



Sustainability highlights

-11%

Energy use from fuels and combustibles compared to 2023

-7%

Scope 1 + Scope 2 location-based tCO₂eq compared to 2023

+17,3%

Female employees compared to 2023

+216

New hires

About this report

At Trasteel Group, sustainability is not treated as an accessory to growth but as a pillar of our long-term strategy. The company's commitment to ESG principles is reflected in concrete actions across all business units from responsible sourcing and decarbonization initiatives to workplace safety and transparent governance practices. This report outlines our approach to building a more resilient, ethical, and future-ready organization.

With this vision in mind, the Corporate ESG Specialist introduces the Sustainability Report, which represents an important step towards transparency and accountability.

This Sustainability Report has been prepared in accordance with the GRI Standards (2021), representing Trasteel Group's strong commitment to transparency, comparability, and continuous improvement in ESG disclosure.

In addition to the GRI Standards, this report adopts the European Sustainability Reporting Standards (ESRS) as a reference framework. This reflects Trasteel's proactive alignment with the evolving regulatory landscape, particularly the Corporate Sustainability Reporting Directive (CSRD).

While not yet fully structured in accordance with ESRS, this report integrates several core ESRS principles and disclosure requirements, especially in relation to:

- **Double materiality**, addressing both inside-out (impacts on people and planet) and outside-in (risks and opportunities for the company) perspectives;
- **Stakeholder engagement**, to ensure responsiveness to expectations across Trasteel's value chain;
- **Environmental and social impact analysis**, including carbon emissions, energy use, and working conditions;
- **Progressive ESG topic coverage**, consistent with CSRD timelines and reporting maturity.

Beyond regulatory alignment, this report expresses Trasteel's intrinsic motivation to contribute to a more sustainable and resilient global economy. The company actively contributes to the achievement of the **United Nations Sustainable Development Goals (SDGs)**, with a focus on SDG 3 (Good Health and Well-being), 7 (Affordable and Clean Energy), 8 (Decent Work and Economic Growth), 12 (Responsible Consumption and Production), and 13 (Climate Action), 5 (Gender equality), 6 (Clean water and sanitation), 16 (Peace and Justice), 9 (Industry, Innovation and Infrastructure).

This ESG journey is not only a compliance effort, but a strategic choice. It defines how Trasteel aims to operate in the coming years, responsibly, innovatively, and with purpose.

3.3

Reporting perimeter

This Sustainability Report refers to the 2024 financial year and covers the companies that were fully consolidated within Trasteel Group as of 31 December 2024 and had a material impact on the Group's ESG profile.

The reporting perimeter includes the following **12 companies**, located across **six countries**, based on financial consolidation, operational control, and ESG relevance:

Entities Included in the Reporting Perimeter

COMPANY	COUNTRY	TYPE OF ACTIVITY
Trasteel trading holding	Switzerland	Trading
Trasteel International SA	Switzerland	Trading, energy, corporate services
Profilmec S.p.A.	Italy	Tube production (Racconigi)
TAMAC S.r.l.	Italy	Steel service center (Massa)
Ispadue S.p.A.	Italy	Tube production (Sesto al Reghena)
Officine Tecnosider S.r.l.	Italy	Heavy steel plate fabrication (San Giorgio di Nogaro)
ROLM S.r.l.	Italy	Machinery and equipment (Cavallerleone)
LIFI S.r.l.	Italy	Tube and sheet metal machinery (Lombardore)
Trasteel Engineering Polska	Poland	Engineering and technical design (Warsaw)
Trasteel Inginerie S.r.l.	Romania	Engineering and cut-bend services (Galati)
Yugotub d.o.o.	Serbia	Tube production (Nova Pazova)
Fematek Uluslararası Ticaret A.S.	Turkey	Industrial manufacturing (Istanbul)
Trasteel Makina ve Ticaret A.S.	Turkey	Heavy fabrication and machinery (Izmir)

These entities represent the core industrial and engineering base of the Group and are responsible for the majority of environmental and social impacts, especially in energy consumption, emissions, occupational health and safety, and workforce development.

Entities Excluded from the 2024 Perimeter:

- **Util Industries S.p.A.** – Excluded: not yet financially consolidated in 2024 following recent acquisition.
- **Trasteel Distribution GmbH** (Germany) – Excluded: trading unit with limited ESG relevance.

- **Trasteel Trading DMCC** (UAE) – Excluded: financial trading office with minimal operational footprint.
- **Trasteel Asia Pte Ltd.** (Singapore) – Excluded: back-office and sourcing support role only.
- **SIM S.r.l.** – Excluded: 50% joint venture, not under full control.

As part of Trasteel's ESG roadmap, the Group aims to progressively expand the reporting perimeter to cover all fully controlled subsidiaries, including newly acquired entities.

*The initiatives outlined in the Plan are aligned with specific **Sustainable Development Goals (SDGs)**, the global framework for sustainable economic and social progress established by the **United Nations (UN) 2030 Agenda**. Through the SDGs, the UN calls upon organizations worldwide to actively contribute to sustainable development within the scope of their business activities, fostering a shared commitment to global cooperation and responsible growth.*



3.4

Esg strategy and vision

In 2024, Trasteel Group further strengthened its commitment to sustainable and responsible development by structurally integrating ESG (Environmental, Social, and Governance) principles into its industrial strategy. Global challenges such as the ecological transition, digital transformation, and the evolution of the European regulatory landscape (including the CSRD and ESRS) require companies to play a more proactive role.

Trasteel is responding to these challenges with concrete, measurable actions aligned with leading international standards such as the GRI, the ESRS, and the United Nations Sustainable Development Goals.

Our journey is rooted in the concept of **double materiality**, evaluating both the Group's impact on people and the planet, and the ESG risks and opportunities that may influence Trasteel's financial performance.

	2025	2026	2027
Annual Report evolutions	Annual Report GRI in accordance	Annual report GRI in accordance	Annual report VSME
ESG Activities	- Materiality analysis - Definition of ESG Plan - Approach to Scope 3 emissions calculation	- Stakeholder engagement activities - Monitoring of material topics and double materiality analysis - Definition of ESG targets and actions (SBTi)	- Approach to Scope 3 calculation - Monitoring of ESG targets and actions
ESG main outcome	ESG first comprehensive info for stakeholders	ESG targets defined for key material topics; initial progress monitored and reported. Improved ESG disclosure practices aligned with GRI	ESG targets defined for key material topics; initial progress monitored and reported. Improved ESG disclosure practices aligned with GRI. Strengthened ESG governance and performance metrics integrated into business strategy. VSME-compliant ESG

Sustainability governance

At Trasteel, sustainability is not an isolated initiative, it is part of how we manage our business. The Group has established a structured governance model that supports the integration of ESG principles across all subsidiaries and business units. This model is designed to ensure both top-down strategic direction and bottom-up engagement, creating shared accountability and broad participation throughout the organization.

Esg governance framework

In 2024, Trasteel formalized its ESG governance system through three core instruments:

- A new **Sustainability Policy**, aligned with our operational reality and global ESG standards
- A revised **Code of Conduct**, reaffirming our ethical commitments and compliance expectations
- The establishment of the **ESG Committee**, with responsibility for monitoring ESG objectives and supporting implementation across all companies in the Group

The Board of Directors exercises overall supervision of sustainability-related matters, ensuring ESG considerations are appropriately integrated into the Group's governance and strategic direction.

The **ESG Committee**, instituted in the 2024 fiscal year, includes representatives from key subsidiaries and departments. Each member acts as an "owner" of one or more material topics, ensuring consistent follow-up and monitoring. The Committee meets quarterly and acts both as a consultative and implementation body for the ESG Plan.

To promote widespread awareness and data accountability, the Group has appointed **ESG Focal Points** across its companies. These individuals serve as contact people for local ESG activities and contribute directly to data collection and monitoring.

We are committed to building ESG capacity internally: regular training and one-on-one sessions are organized for both Committee members and Focal Points, ensuring alignment with evolving expectations and standards.

Code of conduct

Trasteel Group's Code of Conduct, updated in 2024, outlines the ethical principles and standards that guide all employees, partners, and agents across the Group. It promotes a culture of integrity, fairness, and accountability, covering areas such as equal opportunities, anti-discrimination, anti-corruption, conflict of interest, environmental responsibility, and health and safety.

The Code reinforces the Group's zero-tolerance stance on modern slavery, harassment, and unethical behavior across its operations and supply chain. It also emphasizes the responsible use of company resources and the importance of confidentiality.

Employees are encouraged to report concerns through clear internal channels, with the Human Resources department ensuring proper handling. The Code is a foundational element of Trasteel's commitment to responsible business practices and long-term sustainability.

Sustainability policy

Trasteel Group's Sustainability Policy defines the Group's commitment to integrating environmental responsibility into its business strategy and operations. Applicable to all subsidiaries, the Policy promotes efficient use of resources, pollution prevention, regulatory compliance, and supply chain engagement on sustainability. It supports the adoption of energy-saving solutions, waste reduction, and circular practices, while encouraging awareness and accountability among employees and partners. The Policy is regularly reviewed and updated to reflect the Group's evolving ESG priorities.

Traceability and sustainable finance

Trasteel has strengthened its ESG governance through transparent and structured practices:

- A **Sustainability-Linked Loan** was signed, linking loan terms directly to the achievement of ESG objectives, reinforcing financial accountability.
- A supplier ESG questionnaire was introduced to assess environmental, social, and governance performance across the value chain and improve supply chain resilience.
- International certifications have been expanded and maintained, including: ISO 14001 (Environment), ISO 9001 (Quality), ISO 45001 (Health & Safety), and ISO 27001 (Information Security).

3.6

Memberships and certifications

In 2024 Trasteel continued to strengthen its commitment to responsible and transparent management by adhering to internationally recognized sustainability frameworks and obtaining third-party recognitions.

In terms of **certifications and ESG assessments**, Trasteel operates with a solid management system and has achieved multiple **EcoVadis recognitions**, reflecting the maturity of sustainable practices across its subsidiaries.

SUBSIDIARY	CERTIFICATIONS	ECOVADIS RATING (2023)
Trasteel International	ISO 9001, 14001, 45001, 27001	 Bronze 63/100
Trasteel Engineering Polska	—	 Bronze 61/100
Trasteel Inginerie	—	 Bronze 62/100
Profilmec	ISO 9001, 14001, 14067, IATF 16949	 Bronze 64/100
Ispadue	ISO 9001, 14001, 14067, IATF 16949	 Bronze 63/100
Lifi	ISO 9001, 14001, 45001, IATF 16949	 Silver 72/100
ROLM	—	 Silver 69/100
Yugotub	ISO 9001, 14067	—
Officine Tecnosider	ISO 9001, 14001, 45001, 14067, EPD (Environmental Product Declaration)	 Silver 66/100
TAMAC	ISO 9001, 14001, 45001	 Silver 67/100

Stakeholder engagement and map

At Trasteel, building long-term and trust-based relationships with our stakeholders is a key pillar of our sustainability approach. We engage actively with the people and organizations who are affected by our activities or who influence our strategic decisions. This ongoing dialogue helps us align our priorities, improve our ESG performance, and contribute to shared value creation across the value chain.



STAKEHOLDERS	ENGAGEMENT
Customers	We serve a diverse global customer base in the steel, industrial, and energy sectors. Our aim is to build durable relationships based on quality, customization, and innovation. Regular feedback is collected through technical reviews, customer service exchanges, and post-delivery evaluations. Sustainability topics of most interest to our customers include product traceability, energy efficiency, and carbon footprint all of which are addressed in our material topics
Employees	With over 900 people across multiple countries, our employees are at the heart of our operations. We maintain ongoing dialogue through internal surveys, feedback sessions, and safety committees. Training, inclusion, and workplace well-being are key themes. In several sites, dedicated programs are in place to support professional development and team cohesion beyond daily work life.
Suppliers	As a Group with a strong industrial backbone, we rely on strategic suppliers to maintain quality and sustainability across our operations. We engage through ESG questionnaires, performance reviews, and long-term procurement partnerships. The most relevant ESG topics for suppliers include occupational safety, circular sourcing, and responsible business conduct. A shared Code of Conduct and supplier engagement tools support this alignment.
Financial stakeholders	We maintain a continuous and transparent relationship with investors, banks, and financing institutions. The issuance of our Sustainability-Linked Loan marked a milestone in connecting financial performance to ESG targets. ESG data, risk exposure, and regulatory preparedness are core themes discussed in regular meetings and disclosure processes.
Industrial & Strategic Partners	From technical collaborations to innovation partnerships, Trasteel engages with business allies to co-develop solutions for digitalization, clean technology, and circular models. These relationships are maintained through joint ventures, engineering synergies, and participation in industry platforms.
Local Communities	In the regions where we operate industrial facilities, we foster positive relationships with local authorities, social institutions, and educational bodies. Activities include open-door events, environmental transparency, youth employment, and social initiatives particularly in Italy, Serbia, Romania, and Turkey.
Institutions, Academia, Media	We maintain an active dialogue with universities, research centers, and institutional stakeholders to support innovation, sustainability education, and responsible industrial policies. Through participation in sector events, ESG benchmarking, and joint projects, we contribute to the development of industry-wide good practices.

3.8

Building the materiality map

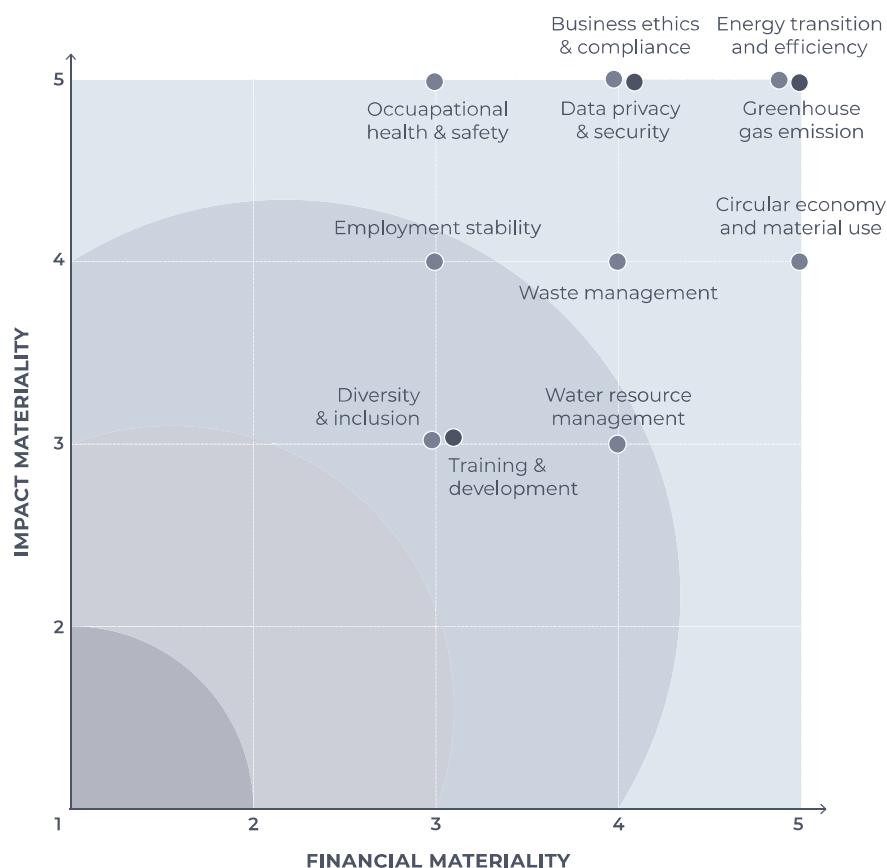
The Materiality Map was developed through a structured and participatory process, which involved key stakeholders via interviews and focused consultations. Each material topic was evaluated according to two core dimensions:

- **Impact on business (X-axis):** this reflects the importance of each topic in terms of strategic risks, growth opportunities, and its influence on Trasteel's operational and financial performance.
- **Impact on people and the environment (Y-axis):** this dimension assesses how each topic affects environmental sustainability, community well-being, and broader stakeholder expectations across the value chain.

The resulting **Materiality Matrix** is more than a compliance tool it is a living framework that reflects Trasteel's evolving sustainability strategy. It aligns our corporate responsibilities with stakeholder expectations and global challenges, providing a clear foundation for:

- ESG planning and prioritization
- ESG disclosures in line with GRI and in reference to ESRS
- Risk management and impact mitigation
- Strategic investment in social and environmental innovation

This matrix will be regularly updated to reflect market developments, regulatory changes, and stakeholder input, and may be subject to **external assurance** in the coming years to strengthen its credibility and relevance.



Double materiality assessment

Trasteel Group conducted its double materiality assessment in accordance with leading international standards, including the **GRI Standards 2021**, the **European Sustainability Reporting Standards (ESRS)**, and in anticipation of the obligations introduced by the **Corporate Sustainability Reporting Directive (CSRD)**. This process represents a fundamental step in enhancing the strategic relevance of sustainability within the Group and ensuring that ESG reporting reflects both regulatory requirements and stakeholder expectations.

The assessment was structured to capture two distinct but interconnected dimensions:

- the impact of the Group's activities on the environment, people, and society (impact materiality),
- the influence of sustainability-related factors on Trasteel's business performance, risk exposure, and financial resilience (financial materiality).

The methodology consisted of several key phases:

1. Context Analysis and Benchmarking

The process began with a comprehensive review of applicable sustainability frameworks (GRI, ESRS, SDGs), industry-specific standards, and peer disclosures. This benchmarking exercise allowed Trasteel to identify the main regulatory trends, ESG priorities, and emerging expectations relevant to its value chain and operating context.

2. Identification of Relevant ESG Topics

Building on this analysis, a preliminary list of potentially material topics was defined, reflecting the full ESG spectrum. These topics were selected by integrating internal knowledge of business operations and risks, external benchmarks, and sectoral dynamics. They included areas such as energy transition, climate impact, circularity, occupational health and safety, ethical business conduct, and supply chain sustainability.

3. Stakeholder Engagement

A series of targeted consultations was then conducted to ensure that the assessment incorporated the views and concerns of the Group's key stakeholders. This included internal discussions with ESG focal points and the ESG Committee, as well as structured dialogues with clients, suppliers, financial institutions, and local partners. Stakeholder feedback played a central role in validating the relevance and prioritisation of each topic.

4. Materiality Scoring and Evaluation

Each topic was assessed according to a double materiality lens:

- Impact materiality considered the actual or potential effects of Trasteel's

activities on the environment, human rights, and society. Criteria included the severity, scale, and irreversibility of impacts, as well as their likelihood.

- Financial materiality focused on the implications of each topic for the Group's economic performance, business continuity, and regulatory compliance. Topics were evaluated in terms of risk exposure, cost implications, investor relevance, and alignment with strategic objectives.

5. Development of the Materiality Matrix

The final topics were plotted on a materiality matrix, where the X-axis reflects their relevance to the company (financial materiality) and the Y-axis their relevance to stakeholders and society (impact materiality). Topics positioned in the upper-right quadrant, high on both dimensions, were identified as strategic priorities and are the focus of this Sustainability Report.

Ongoing commitment

Trasteel views materiality assessment as a dynamic process. The matrix will be reviewed regularly to reflect evolving stakeholder expectations, regulatory developments, and business changes. Future updates will expand stakeholder participation and may include external assurance to reinforce the robustness and credibility of the analysis.

3.10

Most relevant material topics

MATERIAL TOPICS	SDG	WHY IT'S MATERIAL
Energy transition and efficiency	 	Trasteel's operations are energy-intensive, making energy use a key driver of emissions and costs. The Group is investing in photovoltaic systems, renewable energy procurement, and efficiency measures to reduce environmental impact and improve resilience.
Greenhouse Gas Emissions	 	Trasteel's industrial operations generate direct (Scope 1) and indirect (Scope 2) GHG emissions. Managing and reducing these emissions is critical for climate compliance, access to sustainable financing, and alignment with EU climate targets. Regulatory pressure and stakeholder expectations further reinforce its strategic importance.
Water resource management	 	Water is essential in Trasteel's production processes. As water scarcity intensifies in some regions, efficient use and reuse of water become critical for environmental compliance, risk management, and community acceptance. Stakeholders expect transparency and responsibility in water consumption and discharge.
Waste Management		Industrial operations, especially in steel processing, generate significant volumes of both hazardous and non-hazardous waste. Improper waste management poses environmental and regulatory risks. Promoting waste reduction, recovery, and recycling supports circularity, reduces environmental pressure, and ensures compliance with EU and national regulations.
Circular Economy and Material Consumption		Trasteel's operations rely heavily on raw materials, which creates pressure on natural resources. Promoting recycled content, closed-loop scrap reintegration, and waste minimization supports cost-efficiency, environmental compliance, and alignment with circular economy principles increasingly expected by EU regulations and stakeholders.
Occupational Health & Safety	 	Trasteel operates in industrial environments where worker health and safety risks are inherent. Ensuring a safe and compliant workplace is essential to protect employees, maintain productivity, reduce incidents, and meet legal and stakeholder expectations. Certification to ISO 45001 and structured training programs support a strong safety culture.
Employment Stability and Workforce Retention		High turnover, precarious contracts or low retention can affect productivity, morale, and operational continuity. Ensuring stable, long-term employment fosters loyalty, reduces recruitment costs, and supports local development. It also aligns with Trasteel's ESG commitment to decent work and long-term value creation.
Training and Development		The industrial and digital transformation of the steel sector requires upskilling and continuous learning. Investing in employee development enhances innovation, supports retention, ensures adaptability to new technologies, and contributes to long-term competitiveness. It also aligns with regulatory expectations on workforce transition (green and digital).
Diversity & Inclusion		Inclusive and equitable workplaces help attract and retain diverse talent, enhance innovation, and reflect stakeholder and societal expectations. Preventing discrimination, ensuring equal opportunities, and fostering representation at all levels contribute to a fair, responsible, and resilient organization.
Business Ethics & Compliance		Operating with integrity is essential to maintain stakeholder trust, avoid legal and reputational risks, and comply with international regulations. Preventing corruption, fraud, conflicts of interest, and unethical practices strengthens governance and ensures alignment with evolving EU due diligence and corporate responsibility directives.
Data Privacy & Security		As digitalization advances across industrial and commercial operations, protecting customer, employee, and business data is essential. Trasteel faces growing exposure to cyber risks and regulatory scrutiny. Ensuring robust information security systems, aligned with ISO 27001, is key to safeguarding trust, operational continuity, and legal compliance.

3.11

Esg risks and opportunities

The double materiality assessment not only highlights the most relevant ESG topics for Trasteel but also provides critical insights into the risks and opportunities they generate. Understanding these dynamics allows the Group to proactively manage long-term value creation, resilience, and strategic alignment with evolving stakeholder and regulatory expectations.

The following table summarizes the key risks and opportunities associated with each material topic, along with their indicative time horizon and the response of Trasteel:

MATERIAL TOPIC	KEY RISKS	OPPORTUNITIES	TIME HORIZON	TRASTEEL'S RESPONSE
Energy transition and efficiency	Volatility of energy prices; dependence on fossil fuels	Efficiency gains through renewable energy and self-production (e.g., photovoltaics)	Short to Medium	Installation of photovoltaic systems to reduce dependency on fossil fuels.
Greenhouse Gas Emissions	Regulatory penalties; reputational damage from carbon footprint	Carbon reduction strategy; access to sustainable financing (e.g., SLL, carbon credits)	Medium to Long	Comprehensive GHG monitoring, approach to Scope 3 calculation, signing of Sustainability-Linked Loans
Water resource management	Scarcity in certain regions; stakeholder pressure	Innovation in water efficiency (e.g., blockchain-based tools for traceability)	Medium	Preliminary assessment of innovative water management solutions such as blockchain-based tracking tools, with implementation considered in the next reporting cycles.
Waste Management	Regulatory non-compliance; rising disposal costs	Circularity practices; secondary raw material markets	Short to Medium	Promotion of recycled content in raw materials and agreements for closed-loop scrap reintegration.
Circular economy and material consumption	- Depletion of natural resources due to overuse of virgin materials. - Increased regulatory pressure on waste and material traceability.	- Improved cost-efficiency through use of recycled materials. - Strengthened market positioning through circular business models.	Medium	- Use of raw materials with ≥75% recycled content - Closed-loop scrap reintegration agreements - Promotion of circular production models across facilities
Occupational Health & Safety	Workplace accidents; legal and reputational risk	Safer environments; stronger employee engagement and productivity	Immediate to Medium	Implementation of ISO 45001 standards and safety training programs across all sites.

MATERIAL TOPIC	KEY RISKS	OPPORTUNITIES	TIME HORIZON	TRASTEEL'S RESPONSE
Employment Stability and Workforce Retention	- High employee turnover leading to loss of skills and continuity - Increased recruitment and training costs	- Strengthening workforce loyalty and engagement - Enhancing employer reputation and attractiveness - Building long-term skills and internal know-how	Medium to Long	- Focus on stable, long-term contracts across production sites - Monitoring of turnover rate and workforce composition - Development of retention strategies including training, welfare benefits
Training and Development	Skills gap for green/digital transition	Upskilling of workforce; improved innovation and retention	Medium to Long	Development of internal training programs and tracking of learning metrics to support transition skills.
Diversity & Inclusion	Talent attrition; lack of representation	Inclusive leadership; stronger employer branding	Medium	Monitoring of workforce diversity and inclusive hiring practices to improve representation.
Business Ethics & Compliance	Legal violations; fraud and corruption risks	Trust building; improved reputation and business integrity	Immediate to Long	Strict compliance mechanisms supported by updated Code of Conduct and internal audit procedures.
Data Privacy & Security	Cyberattacks; data breaches; erosion of customer trust	Digital trust and competitive edge through governance and certifications (e.g., ISO 27001)	Immediate to Medium	Implementation of ISO 27001 standards, cybersecurity training, and advanced data protection measures.

These risks and opportunities are monitored through Trasteel's ESG governance framework and integrated into decision-making processes, strategic planning, and performance reviews. By addressing interconnections and adopting a forward-looking risk approach, the Group enhances its sustainability performance and overall resilience.

Environmental responsibility and performance

Trasteel Group sees environmental sustainability as a core pillar of its industrial strategy. In recent years, the Group has strengthened its commitment to responsible energy use, emissions reduction, and efficient resource management, integrating these goals into the daily operations of its key production sites.

Notable achievements include reductions in natural gas and electricity consumption, the expansion of photovoltaic installations, and the launch of strategic projects such as the renewable energy agreement between Ispadue and Iberdrola. At the same time, the Group has advanced circular economy initiatives, including the return of metal scrap from Profilmec to Arvedi and the use of raw materials with high recycled content.

These actions reflect a clear path toward a more efficient, circular, and low-carbon production model, fully aligned with the Group's long-term sustainability ambitions.



Energy use

Energy use across the Group remains primarily concentrated in industrial processes, with natural gas as the dominant fuel source, especially in high-temperature operations at sites such as Ispadue and Officine Tecnosider. In 2024, natural gas consumption decreased by 10.8% compared to 2023 (from 586.277,30 GJ to 522.916,81 GJ), reflecting ongoing improvements in thermal efficiency and process optimisation.

The overall consumption of fuels and combustibles dropped by 11,11% (from 593,398.08 GJ in 2023 to 527.442,06 GJ in 2024), with notable reductions in the use of diesel for heating and vehicles (down from 6.468,04 GJ to 2.759 GJ). Petrol for vehicles was the only fuel to show an increase, rising from 652,74 GJ to 1.821,85 GJ, due to changes in the Group's vehicle fleet and operational patterns.

Electricity consumption also decreased by 5.6%, from 143.852,06 GJ to 135.791,16 GJ, indicating improved energy efficiency in electrically powered processes and a growing reliance on self-generated solar energy. As part of its broader energy transition strategy, Trasteel has continued to invest in photovoltaic installations. The share of renewable electricity used rose from 1% in 2023 to 2,2% in 2024, a year-on-year increase of 120%.

Two sites, **Tamac** and **Yugotub**, already have operational photovoltaic systems. In particular, Tamac consumed 592.675 kWh of electricity in 2024, of which 330.000 kWh were generated from its solar PV installation. Yugotub reported a total consumption of 2.154.246 kWh, with 299.323,75 kWh coming from its on-site photovoltaic system.

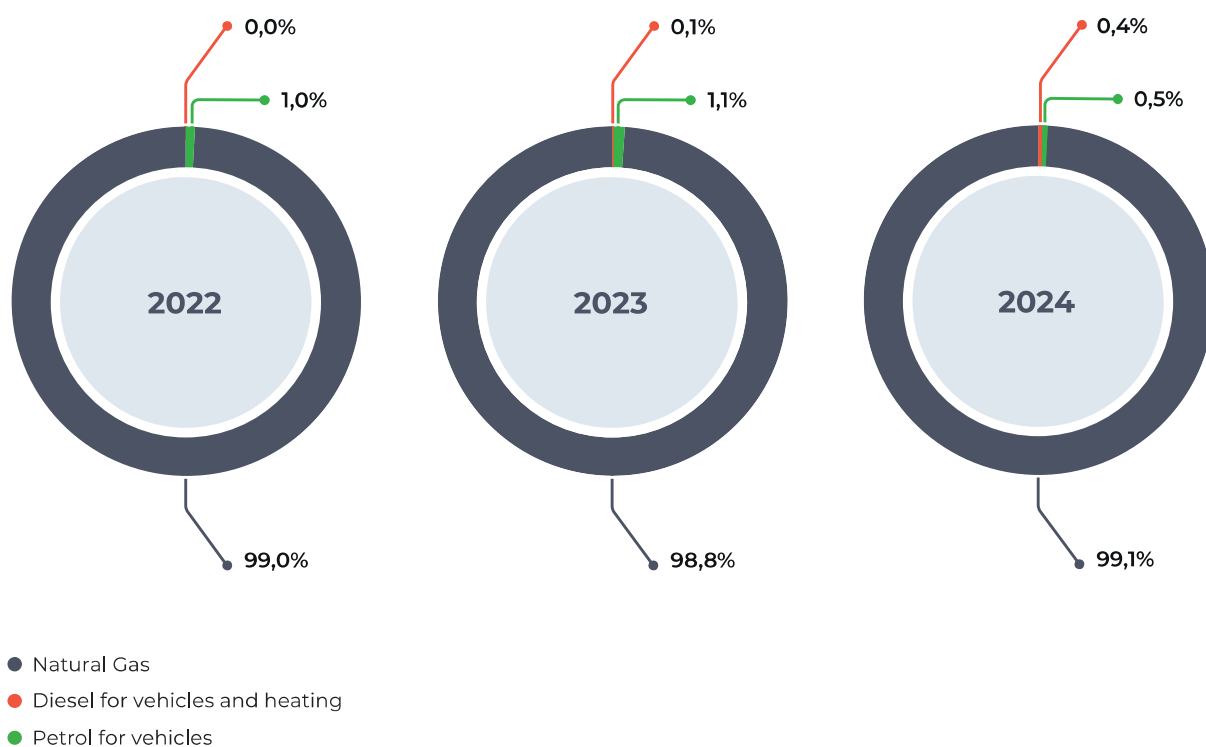
This trend is expected to continue, supported by a recently signed agreement between Iberdrola and Ispadue for the development of a dedicated photovoltaic plant. Similar initiatives are planned for other key industrial sites within the Group, reinforcing Trasteel's long-term strategy to increase on-site renewable electricity generation and reduce dependence on carbon-intensive sources.



ENERGY USE	UNIT OF MEASUREMENT	2022	2023	2024	CHANGE 2023-2024
Fuels and combustibles	GJ	518.506,69	593.398,08	527.497,06	-11,10%
Natural gas		512.803,12	586.277,30	522.916,81	
Diesel for heating and vehicles		5.496,17	6.468,04	2.759	
Petrol for vehicles		207,4	652,74	1.821,85	
Electricity consumption	GJ	118.081,39	143.852,06	135.791,16	-5.6%
Share of renewable electricity	%	0,18%	1%	2.2%	120%

As shown in the charts below, the composition of fuel consumption from 2022 to 2024 has been consistently dominated by natural gas. This reflects

its key role in supporting the Group's industrial activities, particularly in energy-intensive operations. In 2024, natural gas consumption at the most fuel-intensive site Officine Tecnosider (OTS) was 494.632,34 GJ, confirming its substantial contribution to the Group's overall fuel use.



Scope 1 and 2 emissions

In line with internationally recognised frameworks, Trasteel Group classifies its greenhouse gas (GHG) emissions into three scopes:

- **Scope 1 – Direct emissions:**

Emissions from sources that are directly owned or controlled by the Group. These primarily include combustion of fuels for industrial heating and processing.

- **Scope 2 – Indirect emissions (energy-related):**

Emissions resulting from the generation of purchased electricity consumed at Trasteel sites. Scope 2 is reported using both the location-based and market-based approaches to reflect the actual carbon content of the electricity grid and the impact of renewable electricity procurement.

- **Scope 3 – Other indirect emissions:**

All other indirect emissions occurring across Trasteel's value chain, both upstream and downstream. These emissions are currently under analysis and will be progressively included in future reporting cycles.

It is important to underline that Scope 2 emissions can be calculated based on two different approaches:

- *location-based* approach, which considers the blended CO₂ emission factor of the national grid where power is purchased.
- *market-based* approach, which bases the calculation on the emissions associated with the residual mix, i.e., the national energy mix net of certified renewable energy.

Emissions data for 2024 confirm Trasteel Group's ongoing progress in reducing its carbon footprint through targeted energy and process efficiency actions. **Total Scope 1 emissions decreased by 7,24%** between 2023 and 2024, falling from 33.355,75 tCO₂eq to 30.938,45 tCO₂eq, primarily due to a reduction in fossil fuel consumption, particularly natural gas and diesel for heating and transport.

Natural gas remains the primary source of direct emissions, particularly in energy-intensive processes such as those at Officine Tecnosider, which accounted for 93,78% of the Group's total fuel consumption in 2024. Specifically, Officine Tecnosider consumed 14.095.640 m³ of natural gas, underscoring its central role in Trasteel's industrial operations. This high level of consumption is closely linked to the nature of the production processes at Officine Tecnosider: large volumes of natural gas are required to power the furnace at the hot rolling mill, a facility dedicated to the production of steel plates with an annual capacity of 400.000 metric tons.

Despite this significant share, the implementation of energy efficiency measures including upgrades to combustion systems, thermal optimisation, and process control improvements contributed to a marked decrease in overall natural gas use and associated emissions.

Scope 2 emissions, associated with purchased electricity, show diverging trends depending on the reporting method used. Under the **location-based approach**, emissions decreased by 6.35%, from 12.587,06 to 11.787,41 tCO₂eq, reflecting both reduced electricity consumption and a cleaner national grid mix.

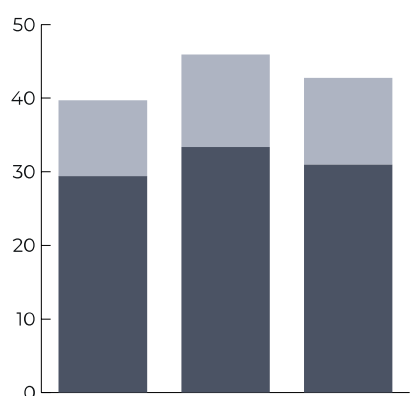


In contrast, **Scope 2 emissions under the market-based approach increased by 3,18%** (from 18,086.20 to 18.662,80 tCO₂eq). This rise is mainly attributable to a **higher emission factor in the Italian residual mix (AIB)**, which reflects the carbon intensity of electricity not covered by guarantees of origin.

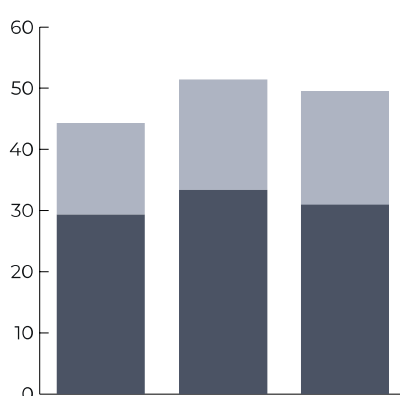
Overall, the Group achieved a **7% reduction in combined Scope 1 and Scope 2** (location-based) emissions, underscoring the effectiveness of its decarbonisation pathway and energy optimisation strategy across key industrial operations.

The renewable energy generated and used for own use, which was considered in the total amount of energy consumption, has no direct impact on GHG emissions.

GREENHOUSE GAS EMISSIONS – tCO ₂ eq	2022	2022	2023	CHANGE 2023/2024
Direct emissions from combustion	29.373,28	29.373,28	30.800,44	
Emissions from refrigerant gas leaks	0	14,33	138,01	
Total Scope 1	29.373,28	33.355,75	30.938,45	-7,24%
Scope 2 location - based	10.332,12	12.587,06	11.787,41	-6,35%
Scope 2 market - based	14.963,39	18.086,20	18.662,8	3,18%
Total scope 1 + scope 2 location - based	39.705,4	45.942,81	42.725,86	-7%



● Scope 1 ● Scope 2 location - based



● Scope 1 ● Scope 2 market - based

Energy transition initiatives and decarbonisation projects

Trasteel Group is actively investing in renewable energy and energy efficiency as core components of its environmental strategy. In addition to energy management improvements and monitoring tools, the Group has launched and expanded a number of photovoltaic energy projects across its industrial subsidiaries. These efforts support the Group’s commitment to reducing greenhouse gas emissions and enhancing self-sufficiency in energy supply.

Flagship Project: ISPADUE and Iberdrola Renewable Energy Agreement

On **February 19, 2025, ISPADUE S.p.A.**, a key subsidiary of Trasteel Group specialising in the production of steel strips, tubes, and profiles, signed a landmark agreement with **Iberdrola Italia**, a leading European renewable energy utility. The agreement entails the long-term supply of renewable electricity through the construction of a **2.5 MWp photovoltaic plant** on-site at the ISPADUE facility in **Sesto al Reghena (PN)**.

The contract, set to last **15 years**, also includes an option to expand the plant’s capacity by an additional **1.7 MWp**, reaching a total of **4.2 MWp**. Once fully operational, the system is expected to produce approximately **3.2 GWh of electricity per year**, enabling ISPADUE to **reduce its grid electricity consumption by 18% and avoid the emission of roughly 1,700 tonnes of CO₂ annually** an environmental benefit equivalent to the absorption capacity of **85,000 trees**.

This project exemplifies Trasteel’s broader ambition to **decarbonise its industrial operations**, improve environmental performance, and foster long-term energy resilience through innovative, low-impact solutions.

Group-wide photovoltaic installations

As of 2024, photovoltaic systems have been deployed across industrial subsidiaries, each contributing to Trasteel’s decarbonisation and energy self-generation targets.

COMPANY	INSTALLED CAPACITY	% OF SITE NEEDS	NOTABLE DETAILS
ISPADUE	2.5 MWp (expandable to 4.2 MWp)	~18%	Iberdrola partnership; flagship site
Tamac	773.5 kWp	~10%	Roof-mounted installation
Yugotub	380.16 kWp	Self-consumption	1,056 panels; 6 Siemens KACO inverters

The **photovoltaic rollout** is part of a broader roadmap that includes energy monitoring systems, load optimisation, and feasibility assessments for Power Purchase Agreements (PPAs) across other sites.

Circularity and efficient resource use



The Trasteel Group integrates circular economy principles into its industrial and commercial operations, promoting the responsible use of resources and minimizing environmental impacts across the value chain. Steel, the Group's core material, plays a central role in this strategy due to its inherent recyclability: it can be remelted indefinitely without losing its structural properties, making it ideal for reuse, remanufacturing, and long product life cycles.

A substantial share of raw materials used by the Group consists of **recovered steel scrap**, which reduces the need for virgin inputs and supports lower-carbon production processes. In this context, **Profilmec, one of the Group's key manufacturing companies, has entered into a resale agreement with Acciaieria Arvedi for the recovery and reintegration of scrap generated during tube production**, reinforcing industrial symbiosis and resource efficiency within the steel sector.

The Group also applies circular principles to **waste management**, with strict procedures for sorting, classifying, and, where possible, recycling both hazardous and non-hazardous waste. These practices are supported by systematic tracking and compliance with applicable environmental regulations.

Regarding water use, the Group is committed to improving efficiency across its operations, especially in production facilities where water plays a critical role in cooling and processing. Continuous investments in water treatment and reuse systems help reduce consumption and ensure the quality of discharged water meets environmental standards. **Among the Group's entities, Officine Tecnosider (OTS) is the largest water consumer, due to the specific nature of their production processes, which involve intensive use of water for thermal regulation, cleaning, and material processing.**

Notably, **OTS is able to reuse approximately 98% of the cooling water it withdraws**, thanks to the implementation of an advanced wastewater recycling system. This closed-loop system has significantly reduced the volume of groundwater extracted, contributing to the Group's broader environmental objectives. **The specific water consumption at OTS is currently below 250 liters per ton of product**, demonstrating strong performance in terms of resource efficiency. These achievements reflect the Group's proactive approach to managing water use, supported by continuous monitoring, technological upgrades, and responsible operational practices.

Altogether, these efforts reflect the Trasteel Group's commitment to integrating circularity into its business model, reducing dependence on finite resources, and contributing to a more sustainable and resilient industrial system.

MATERIALS USED

TONS	2023	2024
Total non-renewable	34.630,17	40.735,596
Total renewable	659.274,788	644.399,471
Total materials	693.904,958	685.135,067

WASTE GENERATED TABLE – BREAKDOWN OF HAZARDOUS AND NON-HAZARDOUS WASTE

TONS	2023	2024
Hazardous waste	864,6	616,710
Non-hazardous waste	32.244,4	30.964
Of which scrap	6.402,69	11.044
Total waste	33.109	31.580,71

TOTAL WATER WITHDRAWAL

CUBIC METER	2023	2024
Total withdrawal	205.212	150.984

3.14

People of Trasteel

The Group's recent development continues to be driven by its most valuable resource: the “people behind Steel” – a motto that encapsulates the dedication, energy, and engagement of the entire team. Since its founding in 2009, the Trasteel Group has grown by staying true to its core values while adapting to the complexities of a highly competitive global market.

As the organization evolves, the challenge remains to preserve the entrepreneurial spirit and agility typical of a family business, while progressively introducing more structured HR systems that support individual growth and organizational efficiency.

In previous years, the Group's growth in workforce was largely fueled by an active acquisition strategy. Although no new acquisitions have been consolidated into the reporting perimeter in 2024, the number of employees has continued to grow. This increase reflects the organic strengthening of operations across several countries and underlines the Group's ongoing commitment to investing in people and talent development.

As detailed in the following sections, this upward trend in employment confirms the Group's stable and sustainable growth path, firmly supported by the capabilities and contributions of its expanding workforce.

Employees by geographic distribution

As of the end of 2023, Trasteel Group employed **912 people** within its ESG reporting perimeter, distributed across six primary countries. The Group's broader industrial and commercial footprint — including joint ventures and recent acquisitions accounts for over **1,400 staff globally**.

Please note that **Util Industries**, a company recently acquired by Trasteel, is **not yet included in the reporting perimeter**, as it was not fully consolidated at the time of reporting. It will be integrated in future reporting cycles in line with ESG data consolidation processes.

COUNTRY	EMPLOYEE 2023	EMPLOYEE 2024	% OF TOTAL WORKFORCE 2024
Italy	596	595	62,7%
Turkey	137	151	15,9%
Serbia	79	82	8,6%
Switzerland	82	88	9,3%
Poland	4	5	0,53%
Romania	14	28	2,95%
Total	912	949	

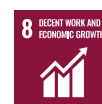
In 2024, the Group's total workforce reached 949 employees, representing a 4.1% increase compared to 912 employees in 2023. The distribution of personnel reflects the geographic footprint of the Group's industrial operations.

Italy remains the country with the highest number of employees, accounting for 62.7% of the total workforce. This predominance is closely linked to the location of the Group's main industrial sites, which are concentrated in Italy and serve as the core of its manufacturing activities.

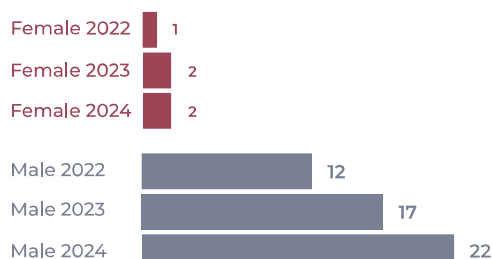
Turkey (15.9%) and Switzerland (9.3%) follow as the next most represented countries. Other countries such as Serbia, Romania, and Poland have smaller shares, although some, like Romania, have seen significant growth, doubling their workforce from the previous year.



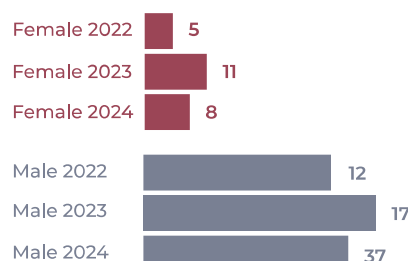
Employment by category



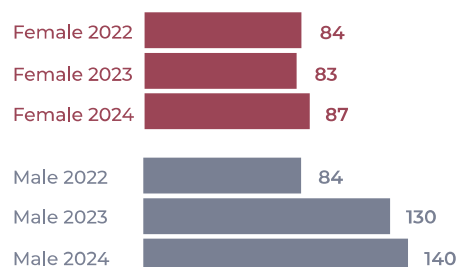
EXECUTIVE



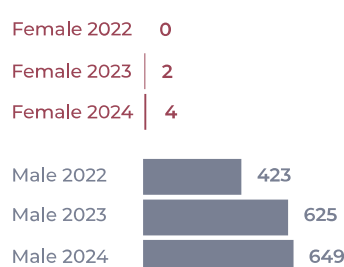
MANAGERS



WHITE COLLARS



BLUE COLLARS



In 2024, the Group recorded continued growth across all employment categories, reflecting both the consolidation of existing activities and the re-inforcement of internal structures. The majority of personnel remains concentrated in operational (blue-collar) roles, with a total of 653 employees, of whom only 4 are women equivalent to **0.6%**. This distribution is consistent with the characteristics of the steel industry, where physically intensive tasks and specific technical requirements have traditionally resulted in a predominantly male workforce.

A more balanced gender representation is observed within white-collar roles. Of the 227 employees in this category, 87 are women, corresponding to **38.3%**. These positions covering administrative, technical, and commercial functions offer greater accessibility and inclusivity, supporting a more diverse professional environment.

Managerial roles comprise 45 individuals, with female employees accounting for **17.8%** (8 women). Although representation remains limited, the increasing presence of women in these positions signals gradual progress in gender diversification at higher responsibility levels. Among executives, women represent **8.3%** of the total workforce (2 out of 24), maintaining the level recorded in the previous year.

The Group reaffirms its commitment to fostering an inclusive workplace culture by promoting equal opportunities and supporting career development for all employees, irrespective of gender, role, or seniority.

Employment type

In 2024, the Group continued to show a strong preference for full-time employment, confirming the structural stability of its workforce. Out of the total employees, **95.8% of male** staff (799 out of 834) and **95.7% of female staff** (110 out of 115) were employed on a full-time basis. These figures represent an increase in full-time female employment compared to 2023 and reflect the Group's operational model, which relies on continuous and full-time presence, particularly in industrial and technical roles.

Part-time employment remains limited overall and is nearly equally distributed across genders. Among female staff, 5 employees worked part-time (4.3%), while among male staff, 35 were in part-time roles (4.2%). This suggests that part-time work, while minimal, is offered as a flexible option rather than as a response to structural constraints. The Group continues to support such flexibility where compatible with operational needs, reaffirming its commitment to inclusive and adaptable working conditions.

COMPANY	FULL TIME / PART TIME	EMPLOYEES NUMBER 2023 (HC)	EMPLOYEES NUMBER 2024 (HC)
Trasteel Trading Holding SA	Full/Part	16 / 5	20 / 3
Trasteel International SA	Full/Part	52 / 9	56 / 9
Profilmec S.p.A.	Full/Part	166 / 9	167 / 9
Ispadue S.p.A.	Full/Part	210 / 9	212 / 8
Lifi S.r.l.	Full/Part	25 / -	35 / -
Rolm S.r.l.	Full/Part	16 / 1	14 / 1
Yugotub D.o.o.	Full/Part	79 / -	82 / -
Officine Tecnosider S.r.l.	Full/Part	115 / 3	113 / 2
Tamac S.r.l.	Full/Part	42 / -	30 / 4
Trasteel Engineering Polska Sp. z o.o.	Full/Part	4 / -	5 / -
Trasteel Ingerie S.r.l.	Full/Part	13 / 1	27 / 1
Trasteel Makina AS / Fematek Uluslararası Ticaret A.Ş.	Full/Part	137 / -	148 / 3

COMPANY	FULL TIME / PART TIME	EMPLOYEES NUMBER 2023 (HC)	EMPLOYEES NUMBER 2024 (HC)
Female	Full/Part	76 / 22	110 / 5
Male	Full/Part	799 / 15	799 / 35

Contract type

In terms of contractual stability, the Group continues to demonstrate a strong orientation toward long-term employment relationships. In 2024, **94.5% of male employees** (788 out of 834) and **94.8% of female employees** (109 out of 115) held permanent contracts. Compared to the previous year, there has been a slight increase in the number of temporary contracts for both genders; however, the incidence remains limited and non-structural, confirming the Group's focus on stable employment.

The continued predominance of permanent contracts reflects the Group's long-term industrial strategy and its commitment to providing secure and reliable working conditions for all employees.

Furthermore, **all employees at the Group's industrial sites in Italy are employed under the provisions of national collective labor agreements (CCNL)**. This ensures uniform protection in terms of wages, working hours, and health and safety conditions, contributing to fair and regulated labor practices across the country

COMPANY	TYPE OF CONTRACT	EMPLOYEES NUMBER 2023 (HC)	EMPLOYEES NUMBER 2024 (HC)
Trasteel Trading Holding SA	Perm/Temp	20 / 1	23 / -
Trasteel International SA	Perm/Temp	61 / -	65 / -
Profilmec S.p.A.	Perm/Temp	171 / 4	167 / 9
Ispadue S.p.A.	Perm/Temp	205 / 14	205 / 15
Lifi S.r.l.	Perm/Temp	25 / -	35 / -
Rolm S.r.l.	Perm/Temp	17 / -	15 / 1
Yugotub D.o.o.	Perm/Temp	67 / 12	65 / 17
Officine Tecnosider S.r.l.	Perm/Temp	113 / 5	112 / 3
Tamac S.r.l.	Perm/Temp	41 / 1	30 / 4
Trasteel Engineering Polska Sp. z o.o.	Perm/Temp	4 / -	5 / -
Trasteel Inginerie S.r.l.	Perm/Temp	14 / -	28 / -
Trasteel Makina AS / Fematek Uluslararası Ticaret A.S.	Perm/Temp	131 / 6	147 / 4

COMPANY	FULL TIME / PART TIME	EMPLOYEES NUMBER 2023 (HC)	EMPLOYEES NUMBER 2024 (HC)
Female	Perm/Temp	98 / -	109 / 6
Male	Perm/Temp	777 / 37	788 / 46

Health and Safety



Work related injuries (employees)

	2022	2023	2024
Total number of recordable work-related injuries	28	87	79
of which: Total number of high-consequence work-related injuries (excluding fatalities)	2	0	4
of which: Total number of fatalities as a result of work-related injury	1.001.820	1.735.509	1.676.664

Temporary data (Employees)

HOURS	2022	2023	2024
Hours worked	1.001.820	1.735.509	1.668.743

Rate

	2022	2023	2024
Rate of recordable work-related injuries	27,95%	50,13%	47,34%
Rate of high-consequence work-related injuries (excluding fatalities)	2%	0%	2,39%
Rate of fatalities as a result of work-related injury	0%	0%	0%

The Trasteel Group places the highest importance on the safety and well-being of its employees, maintaining a strong commitment to promoting a culture of health and safety across all sites and roles. This is reflected in the widespread adoption of the ISO 45001:2018 Safety Management System and in continuous investments in technological upgrades aimed at risk mitigation. In 2024, the Group continued the implementation of safety-enhancing measures, including the introduction of advanced equipment such as robotic islands for labeling, new lifting systems, and precision laser systems.

Across all Group facilities, a total of **1,668,743 hours** were worked in 2024, down slightly from the previous year but still significantly above 2022 levels. Over the course of the year, the Group recorded **79 work-related injuries**, of which **4 were classified as high-consequence**, and no fatalities were reported. The injury rate decreased to **47.34%**, down from **50.13%** in 2023.

A significant portion of the injuries in 2024 **38 out of 79 cases** occurred in Turkey, confirming the need for localized interventions and increased training efforts. This data highlights that new or expanding facilities, particularly those experiencing high turnover or rapid onboarding of new staff, tend to face higher safety risks. As in the previous year, the Group attributes many

incidents to minor but frequent accidents, such as **cuts, splinters,** and **sprains,** often resulting from contact with tools or machinery.

In response, the Group has further strengthened its internal safety procedures, mandated frequent reporting and review of injury data, and required each company to include health and safety metrics in their regular operational reports. These are reviewed on a weekly basis to identify trends, assess risk factors, and take preventive actions promptly.

The Trasteel Group remains strongly committed to fostering a safe and responsible working environment. Through targeted investments in training, process optimization, and equipment modernization, the Group strives to protect its most valuable asset: its people.

Appendix

ESG Data

Employees

COMPANY	EMPLOYEES NUMBER 2023 (HC)	EMPLOYEES NUMBER 2024 (HC)
Trasteel Trading Holding SA	21	23
Trasteel International SA	61	65
Profilmec S.p.A.	175	176
Ispadue S.p.A.	219	220
Lifi S.r.l.	25	35
Rolm S.r.l.	17	15
Yugotub D.o.o.	79	82
Officine Tecnosider S.r.l.	118	115
Tamac S.r.l.	42	34
Trasteel Enginneering Polska Sp.zo.o	4	5
Trasteel Inginerie S.r.l.	14	28
Trasteel Makina AS / Fematek Uluslararası Ticaret A.S.	137	151

GENDER	EMPLOYEES NUMBER 2023 (HC)	EMPLOYEES NUMBER 2024 (HC)
Female	98	115
Male	814	834

New hires and turnover

COMPANY	NEW HIRES 2023	RATE 2023	NEW HIRES 2024	RATE 2024
Trasteel Trading Holding SA	4	19,04%	6	26,09%
Trasteel International SA	8	13,11%	12	18,46%
Profilmec S.p.A.	14	8,00%	9	5,11%
Ispadue S.p.A.	23	10,50%	18	8,18%
Lifi S.r.l.	5	20,00%	12	34,29%
Rolm S.r.l.	0	-	1	6,67%
Yugotub D.o.o.	4	5,06%	7	8,54%
Officine Tecnosider S.r.l.	23	19,40%	23	20,00%
Tamac S.r.l.	6	14,30%	0	-
Trasteel Engineering Polska Sp.zo.o	2	50,00%	1	20,00%
Trasteel Ingerie S.r.l.	3	21,43%	15	53,57%
Trasteel Makina AS / Fematek Uluslararası Ticaret A.S.	155	113,13%	112	74,17%

COMPANY	TURNOVER 2023	RATE 2023	TURNOVER 2024	RATE 2024
Trasteel Trading Holding SA	1	4,76%	4	17,39%
Trasteel International SA	4	6,56%	8	12,31%
Profilmec S.p.A.	10	5,71%	8	4,55%
Ispadue S.p.A.	21	9,59	17	7,73%
Lifi S.r.l.	2	8,00%	2	5,71%
Rolm S.r.l.	1	5,88%	3	20,00%
Yugotub D.o.o.	1	1,27%	4	4,88%
Officine Tecnosider S.r.l.	17	14,41%	26	22,61%
Tamac S.r.l.	1	2,38%	8	23,53%
Trasteel Engineering Polska Sp.zo.o	2	50,00%		
Trasteel Ingerie S.r.l.	3	21,43%	1	3,57%
Trasteel Makina AS / Fematek Uluslararası Ticaret A.S.	153	111,68%	98	64,90%

GRI Context Index

STATEMENT OF USE: Trasteel Trading Holding SA has reported the information cited in this GRI content index for the period 01.01.2024 - 31.12.2024 in accordance to the GRI Standards.

INDICATORS	DESCRIPTION	REPORT REFERENCE	OMISSIONS/NOTES
GENERAL DISCLOSURES			
GRI 2: General Disclosures 2021	2-1 Organizational Details	"Trasteel Group at a Glance"	
	2-2 Entities included in the organization's sustainability reporting	"Reporting Perimeter"	
	2-3 Reporting period, frequency and contact point	"About this Report"	
	2-4 Restatements of information	Not applicable (no restatements declared)	
	2-5 External assurance	This report is not subject to external assurance.	
ACTIVITIES AND WORKERS			
	2-6 Activities, value chain and other business relationships	"Products and Services by Business Line" + "Group Overview"	
	2-7 Employees	"People of Trasteel", "Employment by Category", "Geographic Distribution"	
	2-8 Workers who are not employees	"People of Trasteel", "Employment by Category", "Geographic Distribution"	
GOVERNANCE			
	2-9 Governance structure and composition	"Sustainability Governance"	
	2-10 Nomination and selection of the highest governance body	The Highest Governance Body is nominated and selected according to strict criteria based on expertise and competencies.	
	2-11 Chair of the highest governance body	"Sustainability Governance"	
	2-12 Role of the highest governance body in overseeing the management of impacts	"Sustainability Governance"	
	2-13 Delegation of responsibility for managing impacts	The Board of Directors has not a direct role in overseeing sustainability related impacts of the Group. The ESG Committee is in charge of this responsibility.	
	2-14 Role of the highest governance body in sustainability reporting	"Sustainability Governance"	
	2-15 Conflicts of interest	The responsibility related to the management of organization's sustainability impacts is delegated to the Group's ESG Committee and to each Company's focal points.	

GOVERNANCE

2-16 Communication of critical concerns	“Sustainability Governance”.	
2-17 Collective knowledge of the highest governance body	The responsibility related to the reviewing and approving of the reported information is delegated to the Group's relevant function and Companies' focal points.	
2-18 Evaluation of the performance of the highest governance body	As stated in the Group's Code of Ethics: "The employees must not, directly or through any members of their families or persons living with them or with whom we are associated, or in any other manner: i) have any financial interest that could have a negative impact on the performance of their duties, or derive any financial benefit from any contract between Trasteel Group and a third party where the Employee is in a position to influence the decisions that are taken regarding that contract; ii) or attempt to influence any decision of Trasteel concerning any matter with a view to deriving any direct or indirect personal benefit.	
2-19 Remuneration policies	Critical issues are communicated to the Board of Directors on the basis of their relevance. Whether the issue has high relevance, the Board is directly involved in solving it; otherwise, the direct responsible of the division involved takes care of it.	Confidentiality constraints: for reasons of confidentiality, the Group preferred not to publish the data required by this disclosure.
2-20 Process to determine remuneration	Since the responsibility in terms of sustainability is delegated to the ESG Committee, no actions were implemented to expand the collective knowledge of the highest governance body on sustainable development.	Confidentiality constraints: for reasons of confidentiality, the Group preferred not to publish the data required by this disclosure.
2-21 Annual total compensation ratio	In 2024, no procedures aimed at evaluating the performance of the highest governance body in relation to the overseeing of the management of Trasteel Group's impacts on the economy, the environment and people were implemented.	Confidentiality constraints: for reasons of confidentiality, the Group preferred not to publish the data required by this disclosure.

STRATEGY, POLICIES AND PRACTICES

2-22 Statement on sustainable development strategy	“Letter from the CEO”	
2-23 Policy commitments	“Sustainability Policy”, “Code of Conduct” Reference is made to the Code of Conduct publicly available on the Group's website. Further commitments are published at operating companies' level.	
2-24 Embedding policy commitments	“Sustainability Governance”, “Traceability and Sustainable Finance”	
2-25 Processes to remediate negative impacts	“Described across “Stakeholder Engagement” and “Material Topics”	

STRATEGY, POLICIES AND PRACTICES

2-26 Mechanisms for seeking advice and raising concerns

2-27 Compliance with laws and regulations

During the current reporting year no significant case of noncompliance with laws and regulations for which financial penalties were imposed . During the current reporting year no fines for instances of noncompliance with laws and regulations

2-28 Membership associations

"Memberships and Certifications"

STAKEHOLDER ENGAGEMENT

2-29 Approach to stakeholder engagement

"Stakeholder Engagement and Map"

2-30 Collective bargaining agreements

"Employment Type" and "Contract Type"

MATERIAL TOPICS

GRI 3: Material Topics 2021

3-1 Process to determine material topics

"Double Materiality Assessment" and "Building the materiality map"

3-2 List of material topics

"Most Relevant Material Topics"

ECONOMIC PERFORMANCE INDICATORS

GRI 3: Material Topics 2021

3-3 Management of material topics

Covered across each thematic section: Environment, People, Ethics

GRI 201: Economic performance 2016

201-1: Direct economic value generated and distributes

No data specified

ENVIRONMENTAL PERFORMANCE INDICATORS**MATERIALS**

GRI 3: Material Topics 2021

3-3 Management of material topics

"Circularity and Efficient Resource Use" – Profilmec and Arvedi scrap agreement

GRI 301: Materials 2016

301-1 Materials used by weight or volume

"Materials used" – data for 2023 and 2024 presented

ENERGY

GRI 3: Material Topics 2021

3-3 Management of material topics

"Energy Transition Initiatives", "Group-wide Photovoltaic Installations"

GRI 302: Energy 2016

302-1 Energy consumption within the organization

"Energy Use" – detailed breakdown by fuel type and site, 2022–2024

WATER AND EFFLUENTS

GRI 3: Material Topics 2021

3-3 Management of material topics

"Circularity and Efficient Resource Use" – water efficiency and reuse at OTS

GRI 303: Water and Effluents 2018

303-3 Water withdrawal

"Total Water Withdrawal"

	303-4 Water Discharge	"Circularity and Efficient Resource Use" – water efficiency and reuse at OTS
EMISSIONS		
GRI 3: Material Topics 2021	3-3 Management of material topics	"Scope 1 and 2 Emissions" – reduction efforts and site-level analysis
GRI 305: Emissions 2016	305-1 Direct (Scope 1) GHG emissions	"Scope 1 and 2 Emissions" – data for 2022–2024
	305-2 Energy indirect (Scope 2) GHG emissions	Same section – location-based and market-based calculations included
WASTE		
GRI 3: Material Topics 2021	3-3 Management of material topics	"Circularity and Efficient Resource Use" – scrap recovery and waste tracking
GRI 306: Waste 2020	306-3 Waste generated	"Waste generated table – breakdown of hazardous and non-hazardous waste"
SOCIAL PERFORMANCE INDICATORS		
EMPLOYMENT		
GRI 3: Material Topics 2021	3-3 Management of material topics	"People of Trasteel", "Employment by Category", "Contract Type"
GRI 401: Employment 2016	401-1 New employee hires and employee turnover	"New Hires and Turnover" (section + ESG Data Appendix)
OCCUPATIONAL HEALTH & SAFETY		
GRI 3: Material Topics 2021	3-3 Management of material topics	"Health and Safety" – safety culture, ISO 45001, KPIs
GRI 403: Occupational Health and Safety 2018	403-9 Work-related injuries	"Work-related Injuries" – number, severity, injury rate, by site
	403-10 Work-related ill health	Nothing to report
TRAINING AND EDUCATION		
GRI 3: Material Topics 2021	3-3 Management of material topics	"Training and Development" discussed in qualitative terms
GRI 404: Training and Education 2016	404-1 Average hours of training per year per employee	Not reported quantitatively
	404-3 Percentage of employees receiving regular performance and career development reviews	Not specified
DIVERSITY AND EQUAL OPPORTUNITIES		
GRI 3: Material Topics 2021	3-3 Management of material topics	"Employment by Category" – gender breakdown and trends
GRI 405: Diversity and Equal Opportunity 2016	405-1 Diversity of governance bodies and employees	Gender distribution across roles (blue/white collar, managers)

NON DISCRIMINATION

GRI 3: Material Topics 2021	3-3 Management of material topics	"Code of Conduct" – zero tolerance, internal reporting
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GRI 406: Non-discrimination 2016	406-1 Incidents of discrimination and corrective actions taken	"Code of Conduct" – preventive approach; no specific cases reported
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CUSTOMER PRIVACY

GRI 3: Material Topics 2021	3-3 Management of material topics	"Data Privacy & Security" under material topics
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GRI 418: Customer Privacy 2016	No complaints concerning breaches of customer privacy were registered in FY2023 within the organization.	"Customer Privacy" – No complaints were registered in FY2024
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