	**4,756**	**85,159**
Feralpi Siderurgica		0	11	22
Acciaierie di Calvisano		821	1,114	1,200
FERALPI STAHL		3,884	3,631	83,936
Polymers	**t**	**6,718**	**4,885**	**3,925**
Feralpi Siderurgica		3,886	3,228	3,220
Acciaierie di Calvisano		2,832	1,657	705
Photovoltaic	**MWh**	**1,119**	**784**	**621**
Feralpi Siderurgica		664	609	441
Arlenico		5	4	4
Nuova Defim		276	-	-
Presider		174	171	176

USE OF ENERGY BY SOURCE, EXPRESSED IN GJ *(GRI 302-1)*

	2024	2023	2022
Electricity	**5,735,838**	**5,313,824**	**5,258,522**
Feralpi Siderurgica	2,596,631	2,286,479	2,378,738
Acciaierie di Calvisano	914,383	912,437	914,443
Arlenico	147,780	135,452	141,168
Nuova Defim	10,206	10,590	10,612
Presider	5,836	6,183	5,983
MPL	-	-	2,252
FERALPI STAHL	2,047,844	1,949,869	1,792,152
Feralpi-Praha	5,311	5,174	6,774
Feralpi-Hungária	1,922	1,724	1,751
Presider Armatures	1,706	1,807	1,782
Saexpa	3,884	3,763	2,684
P.R. Soldadura	335	347	183
Natural gas	**2,557,011**	**2,663,055**	**2,634,377**
Feralpi Siderurgica[19]	1,150,168	1,313,371	1,360,451
Acciaierie di Calvisano	145,818	151,223	155,953
Arlenico	348,442	310,240	317,130
Nuova Defim	3,507	2,426	5,210
Presider	1,534	1,504	1,390
FERALPI STAHL	907,255	883,693	793,698
Feralpi-Hungária	287	281	344
Saexpa	0	317	202
Petrol[20]	**1,454**	**1,443**	**1,110**
FERALPI STAHL	971	878	571
Feralpi-Praha	407	433	382
Feralpi-Hungária	76	96	122
Saexpa	0	36	35

[19] The figure relating to natural gas was calculated using SNAM's Lower Calorific Value for 2024, 2023 and 2022.
[20] For Super Petrol E10 and Super Petrol, the conversion factors used were 42.82 MJ/kg - 0.75 kg/l and 43.13 MJ/kg - 0.75 kg/l, respectively.

	2024	2023	2022
Diesel[21]	**92,524**	**88,296**	**89,123**
Feralpi Siderurgica	15,295	14,121	13,639
Acciaierie di Calvisano	5,495	3,937	3,890
Arlenico	2,923	3,008	3,063
Nuova Defim	1,347	2,236	2,042
Presider	2,997	587	462
FERALPI STAHL	63,076	62,220	64,237
Feralpi-Praha	507	694	790
Feralpi-Hungária	170	207	94
Presider Armatures	107	72	72
Saexpa	436	1,044	779
P.R. Soldadura	170	170	55
Charge carbon[22]	**238,057**	**200,770**	**189,473**
Feralpi Siderurgica	90,742	46,885	29,538
Acciaierie di Calvisano	87,611	76,365	21,051
FERALPI STAHL	59,704	77,520	138,884
Waste foam[23]	**137,152**	**136,971**	**119,054**
Feralpi Siderurgica	0	328	643
Acciaierie di Calvisano	23,935	32,081	34,475
FERALPI STAHL	113,217	104,562	83,936
Polymers	**222,909**	**161,208**	**135,580**
Feralpi Siderurgica	128,943	106,521	111,228
Acciaierie di Calvisano	93,966	54,687	24,352
Photovoltaic	**4,027**	**2,823**	**2,235**
Feralpi Siderurgica	2,390	2,191	1,589
Arlenico	18	14	14
Nuova Defim	993	-	-
Presider	626	617	633
TOTAL	**8,988,971**	**8,568,390**	**8,429,474**

[21] Italy: specific weight 0.84 tonnes/m^3 and ETS coefficient 42.873 for 2022, 2023 and 2024. FERALPI STAHL: GEMIS-Datebank conversion factors, 42.63 MJ/kg and 0.836 kg/l.
[22] In 2022, a Lower Calorific Value of 28.721 GJ/t, in 2023, 28.797 GJ/t, and in 2024, 29.150 GJ/t (table of ETS standard parameters).
[23] In 2022, a Lower Calorific Value of 28.721 GJ/t, in 2023, 28.797 GJ/t, and in 2024, 29.150 GJ/t (table of ETS standard parameters).

INDIRECT ENERGY CONSUMPTION[24] EXPRESSED IN GJ *(GRI 302-2)*

	2024	2023	2022
Feralpi Siderurgica			
Employee commuting	9,609	9,315	7,766
Transport and distribution	102,057	88,274	108,406
Upstream	111,666	97,589	116,173
Transport and distribution	110,163	126,086	123,787
Downstream	110,163	126,086	123,787
Acciaierie di Calvisano			
Employee commuting	2,776	2,513	2,223
Transport and distribution	30,855	27,537	33,089
Upstream	33,631	30,050	35,312
Transport and distribution	10,068	10,603	10,533
Downstream	10,068	10,603	10,533
Arlenico			
Employee commuting	1,275	1,199	1,094
Transport and distribution	0	0	1,155
Upstream	1,275	1,199	2,248
Transport and distribution	30,238	47,629	20,257
Downstream	30,238	47,629	20,257
Nuova Defim			
Employee commuting	1,946	1,121	1,113
Transport and distribution	4,415	1,322	1,928
Upstream	6,361	2,443	3,042
Transport and distribution	4,886	2,896	3,200
Downstream	4,886	2,896	3,200

[24] Incoming and outgoing transport refer to road transport only, and is estimated at 28 tonnes for each load. With regard to employee commuting, one round-trip a day per person was considered.

	2024	2023	2022
Presider			
Employee commuting	1,984	1,716	1,484
Transport and distribution	78	64	226
Upstream	2,062	1,780	1,710
Transport and distribution	13,474	11,078	16,876
Downstream	13,474	11,078	16,876
MPL			
Employee commuting	-	-	292
Transport and distribution	-	-	1,878
Upstream	-	-	2,170
Transport and distribution	-	-	2,121
Downstream	-	-	2,121
FERALPI STAHL			
Employee commuting	9,907	9,884	9,051
Transport and distribution	67,472	53,977	47,324
Upstream	77,379	63,861	56,375
Transport and distribution	162,238	180,106	152,075
Downstream	162,238	180,106	152,075
Feralpi-Praha			
Employee commuting	636	753	808
Transport and distribution	0	0	0
Upstream	636	753	808
Transport and distribution	1,456	2,114	2,062
Downstream	1,456	2,114	2,062
Feralpi-Hungária			
Employee commuting	272	261	240
Transport and distribution	0	0	0
Upstream	272	261	240
Transport and distribution	508	218	331
Downstream	508	218	331

	2024	2023	2022
Presider Armatures			
Employee commuting	41	46	47
Transport and distribution	68	55	39
Upstream	110	101	86
Transport and distribution	2,753	1,075	4,888
Downstream	2,753	1,075	4,888
Saexpa			
Employee commuting	1,471	1,472	1,586
Transport and distribution	394	475	318
Upstream	1,865	1,947	1,904
Transport and distribution	4,586	4,982	4,352
Downstream	4,586	4,982	4,352
P.R. Soldadura			
Employee commuting	98	51	42
Transport and distribution	3	0	2
Upstream	101	51	44
Transport and distribution	0	0	0
Downstream	0	0	0

ENERGY INTENSITY IN GJ PER TONNE OF PRODUCT[25] *(GRI 302-3)*

	2024	2023	2022
Billets			
Feralpi Siderurgica	2.11	2.08	2.01
Acciaierie di Calvisano	2.15	2.07	2.08
FERALPI STAHL	1.98	1.99	2.01
Ribbed bar			
Feralpi Siderurgica	0.43	0.68	0.78
FERALPI STAHL	1.13	1.11	1.04
Rebar in coils			
Feralpi Siderurgica	1.67	1.70	1.55
Wire rod			
FERALPI STAHL	1.13	1.11	1.04
Wire rod in special steels			
Arlenico	1.87	1.87	1.87
Downstream products			
Feralpi-Praha	0.16	0.20	0.20
Feralpi-Hungária	0.29	0.30	0.26
Welded mesh and gratings			
Nuova Defim	0.54	0.63	0.59
Saexpa	0.54	0.47	0.34
P.R. Soldadura	2.44	2.57	2.23
Shaped or assembled reinforcing steel in bar			
Presider	0.04	0.05	0.06
Presider Armatures	0.09	0.10	0.09
Girders and angle sections			
MPL	-	-	0.11

[25] The figures relate to December each year. In the calculation, the total consumption of methane, electricity, charge carbon and coal for waste foam was used for Feralpi Siderurgica, the total consumption of electricity and methane for Acciaierie di Calvisano and FERALPI STAHL, consumption of electricity and natural gas for Arlenico and total consumption of electricity for Nuova Defim, Presider, Presider Armatures, Feralpi-Praha, Feralpi-Hungária, Saexpa Group and P. R. Soldadura.

WATER WITHDRAWAL IN ML *(GRI 303-3)*

	2024		2023		2022	
	AREAS SUBJECT TO WATER STRESS	ALL AREAS	AREAS SUBJECT TO WATER STRESS	ALL AREAS	AREAS SUBJECT TO WATER STRESS	ALL AREAS
Surface water (total)	**0**	**111**	**0**	**1,223**	**0**	**1,459**
Fresh water (≤1,000 mg/L total dissolved solid particles)	**0**	**111**	**0**	**1,223**	**0**	**1,459**
Feralpi Siderurgica	0	**0**	0	0	0	0
Acciaierie di Calvisano	0	**0**	0	0	0	0
Arlenico	0	**111**	0	1,223	0	1,459
Feralpi Stahl	0	**0**	0	0	0	0
Other water (>1,000 mg/L total dissolved solid particles)	**0**	**0**	**0**	**0**	**0**	**0**
Feralpi Siderurgica	0	0	0	0	0	0
Acciaierie di Calvisano	0	0	0	0	0	0
Arlenico	0	0	0	0	0	0
Feralpi Stahl	0	0	0	0	0	0
Water table (total)	**2,289**	**2,289**	**2,471**	**2,471**	**2,391**	**2,391**
Fresh water (≤1,000 mg/L total dissolved solid particles)	**2,289**	**2,289**	**2,471**	**2,471**	**2,391**	**2,391**
Feralpi Siderurgica	1,657	1,657	1,839	1,839	1,761	1,761
Acciaierie di Calvisano	632	632	631	631	630	630
Arlenico	0	0	0	0	0	0
Feralpi Stahl	0	0	0	0	0	0
Other water (>1,000 mg/L total dissolved solid particles)	**0**	**0**	**0**	**0**	**0**	**0**
Feralpi Siderurgica	0	0	0	0	0	0
Acciaierie di Calvisano	0	0	0	0	0	0
Arlenico	0	0	0	0	0	0
Feralpi Stahl	0	0	0	0	0	0
Sea water (total)	**0**	**0**	**0**	**0**	**0**	**0**
Fresh water (≤1,000 mg/L total dissolved solid particles)	**0**	**0**	**0**	**0**	**0**	**0**
Feralpi Siderurgica	0	0	0	0	0	0
Acciaierie di Calvisano	0	0	0	0	0	0
Arlenico	0	0	0	0	0	0
Feralpi Stahl	0	0	0	0	0	0

	2024		2023		2022	
	AREAS SUBJECT TO WATER STRESS	ALL AREAS	AREAS SUBJECT TO WATER STRESS	ALL AREAS	AREAS SUBJECT TO WATER STRESS	ALL AREAS
Other water (>1,000 mg/L total dissolved solid particles)	**0**	**0**	**0**	**0**	**0**	**0**
Feralpi Siderurgica	0	0	0	0	0	0
Acciaierie di Calvisano	0	0	0	0	0	0
Arlenico	0	0	0	0	0	0
Feralpi Stahl	0	0	0	0	0	0
Water produced (total)	**0**	**0**	**0**	**0**	**0**	**0**
Fresh water (≤1,000 mg/L total dissolved solid particles)	**0**	**0**	**0**	**0**	**0**	**0**
Feralpi Siderurgica	0	0	0	0	0	0
Acciaierie di Calvisano	0	0	0	0	0	0
Arlenico	0	0	0	0	0	0
Feralpi Stahl	0	0	0	0	0	0
Other water (>1,000 mg/L total dissolved solid particles)	**0**	**0**	**0**	**0**	**0**	**0**
Feralpi Siderurgica	0	0	0	0	0	0
Acciaierie di Calvisano	0	0	0	0	0	0
Arlenico	0	0	0	0	0	0
Feralpi Stahl	0	0	0	0	0	0
Third-party water (total)	**0**	**731**	**0**	**665**	**0**	**623**
Fresh water (≤1,000 mg/L total dissolved solid particles)	**0**	**731**	**0**	**665**	**0**	**623**
Feralpi Siderurgica	0	0	0	0	0	0
Acciaierie di Calvisano	0	0	0	0	0	0
Arlenico	0	4	0	0	0	0
Feralpi Stahl	0	727	0	665	0	623
Other water (>1,000 mg/L total dissolved solid particles)	**0**	**0**	**0**	**0**	**0**	**0**
Feralpi Siderurgica	0	0	0	0	0	0
Acciaierie di Calvisano	0	0	0	0	0	0
Arlenico	0	0	0	0	0	0
Feralpi Stahl	0	0	0	0	0	0
TOTAL WATER WITHDRAWAL	**2,289**	**3,131**	**2,471**	**4,359**	**2,391**	**4,473**

WATER DISCHARGE IN ML *(GRI 303-4)*

	2024		2023		2022	
	AREAS SUBJECT TO WATER STRESS	ALL AREAS	AREAS SUBJECT TO WATER STRESS	ALL AREAS	AREAS SUBJECT TO WATER STRESS	ALL AREAS
Surface water (total)	**411**	**454**	**484**	**1,670**	**463**	**1,246**
Fresh water (≤1,000 mg/L total dissolved solid particles)	**411**	**454**	**484**	**1,670**	**463**	**1,246**
Feralpi Siderurgica	405	405	478	478	456	456
Acciaierie di Calvisano	6	6	6	6	7	7
Arlenico	0	43	0	1,185	0	783
Feralpi Stahl	0	0	0	0	0	0
Other water (>1,000 mg/L total dissolved solid particles)	**0**	**0**	**0**	**0**	**0**	**0**
Feralpi Siderurgica	0	0	0	0	0	0
Acciaierie di Calvisano	0	0	0	0	0	0
Arlenico	0	0	0	0	0	0
Feralpi Stahl	0	0	0	0	0	0
Water table (total)	**0**	**0**	**0**	**0**	**0**	**0**
Fresh water (≤1,000 mg/L total dissolved solid particles)	**0**	**0**	**0**	**0**	**0**	**0**
Feralpi Siderurgica	0	0	0	0	0	0
Acciaierie di Calvisano	0	0	0	0	0	0
Arlenico	0	0	0	0	0	0
Feralpi Stahl	0	0	0	0	0	0
Other water (>1,000 mg/L total dissolved solid particles)	**0**	**0**	**0**	**0**	**0**	**0**
Feralpi Siderurgica	0	0	0	0	0	0
Acciaierie di Calvisano	0	0	0	0	0	0
Arlenico	0	0	0	0	0	0
Feralpi Stahl	0	0	0	0	0	0
Sea water (total)	**0**	**0**	**0**	**0**	**0**	**0**
Fresh water (≤1,000 mg/L total dissolved solid particles)	**0**	**0**	**0**	**0**	**0**	**0**
Feralpi Siderurgica	0	0	0	0	0	0
Acciaierie di Calvisano	0	0	0	0	0	0
Arlenico	0	0	0	0	0	0
Feralpi Stahl	0	0	0	0	0	0

	2024		2023		2022	
	AREAS SUBJECT TO WATER STRESS	ALL AREAS	AREAS SUBJECT TO WATER STRESS	ALL AREAS	AREAS SUBJECT TO WATER STRESS	ALL AREAS
Other water (>1,000 mg/L total dissolved solid particles)	**0**	**0**	**0**	**0**	**0**	**0**
Feralpi Siderurgica	0	0	0	0	0	0
Acciaierie di Calvisano	0	0	0	0	0	0
Arlenico	0	0	0	0	0	0
Feralpi Stahl	0	0	0	0	0	0
Third-party water (total)	**0**	**19**	**0**	**18**	**0**	**20**
Of which volume of water sent to other organisations	**0**	**0**	**0**	**0**	**0**	**0**
Feralpi Siderurgica	0	0	0	0	0	0
Acciaierie di Calvisano	0	0	0	0	0	0
Arlenico	0	0	0	0	0	0
Feralpi Stahl	0	0	0	0	0	0
Fresh water (≤1,000 mg/L total dissolved solid particles)	**0**	**19**	**0**	**18**	**0**	**20**
Feralpi Siderurgica	0	0	0	0	0	0
Acciaierie di Calvisano	0	0	0	0	0	0
Arlenico	0	0	0	0	0	0
Feralpi Stahl	0	19	0	18	0	20
Other water (>1,000 mg/L total dissolved solid particles)	**0**	**0**	**0**	**0**	**0**	**0**
Feralpi Siderurgica	0	0	0	0	0	0
Acciaierie di Calvisano	0	0	0	0	0	0
Arlenico	0	0	0	0	0	0
Feralpi Stahl	0	0	0	0	0	0
TOTAL WATER DISCHARGE	**411**	**473**	**484**	**1,688**	**463**	**1,266**

OPERATIONAL SITES OWNED, LEASED OR MANAGED IN PROTECTED AREAS AND AREAS OF HIGH BIODIVERSITY VALUE OUTSIDE OR CLOSE TO PROTECTED AREAS *(GRI 304-1)*

COMPANY	SITE	COUNTRY	COORDINATES	ACTIVITIES	DIMENSIONS	DISTANCE TO PROTECTED AREA	BIODIVERSITY VALUE				
							AREA NAME	CODE	AREA TYPE	N° HABITAT	N° 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	0,580 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

TOTAL DIRECT GREENHOUSE GAS (GHG) EMISSIONS (SCOPE 1: tCO_2 EQ) *(GRI 305-1)*

	2024	2023	2022
EU ETS emissions	**199,048**	**195,716**	**201,639**
Feralpi Siderurgica	82,917	85,815	93,638
Acciaierie di Calvisano[26]	27,580	25,788	23,938
Arlenico	19,766	17,525	17,865
FERALPI STAHL	68,785	66,588	66,198
Other GHG emissions from natural gas not included in the EU ETS	**208**	**-**	**179**
Feralpi Siderurgica	91	-	131
Acciaierie di Calvisano	13	-	15
Arlenico	31	-	34
FERALPI STAHL	73	-	0
GHG emissions from refrigerant gas leaks	**354**	**140**	**531**
Feralpi Siderurgica	122	87	455
Acciaierie di Calvisano	37	53	71
FERALPI STAHL	195	0	4

[26] Following an alignment, the 2022 figure relating to EU ETS emissions by Acciaierie di Calvisano has been restated with respect to that published in the previous Voluntary Consolidated Sustainability Report.

	2024	2023	2022
GHG emissions from natural gas	**950**	**253**	**408**
Nuova Defim	199	136	297
Presider	88	83	79
FERALPI STAHL	647	-	-
Feralpi-Hungária	16	16	20
Saexpa	0	18	12
GHG emissions from diesel	**7,254**	**4,480**	**830**
Feralpi Siderurgica	1,445	222	120
Acciaierie di Calvisano	421	26	32
Arlenico	228	14	37
Nuova Defim	104	165	146
Presider	162	69	33
FERALPI STAHL	4,705	3,831	334
Feralpi-Praha	70	43	57
Feralpi-Hungária	20	18	7
Presider Armatures	8	0	5
Saexpa	78	77	56
P.R. Soldadura	13	14	4
GHG emissions from petrol	**282**	**67**	**92**
Feralpi Siderurgica	33	-	0
Presider	11	4	0
FERALPI STAHL	148	-	55
Feralpi-Praha	60	42	25
Feralpi-Hungária	11	10	8
Presider Armatures	15	7	0
Saexpa	4	4	3
GHG emissions from LPG for heating	**0**	**0**	**20**
MPL	-	-	20
TOTAL DIRECT EMISSIONS (SCOPE 1)	**208,096**	**200,656**	**203,699**

INDIRECT GREENHOUSE GAS EMISSIONS (GHG) RESULTING FROM ELECTRICITY USE (SCOPE 2: tCO_2 EQ) *(GRI 305-2)*

	2024	2023	2022
Location based[27]	**546,212**	**507,158**	**499,011**
Feralpi Siderurgica	227,205	200,067	208,140
Acciaierie di Calvisano	80,009	79,838	80,014
Arlenico	12,931	11,852	12,352
Nuova Defim	893	927	930
Presider	511	541	524
MPL	-	-	197
FERALPI STAHL	223,556	212,861	195,643
Feralpi-Praha	701	683	894
Feralpi-Hungária	135	121	123
Presider Armatures	27	28	28
Saexpa	227	220	157
P.R. Soldadura	19	20	11
Market based[28]	**337,931**	**523,282**	**780,780**
Feralpi Siderurgica	70,691	61,776	302,067
Acciaierie di Calvisano	77,085	79,295	116,122
Arlenico	3,028	8,057	17,926
Nuova Defim	919	1,345	1,348
Presider	0	785	760
MPL	-	-	286
FERALPI STAHL	184,714	370,491	340,524
Feralpi-Praha	972	1,002	1,312
Feralpi-Hungária	172	153	156
Presider Armatures	19	63	62
Saexpa	305	288	288
P.R. Soldadura	26	27	14

[27] For the calculation of indirect CO_2 emissions from electricity using the location-based methodology, the respective national electricity emission factors were used: for the Italian sites 315 gCO_2 /kWh for 2022, 2023 and 2024; for Germany 393 gCO_2 /kWh for 2022, 2023 and 2024; for the Czech Republic 475 gCO_2 /kWh for 2022, 2023 and 2024; for Hungary 253 gCO_2 /kWh for 2022, 2023 and 2024; for France 56 gCO_2 / kWh for 2022, 2023 and 2024; for Spain 210 gCO_2 /kWh for 2022, 2023 and 2024.

[28] To calculate indirect CO_2 emissions resulting from electricity using the market-based method, reference was made to the AIB (Association of Issuing Bodies) for the years 2022 and 2023. For 2022, reference was made to the 2021 Residual Mix which for Italian sites is 456.57 gCO_2 /kWh, for Germany 617.84 gCO_2/kWh, for Hungary 276.26 gCO_2/ kWh, for the Czech Republic 549.96 gCO_2/kWh, for France 48.57 gCO_2/kWh, for Spain 295.83 gCO_2/kWh. For 2023, reference was made to the 2022 Residual Mix which for Italian sites is 457.15 gCO_2/kWh, for Germany 684.03 gCO_2/kWh, for Hungary 319.96 gCO_2/kWh, for the Czech Republic 697.21 gCO_2/kWh, for France 124.96 gCO_2/kWh, for Spain 275.11 gCO_2/kWh. For 2024, reference was made to the 2023 Residual Mix which for Italian sites is 500.57 gCO_2 /kWh, for Hungary, 322.63 gCO_2/kWh, for the Czech Republic, 658.58 gCO_2/kWh, for France, 40.74 gCO_2/kWh, for Spain, 282.45 gCO_2/kWh. For 2024, reference was made to the emission factor of the German energy supplier RWE for Germany, equal to 469.00 gCO_2/kWh. 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 for the Specific CO_2 Emissions Scorecard (Scope 1, 2, and 3 core boundary), the 2022 values for all companies (except MPL, which is not included in the perimeter) were recalculated using the AIB 2022 Residual Mix.

OTHER INDIRECT GREENHOUSE GAS (GHG) EMISSIONS (SCOPE 3: tCO_2 EQ)[29] *(GRI 305-3)*

◇ SCOPE 3 CATEGORIES - 2024	TOTAL	CORE BOUNDARY	OUT OF CORE BOUNDARY	NOT COVERED BY TARGETS
Purchased goods and services	658,857	266,358	392,499	-
Capital goods	117,342	-	-	117,342
Activities related to fuels and energy, not included in Scope 1 or Scope 2	96,213	-	96,213	-
Upstream and downstream transportation and distribution	197,044	-	197,044	-
Waste produced in operations	26,587	-	26,587	-
Transformation of goods sold	8,498	6,061	2,437	-
End-of-life treatment of products sold	137,854	-	-	137,854
TOTAL	**1,242,395**	**272,419**	**714,780**	**255,196**

◇ SCOPE 3 CATEGORIES - 2023	TOTAL	CORE BOUNDARY	OUT OF CORE BOUNDARY	NOT COVERED BY TARGETS
Purchased goods and services	502,346	155,093	347,253	-
Capital goods	86,486	-	-	86,486
Activities related to fuels and energy, not included in Scope 1 or Scope 2	89,284	-	89,284	-
Upstream and downstream transportation and distribution	179,272	-	179,272	-
Waste produced in operations	23,097	-	23,097	-
Transformation of goods sold	22,709	5,611	17,098	-
End-of-life treatment of products sold	258,329	-	-	258,329
TOTAL	**1,161,523**	**160,704**	**656,004**	**344,815**

◇ SCOPE 3 CATEGORIES - 2022	TOTAL	CORE BOUNDARY	OUT OF CORE BOUNDARY	NOT COVERED BY TARGETS
Purchased goods and services	594,385	268,459	325,926	-
Capital goods	57,621	-	-	57,621
Activities related to fuels and energy, not included in Scope 1 or Scope 2	169,059	-	169,059	-
Upstream and downstream transportation and distribution	145,368	-	145,368	-
Waste produced in operations	23,147	-	23,147	-
Transformation of goods sold	18,514	5,609	12,905	-
End-of-life treatment of products sold	222,452	-	-	222,452
TOTAL	**1,230,546**	**274,068**	**676,405**	**280,073**

[29] ETS Standard National Parameters were used in the calculation.

INTENSITY OF GREENHOUSE GAS EMISSIONS *(GRI 305-4)*

tCO_2/t FINISHED PRODUCT	2024	2023	2022
EU ETS direct emissions (Scope 1)			
Feralpi Siderurgica	0.06	0.07	0.07
Acciaierie di Calvisano	0.06	0.06	0.06
Arlenico	0.07	0.07	0.07
FERALPI STAHL	0.08	0.08	0.08
Indirect emissions resulting from electricity use (Scope 2)			
Feralpi Siderurgica	0.17	0.16	0.16
Acciaierie di Calvisano	0.19	0.18	0.18
Arlenico	0.05	0.05	0.05
Nuova Defim	0.04	0.06	0.05
Presider	0.00	0.00	0.00
MPL	-	-	0.01
FERALPI STAHL	0.26	0.25	0.25
Feralpi-Praha	0.02	0.03	0.03
Feralpi-Hungária	0.02	0.02	0.02
Presider Armatures	0.00	0.00	0.00
Saexpa	0.03	0.03	0.02
P.R. Soldadura	0.14	0.15	0.13

ATMOSPHERIC EMISSIONS *(GRI 305-7)*

	UNIT	2024	2023	2022
Dust[30]	**t**			
Feralpi Siderurgica		2.27	2.49	4.81
Acciaierie di Calvisano		1.86	6.37	4.82
Arlenico		0.23	0.81	0.20
Nuova Defim		0.19	0.19	0.21
FERALPI STAHL		1.99	1.87	2.43
Saexpa		0.07	0.07	0.10
PM10	**t**			
Feralpi Siderurgica		2.14	0.36	0.68
Acciaierie di Calvisano		0.75	1.89	1.26
FERALPI STAHL		1.69	1.59	2.05
NOx[31]	**t**			
Feralpi Siderurgica		91.01	75.06	107.81
Acciaierie di Calvisano		43.13	58.73	49.89
Arlenico		27.73	21.38	18.62
FERALPI STAHL		92.79	152.95	134.11
CO[32]	**t**			
Feralpi Siderurgica		2,732.61	1,675.47	1,144.32
Acciaierie di Calvisano		542.00	588.14	360.06
Arlenico		1.67	0.00	0.66
FERALPI STAHL		960.72	1,500.56	727.39
Dioxins and Furans	**gI-TEQ**			
Feralpi Siderurgica		0.03	0.02	0.03
Acciaierie di Calvisano		0.02	0.05	0.13
FERALPI STAHL		0.14	0.00	0.08
IPA	**kg**			
Feralpi Siderurgica		0.09	0.03	0.03
Acciaierie di Calvisano		0.09	0.10	0.16
FERALPI STAHL		-	-	-

[30] Figure for the site.
[31] The variability of NOx values depends on the way the reheating furnace is operated in relation to the product being rolled during sampling.
[32] Figure for the site.

	UNIT	2024	2023	2022
COT	**t**			
Feralpi Siderurgica		47.33	50.06	39.45
Acciaierie di Calvisano		26.98	12.78	8.19
FERALPI STAHL		-	-	-
Pb	**kg**			
Feralpi Siderurgica		61.32	19.02	27.63
Acciaierie di Calvisano		13.66	84.28	13.86
Arlenico		1.50	1.50	0.63
FERALPI STAHL		34.32	31.20	54.80
Zn	**kg**			
Feralpi Siderurgica		635.67	252.94	288.81
Acciaierie di Calvisano		219.46	1,277.75	260.41
Arlenico		4.44	3.17	9.35
FERALPI STAHL		677.33	666.03	853.71
Hg	**kg**			
Feralpi Siderurgica		44.96	22.37	31.09
Acciaierie di Calvisano		18.67	45.64	50.67
Arlenico		0.08	0.00	0.24
FERALPI STAHL		117.23	105.42	28.32
SOx[33]	**t**			
Feralpi Siderurgica		12.16	18.87	7.05
Acciaierie di Calvisano		19.25	23.18	30.98
FERALPI STAHL		48.90	44.45	4.23
Pcb[34]	**kg**			
Feralpi Siderurgica		0.00	0.01	0.01
Acciaierie di Calvisano		0.17	0.10	0.37
FERALPI STAHL		0.00	0.00	0.00

[33] Figure for the site.
[34] Dioxin-like without toxicity factor.

WASTE GENERATED (t) AND BREAKDOWN BY WASTE COMPOSITION *(GRI 306-3)*

	2024	2023	2022
◇ **HAZARDOUS WASTE**	**43,158**	**42,119**	**43,127**
Fume abatement dust	**42,250**	**41,341**	**42,414**
Feralpi Siderurgica	20,159	19,062	21,218
Acciaierie di Calvisano	6,854	7,099	7,130
FERALPI STAHL	15,237	15,180	14,066
Other waste	**908**	**778**	**713**
Feralpi Siderurgica	163	108	142
Acciaierie di Calvisano	295	75	70
Arlenico	113	107	78
Nuova Defim	5	7	8
Presider	23	19	8
MPL	-	-	0
FERALPI STAHL	306	462	406
Feralpi-Praha	1	1	1
Feralpi-Hungária	1	0	0
Presider Armatures	2	0	0
Saexpa	0	0	0
P.R. Soldadura	0	0	0
◇ **NON-HAZARDOUS WASTE**	**540,250**	**596,421**	**492,744**
Heavy waste from shredding	**0**	**0**	**0**
Feralpi Siderurgica	0	0	0
Acciaierie di Calvisano	0	0	0
FERALPI STAHL	0	0	0
Light waste from shredding (fluff)	**0**	**0**	**0**
Feralpi Siderurgica	0	0	0
Acciaierie di Calvisano	0	0	0
FERALPI STAHL	0	0	0
Mill scale	**35,699**	**32,951**	**34,945**
Feralpi Siderurgica	16,075	13,600	14,618
Acciaierie di Calvisano	879	1,530	448
Arlenico	3,987	3,746	3,837
FERALPI STAHL	14,646	13,930	15,815
Feralpi-Praha	87	117	193
Feralpi-Hungária	25	28	35

	2024	2023	2022
Black slag	**286,521**	**242,042**	**231,262**
Feralpi Siderurgica[35]	143,685	99,556	99,259
Acciaierie di Calvisano	36,362	40,434	42,781
FERALPI STAHL	106,473	102,052	89,222
White slag	**71,844**	**75,923**	**69,844**
Feralpi Siderurgica	37,900	34,473	35,365
Acciaierie di Calvisano	23,001	22,452	16,870
FERALPI STAHL	10,942	18,997	17,609
Other waste	**146,187**	**245,505**	**156,693**
Feralpi Siderurgica	81,986	96,189	89,494
Acciaierie di Calvisano	12,954	16,783	16,479
Arlenico	1,682	2,013	2,185
Nuova Defim	1,172	1,160	1,098
Presider	2,556	2,428	3,343
MPL	-	-	730
FERALPI STAHL	44,388	125,666	42,103
Feralpi-Praha	110	146	201
Feralpi-Hungária	66	67	28
Presider Armatures	1,014	838	885
Saexpa	250	209	140
P.R. Soldadura	7	6	7
TOTAL WASTE	**583,408**	**638,540**	**535,871**

[35] The black slag is sent for recovery in a shared plant (DIMA) for the production of System 2+ certified products such as aggregates and cement mixtures, thus also contributing to the reduction of the use of natural raw materials from quarries.

WASTE NOT INTENDED FOR DISPOSAL (t) *(GRI 306-4)*

2024	ON SITE						AT EXTERNAL SITE					
	Reuse	Recycling	Recovery	Composting	Other treatment	**TOTAL**	Reuse	Recycling	Recovery	Composting	Other treatment	**TOTAL**
HAZARDOUS WASTE												
Feralpi Siderurgica	0	0	0	**0**	**0**	**0**	0	0	19,413	0	0	**19,413**
Acciaierie di Calvisano	0	0	0	**0**	**0**	**0**	0	0	6,670	0	0	**6,670**
Arlenico	0	0	0	**0**	**0**	**0**	0	0	100	0	0	**100**
Nuova Defim	0	0	0	**0**	**0**	**0**	0	0	5	0	0	**5**
Presider	0	0	7	**0**	**0**	**7**	0	0	0	0	0	**0**
MPL	-	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**
FERALPI STAHL	0	**0**	**0**	**0**	**0**	**0**	**0**	**22**	13,801	0	**0**	**13,823**
Feralpi-Praha	0	**0**	**0**	**0**	**0**	**0**	**0**	0	0	0	**0**	**0**
Feralpi-Hungária	0	**0**	**0**	**0**	**0**	**0**	0	0	1	0	0	**1**
Presider Armatures	0	**0**	**0**	**0**	**0**	**0**	0	0	0	0	0	**0**
Saexpa	0	**0**	**0**	**0**	**0**	**0**	0	0	0	0	0	**0**
P.R. Soldadura	0	0	**0**	**0**	**0**	**0**	0	0	0	0	0	**0**
TOTAL	**0**	**0**	**7**	**0**	**0**	**7**	**0**	**22**	**39,990**	**0**	**0**	**40,011**
NON-HAZARDOUS WASTE												
Feralpi Siderurgica	0	0	0	0	0	**0**	0	0	257,241	0	0	**257,241**
Acciaierie di Calvisano	0	0	0	0	0	**0**	0	0	47,981	0	0	**47,981**
Arlenico	0	0	0	0	0	**0**	0	0	5,645	0	0	**5,645**
Nuova Defim	0	0	0	0	0	**0**	0	1,123	50	0	0	**1,172**
Presider	0	2,389	163	0	0	**2,552**	0	0	0	0	0	**0**
MPL	-	-	-	-	-	**-**	-	-	-	-	-	**-**
FERALPI STAHL	0	0	23,588	0	0	**23,588**	0	7,759	142,639	11	0	**150,409**
Feralpi-Praha	0	0	0	0	0	**0**	0	104	93	0	0	**197**
Feralpi-Hungária	0	0	0	0	0	**0**	25	66	0	0	0	**91**
Presider Armatures	0	999	15	0	0	**1,014**	0	0	0	0	0	**0**
Saexpa	0	0	0	0	0	**0**	0	247	3	0	0	**250**
P.R. Soldadura	0	0	0	0	0	**0**	0	7	0	0	0	**7**
TOTAL	**0**	**3,388**	**23,766**	**0**	**0**	**27,154**	**25**	**9,305**	**453,652**	**11**	**0**	**462,992**

2023	ON SITE						AT EXTERNAL SITE					
	Reuse	Recycling	Recovery	Composting	Other treatment	TOTAL	Reuse	Recycling	Recovery	Composting	Other treatment	TOTAL
HAZARDOUS WASTE												
Feralpi Siderurgica	0	0	0	0	0	**0**	0	0	17,264	0	0	**17,264**
Acciaierie di Calvisano	0	0	0	0	0	**0**	0	0	6,744	0	0	**6,744**
Arlenico	0	0	0	0	0	**0**	0	0	87	0	0	**87**
Nuova Defim	0	0	0	0	0	**0**	0	0	7	0	0	**7**
Presider	0	0	0	0	0	**0**	0	0	0	0	4	**4**
FERALPI STAHL	0	0	0	0	0	**0**	17	271	12,411	0	0	**12,700**
Feralpi-Praha	0	0	0	0	0	**0**	0	0	0	0	0	**0**
Feralpi-Hungária	0	0	0	0	0	**0**	0	0	0	0	0	**0**
Presider Armatures	0	0	0	0	0	**0**	0	0	0	0	0	**0**
Gruppo Saexpa	0	0	0	0	0	**0**	0	0	0	0	0	**0**
P.R. Soldadura	0	0	0	0	0	**0**	0	0	0	0	0	**0**
TOTAL	**0**	**0**	**0**	**0**	**0**	**0**	**17**	**272**	**36,512**	**0**	**4**	**36,805**
NON-HAZARDOUS WASTE												
Feralpi Siderurgica	0	0	0	0	0	**0**	0	0	216,357	313	0	**216,671**
Acciaierie di Calvisano	0	0	0	0	0	**0**	0	0	63,050	0	0	**63,050**
Arlenico	0	0	0	0	0	**0**	0	0	4,879	0	0	**4,879**
Nuova Defim	0	0	0	0	0	**0**	0	1,111	49	0	0	**1,160**
Presider	0	0	0	0	0	**0**	0	0	0	0	2,424	**2,424**
FERALPI STAHL	0	0	53,371	0	0	**53,371**	0	5,373	189,279	44	0	**194,696**
Feralpi-Praha	0	0	0	0	0	**0**	0	129	134	0	0	**263**
Feralpi-Hungária	0	0	0	0	0	**0**	28	67	0	0	0	**94**
Presider Armatures	0	0	825	0	13	**839**	0	0	0	0	0	**0**
Gruppo Saexpa	0	0	0	0	0	**0**	0	201	8	0	0	**209**
P.R. Soldadura	0	0	0	0	0	**0**	0	6	0	0	0	**6**
TOTAL	**0**	**0**	**54,196**	**0**	**13**	**54,209**	**28**	**6,886**	**473,757**	**357**	**2,424**	**483,453**

2022	ON SITE						AT EXTERNAL SITE					
	Reuse	Recycling	Recovery	Composting	Other treatment	**TOTAL**	Reuse	Recycling	Recovery	Composting	Other treatment	**TOTAL**
HAZARDOUS WASTE												
Feralpi Siderurgica	0	0	0	0	0	**0**	0	0	18,892	0	0	**18,892**
Acciaierie di Calvisano	0	0	0	0	0	**0**	0	0	6,703	0	0	**6,703**
Arlenico	0	0	0	0	0	**0**	0	0	64	0	0	**64**
Nuova Defim	0	0	0	0	0	**0**	0	1	7	0	0	**8**
Presider	0	0	0	0	0	**0**		0	0	0	1	**1**
MPL	0	0	0	0	0	**0**	0	0	0	0	0	**0**
FERALPI STAHL	0	0	0	0	0	**0**	42	281	11,184	0	0	**11,506**
Feralpi-Praha	0	0	0	0	0	**0**	0	0	0	0	0	**0**
Feralpi-Hungária	0	0	0	0	0	**0**	0	0	0	0	0	**0**
Presider Armatures	0	0	0	0	0	**0**	0	0	0	0	0	**0**
Gruppo Saexpa	0	0	0	0	0	**0**	0	0	0	0	0	**0**
P.R. Soldadura	0	0	0	0	0	**0**	0	0	0	0	0	**0**
TOTAL	**0**	**0**	**0**	**0**	**0**	**0**	**42**	**281**	**36,850**	**0**	**2**	**37,175**
NON-HAZARDOUS WASTE												
Feralpi Siderurgica	0	0	0	0	0	**0**	0	0	211,106	196	0	**211,302**
Acciaierie di Calvisano	0	0	0	0	0	**0**	0	0	45,666	0	0	**45,666**
Arlenico	0	0	0	0	0	**0**	0	0	5,488	0	0	**5,488**
Nuova Defim	0	0	0	0	0	**0**	0	1,403	55	0	0	**1,098**
Presider	0	0	0	0	0	**0**	0	0	0	0	3,343	**3,343**
MPL	0	0	0	0	0	**0**	0	0	0	0	730	**730**
FERALPI STAHL	0	25,489	0	0	0	**25,489**	0	72,792	66,469	0	0	**139,261**
Feralpi-Praha	0	0	0	0	0	**0**	0	188	206	0	0	**394**
Feralpi-Hungária	0	0	0	0	0	**0**	35	28	0	0	0	**63**
Presider Armatures	0	0	0	0	0	**0**	0	0	0	0	885	**885**
Gruppo Saexpa	0	0	0	0	0	**0**	0	139	2	0	0	**140**
P.R. Soldadura	0	0	0	0	0	**0**	0	7	0	0	0	**7**
TOTAL	**0**	**25,489**	**0**	**0**	**0**	**25,489**	**35**	**74,196**	**328,992**	**196**	**4,958**	**408,378**

WASTE FOR DISPOSAL (t) *(GRI 306-5)*

2024	ON SITE					AT EXTERNAL SITE				
	Incineration (with energy recovery)	Incineration (without energy recovery)	Landfilling	Other disposal operations	**TOTAL**	Incineration (with energy recovery)	Incineration (without energy recovery)	Landfilling	Other disposal operations	**TOTAL**
HAZARDOUS WASTE										
Feralpi Siderurgica	0	0	0	0	**0**	0	0	0	909	**909**
Acciaierie di Calvisano	0	0	0	0	**0**	0	0	0	479	**479**
Arlenico	0	0	0	0	**0**	0	0	0	13	**13**
Nuova Defim	0	0	0	0	**0**	0	0	0	0	**0**
Presider	0	0	0	0	**0**	0	0	0	16	**16**
MPL	-	-	-	-	**-**	-	-	-	-	**-**
FERALPI STAHL	0	0	0	0	**0**	0	35	1,685	0	**1,721**
Feralpi-Praha	0	0	0	0	**0**	0	1	0	0	**1**
Feralpi-Hungária	0	**0**	0	0	**0**	0	0	0	0	**0**
Presider Armatures	0	0	0	0	**0**	0	0	0	2	**2**
Saexpa	0	0	0	0	**0**	0	0	0	0	**0**
P.R. Soldadura	0	0	0	0	**0**	0	0	0	0	**0**
TOTAL	**0**	**0**	**0**	**0**	**0**	**0**	**36**	**1,685**	**1,419**	**3,140**
NON-HAZARDOUS WASTE										
Feralpi Siderurgica	0	0	0	0	**0**	0	0	22,395	11	**22,406**
Acciaierie di Calvisano	0	0	0	0	**0**	0	0	25,215	0	**25,215**
Arlenico	0	0	0	0	**0**	0	0	0	24	**24**
Nuova Defim	0	0	0	0	**0**	0	0	0	0	**0**
Presider	0	0	0	0	**0**	0	0	0	4	**4**
MPL	-	-	-	-	**-**	-	-	-	-	**-**
FERALPI STAHL	0	0	0	0	**0**	0	0	2,454	0	**2,454**
Feralpi-Praha	0	0	0	0	**0**	0	0	0	0	**0**
Feralpi-Hungária	0	0	0	0	**0**	1	0	0	0	**1**
Presider Armatures	0	0	0	0	**0**	0	0	0	0	**0**
Saexpa	0	0	0	0	**0**	0	0	0	0	**0**
P.R. Soldadura	0	0	0	0	**0**	0	0	0	0	**0**
TOTAL	**0**	**0**	**0**	**0**	**0**	**1**	**0**	**50,064**	**40**	**50,104**

2023	ON SITE					AT EXTERNAL SITE				
	Incineration (with energy recovery)	Incineration (without energy recovery)	Landfilling	Other disposal operations	**TOTAL**	Incineration (with energy recovery)	Incineration (without energy recovery)	Landfilling	Other disposal operations	**TOTAL**
HAZARDOUS WASTE										
Feralpi Siderurgica	0	0	0	0	**0**	0	0	0	1,906	**1,906**
Acciaierie di Calvisano	0	0	0	0	**0**	0	0	0	430	**430**
Arlenico	0	0	0	0	**0**	0	0	0	20	**20**
Nuova Defim	0	0	0	0	**0**	0	0	0	0	**0**
Presider	0	0	0	0	**0**	0	0	0	15	**15**
FERALPI STAHL	0	0	0	0	**0**	0	63	2,879	0	**2,942**
Feralpi-Praha	0	0	0	0	**0**	0	1	0	0	**1**
Feralpi-Hungária	0	0	0	0	**0**	0	0	0	0	**0**
Presider Armatures	0	0	0	0	**0**	0	0	0	0	**0**
Gruppo Saexpa	0	0	0	0	**0**	0	0	0	0	**0**
P.R. Soldadura	0	0	0	0	**0**	0	0	0	0	**0**
TOTAL	**0**	**0**	**0**	**0**	**0**	**0**	**64**	**2,879**	**2,371**	**5,314**
NON-HAZARDOUS WASTE										
Feralpi Siderurgica	0	0	0	0	**0**	0	0	27,136	12	**27,148**
Acciaierie di Calvisano	0	0	0	0	**0**	0	0	18,149	0	**18,149**
Arlenico	0	0	0	0	**0**	0	0	0	879	**879**
Nuova Defim	0	0	0	0	**0**	0	0	0	0	**0**
Presider	0	0	0	0	**0**	0	0	0	4	**4**
FERALPI STAHL	0	0	0	0	**0**	0	0	12,579	0	**12,579**
Feralpi-Praha	0	0	0	0	**0**	0	0	0	0	**0**
Feralpi-Hungária	0	0	0	0	**0**	0	0	0	0	**0**
Presider Armatures	0	0	0	0	**0**	0	0	0	0	**0**
Gruppo Saexpa	0	0	0	0	**0**	0	0	0	0	**0**
P.R. Soldadura	0	0	0	0	**0**	0	0	0	0	**0**
TOTAL	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**57,864**	**895**	**58,759**

2022	ON SITE					AT EXTERNAL SITE				
	Incineration (with energy recovery)	Incineration (without energy recovery)	Landfilling	Other disposal operations	**TOTAL**	Incineration (with energy recovery)	Incineration (without energy recovery)	Landfilling	Other disposal operations	**TOTAL**
HAZARDOUS WASTE										
Feralpi Siderurgica	0	0	0	0	**0**	0	0	0	2,468	**2,468**
Acciaierie di Calvisano	0	0	0	0	**0**	0	0	497	0	**497**
Arlenico	0	0	0	0	**0**	0	0	0	13	**13**
Nuova Defim	0	0	0	0	**0**	0	0	0	0	**0**
Presider	0	0	0	0	**0**	0	0	0	7	**7**
MPL	0	0	0	0	**0**	0	0	0	0	**0**
FERALPI STAHL	0	0	0	0	**0**	0	22	2,944	0	**2,965**
Feralpi-Praha	0	0	0	0	**0**	0	1	0	0	**1**
Feralpi-Hungária	0	0	0	0	**0**	0	0	0	0	**0**
Presider Armatures	0	0	0	0	**0**	0	0	0	0	**0**
Gruppo Saexpa	0	0	0	0	**0**	0	0	0	0	**0**
P.R. Soldadura	0	0	0	0	**0**	0	0	0	0	**0**
TOTAL	**0**	**0**	**0**	**0**	**0**	**0**	**23**	**3,441**	**2,488**	**5,952**
NON-HAZARDOUS WASTE										
Feralpi Siderurgica	0	0	0	0	**0**	0	0	27,427	7	**27,434**
Acciaierie di Calvisano	0	0	0	0	**0**	0	0	30,911	0	**30,911**
Arlenico	0	0	0	0	**0**	0	0	0	533	**533**
Nuova Defim	0	0	0	0	**0**	0	0	0	0	**0**
Presider	0	0	0	0	**0**	0	0	0	0	**0**
MPL	0	0	0	0	**0**	0	0	0	0	**0**
FERALPI STAHL	0	0	0	0	**0**	0	0	0	0	**0**
Feralpi-Praha	0	0	0	0	**0**	0	0	0	0	**0**
Feralpi-Hungária	0	0	0	0	**0**	0	0	0	0	**0**
Presider Armatures	0	0	0	0	**0**	0	0	0	0	**0**
Gruppo Saexpa	0	0	0	0	**0**	0	0	0	0	**0**
P.R. Soldadura	0	0	0	0	**0**	0	0	0	0	**0**
TOTAL	**0**	**0**	**0**	**0**	**3**	**0**	**0**	**58,337**	**541**	**58,879**

Social sustainability indicators

FERALPI GROUP PERSONNEL AS AT 31.12.2024 *(GRI 2-7)*

	2024			2023			2022		
	MEN	WOMEN	TOTAL	MEN	WOMEN	TOTAL	MEN	WOMEN	TOTAL
◇ **PERSONNEL EMPLOYED BY GENDER AND GEOGRAPHICAL AREA**									
TOTAL	**1,773**	**213**	**1,986**	**1,735**	**187**	**1,922**	**1,680**	**171**	**1,851**
of which Italy	858	112	**970**	850	87	**937**	845	81	**926**
of which Germany	776	69	**845**	746	68	**814**	694	62	**756**
of which Czech Republic	31	8	**39**	32	7	**39**	38	6	**44**
of which Hungary	19	3	**22**	19	3	**22**	21	3	**24**
of which France	3	1	**4**	3	1	**4**	3	1	**4**
of which Spain	74	19	**93**	73	20	**93**	67	17	**84**
of which Algeria	12	1	**13**	12	1	**13**	12	1	**13**
◇ **CONTRACT TYPE**									
Permanent	**1,666**	**200**	**1,866**	**1,642**	**168**	**1,810**	**1,583**	**159**	**1,742**
of which Italy	834	107	**941**	809	79	**888**	803	78	**881**
of which Germany	695	63	**758**	696	58	**754**	646	53	**699**
of which Czech Republic	29	6	**35**	30	6	**36**	31	6	**37**
of which Hungary	19	3	**22**	19	3	**22**	21	3	**24**
of which France	3	1	**4**	3	1	**4**	3	1	**4**
of which Spain	74	19	**93**	73	20	**93**	67	17	**84**
of which Algeria	12	1	**13**	12	1	**13**	12	1	**13**
Temporary	**57**	**7**	**64**	**56**	**13**	**69**	**56**	**8**	**64**
of which Italy	19	4	**23**	34	7	**41**	31	2	**33**
of which Germany	36	1	**37**	20	5	**25**	18	6	**24**
of which Czech Republic	2	2	**4**	2	1	**3**	7	0	**7**
of which Hungary	0	0	**0**	0	0	**0**	0	0	**0**
of which France	0	0	**0**	0	0	**0**	0	0	**0**
of which Spain	0	0	**0**	0	0	**0**	0	0	**0**
of which Algeria	0	0	**0**	0	0	**0**	0	0	**0**
TOTAL EMPLOYEES	**1,723**	**207**	**1,930**	**1,698**	**181**	**1,879**	**1,639**	**167**	**1,806**

	2024			2023			2022		
	MEN	WOMEN	TOTAL	MEN	WOMEN	TOTAL	MEN	WOMEN	TOTAL
Full-time	**1,716**	**176**	**1,892**	**1,692**	**151**	**1,843**	**1,634**	**139**	**1,773**
of which Italy	850	101	**951**	842	77	**919**	833	71	**904**
of which Germany	727	47	**774**	712	45	**757**	662	43	**705**
of which Czech Republic	31	7	**38**	32	6	**38**	36	5	**41**
of which Hungary	19	1	**20**	18	2	**20**	21	1	**22**
of which France	3	0	**3**	3	0	**3**	3	1	**4**
of which Spain	74	19	**93**	73	20	**93**	67	17	**84**
of which Algeria	12	1	**13**	12	1	**13**	12	1	**13**
Part-time	**7**	**31**	**38**	**6**	**30**	**36**	**5**	**28**	**33**
of which Italy	3	10	**13**	1	9	**10**	1	9	**10**
of which Germany	4	17	**21**	4	18	**22**	2	16	**18**
of which Czech Republic	0	1	**1**	0	1	**1**	2	1	**3**
of which Hungary	0	2	**2**	1	1	**2**	0	2	**2**
of which France	0	1	**1**	0	1	**1**	0	0	**0**
of which Spain	0	0	**0**	0	0	**0**	0	0	**0**
of which Algeria	0	0	**0**	0	0	**0**	0	0	**0**
TOTAL EMPLOYEES	**1,723**	**207**	**1,930**	**1,698**	**181**	**1,879**	**1,639**	**167**	**1,806**
Apprentices	50	6	**56**	37	6	**43**	41	4	**45**
TOTAL PERSONNEL EMPLOYED	**1,773**	**213**	**1,986**	**1,735**	**187**	**1,922**	**1,680**	**171**	**1,851**
Temporary and other types of contract	114	10	**124**	101	22	**123**	72	8	**80**
Interns	0	1	**1**	3	1	**4**	2	0	**2**
External companies[36]	2,939	91	**3,030**	2,860	84	**2,944**	2,426	86	**2,512**
TOTAL PERSONNEL[37]	**4,826**	**315**	**5,141**	**4,699**	**294**	**4,993**	**4,180**	**265**	**4,445**

[36] The personnel of contracting companies refers to external personnel operating, as at 31.12.2024, at Feralpi Siderurgica, Acciaierie di Calvisano and Feralpi-Praha (for 2023 the figure includes Feralpi Siderurgica, Acciaierie di Calvisano and Feralpi-Praha, for 2022 the figure includes Feralpi Siderurgica and Acciaierie di Calvisano). These are augmented by 90 men and 9 women from external companies who worked at Presider and Presider Armatures (calculated on average - for Presider and Presider Armatures in 2023, 103 men and 11 women; for Presider, Presider Armatures and MPL in 2022, 121 men and 9 women) and 282 men from external companies who carried out activities at ESF Elbe-Stahlwerke Feralpi GmbH in 2024 (calculated as FTE - 333 men in 2023, 132 men in 2022). These are mainly staff with employment contracts, employed in the following tasks: internal handling, railway handling, installation of new plants and related maintenance (electrical, hydraulic, mechanical), services (reception, security, catering, cleaning).

[37] Only for Germany, the figures do not take into account employees on parental leave or sick leave exceeding 62 weeks as at 31st December.

GOVERNANCE STRUCTURE AND COMPOSITION *(GRI 2-9)*

COMPOSITION OF THE BOD	WOMEN	MEN	TOTAL
BOARD MEMBERS	0	8	**8**[38]
Non-executive members	0	6	**6**
Executive Members	0	2	**2**
Members with a requirement of independence	0	0	**0**
Members belonging to under-represented social groups	0	0	**0**

[38] As at 31 December 2024. For most of 2024, the Board of Directors of Feralpi Siderurgica S.p.A. consisted of nine members until the date of 16 November 2024, when one of them stepped down.

MOVEMENT OF PERSONNEL BY GEOGRAPHICAL AREA AND AGE GROUP *(GRI 401-1)*

	GENDER/AGE	2024 <30	2024 30-50	2024 >50	2024 TOTAL	2023 <30	2023 30-50	2023 >50	2023 TOTAL	2022 <30	2022 30-50	2022 >50	2022 TOTAL
◇ PERSONNEL RECRUITMENT (NO.)													
Group	Women	22	29	6	**57**	11	23	7	**41**	9	22	3	**34**
	Men	82	131	40	**253**	75	143	36	**254**	75	133	25	**233**
	TOTAL	**104**	**160**	**46**	**310**	**86**	**166**	**43**	**295**	**84**	**155**	**28**	**267**
Italy	Women	16	11	1	**28**	7	7	0	**14**	5	4	1	**10**
	Men	21	35	11	**67**	31	43	8	**82**	32	47	14	**93**
	TOTAL	**37**	**46**	**12**	**95**	**38**	**50**	**8**	**96**	**37**	**51**	**15**	**103**
Germany	Women	5	13	4	**22**	3	10	5	**18**	4	16	1	**21**
	Men	55	79	22	**156**	40	89	23	**152**	39	68	3	**110**
	TOTAL	**60**	**92**	**26**	**178**	**43**	**99**	**28**	**170**	**43**	**84**	**4**	**131**
Other areas	Women	1	5	1	**7**	1	6	2	**9**	0	2	1	**3**
	Men	6	17	7	**30**	4	11	5	**20**	4	18	8	**30**
	TOTAL	**7**	**22**	**8**	**37**	**5**	**17**	**7**	**29**	**4**	**20**	**9**	**33**
◇ PERSONNEL OUTGOING TURNOVER (NO.)[39]													
Group	Women	6	18	5	**29**	2	12	11	**25**	1	18	8	**27**
	Men	44	79	67	**190**	27	100	66	**193**	35	111	74	**220**
	TOTAL	**50**	**97**	**72**	**219**	**29**	**112**	**77**	**218**	**36**	**129**	**82**	**247**
Italy	Women	0	4	1	**5**	0	2	4	**6**	0	7	4	**11**
	Men	8	18	25	**51**	16	28	32	**76**	9	41	45	**95**
	TOTAL	**8**	**22**	**26**	**56**	**16**	**30**	**36**	**82**	**9**	**48**	**49**	**106**
Germany	Women	6	12	3	**21**	1	8	5	**14**	1	6	3	**10**
	Men	33	53	40	**126**	11	62	27	**100**	26	55	24	**105**
	TOTAL	**39**	**65**	**43**	**147**	**12**	**70**	**32**	**114**	**27**	**61**	**27**	**115**
Other areas	Women	0	2	1	**3**	1	2	2	**5**	0	5	1	**6**
	Men	3	8	2	**13**	0	10	7	**17**	0	15	5	**20**
	TOTAL	**3**	**10**	**3**	**16**	**1**	**12**	**9**	**22**	**0**	**20**	**6**	**26**

[39] At the Italy level, outgoing personnel on 31/12 of the reporting year are counted among both personnel in force and workers leaving in the reporting year. At the foreign level, outgoing personnel on 31/12 of the reporting year are counted among both personnel in force but not among workers leaving in the reporting year. These workers will be reported among the outgoing workers in the next reporting year.

	GENDER/AGE	2024 <30	2024 30-50	2024 >50	2024 TOTAL	2023 <30	2023 30-50	2023 >50	2023 TOTAL	2022 <30	2022 30-50	2022 >50	2022 TOTAL
◇ **PERSONNEL RECRUITMENT RATE (%)**[40]													
Group	Women	59.46	25.89	9.38	**26.76**	40.74	21.90	10.77	**20.81**	42.86	24.72	4.92	**19.88**
	Men	31.18	14.70	6.46	**14.27**	29.30	17.06	5.71	**14.72**	30.86	16.30	4.03	**13.87**
	TOTAL	**34.67**	**15.95**	**6.73**	**15.61**	**30.39**	**17.60**	**6.18**	**15.35**	**31.82**	**17.13**	**4.11**	**14.42**
Italy	Women	64.00	19.64	3.23	**25.00**	53.85	16.28	0.00	**16.09**	55.56	10.81	2.86	**12.35**
	Men	22.11	7.81	3.49	**7.81**	31.00	10.00	2.50	**9.65**	31.68	11.30	4.27	**11.01**
	TOTAL	**30.83**	**9.13**	**3.47**	**9.79**	**33.63**	**10.57**	**2.28**	**10.25**	**33.64**	**11.26**	**4.13**	**11.12**
Germany	Women	50.00	36.11	17.39	**31.88**	25.00	27.78	26.32	**26.87**	36.36	48.48	5.56	**33.87**
	Men	35.03	21.18	8.94	**20.10**	27.78	25.57	9.02	**20.35**	29.77	21.25	1.23	**15.85**
	TOTAL	**35.93**	**22.49**	**9.67**	**21.07**	**27.56**	**25.78**	**10.22**	**20.88**	**30.28**	**23.80**	**1.53**	**17.33**
Other areas	Women	50.00	25.00	10.00	**21.88**	50.00	23.08	13.33	**20.93**	0.00	9.09	12.50	**9.68**
	Men	54.55	24.29	12.07	**21.13**	33.33	18.33	8.93	**15.63**	36.36	23.38	16.00	**21.74**
	TOTAL	**53.85**	**24.44**	**11.76**	**21.26**	**35.71**	**19.77**	**9.86**	**16.96**	**33.33**	**20.20**	**15.52**	**19.53**
◇ **PERSONNEL OUTGOING TURNOVER RATE (%)**[41]													
Group	Women	16.22	16.07	7.81	**13.62**	7.41	11.43	16.92	**12.69**	4.76	20.22	13.11	**15.79**
	Men	16.73	8.87	10.82	**10.72**	10.55	11.93	10.46	**11.19**	14.40	13.60	11.92	**13.10**
	TOTAL	**16.67**	**9.67**	**10.54**	**11.03**	**10.25**	**11.88**	**11.06**	**11.34**	**13.64**	**14.25**	**12.02**	**13.34**
Italy	Women	0.00	7.14	3.23	**4.46**	0.00	4.65	12.90	**6.90**	0.00	18.92	11.43	**13.58**
	Men	8.42	4.02	7.94	**5.94**	16.00	6.51	10.00	**8.94**	8.91	9.86	13.72	**11.24**
	TOTAL	**6.67**	**4.37**	**7.51**	**5.77**	**14.16**	**6.34**	**10.26**	**8.75**	**8.18**	**10.60**	**13.50**	**11.45**
Germany [42]	Women	60.00	33.33	13.04	**30.43**	8.33	22.22	26.32	**20.90**	9.09	18.18	16.67	**16.13**
	Men	21.02	14.21	16.26	**16.24**	7.64	17.82	10.59	**13.39**	19.85	17.19	9.88	**15.13**
	TOTAL	**23.35**	**15.89**	**15.99**	**17.40**	**7.69**	**18.23**	**11.68**	**14.00**	**19.01**	**17.28**	**10.34**	**15.21**
Other areas	Women	0.00	10.00	10.00	**9.38**	50.00	7.69	13.33	**11.63**	0.00	22.73	12.50	**19.35**
	Men	27.27	11.43	3.45	**9.15**	0.00	16.67	12.50	**13.28**	0.00	19.48	10.00	**14.49**
	TOTAL	**23.08**	**11.11**	**4.41**	**9.20**	**7.14**	**13.95**	**12.68**	**12.87**	**0.00**	**20.20**	**10.34**	**15.38**

[40] The recruitment rate (A) is calculated according to the following formula: A=new hires/total workforce*100.
[41] The outgoing turnover rate (T) is calculated according to the following formula: T=leavers/total workforce*100. At the Italy level, outgoing personnel on 31/12 of the reporting year are counted among both personnel in force and workers leaving in the reporting year. At the foreign level, outgoing personnel on 31/12 of the reporting year are counted among both personnel in force but not among workers leaving in the reporting year. These workers will be reported among the outgoing workers in the next reporting year.
[42] Only for Germany, the exits also include employees on parental leave or sick leave exceeding 62 weeks as at 31st December. These employees, considering only Germany, are not included in the total workforce. New hires, on the other hand, include personnel who returned to work in the reporting year following the use of parental leave.

RATE AND NUMBER OF ACCIDENTS AT WORK BY AREA[43] *(GRI 403-9)*

		2024	2023	2022
◇ RATE OF ACCIDENTS AT WORK BY AREA				
Employees (Accident Rate)				
Group	Accidents recorded	22.81	15.52	16.50
	Serious accidents	1.15	1.52	0.99
	Deaths due to occupational accidents	0.00	0.00	0.00
Italy	Accidents recorded	14.87	11.20	13.95
	Serious accidents	1.65	2.36	1.90
	Deaths due to occupational accidents	0.00	0.00	0.00
Germany	Accidents recorded	29.69	22.27	21.06
	Serious accidents	0.76	0.00	0.00
	Deaths due to occupational accidents	0.00	0.00	0.00
External companies (Accident rate)				
Group	Accidents recorded	8.44	14.30	12.45
	Serious accidents	0.99	0.00	0.00
	Deaths due to occupational accidents	0.50	0.00	0.00
Italy	Accidents recorded	6.65	11.44	11.13
	Serious accidents	0.95	0.00	0.00
	Deaths due to occupational accidents	0.95	0.00	0.00
Germany	Accidents recorded	4.07	29.78	19.27
	Serious accidents	0.00	0.00	0.00
	Deaths due to occupational accidents	0.00	0.00	0.00
◇ NUMBER OF ACCIDENTS AT WORK BY AREA				
Employees (no. of accidents)				
Group	No. of accidents recorded	79	51	50
	No. of serious accidents	4	5	3
	No. of deaths due to occupational accidents	0	0	0
	Hours worked	3,463,585	3,285,536	3,030,081

[43] Index = (no. accidents/hours worked)x1,000,000. The calculation of accidents takes into account accidents that occur in the workplace. Commuting accidents are excluded, with the exception of those occurring with transport organised by the company. Reported incidents (recordable injuries) are those that resulted in absence from the workplace for a period of 24 hours or more, including medical treatment beyond first aid or transfers to another job that resulted in days away from work. Injuries with serious consequences are those that resulted in a number of days lost of 180 or more. The main types of injuries encountered in the three-year period 2021-2023 include lacerated contusion injuries, contusions, crushing, and fractures.

		2024	2023	2022
External companies (no. of accidents)				
Group	No. of accidents recorded	17	14	12
	No. of serious accidents	2	0	1
	No. of deaths due to occupational accidents	1	0	0
	Hours worked	2,013,520	979,301	936,541

PER CAPITA AVERAGE TRAINING HOURS BY GENDER AND BY PROFESSIONAL CATEGORY *(GRI 404-1)*

		2024	2023	2022
◇ AVERAGE TRAINING HOURS PER CAPITA BY GENDER	**GENDER**			
Group	Men	21	23	25
	Women	31	32	12
	TOTAL	**22**	**24**	**24**
Italy	Men	27	35	21
	Women	44	55	17
	TOTAL	**29**	**37**	**21**
Germany	Men	17	12	34
	Women	20	15	9
	TOTAL	**17**	**12**	**32**
◇ AVERAGE TRAINING HOURS PER CAPITA BY PROFESSIONAL CATEGORY	**CATEGORY**			
Group	Blue-collars	19	20	21
	White-collars and middle managers	31	33	29
	Executives	21	30	24
	TOTAL	**22**	**24**	**24**
Italy	Blue-collars	24	34	15
	White-collars and middle managers	39	43	30
	Executives	24	44	36
	TOTAL	**29**	**37**	**21**
Germany [44]	Blue-collars	17	10	33
	White-collars and middle managers	19	20	31
	Executives	19	10	4
	TOTAL	**17**	**12**	**32**

[44] At the level of Germany, starting in 2021, apprentice workers are considered below the category of “Blue collars”.

COMPOSITION OF THE MEMBERS OF FERALPI SIDERURGICA'S BOARD OF DIRECTORS BY GENDER AND AGE GROUP *(GRI 405-1)*

AGE	2024 MEN	2024 WOMEN	2024 TOTAL	2023 MEN	2023 WOMEN	2023 TOTAL	2022 MEN	2022 WOMEN	2022 TOTAL
◇ COMPOSITION OF THE MEMBERS OF FERALPI SIDERURGICA'S BOARD OF DIRECTORS, NUMBER									
<30	0	0	**0**	0	0	**0**	0	0	**0**
30-50 (including 30 and 50)	0	0	**0**	0	0	**0**	0	0	**0**
>50	8	0	**8**	9	0	**9**	9	0	**9**
TOTAL	**8**	**0**	8	**9**	**0**	9	**9**	**0**	9
◇ COMPOSITION OF THE MEMBERS OF FERALPI SIDERURGICA'S BOARD OF DIRECTORS, PERCENTAGE									
<30	0	0	**0**	0	0	**0**	0	0	**0**
30-50 (including 30 and 50)	0	0	**0**	0	0	**0**	0	0	**0**
>50	**100**	0	**100**	100	0	**100**	100	0	**100**
TOTAL	**100**	**0**	100	**100**	**0**	100	**100**	**0**	100

COMPOSITION OF GROUP EMPLOYEES BY GENDER, AGE GROUP AND OTHER RELEVANT CATEGORIES *(GRI 405-1)*

	2024 MEN		2024 WOMEN		2024 TOTAL		2023 MEN		2023 WOMEN		2023 TOTAL		2022 MEN		2022 WOMEN		2022 TOTAL	
Age	**NO.**	**%**	**NO.**	**%**	**NO.**	**%**	**NO.**	**%**	**NO.**	**%**	**NO.**	**%**	**NO.**	**%**	**NO.**	**%**	**NO.**	**%**
<30	263	13.24	37	1.86	**300**	**15.11**	256	13.32	27	1.40	**283**	**14.72**	235	12.70	21	1.13	**264**	**14.26**
30-50 (30 and 50 included)	876	44.11	110	5.54	**986**	**49.65**	838	43.60	105	5.46	**938**	**48.80**	824	44.52	89	4.81	**905**	**48.89**
>50	634	31.92	66	3.32	**700**	**35.25**	631	32.83	65	3.38	**701**	**36.47**	621	33.55	61	3.30	**682**	**36.84**
TOTAL	**1,773**	**89.27**	**213**	**10.73**	1,986	100.00	**1,725**	**89.75**	**197**	**10.25**	1,922	100.00	**1,680**	**90.76**	**171**	**9.24**	1,851	100.00

◇ OTHER DIVERSITY INDICATORS

OTHER DIVERSITY INDICATORS	2024 NUMBER	2024 %	2023 NUMBER	2023 %	2022 NUMBER	2022 %
Protected categories	67	3.37	64	3.33	63	3.39
Other	67	3.37	46	2.39	33	1.78

RATIO (%) BETWEEN AVERAGE MALE AND FEMALE REMUNERATION[45] *(GRI 405-2)*

	CATEGORY	2024	2023	2022
Feralpi Siderurgica	White-collars and middle managers	68.65	68.69	-
Arlenico	White-collars and middle managers	65.05	61.36	57.04
Presider	White-collars and middle managers	77.32	76.84	76.93
ESF Elbe-Stahlwerke Feralpi	White-collars and middle managers	69.17	67.44	65.29

RATIO (%) BETWEEN MALE AND FEMALE BASE SALARY[46] *(GRI 405-2)*

	CATEGORY	2024	2023	2022
Feralpi Siderurgica	White-collars and middle managers	92.33	92.38	-
Arlenico	White-collars and middle managers	93.39	91.79	89.08
Presider	White-collars and middle managers	94.31	95.23	94.92
ESF Elbe-Stahlwerke Feralpi	White-collars and middle managers	100.00	100.00	100.00

[45] The table shows only the sites and categories where female personnel are present or where the breakdown by role concerns at least 6 members of female personnel.
[46] The table shows only the sites and categories where female personnel are present or where the breakdown by role concerns at least 6 members of female personnel.

System certifications

Feralpi Siderurgica	UNI EN ISO 9001, 14001, 45001, 50001, EMAS
Acciaierie di Calvisano	UNI EN ISO 9001, 14001, 50001, EMAS
Presider	UNI EN ISO 9001, 14001
Presider Armatures	BS EN ISO 9001
Nuova Defim	UNI EN ISO 9001
Arlenico	UNI EN ISO 9001, 14001 - IATF 16949 - Automotive Quality Management System
ESF Elbe-Stahlwerke Feralpi GmbH	DIN EN ISO 9001, 14001, 50001, EMAS, Entsorgungsfachbetried
FERALPI STAHLANDEL GMBH	DIN EN ISO 9001, 50001
FERALPI LOGISTIK GMBH	DIN EN ISO 9001, 50001
FERALPI-PRAHA S.R.O.	ISO 9001
FERALPI-Hungária KFT	ISO 9001

Product certifications

Feralpi Siderurgica	EPD - Environmental Product Declaration UNI EN ISO 14067 Certificate of minimum recycled/recovered/by-product content for: ◇ Steel ◇ Green stone ◇ Green lime ◇ 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 for
Presider	EPD - Environmental Product Declaration UNI EN ISO 14067 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
Nuova Defim	UNI EN ISO 1090-1
Arlenico	EPD - Environmental Product Declaration UNI EN ISO 14067
ESF Elbe-Stahlwerke Feralpi GmbH	EPD - Environmental Product Declaration Certificate 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.