

SUSTAINABILITY REPORT



2023



RUBIERA SPECIAL STEEL S.p.A.

© Rubiera Special Steel SpA
Sustainability Report - 2023



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Letter to our Stakeholders.

We are proud to publish the second edition of this non-financial report, aimed at conveying to all stakeholders the vision, mission, culture, and therefore the DNA of Rubiera Special Steel SpA.

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

The document is intended to consolidate the methods and tools used in ESG reporting, relying on the professionalism and active collaboration of the entire organization, which, with dedication and seriousness, addresses change constructively by adopting the best practices in the industry, developing new techniques, and appropriate strategies.

In this second edition, we can only reaffirm 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 Special Steel SpA, sustainability means producing the highest quality steel while ensuring respect for the surrounding environment and the health and well-being of workers.

All of this in a market context that is objectively complex and difficult to interpret and

understand, driven on one side by macro-economic dynamics heavily influenced by ongoing international crises that are suppressing growth rates, and on the other by an evident, though latent, trade war between different steel production sectors, which is impacting European companies' ability to compete on price.

In this complex scenario, in agreement with our shareholders, we nonetheless intend to continue investing in technology and innovation, while maintaining the commitments made to all our stakeholders.

We aim to develop a transition of processes that can balance economic sustainability with the protection of the environment and the interests of social stakeholders, also supporting the local community in the development of social projects.

Throughout 2023, we continued raising safety awareness among all personnel and completed significant energy efficiency interventions, in terms of reducing natural gas consumption and CO2 emissions, the results of which we are seeing in 2024.

On this journey, we can rely on the contribution of our staff, the network of suppliers and customers, and more generally all of our stakeholders. We have grown accustomed to analyzing risks and opportunities with them, identifying the most effective and efficient solution to achieve the expected results.

We therefore continue to strengthen relationships with our customers by meeting the increasingly specific market demands for the type of steel to be produced and, secondarily, to develop and expand our commercial horizons towards high-margin products and services.

Considering the overall evolution of the re-

gulatory framework concerning emission trading and increasingly stringent climate-related emission reduction targets, we have developed an environmental program aimed at identifying reduction actions through energy efficiency measures, evaluation of alternative materials to those of fossil origin, and digitization of processes.

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

Federico Galperti

A handwritten signature in black ink, appearing to read 'FSG', positioned below the name Federico Galperti.

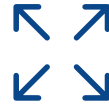
Key figures 2023.



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



132.018 tons of iron scraps turned into steel



250.000 sqm surface



89% of waste is recycled



44% of energy from RES



23.866 tons of CO₂eq Emissions Scope 1



3.975 tons of CO₂ avoided thanks to energy efficiency measures



32.200 sqm of reforestation projects



152 employees of whom **17%** are women



57% of employees are women



90% permanent contracts



19 hours of training per employee



Turnover of **€ 210.259 mln**



01.
Rubiera
Special
Steel SpA.



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About us.

Rubiera Special Steel SpA began its activity in 1965 under the name Acciaieria di Rubiera, in an area where industrial activities were predominantly manufacturing and ceramics, during a time when the consumption of construction steel for building was experiencing significant growth rates. Since then, it has distinguished itself for quality and reliability, making its mark in the Italian history high-integrity forge ingots production.

Quality, teamwork, safety, and environmental care are values that enable it to meet diverse requests and establish long-lasting partnerships with clients and suppliers. Rubiera Special Steel SpA has been long qualified with ISO 14001 and ISO 9001 certifications and through the EMAS regulation.

Its consistent commitment to quality and the environment has enabled it to obtain ISO 45001 and ISO 50001 certifications, concerning workplace safety and energy efficiency, respectively. As part of its continuous improvement approach, Rubiera Special Steel SpA has set the goal of achieving ISO 14064 certification in 2024, for which the necessary procedures are currently underway.

Quantifying emissions through a comprehensive GHG inventory can enhance the organization's understanding of its emissions. Managing its carbon inventory thus becomes a useful and timely action in ter-

ms of corporate environmental responsibility, interesting for the potential reduction of company waste as well.

Reporting emissions can significantly help identify the best reduction opportunities, leading the organization to improve its use of raw materials and energy efficiency, as well as developing new services that can reduce GHG impacts for clients and suppliers. This helps the company better position itself in a market that is increasingly sensitive and attentive to environmental issues. Conducting a rigorous inventory is therefore a fundamental prerequisite for setting targets for subsequent monitoring and reporting phases.

In 2023, Rubiera Special Steel SpA continued its program of technical and organizational growth, despite the challenging socio-economic context induced by international crises (Ukraine, Middle East).

In terms of technological development and in line with market strategies, the redevelopment of the industrial layout continued with the revamping of the thermal power plants that serve the production process.

Our Values.

- Quality
- Flexibility
- Reliability
- Environment
- Innovation
- Health and Safety
- Team work

Our Mission.

Rubiera Special Steel SpA aims to provide its clients with a comprehensive service in terms of **quality, flexibility, and delivery speed** by producing the best steel, consuming as few fossil resources as possible in a safe working environment, through continuous investments and teamwork.

Our Vision.

Becoming the main partners for our clients in the supply of sustainable steel ingots, with a **continuous pursuit of improving quality and processes** in terms of circular economy.

Governance.

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

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

Composition of the governance bodies and management

Rubiera Special Steel SpA has adopted an Organization, Management and Control Model with the objective of developing and implementing a Governance system in line with the company's code of ethics.

This model was designed to promote a constant dissemination of a control culture and to further raise employees' awareness toward responsible and conscientious behavior, preventing and/or reducing the risk of offenses, including environmental ones, as provided by Legislative Decree 8 June 2001 no. 231 (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 for the implementation and achievement of the company's goals. The Board of Directors is composed of five members, including the Chairman, the CEO, and the Employer.

- **Board of Statutory Auditors:** it is composed of five full members who meet the prescribed requirements for accounting oversight.

- The accounting control is entrusted by the Board of Directors to an **Auditing Company** registered in the official register established by the competent authority.

- **Supervisory Body** under D.lgs. 231/01 is composed of two independent professionals tasked with overseeing the proper application of the Organization, Management, and Control Model, providing timely reports to the Board of Directors.

Code of Ethics.

The Code of Ethics is the tool designed to define the set of ethical values that the company recognizes, accepts, and shares. They shape 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 Management has appointed the Environmental Management System Manager and HSE Manager, who supports the Management on environmental issues by:

- designing, implementing, and monitoring the Management System;
- managing relations with Regulatory Authorities, the Supervisory Body, Certification Bodies, and other stakeholders;
- overseeing environmental monitoring, including those required by current authorizations;
- coordinating the continuous improvement of the environmental management system.

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

Our business.

Rubiera Special Steel SpA specializes in the production of high-integrity steels, offering a wide range of products in any type of high-quality steel.

The company's production capabilities cover ingots ranging from 1.6 to 145 tons in various types of steel, thus meeting a wide range of market demands.

Rubiera Special Steel SpA caters to both national and international markets and can produce up to 300.000 tons of finished product annually.

Its customers are steel processors, particularly forges and foundries that produce for various sectors such as oil & gas, energy, tooling, etc.

RUBIERA SPECIAL STEEL SpA operating system

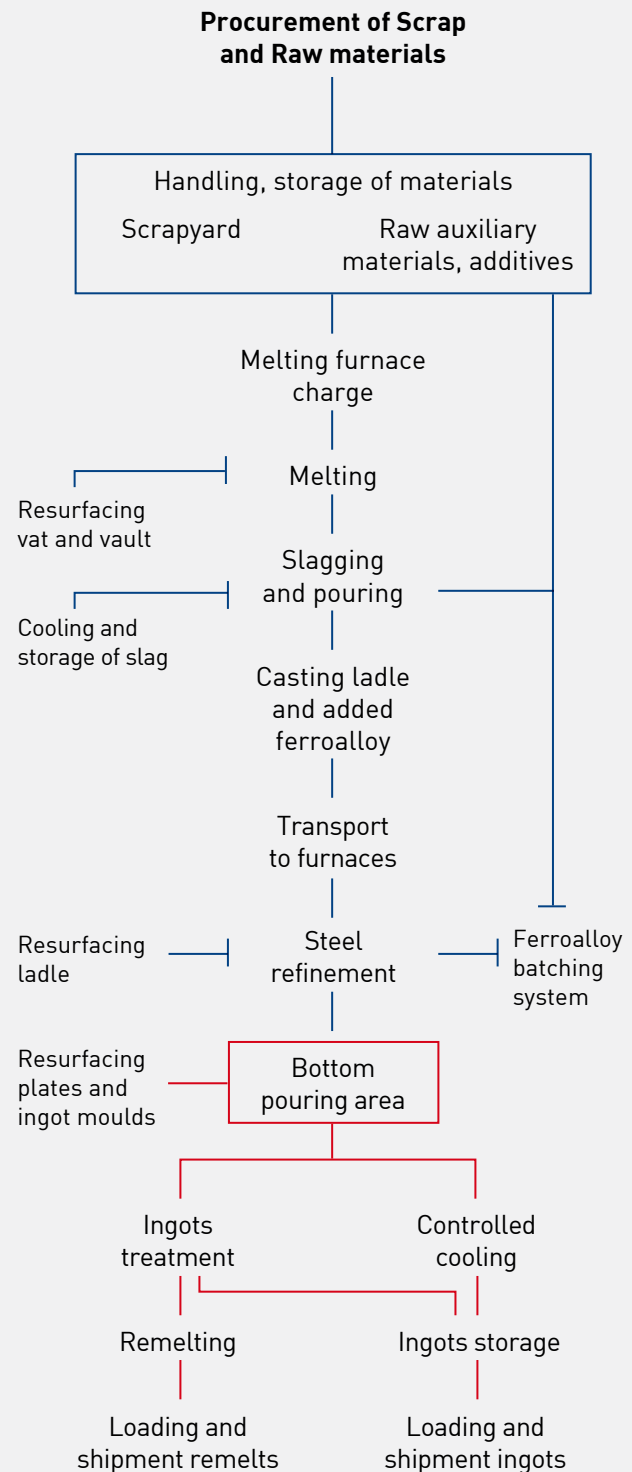


FIGURE 1: SUMMARY SCHEME OF THE PRODUCTION OF RUBIERA SPECIAL STEEL SpA

The company offers a product customization service based on specific customer requests, both for remelted steels and specific weights.

This flexibility allows the company to meet every market demand while maintaining the

same high quality of supply. Rubiera Special Steel SpA can provide a wide range of products in various types of high-quality steel.

Ingots	Remelted Ingots
Polygonal: 3 - 140 tons	ESR: Ø 700 – 800 mm, 12 -100 tons
Multifaced: 21 - 145 tons	VAR: Ø 500 – 1070 mm, 6 – 27 tons
Round: 3 - 37 tons	
Square: 1,6 – 20 tons	

Table 1: RUBIERA SPECIAL STEEL SpA's PRODUCTS





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Our
sustainability
strategy.



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Steel production, which represents the core business of Rubiera Special Steel SpA, is inherently sustainable as it enhances the value of scrap metal in line with the principles of the Circular Economy.

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

Within a European context, the company is committed to supporting the achievement of decarbonization targets by 2050, fulfilling its sustainability certification commitments for its products and investing in the ecological transition of its facilities.

Stakeholder mapping.

Rubiera Special Steel SpA includes among its stakeholders individuals with very different roles, all of which are fundamental to the sustainable development of the business. In fact, each stakeholder plays a role within the company's value chain. Rubiera Special Steel SpA is committed to involving its stakeholders on sustainability issues as well.

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), Unsidar (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
	Customers in the nuclear sector	Forges/ Forging companies	Product quality, traceability, high level of staff awareness, strict control of all production phases, complete supporting documentation in line with customer standards and specifications, availability for second-party audits.
	Local community	Municipality of Casalgrande and Rubiera, Neighbourhood	Environmental protection and prevention of pollution, sponsorships, solidarity
	Competitors	Steelworks	Talent attraction, competitiveness, best practices, environment, health and safety, product knowledge
	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

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

TABLE 2: RUBIERA SPECIAL STEEL SpA's STAKEHOLDERS

Double materiality assessment.

Together with the stakeholders, the most important topics for Rubiera Special Steel SpA 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) (which Rubiera Special Steel SpA will be subject to starting January 1, 2026, with reporting on the 2025 financial year) and the Exposure Drafts of the European Sustainability Reporting Standards (ESRS) provided by EFRAG (European Financial Reporting Advisory Group).

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

The impacts that hold greater weight and significance for Rubiera Special Steel SpA and its stakeholders represent the material topics considered for the drafting of the sustainability report, and are the following:

01 Circular Economy
In light of the evolving EU policies regarding the introduction of the “taxonomy” for identifying “environmentally sustainable industrial activities,” which includes steel production, Ru-

biera Special Steel SpA is committed to promoting the principles of the Circular Economy and adhering to “green” process and product criteria that can be leveraged as a competitive advantage, based on the available technological developments suitable for the company’s scale.

02 Energy efficiency and renewable energy

The Ukraine crisis and new EU policies to combat climate change have led to increased business costs (energy costs and emission trading costs), making Rubiera Special Steel SpA focused on improving the efficiency of its supply chain and sourcing energy from renewable sources.

03 Environmental protection and pollution reduction

Rubiera Special Steel SpA is committed to preventing all forms of pollution and protecting the environment by optimizing resource consumption, reducing waste production, improving and monitoring air and water emissions, controlling noise, protecting soil and subsoil, and managing all other direct and/or indirect impacts.

04 Professional growth and equal opportunities

Rubiera Special Steel SpA values the skills of its personnel through training and development programs.

05 Occupational health and safety

The company protects workers’ health and safety by controlling hazards, raising awareness, and reducing risks.

Supporting local communities

06 Rubiera Special Steel SpA engages and supports the community by collaborating with technical institutes.

Management systems.



Rubiera Special Steel SpA has established and implemented a management system that remains active and compliant with certification standards:

UNI EN ISO 9001

UNI EN ISO 14001

UNI EN ISO 45001

UNI EN ISO 50001

EMAS



In 2023, Rubiera Special Steel SpA renewed the certifications for all the aforementioned Management Systems.

Based on the analysis and continuous monitoring of the internal and external environment, as well as the input from stakeholders, the Management - intended as the group of roles leading the organization - provides resources, structures, and means to:

- plan processes and activities while considering risks and opportunities;
- effectively manage both support and core processes;
- systematically and continuously monitor performance;
- pursue continuous improvement.

Rubiera Special Steel SpA and the SDGs.

Rubiera Special Steel SpA has indicated how the material topics contribute to achieving the Sustainable Development Goals (SDGs) defined in the context of the UN's 2030 Agenda. Therefore, one or more relevant SDGs are associated with each of the identified material topics. The

report has been prepared in line with the reporting requirements of the Global Reporting Initiative and takes into account the new sustainability reporting principles (Directive 2023/2464, Article 29 ter) introduced at the European level by the Corporate Sustainability Reporting Directive (CSRD).

Material topic

SDGs impacted

Circular economy



Energy efficiency and renewable energy



Environmental protection and pollution reduction



Professional growth and equal opportunity



Occupational health and safety



Supporting local communities







03.
Sustainability.

Leybold

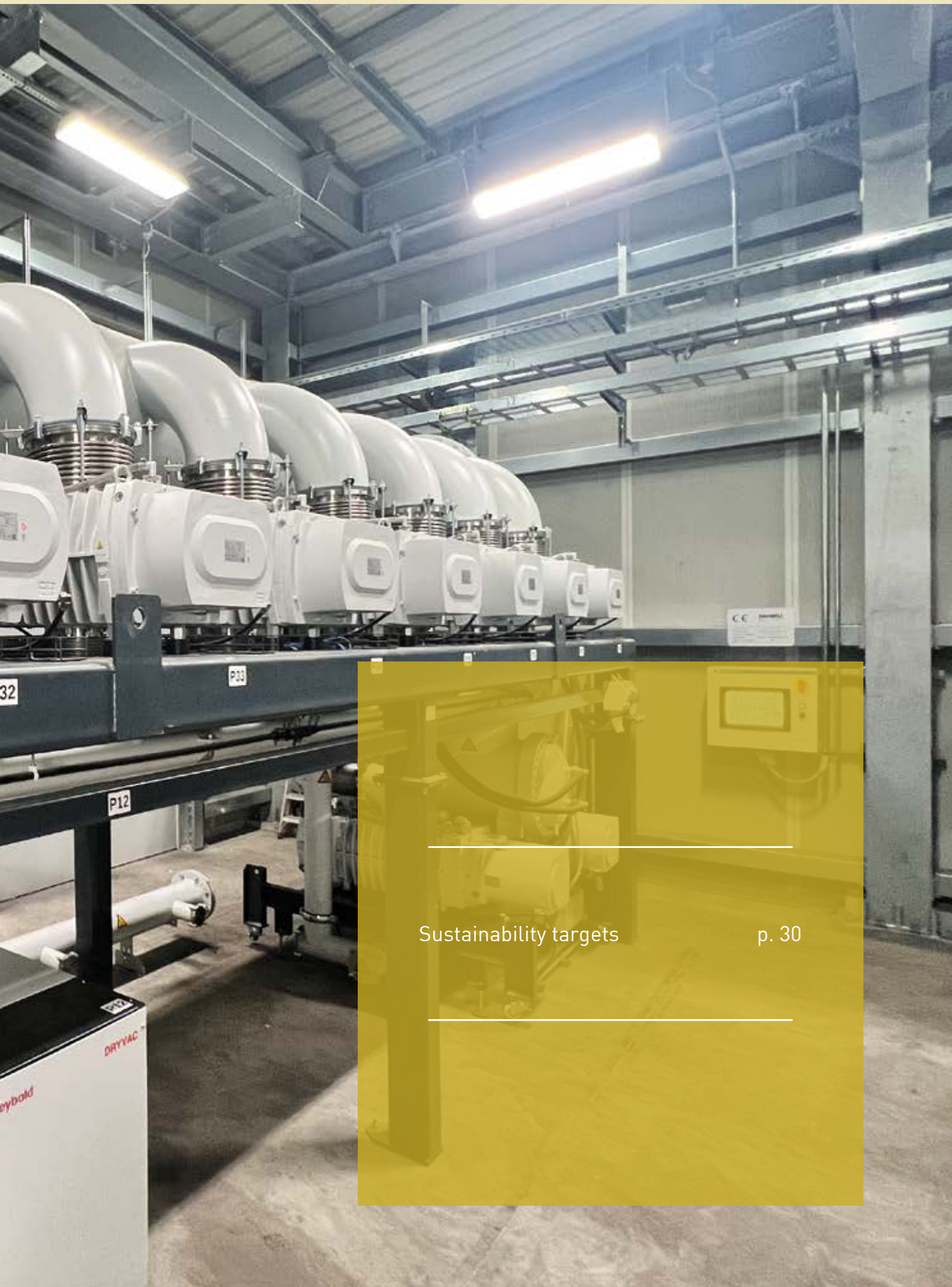
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Sustainability targets

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Rubiera Special Steel SpA has established documented goals and targets regarding sustainability. The targets break down the objectives into time-specific elements and, where feasible, are quantitatively defined. This is particularly true for goals that require complex interventions or are formulated with multi-year horizons to ensure a continuous improvement trend. The objectives are pursued through plant modifications, management measures, or studies aimed at understanding specific environmental aspects.

For the 2021-2023 period, Rubiera Special Steel SpA has continued improving its performance by making significant investments. In particular, a steel degassing system with mechanical vacuum pumps was introduced, part of the thermal power plant was decommissioned, and the remaining units were replaced with more efficient, new-generation boilers. Significant improvements

were made to the compressed air network and the internal electrical distribution system. Actions to enhance waste recovery, directing it to recycling plants rather than disposal, were consolidated. In terms of water consumption, steps were taken to reduce usage by minimizing losses.

The 2023 indicators only partially reflect this improvement in efficiency, especially in energy and water usage, due to market conditions that did not allow for the achievement of the expected production volumes.

However, it should be noted that some significant energy use interventions will demonstrate their effectiveness only in 2024, in line with European decarbonization targets.



2021 - 2023 Goals

		2021		2022		2023	
	SDGs impacted	Goals	Results	Goals	Results	Goals	Results
Reduction of energy consumption (TEP x 1000/ t produced)		185	186,50	180	172,06	175	188,16
Reduction of hazardous waste disposal (t waste disposal / t produced X 1000)		10	7,98	8	4,95	6	4,37
Reduction of water consumption (m3/ t produced)		5,50	5,36	5	4,74	4,50	4,92

TABLE 3: 2021-2023 RUBIERA SPECIAL STEEL SpA's GOALS





04.
Our commitment to the environment.



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Circular Economy.

2030 Agenda Targets



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



The contribution of Rubiera Special Steel SpA

Steel is a 100% recyclable material, retaining all its original properties after recycling. Rubiera Special Steel SpA is committed to minimizing the procurement of raw materials by promoting the reuse of ferrous scrap and bringing circularity to its products. Currently, 89% of waste is recycled, and plans have been made to reduce hazardous special waste resulting from plant modifications during the 2021–2023 period. An example of this is the decommissioning of the boilers serving the ASEA furnace.

Raw materials

The company’s strategy excludes the use of pig iron, favoring recovered raw materials, and emphasizes the continuous improvement in scrap yield, even with a production increasingly focused on special steels. Since 2019, Rubiera Special Steel SpA has primarily used ferrous scrap for steel production. Rubiera Special Steel SpA’s products are made from 100% recycled scrap.

RAW MATERIAL	2020	2021	2022	2023
Iron scrap (t)	129.930	140.261	144.817	129.556
Pig iron (t)	0	0	0	0
Total (t)	129.930	140.261	144.817	129.556

TABLE 4: RAW MATERIALS USED BY RUBIERA SPECIAL STEEL SpA

Waste and By-products from the Process

The waste produced by the plant comes from both the production process and maintenance and operation activities and includes:

- non-hazardous special waste (packaging waste, refractory materials, septic sludge, untreated slag, etc.);
- hazardous special waste (dust from fumes, hydraulic circuit oil, emulsions, batteries, etc.).

Below are the absolute and specific productions (key waste indicators) related to the production of hazardous and non-hazardous waste from 2020-2023.

The 2023 data show a slight increase in the amount of non-hazardous waste produced. This increase is attributable to the implementation of significant plant modifications in 2023, which involved the replacement and disposal of obsolete equipment (such as the boilers serving the ASEA furnace) and an increase in typical maintenance waste, such as rock wool, rags and absorbents, insulating materials, and others.

These works, combined with a slight reduction in production due to market conditions, led to an increase in waste-related indices. In 2023, Rubiera Special Steel SpA produced 30.952 tons of waste, 89% of which was recycled, showing a significant improvement compared to the percentages of previous years.

The majority of the waste consists of slag. Slag remains the main non-hazardous waste, while the waste from fume treatment continues to be the primary hazardous waste. The slag is cooled with water, and before disposal, it undergoes deferrization and crushing. During the handling and storage of slag,

cleaning and humidification of the yards are carried out as required by BAT (Best Available Techniques). Most of the dust produced by the smelting furnace's abatement system is sent to recovery facilities.

FIGURE 2: WASTE PRODUCED BY RUBIERA SPECIAL STEEL SpA

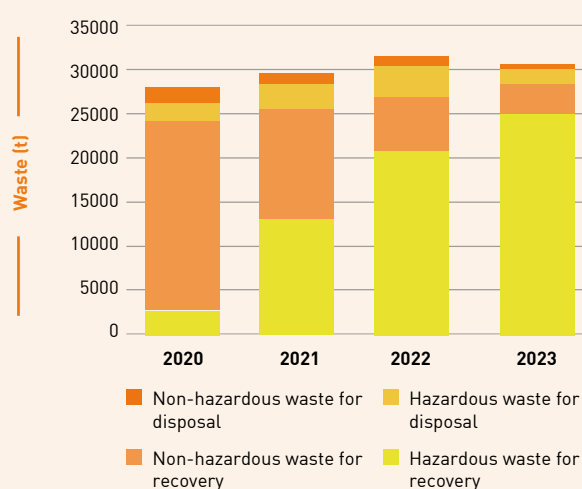


TABLE 5: WASTE PRODUCED, PER TYPE

WASTE	2020 (t)	2021 (t)	2022 (t)	2023 (t)
Non-hazardous	24.686	26.344	28.583	28.055
for recovery	2.890	13.787	20.571	25.137
for disposal	21.797	12.557	8.012	2.918
Hazardous	2.808	3.344	2.996	2.897
for recovery	1.206	2.186	2.260	2.302
for disposal	1.602	1.158	736	595
TOTAL	27.494	29.688	31.579	30.952
% recycled waste	15%	54%	72%	89%

Climate change.

2030 Agenda Targets



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

The contribution of Rubiera Special Steel SpA

Rubiera Special Steel SpA operates a photovoltaic plant with a nominal power of 54 kW. In 2023, 44% of the electricity used by Rubiera Special Steel SpA came from renewable sources. The company has undertaken several energy efficiency measures, resulting in a further 1.6% reduction in natural gas consumption, in addition to the decrease already achieved in previous years (-26%).

Energy consumption

Rubiera Special Steel SpA considers its energy policy to be strategic, addressing it both commercially and technologically, aiming to optimize consumption per unit of product. Thanks to the ISO 50001 System implemented in 2020, the process of monitoring electricity and natural gas consumption has been improved.

Achieving the new certification was a goal set by the company's management to align

business strategy with sustainability and efficiency objectives.

Rubiera Special Steel SpA identified the most energy-intensive processes as those related to the melting and refining of materials, which account for 90% of energy consumption. Consequently, several energy efficiency systems have been implemented.

Energy efficiency initiatives

- **Replacement** of the two boilers serving the ASEA furnace with more efficient ones
- **Replacement** of the old ELTI-SIGMA heat treatment furnaces with more efficient muffle furnaces
- **Improved management** of scrap load by adjusting the mix based on the type of steel to be produced
- **Implementation** of a monitoring system for each energy-intensive plant
- **Optimization** of ladle burner management

In 2023, electricity consumption remained nearly constant and in line with previous years, while a slight decrease in natural gas consumption confirmed the expected improvement following the decommissioning of the vacuum boilers in January 2023.

The result of these initiatives is a **1.6% reduction in natural gas** consumption compared to 2022 and an increase of **49 TOE** (Tons of Oil Equivalent) in 2023.

The summary table of energy consumption

over the last three years shows the contribution of energy from renewable sources.

Currently, renewable electricity represents 44% of all the energy used.

	2020	2021	2022	2023
Methane (Smc)	6.688.857	6.432.893	4.733.593	4.656.453
Electricity purchased (MWh)	108.534	115.528	115.967	116.230
<i>of which from renewable sources</i>	<i>45.273</i>	<i>47.365</i>	<i>45.622</i>	<i>51.141</i>
Energy generated (MWh)	23	22	21	16,47
% renewable electricity	41,7%	41%	39,4%	44%

TABLE 6: RUBIERA SPECIAL STEEL SpA'S ENERGY CONSUMPTION

Emissions reporting

Rubiera Special Steel SpA has initiated a greenhouse gas emissions reporting process in accordance with the GHG Protocol, considering both the impacts generated inside and outside the organization.

This first sustainability report presents the emissions associated with the internal activities of Rubiera Special Steel SpA, particularly direct emissions (Scope 1) and indirect

emissions (Scope 2).

In addition, the quantification of some Scope 3 emissions has begun.

Scope 1

The direct emissions of Rubiera Special Steel SpA are monitored according to a plan approved by the Competent National Authority and validated by an accredited verifier. The table shows the CO₂ emissions verified by LRQA Italy, an accredited verifier. For the year 2023, despite a reduction in tapped production, there was a slight increase in the CO₂ index by 1.8% compared to 2022,

which is linked to a different production mix.

Direct emissions from fixed plants are also accompanied by those from the use of diesel by company machinery, which in 2023 amounted to 227.965 tCO₂eq. che nel 2023 equivalgono a **227.965 tCO₂eq.**

In 2023, the total direct greenhouse gas emissions amounted to **24.093 tCO₂eq.**

	2020	2021	2022	2023	2022-2023 change
CO ₂ emissions (t) from fixed plants	26.778	27.531	25.571	23.866	-6,7%
Production (t)	131.875	145.053	148.620	136.219	-8,3%
(CO ₂ emissions/productions) *100	20,30	18,98	17,21	17,52	+1,8%

Scope 2

Scope 2 indirect emissions are associated with the generation of purchased electricity used by Rubiera Special Steel SpA for maintaining offices and production processes.

In total, **28.036 tCO₂eq** of Scope 2 emissions were recorded in 2023.

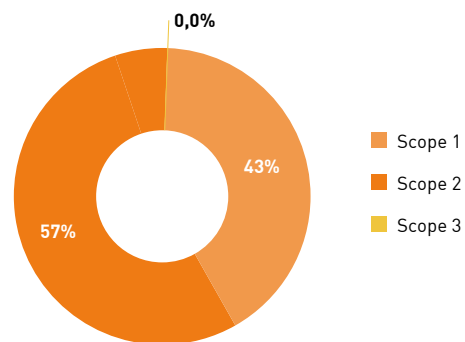
	2020	2021	2022	2023
Consumed Energy	108.534 MWh	115.528MWh	115.967 MWh	116.230 MWh
<i>of which from renewable sources</i>	<i>45.273 MWh</i>	<i>47.365 MWh</i>	<i>45.622 MWh</i>	<i>51.141 MWh</i>
Self-produced Electricity	23 MWh	22 MWh	21 MWh	16,47 MWh
Emission Factor of the Italian Energy Grid	0,00045659 tCO ₂ /kWh	0,00045659 tCO ₂ /kWh	0,00045659 tCO ₂ /kWh	0,00045659 TCO ₂ /kWh

Scope 3

In 2023, with a view to continuously improving the scope of reporting, Rubiera Special Steel SpA began collecting data for the calculation of indirect emissions (Scope 3), starting with those related to the transportation of goods purchased and sold by Rubiera Special Steel SpA, as well as those derived from employee commuting.

The calculations, approximated on the higher side, reported a total of **1.099.964 km** covered by trucks for the transportation of materials to Rubiera Special Steel SpA, **1.648.685 km** for the transportation of products to customers, and **124.159 km** for the transport of waste to disposal centers.

Lastly, employee commuting amounted to a total of **612.740 km**. In total, Scope 3 emissions correspond to **2.573 tCO₂eq.**



The total emissions for Scope 1, 2, and 3 associated with the year 2023 amount to 54.703 tCO₂eq.

Other emissions

Rubiera Special Steel SpA conducts quarterly self-monitoring to specifically track pollutants to ensure compliance with authorized limits.

Currently, the plant is authorized for 51 emissions (Aut. AIA Prot. No. 66759 of 12/11/2014 and subsequent amendments). The most recent significant emission points authorized relate to the installation of two

new grinders that have come into operation and are fully functional. The most significant emissions come from dust from the smelting furnace (E1) and from the refining, oxy-cutting, and ladle heating processes (E5, E6, E9).

The table shows the emission factor data for dust at each emission point subject to quarterly self-monitoring over the past three years. The key indicator for total annual dust emissions is obtained by the ratio between

the average concentration values of dust in g/h measured during the self-monitoring and the average annual production data (t/hour) sent for testing. **In 2023, the values remained consistently and significantly below the reference limits.**

The reports from inspections conducted on air conditioning and/or electrical insulation systems indicate that no leaks were detected during 2023.

DUST EMISSION KEY INDICATORS (g/t)						
	2020	2021	2022	2023	Authorized limit	Company limit
E1	4,4	1,7	0	0,4	5	3
E5	0,17	0,19	0,66	0,35	19	13
E6	1	0,2	0,14	0,78	18	13
E9	0,6	1,5	0,83	0,57	18	13

TABLE 7: OTHER EMISSIONS PRODUCED BY RUBIERA SPECIAL STEEL SpA

Diffuse emissions

These are emissions that are minor and cannot be channeled. The diffuse emissions generated within the site are caused by activities such as:

- occasional welding operations during maintenance;
- dust from material handling and storage (slag, demolitions, etc.);
- exhaust gases from transport vehicles;
- radle reheating using natural gas burners.

Regarding emissions from the handling of additives, in addition to adopting storage (silos) and transport (conveyor belt) systems equipped with dust extraction, weekly cleaning of the yards is also carried out.



EMISSIONE
E 51

Biodiversity.

2030 Agenda Targets



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

The contribution of Rubiera Special Steel SpA

Rubiera Special Steel SpA is involved in reforestation efforts over an area of 32.200 sqm. The company avoids any form of soil contamination that could be caused by its activities.

Reforestation

As part of an industrial area development program, the company signed an environmental improvement plan with the Municipality of Casalgrande for an area called “Ex cava di ghiaia” (former gravel quarry) adjacent to the industrial site.

Since 2017, the plan has been in operation, and environmental restoration and refore-

station works have begun on the area.

The natural recovery project covers an area of 32.200 sqm, with the planting of native tree species, following the methods and criteria defined by current planning tools.

In 2020, the restoration activities were completed, and the company is awaiting approval of the rehabilitation by the relevant authorities, with whom it maintains productive and ongoing communication.

Regarding biodiversity indicators, the summary table of surface areas is provided below

(note that there have been no boundary modifications since 2017):

	2023
Total land area	101.000
<i>of which building footprint (sqm)</i>	<i>37.000</i>
<i>of which private parking area (sqm)</i>	<i>2.953</i>
<i>of which green spaces and permeable surfaces (sqm) (total nature-oriented area the site)</i>	<i>15.885</i>
Total sealed area (sqm) total surface-green areas)	85.115
Nature-oriented areas off-site (sqm)	32.200

TABLE 8: BIODIVERSITY TABLE (AS PER PPC N.4/2020)

Soil contamination

Prior to the construction of the steel mill, the land was used for agricultural purposes. No environmental incidents leading to soil pollution occurred either during the construction or during the operation of the plant. All tanks installed at the steel plant are equipped with containment basins sized for maximum capacity, to prevent accidental tank rupture from contaminating the soil.

The risk of contamination is therefore limited by the preventive measures adopted, such as appropriate containment basins, staff training to prevent such risks, and regular inspections.

The storage of hazardous and non-hazardous substances that could potentially cause soil pollution includes:

- **Above-ground tanks:** average quantities of new and used hydraulic and lubricating oils: 7 m³
- **Underground tanks:** diesel tank capacity: 7 m³

- **Other storage:** used battery storage; active sludge treatment systems (underground tanks).

To protect the soil from possible contamination, Rubiera Special Steel SpA conducts regular inspections and monitoring.

A quarterly internal leak test is conducted on the diesel tank, and records are kept. Every two years, an external specialized company inspects the tank's condition. For above-ground tanks and the storage of waste oils and batteries, visual inspections are carried out almost daily. The civil water treatment plant is constantly maintained and monitored by the manufacturer, which is responsible for its management and maintenance. For any spills near the storage areas of hazardous substances and waste, a first-response and containment kit is available.

Water withdrawal and effluents.

2030 Agenda Targets



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

The contribution of Rubiera Special Steel SpA

Rubiera Special Steel SpA uses water for cooling its plants.

After cooling with evaporative towers, the water is recirculated.

Maintenance activities continue to reduce system losses and decrease water consumption to 4.5 m³/ton compared to 2021.

Rubiera Special Steel SpA prevents any form of water contamination that could be caused by its activities.

Water consumption

Following the decommissioning of the VD2 and VD3 boilers, water use is now solely related to the steam generator for operating the VD1 degassing ejectors and the circuit for cooling the furnace domes. Part of the water used for cooling is recycled through two evaporative tower systems, one serving the smelting furnace (to the east) and the other serving the refining furnaces (to the west).

In 2023, there was an improvement in the volume of water withdrawn, **with a 5% reduction in well water extraction compared to 2022, over 13% compared to 2021, and more than 18% compared to 2020.**

Annual self-monitoring of well water is conducted to measure concentrations of hydrocarbons, total Cr, Cd, Cu, Ni, and Zn.

To date, the monitoring has never shown significant concentrations of these pollutants.

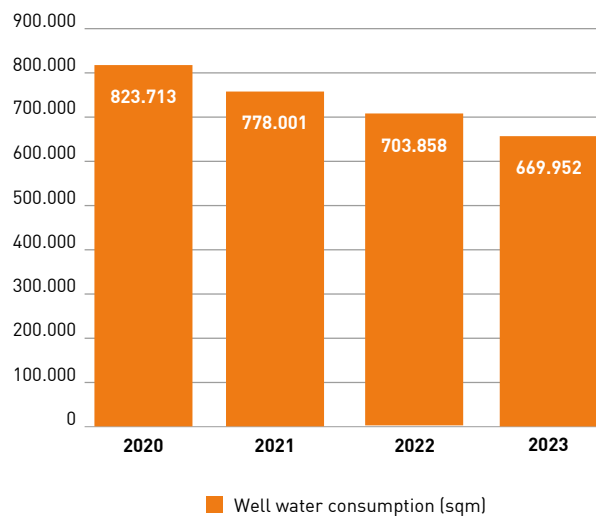


FIGURE 3: RUBIERA SPECIAL STEEL SpA'S WATER CONSUMPTION

Water discharges

Water discharges from the steel mill are as follows:

DISCHARGE N.1

Discharge of industrial water into the Secchia River, consisting of:

- cooling water from the plants;
- washing water from the scale filter;
- washing water from the softening plant (resin filters);
- domestic water (from the office building)

Before being discharged, this water passes through an underground open concrete tank for sedimentation, and from there, it is siphoned and discharged into the Secchia River.

Domestic water from the office building is treated by a total oxidation plant and subsequently routed into the same pipeline as the cooling water mentioned above. Significant discharge parameters, including pH and temperature, are checked quarterly through analyses conducted by an external laboratory.

Use of chemical substances

The storage of chemical substances is limited to additives used for softening cooling water in the plants and technical gases. In 2023, there was a 32% increase in substances used for water treatment compared to 2022, partly due to the decommissioning of the ASEA furnace boilers, a 3.35% increase compared to 2021 and a 0.3% increase compared to 2020.

There is also a volumetric meter where the discharged water is measured monthly.

DISCHARGE N.2

Discharge of domestic water from the locker rooms and other company-owned residences, treated with two separate total oxidation plants and discharged at a second point into the Secchia River. Monitoring has consistently confirmed water quality well within legal limits.

DISCHARGE N.3

New domestic water discharge (AIA modification dated 08/08/2019), consisting of domestic water from new company-owned restrooms, treated with two separate total oxidation plants and discharged into surface waters.

Rainwater from yards and roof gutters is also conveyed into all discharges. The runoff from the paved courtyard areas does not involve deposits of raw materials or solid powdery waste.

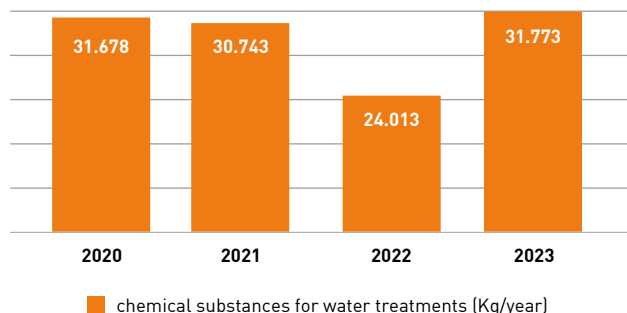


FIGURE 4: WATER DISCHARGE OF CHEMICAL SUBSTANCES



05.
Company.

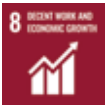


People
Health and Safety
Community engagement

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People.

2030 Agenda Targets



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

The contribution of Rubiera Special Steel SpA

Generating value, supporting the local economy, and contributing to job creation. The company offers suitable working conditions and equal opportunities for development and career advancement to all its workforce. The number of employees grew by 15 people between 2021 and 2023. Women represent 57% of employees with management contracts. In 2023, the training hours amounted to 19 per employee.

Rubiera Special Steel SpA prioritizes the health and well-being of its employees, basing its corporate culture on:

- equal opportunity and non-discrimination
- personnel training and growth
- a safe and flexible workplace

Rubiera Special Steel SpA has 152 employees, of whom 83% are men and 17% are women, broken down as follows:

RUBIERA SPECIAL STEEL SpA WORKFORCE	2020		2021		2022		2023	
	women	men	women	men	women	men	women	men
Senior executives	-	1	-	1	-	1	0	1
Middle managers	3	3	3	2	4	2	4	3
White collar employees	15	18	16	19	17	20	18	18
Blue collar employees	4	85	4	92	4	100	4	104
Total	22	107	23	114	25	123	26	126

The four-year period from 2020 to 2023 saw an increase of 15 employees and a rise in representation within the staff and management areas. The majority of contracts are permanent (90%).

	2020	2021	2022	2023
Permanent	126	131	137	137
Fixed-term	3	6	11	15
Total	129	137	148	152

Rubiera Special Steel SpA recognizes the commitment of its employees and offers internal promotions based on internal evaluations, ensuring equal opportunities for growth.

INTERNAL PROMOTIONS	2020	2021	2022	2023
Senior executives	0	0	0	0
Middle managers	0	0	1	1
White collar employees	0	1	5	3
Blue collar employees	1	19	8	16
Total	1	20	14	20

Training

Rubiera Special Steel SpA values the skills of its personnel through training and development programs that foster an adequate awareness of their role, their impact on the organization's functioning, the energy efficiency of the processes conducted, and the related risks in terms of process and environmental issues. In 2023, 3.006 hours of training were conducted, with an average of 19 hours per employee.

TRAINING HOURS	2020	2021	2022	2023
Total	1054	2753	2571	3006
per employee	8,17	20,09	17,37	19,78

TRAINING AREAS	2020	2021	2022	2023
SAFETY	820	2476	1999	2266
ENVIRONMENT	105	116	409	142
QUALITY	125	161	147	393
TECNIQUE	4		16	205
Total	1054	2753	2571	3006

School-Work project

Rubiera Special Steel SpA is interested in attracting young talent. Upon request, Rubiera Special Steel SpA hosts technical institutes from the Emilia-Romagna region at its plant. Students are shown the production process that transforms scrap into finished products in line with environmental protection principles. Currently, 14% of Rubiera Special Steel SpA employees are under 30 years old.

N° OF EMPLOYEES BY AGE	2020		2021		2022		2023	
	women	men	women	men	women	men	women	men
← 30 YEARS OLD	3	19	5	17	5	21	5	17
30-50 YEARS OLD	9	48	9	49	10	54	10	61
→ 50 YEARS OLD	9	41	10	47	10	48	9	50
Total	21	108	24	113	25	123	24	128
Total	129	137	148	152	148	152	152	152

Employee benefits

Rubiera Special Steel SpA provides videoconferencing systems: used for meetings and training sessions, they are available to all personnel and enable participation in remote meetings. Additionally, the company offers low-emission vehicles, renewing its fleet every 5 years by renting Euro 6 vehicles. Lastly, Rubiera Special Steel SpA offers apartments for rent at below-market rates.

Health and Safety.

2030 Agenda Targets



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

The contribution of Rubiera Special Steel SpA

Rubiera Special Steel SpA promotes the health and safety of its employees through the use of eco-friendly 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 workers' health and safety are top priorities for Rubiera Special Steel SpA.

The organization has always worked on these issues and invests resources to support various projects, all aimed at the same goal. Several aspects are considered strategic by the management, and the various projects focus on these areas.

One of the management's strategic objectives is to strengthen **the prevention of occupational risks through monitoring activities** in departments most prone to accidents, providing training, information, and assistance to workers.

Constant checks and controls are carried out to **ensure the safe use of equipment, machinery, and plants**. Another focus is on the prevention of **occupational diseases**, particularly in specific departments.

The most significant projects in 2023 were:

- voluntary additional blood tests (cholesterol);
- consolidation of the Local Health Authority (ASL) Workplace Health Promotion project: presence of a Health Bulletin Board displaying the project, information, posters, and illustrative materials from the ASL

- provision of free supplements during the summer months to all employees;
- consolidation of the GEDI training process (Guardare E Decidere Insieme, “Look and Decide Together”), aimed at improving safety awareness in the workplace;
- completion of the construction of new

locker rooms for external contractors;

- safety training (employees) provided in 2023: approximately 3.100 hours.

Rubiera Special Steel SpA has a health and safety management system for workers and reports on its performance in this area.

	DESCRIPTION		2020	2021	2022	2023	2024 TARGET
System	No. of safety committee	n.	5	7	20	7	>12
	Hours of OH&S training/ number of employees	%	7	19.9	13.7	20.39	>13
Accidents	Total no. of industrial accidents	n.	11	10	14	10	≤ no. in the previous year
	Plant severity index	n.	1.09	0.43	2.07	1.47	≤ no. in the previous year
	Plant frequency index	n.	54	45	61	41	≤ no. in the previous year

TABLE 9: SSI PERFORMANCE INDICATORS

Emergency management

Rubiera Special Steel SpA has established an emergency management plan and has appointed fire safety and first aid personnel to provide immediate responses in case of accidents or emergencies. The goal is to prevent and mitigate the resulting environmental impact and activate all necessary actions to ensure the maximum protection of environmental assets, particularly for emergencies related to accidental spills on the ground and fires. The company has extinguishing systems, including powder and

carbon dioxide fire extinguishers, which are subjected to scheduled maintenance.

Periodic checks are conducted on all safety devices. Rubiera Special Steel SpA holds the regularly updated Fire Prevention Certificate (CPI) practice no. 1533. The organization ensures the efficiency of equipment, devices, and systems, and complies with all other requirements or operating conditions outlined in the certificate.

Radioactive source monitoring

Incoming scrap loads are systematically inspected using four detectors for radiometric control. These controls are carried out to prevent the entry of contaminated materials potentially containing radioactive substances.

The detectors are set with an alarm threshold: if this threshold is exceeded with abnormal loads, procedures are activated to segregate the load, which is then rejected and returned to the supplier.

The equipment is maintained under a service contract with a specialized company, and calibration checks are conducted every six months.

A “Geiger counter” is also available at the plant for additional checks on material storage. The entire radioprotection system is managed with the support of a Qualified Expert in Radioprotection, appointed in accordance with current regulations.



Electromagnetic pollution monitoring

The site contains an electrical substation for the reception and transformation of power supplied by the Italian electrical grid.

In the substation, the voltage is transformed from high to medium, and then directed, via transformer stations, to the plant’s utilities.

The substation area is properly fenced, and access is only allowed to authorized person-

nel. In July 2017, during the new expansion on the east side, specific measurements of electromagnetic pollution caused by the power line were conducted.

The measurements confirmed compliance with quality levels, showing 3 μ T.

Community engagement.

2030 Agenda Targets



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, [...]

The contribution of Rubiera Special Steel SpA

Rubiera Special Steel SpA collaborates with various local schools. Before the pandemic, the company hosted 60 students per year for disciplinary workshops. In 2023, these activities were renewed. In 2023, the company invested €154.153 in sponsorship activities to support the community. Rubiera Special Steel SpA contributed to the construction of a bike path in the local area.

Activities carried out with local schools

Each year, Rubiera Special Steel SpA hosts schools that request visits to the production plant.

The visits are primarily from technical high schools specializing in industrial chemistry, mechanics, mechatronics, and other technical fields from nearby provinces. After a brief presentation of the production process in a classroom setting, students and teachers are accompanied by company staff

on a tour of the plant and production areas, including the laboratory where mechanical tests on materials are conducted. The visit lasts approximately two hours.

During the visit, the plant technologies used to produce high-quality steel safely and with minimal environmental impact are also explained. The table below summarizes the visits, which were suspended during the 2020, 2021, and 2022 periods due to the COVID pandemic.

YEAR	NO. VISITS /YEAR	INSTITUTES	NO. OF STUDENTS
2023	3	Technical institutes	116
2020/2021/2022	-	-	-
2019	2	Technical institutes	60
2018	2	Technical institutes	60

Sponsorship activities

Rubiera Special Steel SpA sponsors organizations with social utility projects that have a charitable focus, such as the parish Caritas and Progetti del cuore (Projects of the Heart), a benefit corporation that provides aid to disadvantaged individuals due to physical, mental, economic, social, or family conditions, or offers humanitarian aid to foreign communities.

Additionally, Rubiera Special Steel SpA annually sponsors local amateur sports associations, such as Rebasket and Tre Esse, and cultural initiatives like the music project of Associazione Colico Festival Musica sull'Acqua.

In 2023, Rubiera Special Steel SpA donated **€154.153**.

ORGANIZATIONS	2023
Rebasket A.S.D	€ 45.000
Tre Esse	€ 153
Basket 2000	€ 60.000
ASD Athletic Cdr Mutina	€ 2.000
Coop. Sportiva ricreat. Salvaterra	€ 1.000
Associazione Colico Festival	€ 11.000
A.P.S. Associazione Promozione Sociale	€ 20.000
Caritas parrocchiale	€ 15.000
Total	€ 154.153

Relations with local governments and jointly promoted initiatives

In agreement with the Municipality of Casalgrande, Rubiera Special Steel SpA completed the construction of a bike path as part of an environmental redevelopment project, which was handed over to the Municipal Administration.

This bike path, starting from Provincial Road SP 51, will connect with the existing bike path along the Secchia River, as part of a larger project involving neighboring municipalities.



06.
Data.



Energy consumption data
GRI Index

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p. 59

Energy consumption data.

As referenced in GRI: 302: Energy 2016, the table shows the organization's internal energy consumption for the year 2023. The reported consumption was identified through periodic energy audits and Rubiera Special Steel SpA's consumption monitoring system.

As previously mentioned in the "Energy Consumption" section, the various energy efficiency investments resulted in a 1.6% reduction in natural gas demand.

CONSUMPTION		2020	2021	2022	2023
Non-renewable fuel sources	Total Methane (GJ)	237.533,6	227.319,1	167.271,0	162.992
	Diesel for transport (GJ)		2.326,9	2.960,4	3.075,26
	Anthracite for furnace (GJ)		65.024,3	135.936,5	123.633
Electricity	Total purchased electricity (GJ)	390.722,4	415.900,8	417.481,2	418.428
	<i>of which from renewable sources (GJ)</i>	<i>162.982,8</i>	<i>170.514,0</i>	<i>164.239,2</i>	<i>184.108</i>
	Energy produced from photovoltaic plant (GJ)	82,8	79,2	75,6	59
Total (GJ)		628.338,8	710.650,4	723.724,7	892.296
RSS Production (t)		131.875	145.053	148.620	136.219
Energy Intensity (GJ/t)¹		4,76	4,90	4,87	6,55

¹ The scope chosen by Rubiera Special Steel SpA is the tons of tapped steel produced.

TABLE 10: DATA ON THE ENERGY CONSUMPTION OF RUBIERA SPECIAL STEEL SpA, CONVERSION FACTORS FROM ISPRA TABLE 2022-2023

GRI Index.

General information

GRI Standard	Information or references	Omissions/Notes														
GRI 2 – General information 2021																
The organization and its reporting practices																
2-1	Organizational details	"About us" p. 12; "Our business" p. 16.														
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 workers																
2-6	Activities, value chain and other business relationships	"Our business" p. 16; "Stakeholder mapping" p. 21.														
2-7	Employees	"People" p. 48; Full-time employees: 143, part-time: 5.														
2-8	Workers who are not employees	<p>13 workers who are not employees of RSS:</p> <table border="1"> <thead> <tr> <th>Duties</th> <th>Workers</th> </tr> </thead> <tbody> <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> </tbody> </table>	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. 14.														
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" p. 14.	
2-13	Delegation of responsibility for managing impacts	"Governance" p. 14.	
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
Strategy, 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 Standards		Information or 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	

Environmental 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 and 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	"Health and Safety" p. 51. "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	
	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 opportunity		
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	
Supporting local communities		
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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