

SUSTAINABILITY REPORT



2024



RUBIERA
SPECIAL STEEL S.P.A.

SUSTAINABILITY REPORT

2024

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00. Foreword

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Letter to Our Stakeholders

We are proud to publish the third edition of this non-financial report, aimed at communicating the vision, mission, culture, and therefore the DNA of Rubiera Special Steel S.p.A. to all interested parties.

This journey, currently voluntary, serves to bear witness to our continuous commitment and sensitivity to sustainable development issues, setting goals for continuous improvement and communicating our environmental, social, economic, and governance performance to our stakeholders.

This document is born with the objective of consolidating methods and tools already adopted by the organization for ESG reporting, enhancing the professionalism and collaboration of all the people who tackle change constructively, with dedication and seriousness. At the same time, it aims to go beyond current obligations, with the clear intention of anticipating the requirements introduced by the Corporate Sustainability Reporting Directive (CSRD), which defines a more rigorous and detailed regulatory framework for sustainability reporting. In this perspective, the document reflects a proactive approach, aimed at integrating the best practices in the sector and developing new techniques and strategies capable of guaranteeing continuity, innovation, and constant alignment with future European regulatory scenarios.

In this third edition, we can only reconfirm the key values of our Company, which continue to be

product quality, service reliability and continuity, flexibility, and innovation in responding to the market.

For Rubiera, being sustainable means producing the best quality steel while ensuring respect for the surrounding environment, and the health and well-being of our workers.

All this is set within an objectively complex and difficult-to-interpret market context, driven on the one hand by macroeconomic dynamics strongly conditioned by ongoing international crises, which penalize growth rates, and on the other hand, by an evident, albeit latent, commercial war between the various areas of steel production, which is impacting the ability of European companies to compete on price.

In this complex scenario, in agreement with our shareholders, we nevertheless intend to continue investing in technology and innovation, upholding the commitments made to all our stakeholders. We aim to develop a transition of processes capable of supporting the economic balance while protecting the environment and the interested social parties, also supporting the local community for the development of social projects. During 2024, we carried out the safety awareness project for all personnel and completed significant energy efficiency interventions, in terms of reducing natural gas consumption and emissions.

In this journey, we can count on the support of our personnel, the network of suppliers and cu-



stomers, and, more generally, all our stakeholders with whom we are accustomed to analyzing the risks and opportunities that arise, identifying the most effective and efficient solution for achieving the expected results.

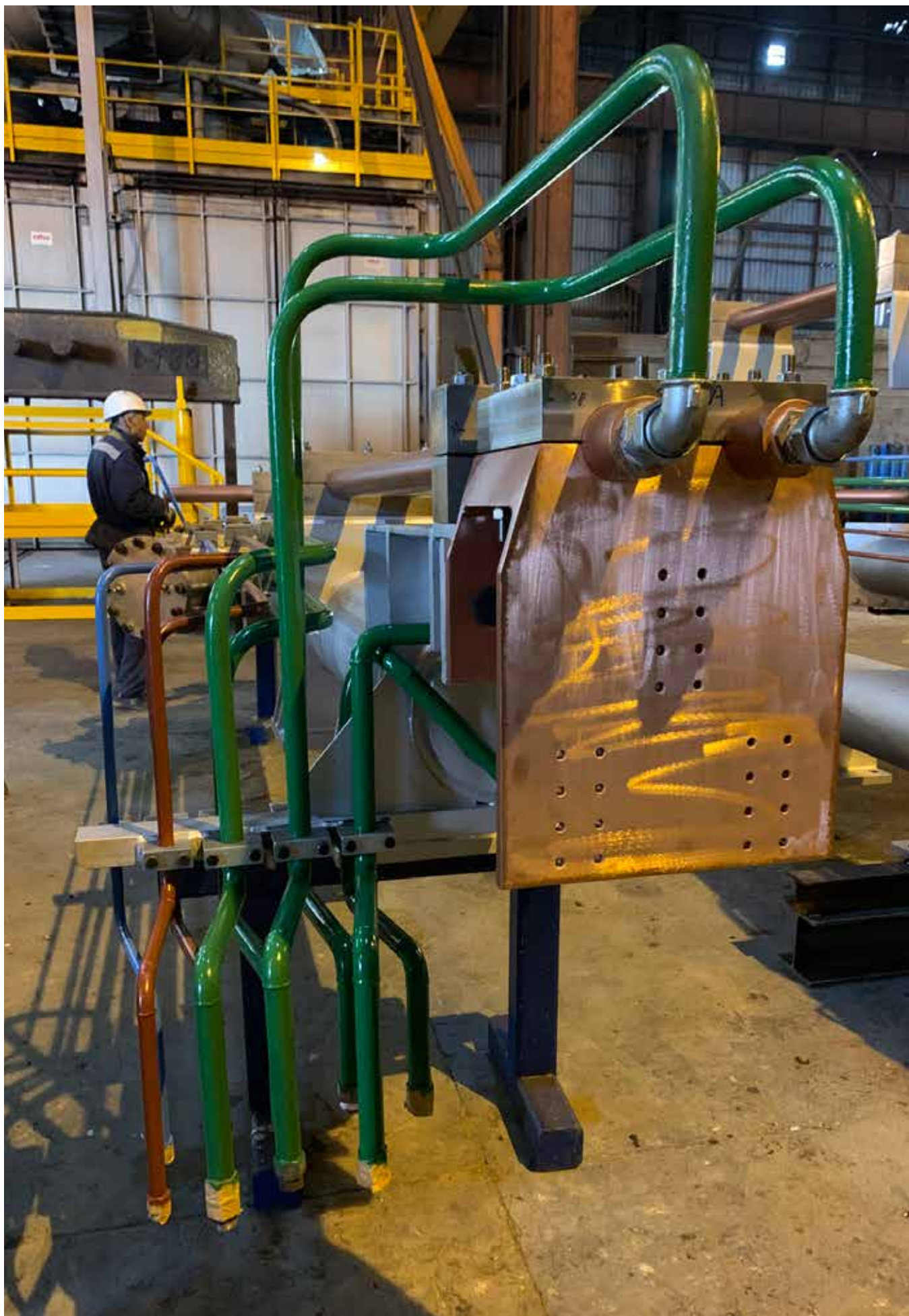
We therefore continue to consolidate relationships with our customers by following the ever-increasing market demands regarding the type of steel to be produced and, secondly, to expand our commercial horizons toward high-margin productions and services.

Considering the general evolution of the regulatory framework on emission trading and the increasingly stringent objectives for reducing greenhouse gas emissions, we have developed an environmental program aimed at identifying reduction actions through: energy efficiency interventions, evaluation of alternative materials to those of fossil origin, and process digitalization.

This goal is to be achieved through monitoring the technological evolution of steel processes, aimed at the production of so-called “green steel” that can be applied in our steel plant.

Federico Galperti

Handwritten signature of Federico Galperti.



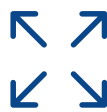
Key Figures 2024



128.531 tons of
steel produced
containing **100%**
scrap



120.207 tons of
iron scraps
turned into **steel**



surface area of
250.000 sqm



91% of waste
is **recycled**



92% of energy
from **RES**



22.783 tons of
CO₂eq Emissions
Scope 1



325 tons
of **CO₂** avoided thanks to
energy efficiency
measures



32.200 sqm of
reforestation projects



161 employees
of whom
16% are **women**



44,4% of **managers**
are **women**



96%
permanent contracts



29,8 hours of
training per employee



Turnover of
€ 172.828 mlns





01. Rubiera Special Steel SpA

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With the entry into force of the Corporate Sustainability Reporting Directive (CSRD), the European Union is introducing new reporting obligations regarding environmental, social, and governance (ESG) matters, thereby strengthening the integration of sustainability into corporate management.

Introduction

To align with the new European Sustainability Reporting Standards (ESRS), which will

come into effect starting from 2028 for reporting related to the 2025 financial year, Rubiera Special Steel has initiated a gap analysis aimed at identifying any shortcomings in its reporting process compared to the provisions of the standards.

Based on the latest international guidelines and with the objective of conforming to the methodology required by the CSRD, the company has also conducted a double materiality analysis, assessing both the impacts of its activities on society and the environment, and the external factors potentially capable of influencing its financial variables.

The decision to anticipate this analysis reflects the awareness of Rubiera Special Steel S.p.A. regarding the increasing importance of evaluating impacts, risks, and opportunities along its value chain, as mandated by the new regulations.

Rubiera Special Steel S.p.A. began its operations in 1965 under the name Acciaieria di Rubiera, in an area where industrial activities were primarily focused on manufacturing and ceramics, and during a period when the consumption of construction steel for the building sector had significant growth rates.

Since then, it has distinguished itself for quality and reliability, shaping the Italian history of producing forge ingots in high-integrity steels.

These same principles will be extended to the operations of the second local unit in Civate al Piano, which was acquired from bankruptcy proceedings during 2023 and where activities aimed at resuming production are underway, starting in the first half of 2026.

Our values of quality, teamwork, safety, and attention to the environment allow us to satisfy the most diverse requests and forge lasting partnerships with customers and suppliers.

Rubiera Special Steel has been qualified for years with ISO 14001 and ISO 9001 certifications and through the EMAS regulation. The constant commitment to quality and the environment has recently allowed the company to obtain ISO 45001 and ISO 50001 certifications, regarding workplace safety and energy efficiency, respectively. In line with this continuous improvement, Rubiera Special Steel S.p.A. obtained the ISO 14064 certification to quantify its GHG emissions, with

About Us

the aim of implementing operational-level Carbon Management policies—also for the possible consequent reduction of corporate waste—and communicating its commitment to environmental sustainability to its stakeholders.

Despite the international crises in Ukraine and the Middle East that have negatively impacted the global socio-economic context, Rubiera Special Steel S.p.A. continued to invest in its technical and organizational development in 2024.

In the area of technological development and in line with market strategies, the process of revamping the boilers in the thermal power plant was completed during 2024, replacing the existing units with more efficient ones; concurrently, significant interventions were implemented in the transformer substations with the adoption of more efficient transformation units, thus consolidating Rubiera Special Steel S.p.A.'s efforts to maintain high standards of sustainability and energy efficiency.



Our Values

- Quality
- Flexibility
- Reliability
- Teamwork
- Innovation
- Health & Safety
- Environment

Our Mission

Rubiera Special Steel S.p.A. aims to provide a complete service to its customers in terms of **quality, flexibility, and speed of delivery** by producing the best steel, consuming the fewest possible fossil resources, and operating in a safe working environment through continuous investment and teamwork.



Our Vision

We aspire to become the primary partner for our customers for the supply of sustainable steel ingots, with **continuous research to improve quality and processes** in terms of circular economy.

Governance

By Governance, we mean the structure of the system which, through procedures and protocols, as well as continuous staff training, ensures compliance with our ESG policies.

Naturally, in order to monitor and guarantee the company's adherence to these provisions, specialized governing bodies have been created for the different areas of professional expertise.

Composition of Governing Bodies and Management

Rubiera Special Steel S.p.A. has adopted an Organization, Management, and Control Model (Modello di Organizzazione, Gestione e Controllo) with the aim of developing and implementing a governance system in line with the corporate Code of Ethics. This Model was designed to promote a constant diffusion of the culture of control and to further raise employees' awareness toward responsible and conscious behavior, preventing and/or reducing the risk of offenses, including environmental ones, as provided for by Legislative Decree no. 231 of June 8, 2001 (hereinafter "D.lgs. 231/2001").

The Governance Model is based on the following elements:

- **Board of Directors:** It is vested with the broadest powers for the ordinary and extraordinary management of the Company and has all the authority to implement and achieve the corporate purposes. The Board of Directors is composed of five members, including the Chairman, the Chief Executive Officer, and the Employer.

- **Board of Statutory Auditors:** It is composed of five standing members who meet the prescribed requirements for the accounting control function.

- The accounting control is entrusted by the Board of Directors to an **Audit Firm** (Società di Revisione) registered in the register established by the competent authority

- **Supervisory Body** pursuant to D.lgs. 231/01: It is composed of two independent professionals tasked with overseeing the correct application of the Organization, Management, and Control Model and providing timely information thereon to the Board of Directors

Code of Ethics

The Code of Ethics is the tool prepared to define the set of ethical values that the Company recognizes, accepts, and shares, which form the corporate culture and lead to the following behaviors with our stakeholders:

Relationships with customers	We strive to provide exceptional service and on-time delivery without compromising on quality.
Relationships with associates	We treat every individual with respect and without any form of discrimination.
Relationships with suppliers	We respect each company and assess their compatibility without bias.
Relationships with public bodies	We adhere to the principles of integrity and fairness, abstaining from any conduct that could compromise them.
Intellectual property protection	We are constantly searching for innovation opportunities while complying with the laws that protect both our own and third-party knowhow.
Confidential information	We operate with fairness and respect for the professionalism of others; we treat information obtained through our partnerships as confidential.
HSE (Health, Safety and Environment)	We are constantly seeking out and implementing new investment opportunities, both structural and in training, to prevent potential incidents that could impact our employees or the surrounding environment.

The Company Management has appointed the Head of the Environmental Management System and HSE Manager, who supports the Management on environmental issues:

- For the design, implementation, and monitoring of the Management System;
- For managing relations with Control Authorities, the Supervisory Body, Certification Bodies, and other stakeholders;
- For managing environmental monitoring, including that required by existing authorizations;
- For coordinating the continuous improvement of the environmental management system.

To make our ethical principles easily accessible and available, the corporate policy can be downloaded from our website at: <https://www.arss.it/it/>.



RUBIERA SPECIAL STEEL SpA operating system

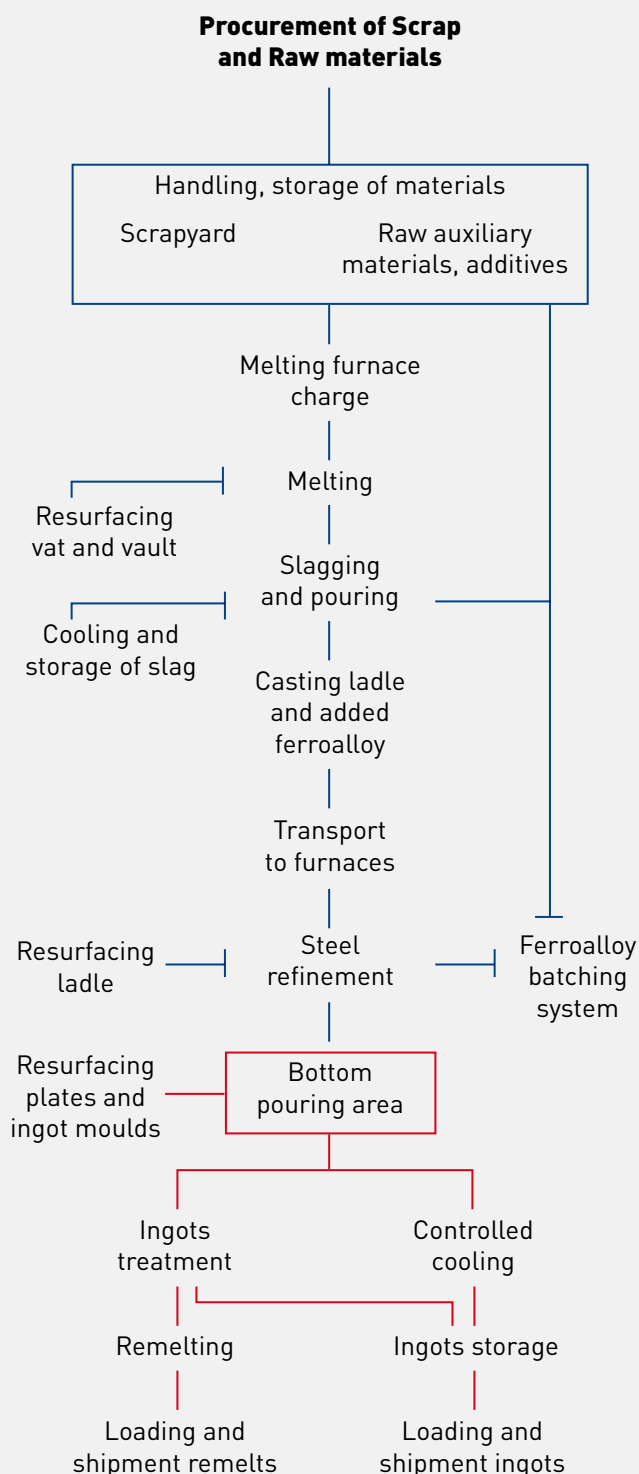


FIGURE 1: SUMMARY SCHEME OF THE PRODUCTION OF RUBIERA SPECIAL STEEL SpA

Our Business

Rubiera Special Steel S.p.A. specializes in the production of high-integrity steels, offering a wide range of products in all types of high-quality steel. The company's production range extends from ingots weighing to tonnes in different steel types, thus covering a large segment of market demands.

Rubiera Special Steel S.p.A. addresses both national and international markets and can produce a total of up to tonnes of finished product annually. Our customers are steel processors, particularly forges and foundries that produce for various sectors such as: oil & gas, energy, tooling, and others.

In 2024, the steel plant in Cividate al Piano, in the province of Bergamo, was acquired with the aim of integrating and completing the product range of quality special steels and alloys starting from 2026. A significant investment plan is underway for this second local unit to ensure the implementation of a production process characterized by modernity, high performance, and energy efficiency, while respecting the environment for increasingly "green" processes and production.

The company offers a product customi-

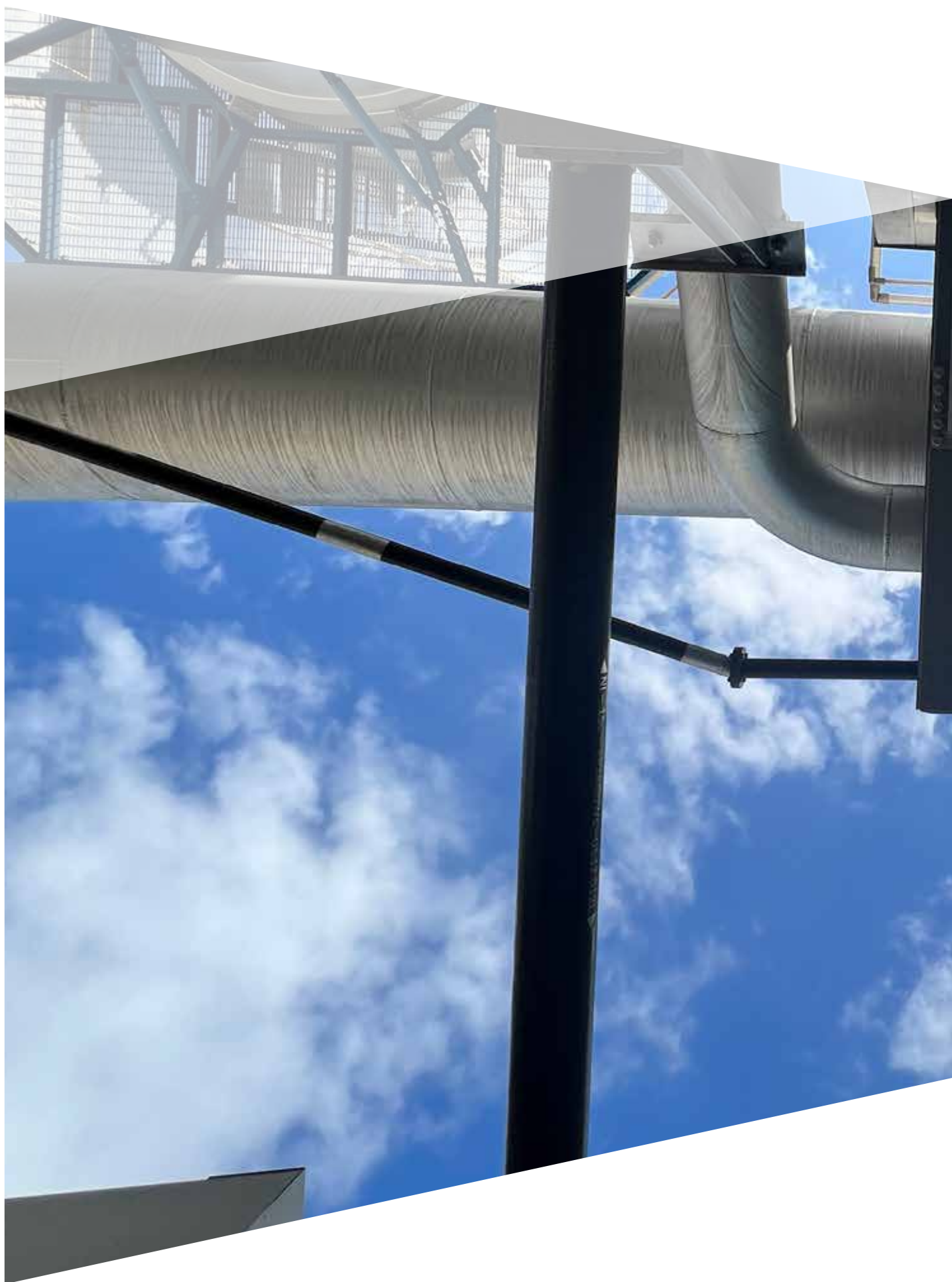
zation service based on specific customer requests, whether for electroslag remelted steels or specific weights. This flexibility allows the company to meet every market request while maintaining the quality of sup-

ply. Rubiera Special Steel S.p.A. can supply a wide range of products in different types of high-quality steel.

RUBIERA SPECIAL STEEL SpA's PRODUCTS

Ingots	Remelted Ingots
Polygonal: 3 - 130 tons	ESR : Ø 700 – 1800 mm, 12 -100 tons
Multifaced: 21 - 130 tons	VAR: Ø 500 – 1070 mm, 6 – 27 tons
Round: 3 - 31 tons	
Square: 1,6 – 20 tons	







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Ecological Transition

The steel produced at the heart of Rubiera Special Steel S.p.A.'s work is inherently sustainable as it valorizes scrap metal in line with the principles of the **Circular Economy**.

The mission of Rubiera Special Steel S.p.A. is to produce the best quality steel at the lowest cost, while protecting the health and safety of workers, safeguarding the external environment, and ensuring the best energy efficiency of processes.

In a **European context**, the company is committed to supporting the achievement of decarbonization targets by 2050, carrying forward commitments to certify the sustainability of its products and investing in the ecological transition of its plants.



Rubiera Special Steel S.p.A. includes stakeholders with very different, yet fundamental, roles for the sustainable development of the business: in fact, every stakeholder plays a role within the company's value chain. Rubiera Special Steel S.p.A. is committed to engaging its stakeholders also on sustainability issues.

Stakeholder Mapping

RUBIERA SPECIAL STEEL SpA's STAKEHOLDERS

Type	Stakeholder	Description	Key issues
INTERNAL	Workers	All employees	Stability, health and safety, enhancement, training and development
	Owner	Ring Mill / The Galperti Family	Proper management, investments, reputation, profitability
	Union Representation	Joint Trade Union Representatives and Workers	Wage and company policy, health and safety, equal opportunity, legally protected categories
EXTERNAL	Supervisory authorities	Supervisory Body, Statutory Auditors, Independent Auditors	Transparency, conformity, traceability of cash flows, proper management
	Other Group companies	Ring Mill	Collaboration, synergies, vertical integration
	Trade associations	Federacciai (Federation of the Italian Steel Companies), Unisider (Italian iron and steel standardisation authority), Confindustria	Propensity for innovation
	Regulatory Authorities and Institutions	ARPAE (Regional Environmental Protection Agency) AUSL (Local Health Authority) Fire Dept., Province, Region, Department of Labour, INAIL, Prefecture	Conformity, transparency and cooperation

Type	Stakeholder	Description	Key issues
EXTERNAL	Customers	Forges/ Forging companies	Product and service quality, pricing policy, reliability, system certification, safety and environment. Some required parameters: KPI, investments, production capacity, list of facilities, dealings with countries on the Black List
	Suppliers	Of Scrap, Raw Materials; Processing on products; Plants, vehicles and equipment On-site Services	Solidity, reliability relationship continuity, qualification system, product and service quality levels
	Energy Consortia	Consortium for the management of the rolling blackout contract; Interconnector management consortium	Energy costs, Interruptibility, Reliability of the data network, Interconnector
	Consultants	Legal and management consultants, technical consultants for risk analysis and assessment, Management system and certification consultants, IT consultants	Solidity, reliability, propensity for innovation
	Insurance institutions	IBK Broker	Risk assessment, Business continuity, system certification, safety and environment, investment and improvement plans
	Certification Bodies	Llyods, TUV, BV, ABS, DN-V-GL, EMEA, NKK, RINA EcoLabel committee	Conformity, transparency, commitment to continuous improvement

Type	Stakeholder	Description	Key issues
	Financial institutions	BPS, MPS, Intesa	Financial strength

The company has also initiated an internal and external stakeholder engagement process. This activity, also required by the European Reporting Standards (ESRS), is crucial to ensure the detection of stakeholders' expectations and the coherence between the corporate strategy and the most relevant social and environmental concerns.



Rubiera Special Steel SpA has adopted a structured approach to the double materiality assessment, in line with the provisions of the CSRD and the ESRS, articulated in the following phases:

- **Definition of Scope and Objectives**

The scope of the analysis was outlined, including the identification of key business activities, and the mapping of the value chain and relevant geographical areas, in order to construct a customized and complete list of ESG topics.

- **Identification of Topics and IROs (impacts, risks and opportunities)**

Sustainability topics and their related IROs were identified, involving internal and external stakeholders including employees, company committees, suppliers, commercial partners, and sector associations, through direct (interviews, workshops) and indirect (documentary research) methods.

- **Assessment of Impact and Financial Materiality**

Impacts were assessed based on quantitative criteria and predefined thresholds, considering severity (e.g., scope, duration,

Impact Materiality Assessment Methodology

remediability), probability of occurrence, and financial magnitude in the short, medium, and long term. Topics that exceeded the established thresholds were considered material and classified according to their level of relevance.

- **Validation of Results**

The results of the analysis were submitted for validation by Management, with the aim of integrating the material topics into the corporate strategy, in coherence with the requirements of the new European regulation.

These activities are currently being consolidated, also in agreement with the Group's financial holding company, in order to define common principles and approaches on the matter.

Together with stakeholders, the most important topics for Rubiera Special Steel S.p.A. were mapped, in line with the reporting requirements of the Global Reporting Initiative and taking into account the new requirements introduced at the European level by the Corporate Sustainability Reporting Directive (CSRD), to which Rubiera Special Steel S.p.A. will be subject starting from January 1, 2028, with reporting on the 2027 financial year, and by the Exposure Drafts of the European Sustainability Reporting Standards (ESRS) made available by EFRAG (European Financial Reporting Advisory Group)..

Double Materiality Analysis

The materiality analysis was conducted, taking into account the company's mission and management plans, on the impacts that business activities have on the economy, environment, and society (Inside-Out) and on the impacts that external subjects could have on the company and/or its financial results (Outside-In).

The impacts that carry greater weight and a more significant value for Rubiera Special Steel S.p.A. and its stakeholders represent the material topics considered for the drafting of the sustainability report and are listed below:

0 Circular Economy

1 Given the evolution of EU policies regarding the introduction of the "taxonomy" for identifying "environmentally sustainable industrial activities"—which includes steel production—Rubiera Special Steel S.p.A. is committed to promoting the principles of the Circular Economy and complying with the process and product green criteria that can be leveraged as a competitive advantage based on the technological evolutions available for the company's scale.

0 Energy Efficiency and Renewable Energy

2 The Ukraine crisis and new EU policies to combat climate change have led to increased company costs (energy costs and emission trading costs), further stimulating Rubiera Special Steel S.p.A.'s interest in the efficiency of its supply chain and sourcing from renewable energy sources.

0 Environmental Protection and Pollution Reduction

3 Rubiera Special Steel SpA is committed to preventing any form of pollution and protecting the environment through the optimization of resource consumption,

the reduction of waste production, the improvement and monitoring of air and water emissions, noise containment, soil and subsoil protection, and the control of every other direct and/or indirect impact.

0 Professional Growth and Equal Opportunities

4 Rubiera Special Steel S.p.A. enhances personnel skills through training and development programs.

0 Occupational Health and Safety

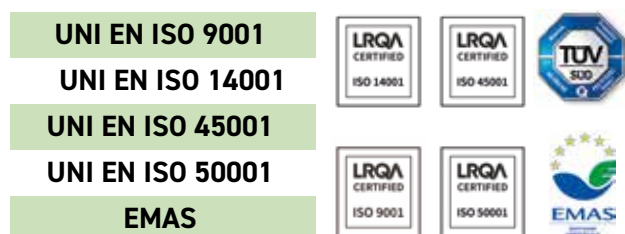
5 Rubiera Special Steel S.p.A. is committed to protecting the health and safety of workers through hazard control, awareness, and risk reduction.

0 Support for Local Communities

6 Rubiera Special Steel S.p.A. involves and supports the community by collaborating with technical institutes.

Further evolutions of the Sustainability Report will derive from these commitments, making it increasingly coherent and in line with the principles introduced by the new Directive.

Rubiera Special Steel SpA has established and implemented a management system that it keeps active and compliant with the requirements of the following certification standards:



Management Systems

Throughout 2024, Rubiera Special Steel S.p.A. maintained full compliance of its management system with the Environment, Health and Safety, and Energy standards and obtained the renewal of the ISO 45001, 14001, and 50001 certifications following audits conducted by the appointed Body in the second half of the year. Also during 2024, the first surveillance audits for the new certification period were carried out, during which no significant findings emerged.

Based on the analysis and continuous monitoring of the internal and external context and the requests received from interested parties, the Management, understood as the set of roles guiding the organization itself, makes resources, structures, and means available in order to:

- **Plan processes and activities taking into account risks and opportunities;**
- **Effectively manage core and support processes;**
- **Systematically and continuously verify performance;**
- **Pursue continuous improvement.**

Rubiera Special Steel SpA and the SDGs

Transizione Ecologica
Mappatura degli Stakeholder
Metodologia di valutazione della materialità
di impatto
Analisi di doppia materialità
I sistemi di Gestione
Rubiera Special Steel SDGs

Rubiera Special Steel S.p.A. has indicated how the material topics contribute to the achievement of the Sustainable Development Goals (SDGs) defined within the UN 2030 Agenda. Accordingly, one or more relevant SDGs are associated with each of the material topics identified below.

The Sustainability Report was conducted in line with the reporting requirements of the

Global Reporting Initiative and taking into consideration the new sustainability reporting principles (Directive 2023/2464, Article 29-ter) introduced at the European level by the Corporate Sustainability Reporting Directive (CSRD).

These impacts are also topics of interest for the second local unit in Civate al Piano.

Material Topic

Impacted SDGs

Circular Economy



Energy Efficiency & Renewable Energy



Protezione ambiente e riduzione Inquinamento



Professional Growth & Equal Opportunities



Health & Safety at the Workplace



Support to Local Communities







03.

Sustainability

Sustainability Targets

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Rubiera Special Steel SpA defines formalized sustainability objectives and targets, articulated in time-based steps and, where possible, with quantitative parameters. This particularly applies to the most complex or long-term targets, ensuring a trajectory of continuous improvement. The pursuit of these objectives is achieved through plant interventions, managerial measures, or focused studies on specific environmental aspects.




For the three-year period 2022-2024, the company continued the growth path of its environmental performance, supported by significant investments. Among the most significant actions are the introduction of the steel degassing system using mechanical vacuum pumps, the partial decommissioning of the thermal power plant, and the replacement of the remaining boilers with newer, more high-performing models. Substantial interventions were also carried out on the compressed air network and the internal electricity distribution system. In parallel, the commitment to waste valorization

Sustainability Targets

has been consolidated, favoring its delivery to recovery facilities instead of disposal. Regarding water consumption, actions focused on reducing leaks and thus the volumes withdrawn..

The indicators for 2024 only partially reflect the progress achieved, particularly in the energy and water sectors. Market conditions, in fact, did not allow the planned production volumes to be reached, limiting the possibility of fully capturing the results of the interventions carried out.

2022 - 2024 Goals

	impacted SDGs	2022		2023		2024	
		Goals	Results	Goals	Results	Goals	Results
Reduction of energy consumption (TEP x 1000/ t _{production})		180	172,06	175	188,16	175	195,95
Reduction of hazardous waste disposal (t _{waste disposal} / t _{production} x 1000)		20	20,16	19	21,27	19	20,72
Reduction of water consumption (m ³ / t _{production})		5	4,74	4,50	4,92	4,50	5,11







04. Our Commitment Towards the Environment

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Circular Economy

Agenda 2030 Goals



12.5 By 2030, substantially reduce waste generation through prevention, reduction, recycling, and reuse.



Rubiera Special Steel SpA's Contribution

Steel is a 100% recyclable material that loses none of its original properties after recycling. Rubiera Special Steel S.p.A. is committed to minimizing the sourcing of primary raw materials by promoting the reuse of ferrous scrap and conferring circularity to its products.

Waste directed to recycling increased in 2024, reaching a percentage of 91% of the total. Furthermore, the continuous reduction of special waste has been planned, also thanks to plant modifications carried out during the three-year period 2021-2023.

Natural Resources

The corporate strategy excludes the use of pig iron, prioritizing recovered raw materials. Constant improvement in scrap yield is also noted, even with production increasingly oriented towards special steels. Since 2019, Rubiera Special Steel S.p.A. primarily uses ferrous scrap for steel production. Rubiera Special Steel S.p.A.'s products are formed by over 90% recycled scrap.

NATURAL RESOURCES EMPLOYED BY RUBIERA SPECIAL STEEL SpA IN TONS

MATERIA PRIMA	2021	2022	2023	2024
Iron Scraps (t)	140.261	144.817	129.556	120.207
Pig Iron (t)	0	0	0	0
Total (t)	140.261	144.817	129.556	120.207

Waste and By-products from the Process

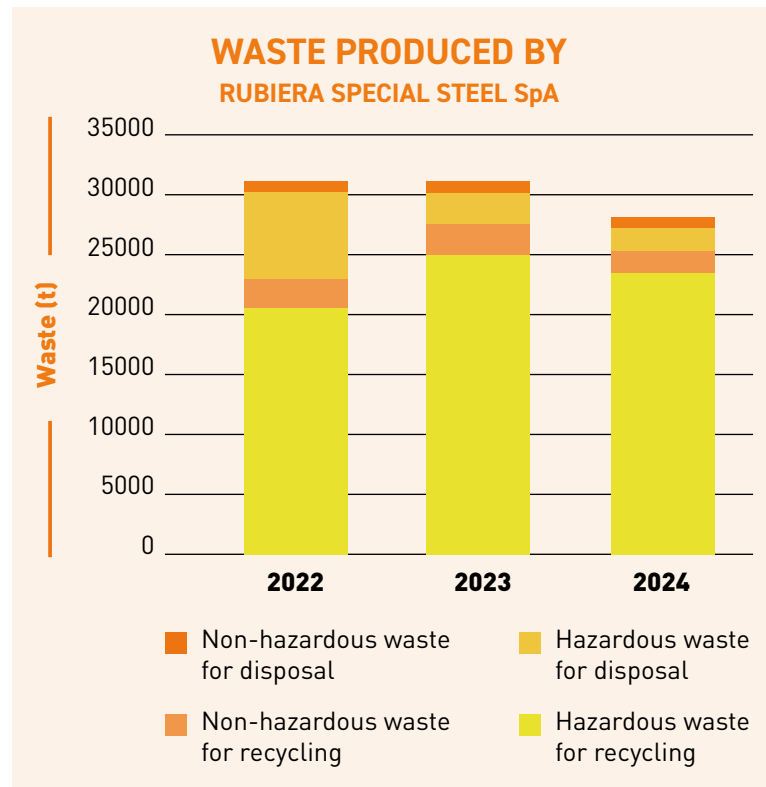
The waste produced by the plant derives from both the production process and maintenance and operating activities of the facilities, and includes:

- Non-hazardous special waste (packaging waste, refractory materials, untreated slag, etc.)
- Hazardous special waste (fume dust, oil for hydraulic and lubrication circuits, etc.)

The graph shows the absolute and specific production (key indicators of waste produced) related to the production of hazardous and non-hazardous waste for the three-year period 2022-2024.

The 2024 data highlights a decrease in non-hazardous and hazardous waste produced compared to 2023 figures. In 2024, Rubiera Special Steel S.p.A. produced 27,458 tonnes of waste, 91% of which was recycled, a clear improvement over previous years' percentages. The majority of the waste consists of slag.

Slag remains the main non-hazardous waste, and waste produced from fume treatment remains the main hazardous waste. The slag is cooled with water and, before being sent for disposal, it is deferrized and crushed. During the handling and storage of slag, the storage yards are cleaned and moistened as required by the Best Available Techniques (BAT). The dust produced by the melting furnace abatement system is largely sent to recovery facilities for metallic oxides.



WASTE PRODUCED, BY TYPE

WASTE	2021 (t)	2022 (t)	2023 (t)	2024 (t)
Non-hazardous	26.344	28.583	28.055	24.795
for recycling	13.787	20.571	25.137	22.905
for disposal	12.557	8.012	2.918	1.889
Hazardous	3.344	2.996	2.897	2.664
for recycling	2.186	2.260	2.302	2.079
for disposal	1.158	736	595	585
TOTAL	29.688	31.579	30.952	27.458
% of recycled waste	54%	72%	89%	91%

Climate Change

Agenda 2030 Goals



7.2 By 2030, significantly increase the share of renewable energy in the global energy mix

7.3 By 2030, double the global rate of improvement in energy efficiency



9.4 By 2030, upgrade infrastructure and modernize industries to make them sustainable, with increased resource efficiency and greater adoption of clean and environmentally friendly technologies and industrial processes

Rubiera Special Steel SpA's Contribution

Rubiera Special Steel S.p.A. has a photovoltaic system with a nominal power of . of the electricity used by Rubiera Special Steel S.p.A. in 2024 comes from renewable sources.

Rubiera Special Steel S.p.A. has completed several energy efficiency works that have led to a sharp decrease in the demand for natural gas compared to 2021.

Energy Consumption

Rubiera Special Steel S.p.A. considers its energy policy strategic, addressing it at both commercial and technological levels, aiming for the optimization of consumption per unit of product. Thanks to the ISO 50001 System implemented in 2020, the monitoring process for electricity and methane consumption has been improved. Achieving the new certification was an objective set by

company management to align the business strategy with sustainability and efficiency themes.

Rubiera Special Steel S.p.A. has identified the most energy-intensive processes as those related to material melting and refining, which account for of energy consumption.

Energy Efficiency Initiatives

- **Replacement** of the two boilers serving the ASEA furnace with more efficient ones.
- **New degassing system** with mechanical pumps instead of steam pumps.
- **Replacement** of the old ELTI-SIGMA heat treatment furnaces with higher-performing muffle furnaces.
- **Improved management** of the scrap charge by varying the mix according to the type of steel to be produced.
- **Implementation** of a monitoring system for every energy-intensive plant.
- **Optimization** of the management of ladle burners.

In 2024, there was a decrease in electricity consumption. Within Scope 2, the purchase of Guarantees of Origin (GO) certificates allowed for a significant increase in the share of electricity from renewable sources, contributing to a reduction in emissions associated with energy consumption. Furthermore, considering the average values of the national supply network, the purchase of GO Certificates brought the overall percentage of renewable electricity to approximately of

the total.

A summary table of energy consumption for the last four years follows, indicating the share from renewable sources. In 2024, electricity consumption from the new Local Unit of Cividate al Piano was also included, which was not present in previous years due to its recent acquisition.

RUBIERA SPECIAL STEEL SpA's ENERGY CONSUMPTION

	2021	2022	2023	2024
Methane (Smc)	6.432.893	4.733.593	4.656.453	4.812.626
Electricity purchased (MWh)	115.528	115.967	116.230	113.935
<i>of which from renewable sources</i>	47.365	45.622	51.141	105.065
Energy generated (MWh)	22	21	16,47	18,98
% of energy from renewable sources	41%	39,4%	44%	92,2%

Decarbonization Levers

The mitigation activities implemented by Rubiera Special Steel S.p.A. are primarily aimed at reducing climate-altering emissions across the different categories provided by the GHG Protocol. Specifically, interventions are made to reduce direct emissions (Scope 1) generated by production processes subject to the ETS system.

In parallel, for Scope 2, the company has initiated a path to reduce indirect emissions resulting from purchased electricity consumption, by purchasing Guarantees of Origin (GOs) associated with Renewable Energy Sources (RES). Finally, with a view to progressively extending the emission boundary, Rubiera Special Steel S.p.A. is promoting collaboration with logistics operators equipped with biomethane-fueled fleets, with the aim of contributing to the reduction of indirect emissions included in Scope 3.

RUBIERA SPECIAL STEEL SpA's ENERGY CONSUMPTION

GOAL TYPE	TIMES / PRIORITIES	MISSION CATEGORY	REDUCTION %
Reduction of steel mill emissions	2024-2050	Scope 1	7% al 2025 37% al 2030 61% al 2040 100% al 2050
Reduction of emissions from processes downstream of the steel mill	2024-2050	Scope 1	0% al 2025 43% al 2030 75% al 2035 100% al 2040
Energy Produced (MWh)	2024-2050	Scope 2	40% al 2024 60% al 2026 80% al 2028 100% al 2030

Emission Reporting

Rubiera Special Steel S.p.A. has consolidated the process of reporting greenhouse gas emissions in compliance with the GHG Protocol, initiated in 2024 and consolidated in 2025, including the new corporate boundary. The contribution of the Civate al Piano local unit, however, remains limited, as it is currently involved in investment projects ai-

med at restarting production activities. The Sustainability Report provides evidence of Scope 1, 2, and 3 emissions. The data relating to GHG emissions for the year 2024 are currently undergoing a validation process as part of obtaining ISO 14064 certification.

Scope 1

Direct emissions of Rubiera Special Steel S.p.A. are monitored according to a monitoring plan approved by the National Competent Authority and validated by an accredited

verifier. The verified emissions are shown in the table; for the year 2024, the index is stable compared to 2023.

RUBIERA SPECIAL STEEL SpA's EMISSIONS FROM STATIONARY PLANTS

	2021	2022	2023	2024	2023-2024 VARIATION
CO ₂ emitted (t) by stationary plants	27.531	25.571	23.866	22.515	-5,7%
Production (t)	145.053	148.620	136.219	128.531	-5,6%
[CO ₂ emitted/production] *100	18,98	17,21	17,52	17,52	-0,00%

Direct emissions from fixed installations are also associated with those resulting from the use of fuels and additives by the company vehicle fleet, which in 2024 totaled **268**

tCO₂eq. Over the course of 2024, the total direct GHG emissions amounted to **22.783 tCO₂eq.**

Scope 2

Scope 2 indirect emissions are associated with the generation of purchased electricity used by Rubiera Special Steel S.p.A. for maintaining offices and production processes. In total, 3.913 tCO₂eq of Scope 2 emissions were emitted in 2024. In 2024, Guarantees of Origin for 45.500 MWh were purchased, thereby increasing the share of

electricity from renewable sources, which reached a total of 105.065 MWh. Compared to 2023, the acquisition of GOs contributed to a significant reduction in indirect emissions from imported energy: from **28.036 tCO₂eq** in 2023 to **3.913 tCO₂eq** in 2024. Scope 2 emissions related to purchased electricity were calculated using the market-based approach.

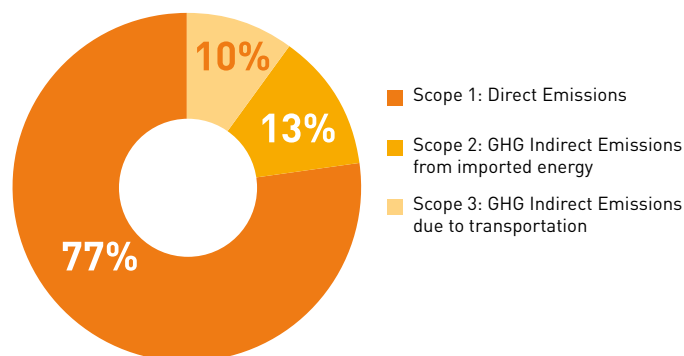
ELECTRICITY CONSUMED BY RUBIERA SPECIAL STEEL SpA

	2021	2022	2023	2024
Consumed energy	115.528MWh	115.967 MWh	116.230 MWh	113.935 MWh
<i>of which from renewable sources</i>	<i>47.365 MWh</i>	<i>45.622 MWh</i>	<i>51.141 MWh</i>	105.065 MWh
Energy generated (MWh)	22 MWh	21 MWh	16,47 MWh	18,98 MWh
Emission factor of the Italian energy network	0,00045659 tCO ₂ /kWh	0,00045659 tCO ₂ /kWh	0,00045659 tCO ₂ /kWh	0,00044120 tCO₂/kWh

Scope 3

During 2024, and with a view to continuously improving the reporting boundary, Rubiera Special Steel S.p.A. consolidated the data collection activity for calculating indirect emissions (Scope 3), starting with those related to the transport of products purchased and sold by Rubiera Special Steel S.p.A., in addition to those deriving from employee commuting. The calculations reported a total of **1.279.989 km** traveled by heavy goods vehicles (HGVs) and trucks for the transport of materials to Rubiera Special Steel S.p.A., **2.000.441 km** for the transport of its products to customers, and, **142.304 km** for

the transport of waste to disposal centers. Finally, commuting amounted to a total of **712.380 km** traveled. Overall, Scope 3 emissions correspond to **3.107 tCO₂eq.**



The total Scope 1, 2, and 3 emissions attributable to the year 2024 amount to 54.703 tCO₂eq.

SCOPE TREND OVER THE YEARS

SCOPE	2022	2023	2024
Scope 1	25.795	24.093	22.783
Scope 2	32.119	28.036	3.913
Scope 3	2.324	2.573	3.107
Total	60.238	54.703	29.803

Other Emissions

Rubiera Special Steel SpA carries out quarterly self-monitoring for the specific monitoring of pollutants, with the aim of verifying compliance with authorization limits. To date, the plant is authorized for 51 emission points (AIA Authorization Prot. No. 66759 of 11/12/2014 and subsequent amendments).

In 2024, the values were consistently and largely below the reference limits.

Reports from checks carried out on air conditioning and/or electrical insulation systems indicate that no greenhouse gas leaks were found during 2024.

Diffused Emissions

These are minor, non-ducted emissions. Diffuse emissions generated within the site are determined by the following activities:

- Occasional welding operations during maintenance;
- Dustiness from material handling and storage (slag, demolitions, etc.);
- Exhaust gases from transport vehicles;
- Ladle preheating using methane burners.

Regarding emissions from additive handling, in addition to adopting storage (silos) and transport (conveyor belt) systems with dust extraction, the yards are cleaned weekly.



Biodiversity

Agenda 2030 Goals



13.1 Strengthen resilience and adaptive capacity to climate-related risks and natural disasters in all countries



15.5 Take urgent and significant action to reduce the degradation of natural habitats, halt the loss of biodiversity, and protect and prevent the extinction of threatened species



12.4 Achieve the environmentally sound management of chemicals and all waste throughout their life cycle, in accordance with agreed international frameworks, and significantly reduce their release into air, water, and soil to minimize their adverse impacts on human health and the environment

Rubiera Special Steel SpA's Contribution

The company is involved in reforestation works covering an area of 32.200 sqm.

Rubiera Special Steel S.p.A. prevents any type of soil contamination that could be caused by its operations.

Reforestation

As part of a programme for the development of the industrial area, the company entered into an environmental improvement plan with the Municipality of Casalgrande concerning an area known as the "Former gravel quarry," located adjacent to the industrial hub. Starting in 2017, the plan became operational and works for environmental restoration and reforestation of the area commenced.

The naturalistic restoration project covers an area of 32,200 m² and involved the planting of native tree species, in accordance with the methods and criteria defined by the relevant planning instruments; the project was completed in 2024.

With regard to biodiversity indicators, a summary table of the areas relating to the year 2024 is provided below.

Soil Contamination

Prior to the construction of the steel plant, the land was used for agricultural purposes. Neither during construction nor during operation have environmental incidents occurred that resulted in soil pollution.

All tanks installed at the steel plant are equipped with special containment basins sized for maximum capacity, in order to prevent the accidental rupture of a tank that could contaminate the soil.

The risk of contamination is therefore limited due to the preventive measures adopted, such as adequate containment basins, staff training to prevent this risk, and periodic checks, as well as actions for reducing consumption and searching for more sustainable alternative products.

The storage of hazardous and non-hazardous substances that can potentially be a source of soil pollution include:

- **Above-ground tanks:** used for storing new and used oils;
- **Underground tanks:** used for storing diesel fuel;
- **Other storage areas:** used for waste deposit.

To protect the soil from possible contamination, Rubiera Special Steel S.p.A. carries out periodic checks and monitoring.

Quarterly, company functions perform a tightness test on the diesel tank, and a specialized external company verifies the tank's status every two years.

BIODIVERSITY TABLE (AS PER PPC N.4/2025)

	2024
Total land area	101.000
<i>of which building footprint (sqm)</i>	38.245
<i>of which private parking area (sqm)</i>	2.953
<i>of which green spaces and permeable surfaces (sqm) (total nature-oriented area the site)</i>	13.235
Total sealed area (sqm) total surface-green areas]	87.765
Nature-oriented areas off-site (sqm)	27.546

Water Withdrawal and Discharge

Agenda 2030 Goals



6.4 By 2030, substantially increase water-use efficiency across all sectors and ensure sustainable withdrawals and supply of freshwater to address water scarcity and reduce the number of people suffering from water scarcity



12.4 Achieve the environmentally sound management of chemicals and all wastes throughout their life cycle, in accordance with agreed international frameworks, and significantly reduce their release into air, water, and soil to minimize their adverse impacts on human health and the environment

Rubiera Special Steel SpA's Contribution

Rubiera Special Steel S.p.A. prevents any type of water contamination that could be caused by its operations.

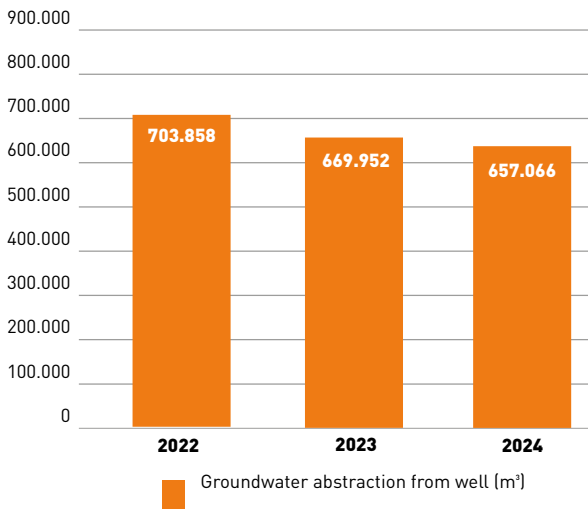
Rubiera Special Steel S.p.A. uses water for cooling the plants. This water is recirculated after cooling through evaporative towers. Maintenance activity continues to reduce system losses and consumption.

Water Consumption

Following the decommissioning of boilers VD2 and VD3 in 2023, water use now relates solely to the steam generator for the operation of the ejectors of the VD1 degassing system and to the circuit for cooling the furnace vaults. Part of the water used for cooling is recycled through two evaporative cooling tower systems, one serving the melting furnace (east) and the other serving the refining furnaces (west).

In 2024, an improvement in water withdrawal volumes was observed, with a 2% reduction in groundwater abstraction **compared to 2023, a 7% reduction compared to 2022, and a 16% reduction compared to 2021**, consolidating a trend that over time has resulted in a reduction of more than 30% compared to 2019.

RUBIERA SPECIAL STEEL SpA's WATER CONSUMPTION



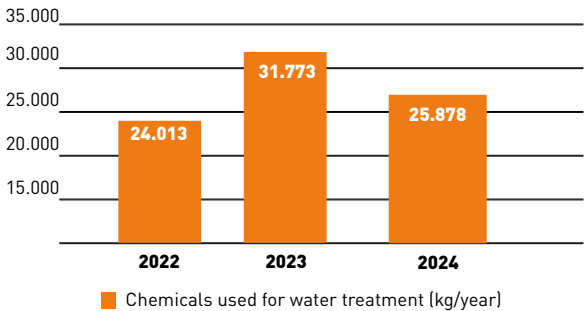
Water Discharge

In light of the interventions aimed at internal recovery of the water resource, the water discharge into the external receiving body (Secchia river) has been significantly reduced and currently consists only of cooling water from the plants, wastewater equivalent to domestic sewage, and runoff water (from roofs and yards). Periodic control analyses are conducted, confirming broad compliance with limits.

Use of Chemical Substances

For water treatment purposes, the storage of chemical substances is limited to additives used for the softening process. In 2024, there was an decrease in the consumption of these products compared to the 2023 values. The consumption reflects the loads that were conferred to the systems.

DISCHARGE OF CHEMICAL SUBSTANCES IN THE WATER







05. Society

People	p. 48
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People

Agenda 2030 Goals



8.5 By 2030, achieve full and productive employment and decent work for all women and men, including young people and persons with disabilities, and equal pay for work of equal value

8.8 Protect labor rights and promote a safe and secure working environment for all workers, including migrant workers, particularly migrant women, and those in precarious employment



5.5 Ensure women's full and effective participation and equal opportunities for leadership at all levels of decision-making in political, economic, and public life



4.4 By 2030, substantially increase the number of youth and adults who have the relevant skills, including technical and vocational skills, for employment, decent jobs, and entrepreneurship

Rubiera Special Steel SpA's Contribution

The company aims to generate value, support the local economy, and contribute to job creation.

Rubiera Special Steel SpA provides suitable working conditions and equal opportunities for development and career advancement to its entire workforce. In 2024, the number of employees increased by 24 compared to 2021.

Women account for 44.4% of employees with executive (managerial) contracts.

In 2024, training hours amounted to 29.83 per employee.

Rubiera Special Steel SpA places the health and well-being of its employees as a top priority, basing its corporate culture on:

- equal opportunities and non-discrimination
- employee training and development
- a safe and flexible workplace

Rubiera Special Steel SpA employs a total of 161 people, of whom 84% are men and 16% are women.

RUBIERA SPECIAL STEEL SpA's EMPLOYEES

ACTIVE PERSONNEL	2021		2022		2023		2024	
	women	men	women	men	women	men	women	men
Executives	-	1	-	1	0	1	0	2
Managers	3	2	4	2	4	3	4	5
Clerical staff	16	19	17	20	18	18	18	26
Blue-collar workers	4	92	4	100	4	104	3	103
Total	23	114	25	123	26	126	25	136

The three-year period from 2021 to 2024 saw an increase of 24 employees, along with greater representation within the clerical and managerial staff categories. The majority of employment contracts are permanent (96%)..

PERMANENT AND TEMPORARY CONTRACT EMPLOYEES

	2021	2022	2023	2024
T. Indeterminato	131	137	137	155
T. Determinato	6	11	15	6
Total	137	148	152	161

The majority of contracts are permanent. Rubiera Special Steel S.p.A. recognizes the commitment of its employees and offers internal promotions following internal evaluations, ensuring equal opportunities for growth.

PROMOTIONS AT RUBIERA SPECIAL STEEL SpA

INTRNAL PROMOTIONS	2021	2022	2023	2024
Executives	0	0	0	0
Managers	0	1	1	0
Clerical staff	1	5	3	6
Blue-collar workers	19	8	16	20
Total	20	14	20	26



Training

Rubiera Special Steel S.p.A. enhances staff skills through training and development programs capable of fostering adequate awareness of their role, their impact on the organization's functioning, the energy efficiency of the processes carried out, and the related risks on process and environmental issues. In 2024, hours of training were held, for an average of hours per employee.

EMPLOYEE TRAINING HOURS

TRAINING HOURS	2021	2022	2023	2024
Total	2753	2571	3006	4803
per employee	20,09	17,37	19,78	29,83

TRAINING AREAS

AREE TEMATICHE FORMAZIONE EROGATA	2021	2022	2023	2024
SAFETY	2476	1999	2266	3450
ENVIRONMENT	116	409	142	298
QUALITY	161	147	393	572
TECNIQUE		16	205	483
Total (hours)	2753	2571	3006	4803



School-Work Projects

Rubiera Special Steel S.p.A. is interested in attracting young talent. Upon request, the company hosts technical institutes from the Emilia-Romagna region at its plant. Students are shown the production process that leads from scrap to the finished product in accordance with environmental protection principles. of Rubiera Special Steel S.p.A.'s employees are under 30 years old.

NUMBER OF EMPLOYEES BY AGE GROUP

N° EMPLOYEES BY AGE GROUP	2021		2022		2023		2024	
	women	men	women	men	women	men	women	men
< 30 years old	5	17	5	21	5	17	5	17
30-50 years old	9	49	10	54	10	61	10	71
> 50 years old	10	47	10	48	9	50	10	48
Total	24	113	25	123	24	128	25	136
Total	137		148		152		161	

Employee Benefits

Rubiera Special Steel S.p.A. offers videoconferencing systems for meetings and training, which are available to all personnel and allow for remote meeting participation. Furthermore, the company offers low-emission vehicles by renewing its fleet every 5 years, leasing Euro 6 vehicles. The company also offers apartments for rent at a controlled price compared to the local market.

Health & Safety

Agenda 2030 Goals



3.9 By 2030, substantially reduce the number of deaths and illnesses caused by hazardous chemicals and air, water, and soil pollution and contamination

3.d Strengthen the capacity of all countries, particularly developing countries, to prevent, reduce, and manage national and global health risks

Rubiera Special Steel SpA's Contribution

Rubiera Special Steel S.p.A. promotes the health and safety of its employees through the choice of ecological materials where possible, dust sampling in work environments, monitoring systems for radioactivity in incoming materials, and monitoring for electromagnetic pollution.

The prevention and promotion of worker health and safety are the priority for Rubiera Special Steel S.p.A. The organization has always worked on these issues and invests resources to support multiple different projects united by the same goal.

The Management considers the strengthening of occupational risk prevention as one of its strategic objectives through surveillance activities in high-risk sectors, in addition to worker training, information, and instruction. Verification and control over the safe use of equipment, machinery, and systems, as well as compliance by companies working at the plant with general prevention and protection measures, are constant

The most relevant projects implemented during 2024 are listed below:

- Consolidation of the health protocol by pro-

posing additional, voluntary-access exams;

- Consolidation of the ASL (Local Health Authority) Health Promotion at Work project: presence of a Health Notice Board, with project illustration, information, posters, and illustrative materials from the ASL;

- Consolidation of the GEDI (Look and Decide Together) training process, aimed at improving safety awareness in the workplace with particular attention to the role of supervisors;

- Improvement of the workplace, which included the completion of the construction of new changing rooms for external companies.

Rubiera Special Steel S.p.A., as previously indicated, operates with a worker health and safety management system in line with the ISO 45001 standard and invests significant resources in the continuous training process of its workers; a total of hours of training were reported in 2024.

INDICATORI DI PRESTAZIONE SSL

	DESCRIPTION		2021	2022	2023	2024	TARGET 2025
System	Number of Safety Committee (SC) meetings	n.	7	20	7+8	6	>10
Training	Hours of SSL Training/ number of employees	%	19.9	13.7	14,48	8,56	>13
Accidents	Total number of industrial accidents	n.	10	14	14	8	≤ n. previous year
	Plant Severity Index	n.	0,43	2,07	2.07	1.83	≤ n. previous year
	Plant Frequency Index	n.	45	61	61	31	≤ n. previous year

Emergency Management

Rubiera Special Steel S.p.A. has defined an emergency management plan and has appointed fire-fighting and first aid personnel to provide immediate responses in case of accidents or emergencies, aimed at preventing and mitigating the resulting environmental impact and activating all necessary actions to restore safe conditions.

Rubiera Special Steel S.p.A. holds the CPI (Fire Prevention Certificate) file no. 1533, which is regularly updated. The organization maintains the efficiency of equipment, devices, and systems and ensures compliance with every other requirement set out in the emergency plan, which is periodically tested through simulations and drills.

Monitoring of Radiative Sources

Incoming scrap loads to the plant are systematically checked using four detectors for radiometric control. This procedure is carried out to eliminate the risk of materials contaminated with any radioactive substances entering the plant. The detectors are set with an alarm threshold: if the threshold is exceeded in the event of abnormal loads, management procedures for cargo segregation are triggered, and the load is rejected back to the supplier. The entire radiation protection system is managed with the support of the Qualified Expert in Radiation Protection appointed in accordance with current regulation.

Monitoring of Electromagnetic Pollution

An electrical substation for receiving and transforming power supplied by the Italian electrical grid is present within the site. In the substation, the voltage is transformed from high to medium and is subsequently directed, through the transformer substations, to the plant's utilities. The substation area is properly fenced, and access is permitted only to authorized personnel.

Agenda 2030 Goals



4.4 By 2030, substantially increase the number of youth and adults who have the necessary skills, including technical and vocational skills, for employment, decent jobs, and entrepreneurship



3.d Strengthen the capacity of all countries, particularly developing countries, for the prevention, reduction, and management of national and global health risks



11.2 By 2030, provide access to safe, sustainable, and affordable transport systems for all, improve road safety, [...]

Community Engagement

Rubiera Special Steel SpA's Contribution

Rubiera Special Steel S.p.A. collaborates with various local schools.

The company provided €132,500 in sponsorships in 2024 to support the community. Rubiera Special Steel S.p.A. contributed to the construction of a bicycle path in the area.

Actions Involving Local Schools

Rubiera Special Steel S.p.A. makes itself available to host educational institutions that request site visits to learn about the production processes conducted. These are mainly technical high schools specializing in industrial chemistry, mechanics, mechatronics, and other technical fields from the province.

During these visits, particular attention is paid to illustrating the technical and managerial solutions used to minimize environmental impacts and workplace risks, and designed to evolve the production process toward high-quality steels. The table summarizes the data for this awareness activity, which had been suspended during the three-year period 2020-2022 due to the COVID pandemic.

SCHOOL VISITS BY RUBIERA SPECIAL STEEL SpA

YEAR	N° OF VISITS/YEAR	SCHOOL	N°OF PUPILS
2024	1	UniMORE	19
2023	3	Technical Institutes	116
2019	2	Technical Institutes	60
2018	2	Technical Institutes	60

Sponsorships

Rubiera Special Steel SpA sponsorizza associazioni con progetti di utilità sociale con finalità solidaristiche diretti a recare beneficio alla comunità. In questo contesto sponsorizza annualmente associazioni sportive dilettantistiche del territorio locale come **Basket 2000** e **U.S. Rubierese**, oltre ad iniziative culturali come il progetto musicale di **Associazione Colico Festival musica sull'acqua**. Nel corso del 2024, Rubiera Special Steel SpA ha donato un totale di **133.153 €**.

SPONSORED ASSOCIATIONS AND AMOUNT DONATED

ASSOCIATION	2024
Basket 2000	€ 120.000
Associazione Colico Festival	€ 10.000
U.S. Rubierese	€ 1.500
Coop. Sportiva Ricreativa Salvaterra	€ 1.000
Total	€ 132.500


Relationships with Local Administrations and Jointly Promoted Initiatives

In agreement with the Municipality of Casalgrande, Rubiera Special Steel S.p.A. completed the construction of a bicycle path, as part of an environmental redevelopment project. This path was transferred to the Municipal Administration and allows for the extension of usable areas along the Secchia river, integrating those built by neighboring Municipalities.





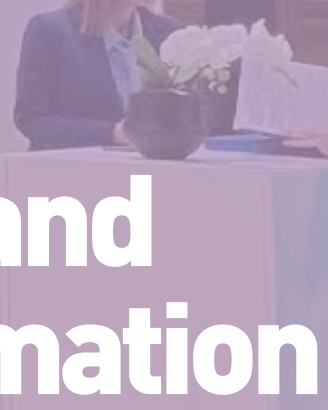






www.arss.it

06. Data and Information



Energy Consumption
Data
GRI Index

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Energy Consumption Data

In accordance with GRI 302: Energy 2016, the table below reports the organization's internal energy consumption for the year 2024.

DATA REGARDING RUBIERA SPECIAL STEEL SpA's ENERGY CONSUMPTION

CONSUMPTION		2021	2022	2023	2024
Fuel from non-renewable sources	MTotal Methane (GJ)	227.319,1	167.271,0	162.992	168.435
	Diesel for Transport (GJ)	2.326,9	2.960,4	3.075,26	3.649,48
	Anthracite for Furnace (GJ)	65.024,3	135.936,5	123.633	108.330
Electricity	Total Electricity Purchased (GJ)	415.900,8	417.481,2	418.428	410.167
	<i>of which from renewable sources (GJ)</i>	170.514,0	164.239,2	184.108	378.235
	Energy from photovoltaic plants (GJ)	79,2	75,6	59	68,34
TOTAL (GJ)		710.650,4	723.724,7	708.187,26	690.649,8
RSS PRODUCTION (t)		145.053	148.620	136.219	128.531
ENERGY INTENSITY (GJ/t)		4,90	4,87	5,19	5,37

¹ Referred to the tonnes of tapped steel produced

GRI Index

General Information

GRI STANDARD		INFORMATION OR REFERENCE	OMISSIONS / NOTES														
GRI 2 –GENERAL INFORMATION 2021																	
The organization and its reporting practices																	
2-1	Organizational details	“About us” p. 6; “Our business” p. 11.															
2-2	Entities included in the organization’s sustainability reporting	Rubiera Special Steel SpA															
2-3	Reporting period, frequency and contact point	Annual frequency; Contacts: anna.cocci@arss.it; alessandro.zucchini@arss.it															
2-4	Restatements of information	Not applicable - first publication of sustainability report.															
2-5	External assurance	No external assurance.															
Activities and employees																	
2-6	Activities, value chain and other business relationships	“Il nostro business” pag. 16; “ Mappatura degli stakeholder” pag. 21.															
2-7	Employees	“People ”pag. 48; Full-time employees: 143, part-time: 5.															
2-8	Workers who are not employees	<div>13 workers who are not RSS employees:<table><tr><th>Duties</th><th>Workers</th></tr><tr><td>Supervisory Body</td><td>2</td></tr><tr><td>Legal Representative</td><td>1</td></tr><tr><td>Independent contractors</td><td>1</td></tr><tr><td>Chairman</td><td>1</td></tr><tr><td>Temporary Employees</td><td>7</td></tr><tr><td>Company doctor</td><td>1</td></tr></table></div>	Duties	Workers	Supervisory Body	2	Legal Representative	1	Independent contractors	1	Chairman	1	Temporary Employees	7	Company doctor	1	
Duties	Workers																
Supervisory Body	2																
Legal Representative	1																
Independent contractors	1																
Chairman	1																
Temporary Employees	7																
Company doctor	1																
Governance																	
2-9	Governance structure and composition	“Governance” p. 13.															
2-10	Nomination and selection of the highest governance body	Company Registration Report															

2-11	Chair of the highest governance body	The chair and the employer are two separate positions in the board of directors.
2-12	Role of the highest governance body in overseeing the management of impacts	"Governance" pag. 13.
2-13	Delegation of responsibility for managing impacts	"Governance" pag. 13.
2-14	Role of the highest governance body in sustainability reporting	The Chief Sustainability Officer, acting as the legal representative, approves the sustainability report.
2-15	Conflicts of interest	Rubiera Special Steel SpA Code of Ethics (available at www.arss.it).
2-16	Communication of critical concerns	Rubiera Special Steel SpA code of Ethics (available at www.arss.it). No critical issues reported in 2023.
2-17	Collective knowledge of the highest governance body	Management has appointed an Environmental Management System Manager and HSE Manager who assist Management on sustainable development issues.
2-18	Evaluation of the performance of the highest governance body	Regular review by management on the goals concerning the management of the impacts on the economy, environment, and people. Rubiera Special Steel SpA's performance is also evaluated by means of the audit reports issued by third-party certifying bodies for management issues related to energy (50001), the environment (ISO 14001, 45001, EMAS) and safety (ISO 45001).
2-19	Remuneration policies	The remuneration of the members of the highest governance body and other senior executives are approved by the Board of Directors.
2-20	Process to determine remuneration	The remuneration of employees is decided on the basis of position, job, duties/functions attributed to him/her and the market. The departments involved are: Management, the legal representative, the Director of Administration of Finance, control and human resources.
2-21	Annual total compensation ratio	The organization omits this disclosure due to confidentiality constraints, for privacy reasons, and to protect the confidentiality of the subjects.
Strategies, policies and practices		
2-22	Statement on sustainable development strategy	"Letter to our Stakeholders" p. 07.
2-23	Policy Policy	"Code of Ethics" p. 15; "Sustainability targets" p.30, "Quality, environment, safety and energy policy" available on the company website.
2-24	Embedding policy commitments	"Code of Ethics" p. 15; "Sustainability targets" p. 30.
2-25	Processes to remediate negative impacts	"Reforestation" p. 41, "Relations with local governments and jointly promoted initiatives" p. 55.p
2-26	Mechanisms for seeking advice and raising concerns	Rubiera Special Steel SpA receives requests for advice and/or concerns through the e-mail address info@arss.it .

2-27	Compliance with laws and regulations	No significant instances of non-compliance, no fines.
2-28	Membership associations	Rubiera Special Steel SpA is a member of Confindustria.
Stakeholder engagement		
2-29	Approach to stakeholder engagement	"Stakeholder mapping" p. 9.
2-23	Collective bargaining agreements	All employees are covered by the National Collective Bargaining Agreement (CCNL) for metalworkers supplemented by Rubiera Special Steel SpA with company contracts.

Material Topics

GRI STANDARD		INFORMATION AND REFERENCES
Material Topics		
GRI 3: Material Topics 2021	3-1 Process to determine material topics	"Double materiality assessment" p. 24.
GRI 3: Material Topics 2021	3-2 Material topics list	
Circular Economy		
GRI 3: Material Topics 2021	3-3 Management of material topics	"Circular economy" p. 34.
GRI 301: Materials 2016	301-1 Materials used by weight or volume	"Raw materials" p. 34.
	301-2 Recycled input materials used	
GRI 306: Waste 2020	306-3 Waste generated	"Waste and by-products" p. 35.
	306-4 Waste diverted from disposal	
	306-5 Waste directed to disposal	
Energy Efficiency and Renewable Energy		
GRI 3: Material Topics 2021	3-3 Management of material topics	"Energy consumption" p. 36.
GRI 302: Energy	302-1 Energy consumption within the organization	"Energy consumption figures" p. 58.
	302-3 Energy intensity	
	302-4 Reduction of energy consumption	
Environment Protection and Pollution Reduction		
GRI 3: Material Topics 2021	3-3 Management of material topics	"Climate change" p. 37, "Biodiversity" p. 42, "Water withdrawal and effluents", p. 44.

GRI 305: Emissions 2016	305-1 Direct (Scope 1) GHG emissions	"Emissions reporting" p. 38; emission factors from national standards ISPRA 2023.
	305-2 Energy indirect (Scope 2) GHG emissions	"Emissions reporting" p. 38; Grid electricity emissions factors in Italy by AIB - European Residual Mixes – IT- Table 2: Residual Mixes 2021 [AR5 GWP Dataset]
	305-3 Other indirect (Scope 3) GHG emissions	"Emissions reporting" p. 38; GHG protocol emission factors.
GRI 304: Biodiversity	304-3 Habitats protected or restored	"Biodiversity" p. 42.
GRI 303: Water and effluents	303-1 Water and tributaries	"Water withdrawal and effluents" p. 44.
GRI 306: Effluents and waste	306-1 Water discharge by quality and destination	

Occupational Health & Safety

GRI 3: Material topics 2021	3-3 Management of material topics	"Health and Safety" p. 51.
GRI 403: Occupational health and safety 2018	403-1 Occupational health and safety management system	"Management system" p. 25; "Health and Safety" p. 51; Code of Ethics Rubiera Special Steel SpA (available at www.arss.it).
	403-5 Worker training on occupational health and safety	"Health and Safety" p. 51.
	403-6 Promotion of worker health	
	403-7 Prevention and mitigation of occupational health and safety impacts	
	403-9 Work-related injuries	

Professional Growth and Equal Opportunities

GRI 3: Material topics 2021	3-3 Management of material topics	"People" p. 48.
GRI 401: Occupation	GRI 401-1 New employee hires and employee turnover	
GRI 405: Diversity and equal opportunity 2016	GRI 405-1 Diversity of governance bodies and employees	

Local Community Support

GRI 3: Material topics 2021	3-3 Management of material topics	"Community engagement" p. 54.
GRI 203: Indirect economic impacts 2016	203-1 Infrastructure investments and services supported	

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