

# Social information

- 16.1. Raising competencies: people growth and development \_78
- 16.2. The health and safety management at the workplace \_80
- 16.3. Welfare \_82
- 16.4. Diversity, Equity, Inclusion \_83
- 16.5. Human rights in the workplace and along the supply chain \_84
- 16.6. Creating value for the territory \_85

# 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

<b>Attracting talent</b> Diverse recruitment formats, offering professional growth and development in a safe and stimulating working environment.	
<b>Developing competencies</b> Promoting a culture of continuous learning through quality training for employees and supporting the younger generation for conscious growth.	
<b>Ensuring a positive working environment: safe, inclusive and respectful</b> 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.	
<b>Valuing potential</b> Professional development plans with targeted training, succession planning, performance management tools and fair policies aligned to employee performance and contribution.	

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

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:

<b>Technical area organisational development</b>
<b>GROUP TECHNICAL DEPARTMENT</b>
<b>Inclusion of new staff</b>
<b>TALENT ATTRACTION PROJECTS</b>
<b>Technical skills development</b>
<b>TALENT DEVELOPMENT</b>

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	<b>Technical Graduate Programme:</b> development of specialised skills for young technicians with engineering degrees.
2	<b>Operation Graduate Programme:</b> development of technical team and soft skills.
3	<b>Sider+:</b> transfer of basic skills to access selection processes for the company's production areas.
4	<b>Sider+ Advanced:</b> development of intermediate technical skills for the steel industry for candidates with basic skills.
5	<b>Future4Steel (IFTS):</b> highly professional training by the Steel Academy to train "Experts in installation and maintenance techniques in civil and industrial plants".
6	<b>ITS Meccatronica:</b> 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	<b>Special recruitment projects (for professional clusters):</b> recruitment and selection targeted at different professional clusters at national level.
8	<b>Meetings with students:</b> 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

<b>FERALPI BOOTCAMP</b>	Through <b>Feralpi Bootcamp</b> , a series of autonomous but complementary initiatives, Feralpi Group promotes <b>training and orientation initiatives for conscious growth aimed at employees' children, work experience programmes and advanced training through ITS and IFTS</b> . 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.
<b>PROJECT STEELWOMEN</b>	<b>Feralpi Group is committed to recruiting female staff in all company areas, including technical areas.</b> 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.
<b>SUCCESSION PLANNING</b>	In 2024, activities continued on the <b>Succession Planning project, aimed at addressing possible planned and unplanned replacement needs of employees in strategic roles in the company.</b> 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.
<b>FERALPI PRO</b>	The <b>Feralpi PRO</b> system, which allows <b>personnel skills to be mapped</b> , 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.

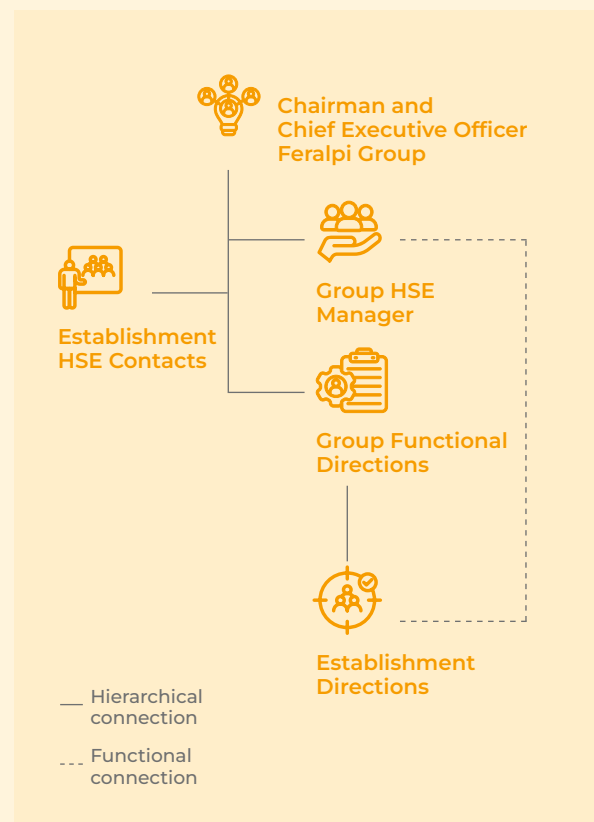
The company is constantly committed to raising awareness of safety issues and reducing risk through training, constant monitoring and targeted initiatives that enable continuous improvement of working conditions.

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.

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 **NET-ZWERK 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.

## 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.



## 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, edu-

cational, 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

<p><b>SOCIAL SECTOR</b></p> 	<ul style="list-style-type: none"> <li>◇ Safeguarding and caring for the environment</li> <li>◇ Education, training and work as tools for change</li> <li>◇ Promotion of individual physical and mental well-being and safety at work</li> <li>◇ Social inclusion through sport and culture, and the creation of inclusive spaces</li> <li>◇ Community development</li> <li>◇ Global emergencies</li> </ul>
<p><b>CULTURAL SECTOR</b></p> 	<ul style="list-style-type: none"> <li>◇ Culture as an educational tool</li> <li>◇ Development of entrepreneurial culture</li> <li>◇ Publication and education on the world of steel</li> <li>◇ Preservation of the artistic and historical heritage of the community</li> </ul>

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.