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Steel confidence.

Sustainability Report 2024

Summary

Methodological Note

CB Trafilati Acciai S.p.A. («**CB**» or the «**Company**») is reporting its second sustainability report. Through a big awareness and engagement of all company's departments, it is going to acquire even more consciousness about the ESG contents of the company and the sector.

CB is spreading its Sustainability Report 2024 («**Report**») on a voluntary basis. It is yearly made with the purpose of illustrating the main non-financial data, such as the policies adopted, the main sustainable goals, activities and results. The main role of this statement is to provide a clear and complete vision of the main Company's activities. CB wants to highlight the goals, the progress and all the steps pursued to enhance its environmental and social impact.

CB is not subjected to the EU 2022/2464 Directive, known as *Corporate Sustainability Reporting Directive* – CSRD, that's why the Report is drawn up on a voluntary basis and it is not a Non-Financial Statement (NFS).

The Report is taking inspiration from the ESRS (*European Sustainability Reporting Standards*), particularly from the Voluntary Sustainability Reporting Standard for non-listed SMEs (VSME). Its aim is to give a complete representation of CB's activities and impacts.

The qualitative and quantitative boundary of the Report is referred to CB Trafilati Acciai S.p.A. 's performance and the Financial Statement 2024. In order to compare data across the different years, there is a comparison – where possible – with the previous year.

This Sustainability Report has been approved by the CB's Board of Directors and it is not audited by any external and independent auditors.

01

Sustainability Report 2024

Our Group

Established in 1974 in Tezze sul Brenta, in the north-east of Italy, CB Trafilati Acciai, owes its name to the acronym of the founder families, Corti and Beri. Since 2008 it is totally owned by the Beri family, but it has maintained the original name «CB Trafilati Acciai».

The entire capital is owned by Steelgroup Italy Holding S.r.l., the Holding of **ITA S.p.A.** and **FAR S.p.A.**, too. Both companies are **specialised in tempered steel wires and high carbon steel wires**.

All the Steelgroup's companies share the same vision and **mission to the high products quality and the high attention to their customers**. A work ethic with a constant drive for innovation and an ability to adapt to changes is deeply rooted in all Group companies.

Mastery of technical knowledge, extensive experience in international markets and the willingness to exchange information and data with the entire production chain have enabled the Group to constantly **improve production quality and reputation**. Combining all these factors have also allowed a more comprehensive vision focused on economic, social and environmental sustainability. Looking to the future with optimism and realism.

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300.000 tons/year

PRODUCTION CAPACITY

263

EMPLOYEES 2024

190.000 mq

PRODUCTION AREA

€156 millions

REVENUES 2024

ITA

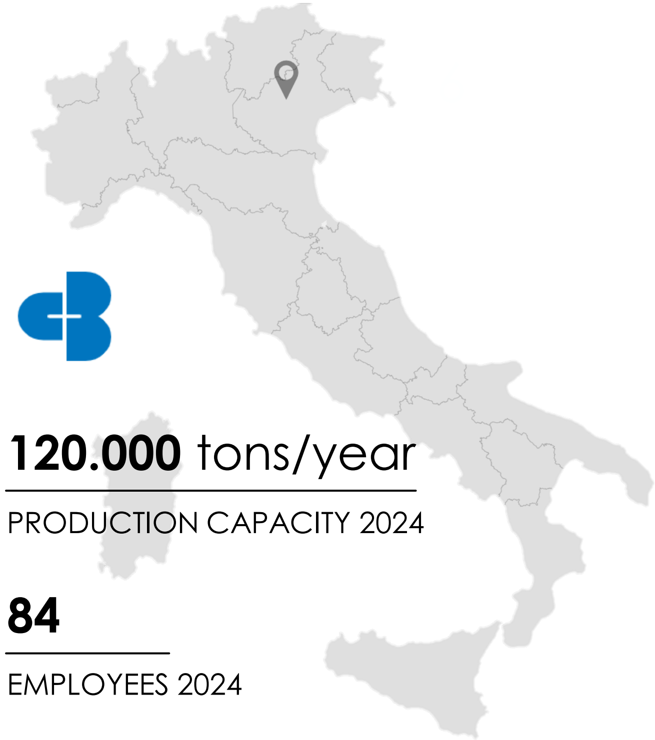
Our Company

CB Trafilati Acciai is a **leading company** in steel production in the field of **prestressing and post-tensioning**. The product range meets the needs of the most demanding customers worldwide, with its variety of products: strand and wire.

These products are used for pre-stressed concrete and post tension. The products are used in the prefabrication industry and large infrastructures for pre-stressing and post-tensioning engineering works, both national and international. **Professionalism**, **quality** and **reliability** are for CB essential characteristics of any project.

Since 1974, CB has invested in the organizational and technological progress, aiming to **reduce at the minimum the environmental impact**. These are some of the **main goals** pursued:

- **2 Power Unit** generators for energy and heat used inside the production plant
- **Solar Panels** usage to produce green energy
- **Noise impact** reduction through the installation of a sound-absorbing shield on production equipmentt
- Energy-saving illumination in all departments, using LEDs
- **High attention to water usage,** using internal double purifiers and analysing several times the water used and re-used



120.000 tons/year

PRODUCTION CAPACITY 2024

84

EMPLOYEES 2024

40.000 mq

PRODUCTION AREA

€61 millions

REVENUES 2024

Governance

Beri Family through the **Steelgroup Italy Holding S.r.l.** is the main owner of CB Trafilati Acciai S.p.A.

Famiglia Beri

100%

Steelgroup Italy Holding S.r.l.

100%

CB Trafilati Acciai S.p.A.

Updated in 2023 and remaining unchanged to this day, the **Board of Directors** (BoD) is periodically nominated and evaluated by the Shareholders. It is composed of three members – including one external to the Beri's Family – who continuously provide technical advice aligned with Company vision. The BoD is responsible for developing and managing the company's strategies, as well as for decision-making and oversight regarding financial, economic, and ESG matters.

The Board of Directors is vested with the broadest powers for ordinary and extraordinary management of the Company and is granted all the powers necessary for the implementation and THE achievement of the corporate purposes that are not reserved by law and/or the company bylaws to the shareholders.

Company also has a **Board of Auditors**, which monitors compliance with the law and the company bylaws, adherence to sound administrative principles, and particularly the adequacy of the organizational, administrative and accounting structure. The **auditing of accounts** is entrusted to an external auditing firm.

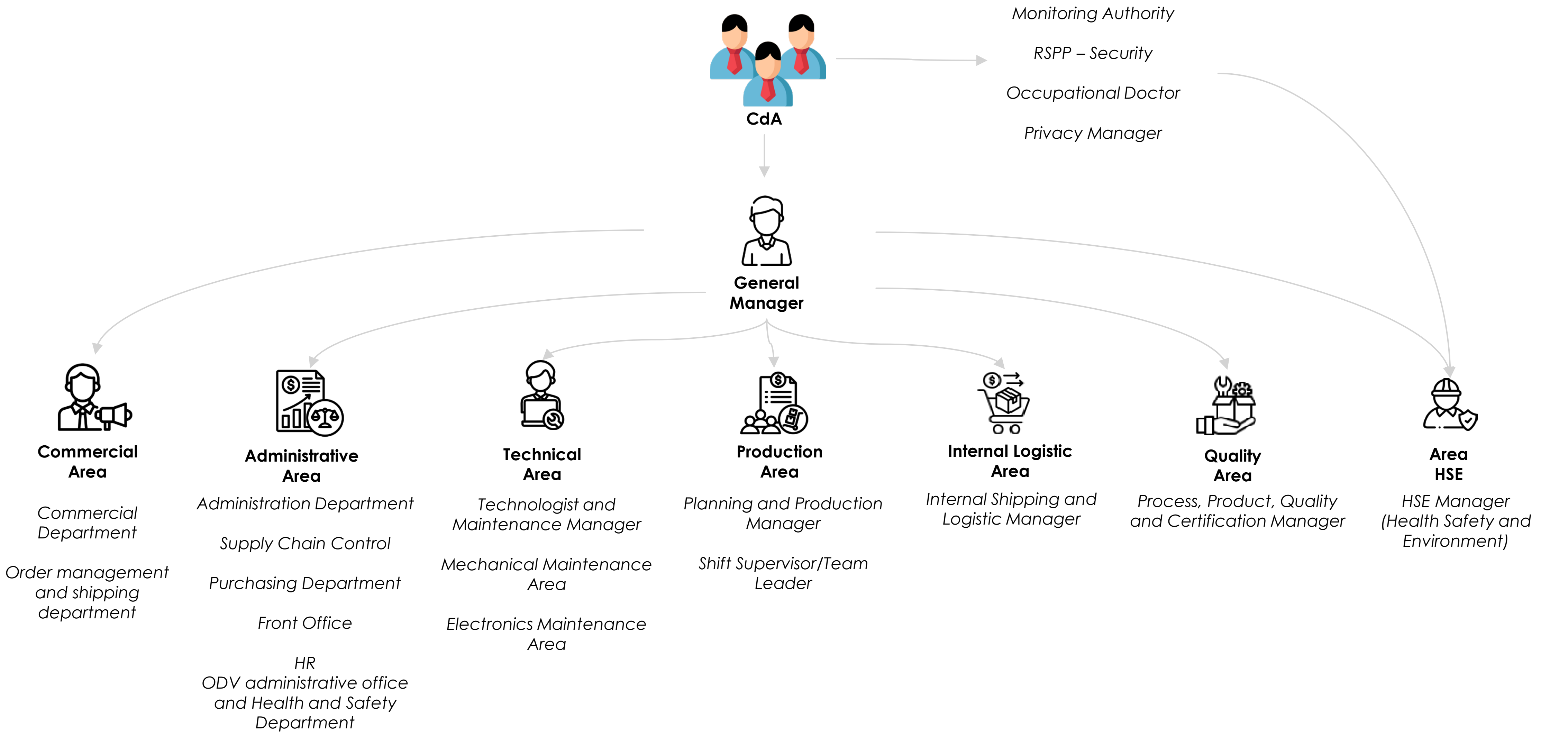
CB Trafilati Acciai has implemented the **Organisational and Management Model in compliance with Legislative Decree 231/2001**, aimed at establishing a clear chain of responsibility for managing workers' health and safety, and has nominated a Monitoring Authority.

Board of Directors	
Beri Giovanni Battista	Chairman
Beri Andrea	Member of the board of directors and CEO
Formaggio Carlo	Member of the board of directors

Board of Auditors	
Pizzi Francesco	Chairman
Gandola Giancarlo	Statutory auditor
Tettamanti Riccardo	Statutory auditor
Pesenti Anna	Statutory auditor
Serra Massimiliano	Statutory auditor

Organisational Structure

The organisational structure reflects the system of functions, powers, delegated authority, decision-making processes and company procedures, providing a clear identification of each person's tasks and responsibilities with regard to company activities.



Our Products

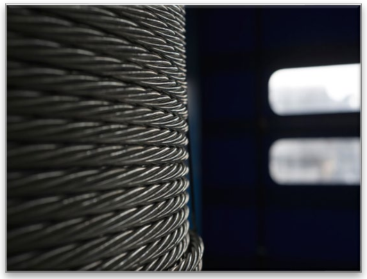
CB Trafilati Acciai produces:

- 7-wire strand
- 2 and 3-wire strand
- Tempered steel wires for C.A.P.
- PPWS wires

Our products are used in the building sector and are used for different structures:

- **<u>Prestressed structures</u>**: industrial sheds, civil offices, railway sleepers, multi-storey car park, prefabricated floor space and girders;
- **<u>Post-tensioning structures</u>**: nuclear sites, railway and highway viaducts, guyed and suspended bridges, LNG tanks and large-scale works in general.

7-wire strand



Steel wires made of 7 wires for prestressed and post-tensioning applications in large infrastructure projects

2 and 3-wire strand

2 and 3-wire strand for prestressing applications for the construction of light works such as joists, slabs and poles for vineyards.

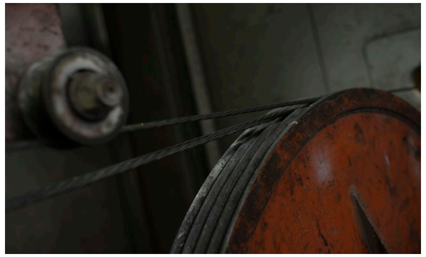
Tempered steel wires for C.A.P.

Tempered steel wires in coils for prestressing applications, for the construction of sleepers for high-speed or underground railway lines, with smooth or indented surface

PPWS wires

High performance zinc-coated wires – with PPWS (Prefabbricated Parallel Wire Strand) technology - for suspended bridges

Production Process



Wire rod arrival

The production of steel products begins with the arrival of round steel wire rod, purchased from selected domestic and international steel producers.

Upon arrival, it undergoes several acceptance checks: visual inspection during unloading, validation of mechanical and dimensional characteristics and chemical verification analysis carried out by the supplier. The wire rod is then sorted by casting and made available for production.

Pickling and Phosphating

Once checked, the following step is the pickling phase. It consists in immersing a wire rod in a solution made of sulphuric acid of 45°C for 20 minutes, in order to clean the surface from oxide impurities.
The phosphating phase consists in immersing a wire rod in a saline and zinc-phosphate solution

Strand and wire drawing

Strand and wire drawing is essential to transform the raw rod into a semifinished rod. This phase is fundamental to produce strand and wire with a small diameter and a stronger resistance.

Then, strand can be processed and covered in specific machines ("cordatrici") which braid wires to create a rope.
Instead, single wires have a different process: machines pull them till the wires are completely straight.

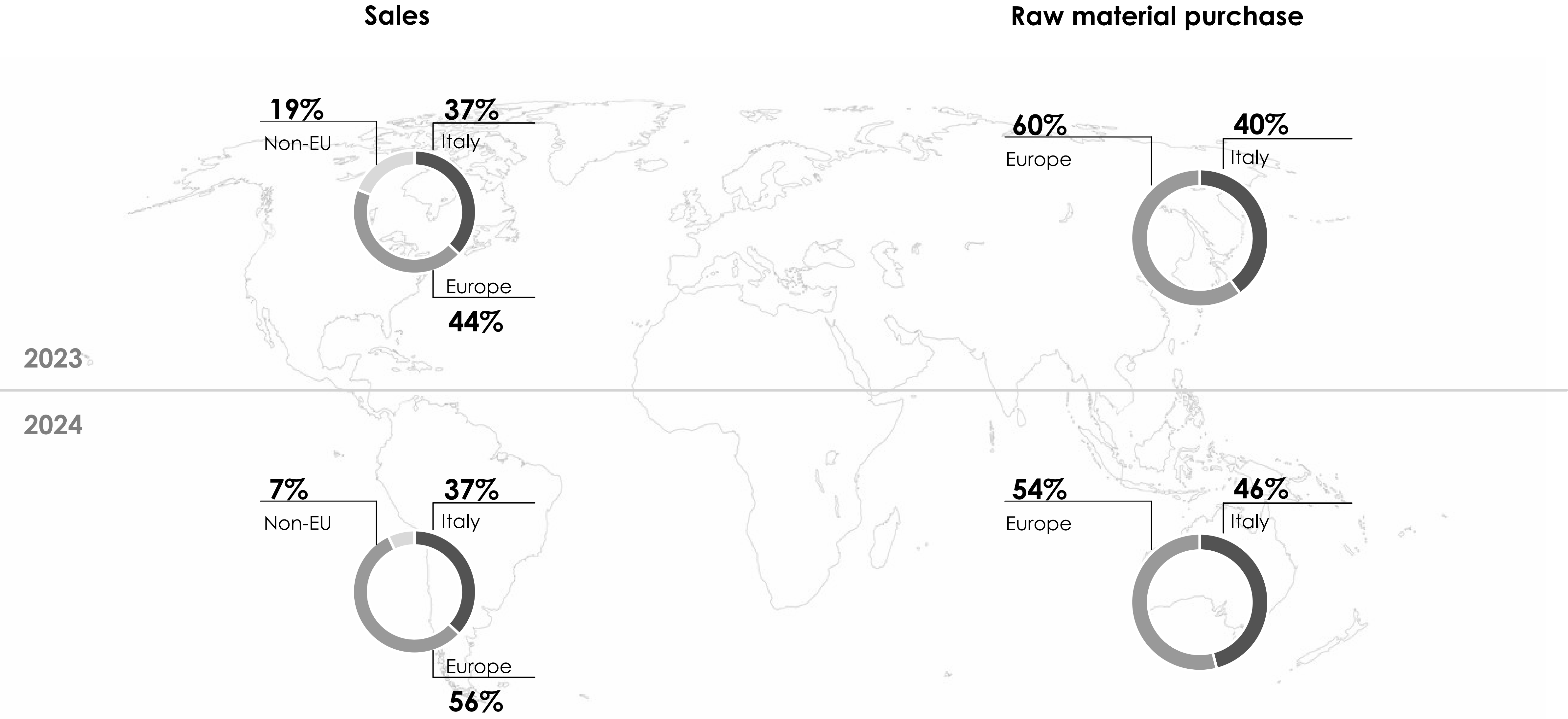
In-line thermal-mechanical treatment

After being drawn, all semifinishe products undergo in-line thermal-mechanical treatment in furnaces that reach of approximately 350-450°C. After that, machines immerse them in the water.
The aim of the treatment is to reduce load losses due to the material relaxation during installation and to increase the yield strength characteristics compared to the initial raw product.

Coating products and final phase

The final product can be coated with grease or wax and a layer of HDPE using coating machines.
It is secured and packed with metal straps, labelled with an identification tag and subjected to various quality checks - based on samples taken during production

Geographic presence



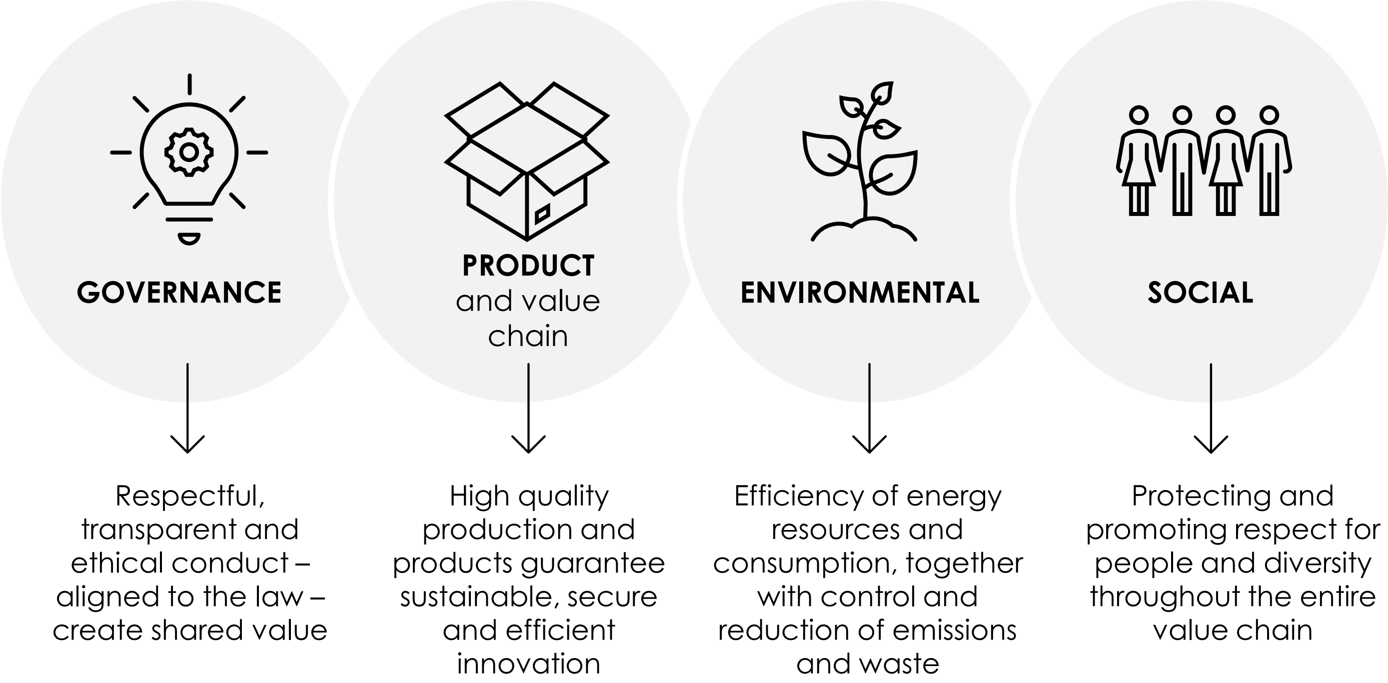
CB and sustainability

CB has always pursued an industrial development model that embraces the principles of **sustainability**, **transparency** and **quality**, adopting specific management and organisational structures, with the aim of creating shared value for all its stakeholders.

For CB Trafilati Acciai, **continuous improvement in environmental performance is a priority**. We are committed to minimise our impact and respect the environment and emissions regulations through **efficient energy sources**, **proper waste management** and **infrastructure upgrades**.

Our focus on sustainability extends to social and governance aspects, too. CB's management team is aware of its role and responsibilities and recognises the **importance of human resources as an added value**. In line with this vision, the company seeks to support the local community where CB was founded and continues to operate, as well as the people who work within the organisation every day and contribute to the creation of the company's economic results.

Only by promoting these ideas, CB can create value and guarantee further progress, innovation and continuity.



02

Materiality Analysis

Materiality Analysis

Materiality analysis is the methodological core of every sustainability report.

The starting point is the selection of the **material topics**, i.e. **the most relevant sustainability issues on which to base one's ESG strategy**. The Company has focused primarily on the impact of its business activities on people and the environment (***inside-out materiality***).

In order to identify the relevant issues, a **comparative analysis was carried out to understand the sector's ESG priorities** and the direction to which the industry is developing in terms of ESG activities and reporting. Summarizing it up, the sector demonstrates a high awareness of environmental, social and governance expectations and its own impacts. In addition, there is a strong inclination to adopt sustainable and operational practices such as supply chain traceability, gradual improvement in energy efficiency and product certification.

During 2024, **CB updated the 2023 materiality analysis involving directly its stakeholders**, particularly all subjects closely related to the company's activities.

During this process, CB has mapped and identified **six macro-categories of stakeholders**, aware of the importance of their involvement in achieving its objectives:

STAKEHOLDERS ENGAGEMENT

- **Governance**
- **Employees**
- **Customers**
- **Raw materials and service suppliers**
- **Institutions and local communities**
- **Banks and investors**

MATERIALITY DETERMINATION PROCESS

- Mapping relevant stakeholders
- Strategic and company-inside analysis
- Outside analysis and sector priorities
- Actual and potential impact identification
- Evaluation of relevant aspects and impacts to CB
- Grouping and prioritisation of the main relevant factors

Stakeholders’ engagement

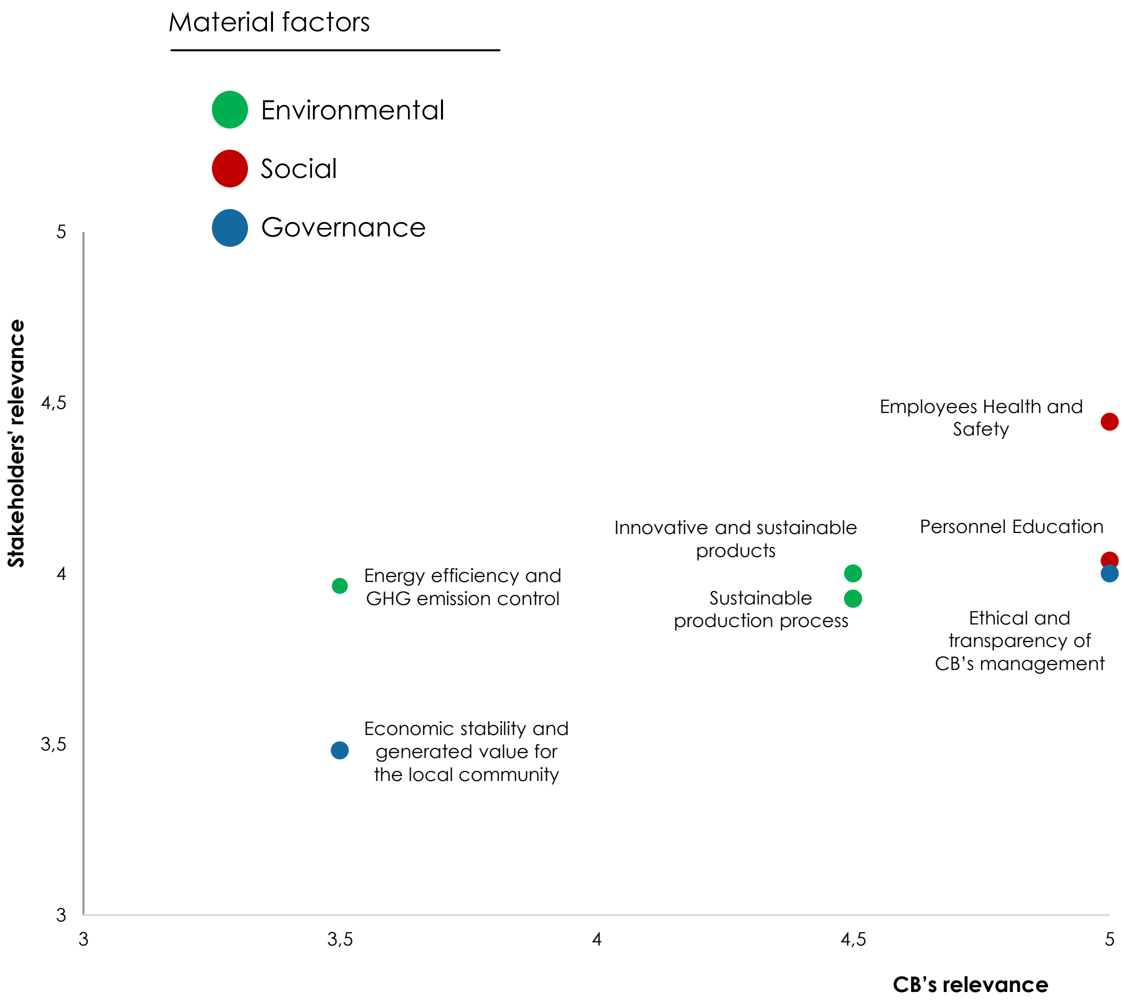
The stakeholder engagement is a systematic process composed by a constant dialogue of both parties. The purpose is to verify how much CB sustainable vision is aligned to our stakeholders’.

At first, the engagement consisted in sending an **anonymous online questionnaire** to better understand the internal and external stakeholders’ expectations related to the company’s priorities and material factors.

Then, the core activity of the questionnaire involved participants **reclassifying the material topics identified by the company according to their perception** of significance and relevance to CB's business reality - on a scale of 1 to 5. The purpose is to **value the completeness of the list of CB’s relevant topics and its coherence with the related steel-sector**.

After having collected all the answers – from internal and external stakeholders, the Company has created the materiality matrix.

As represented, the scale was set to 3 based on the answers received (which had scale from 1 to 5).



Stakeholders' engagement

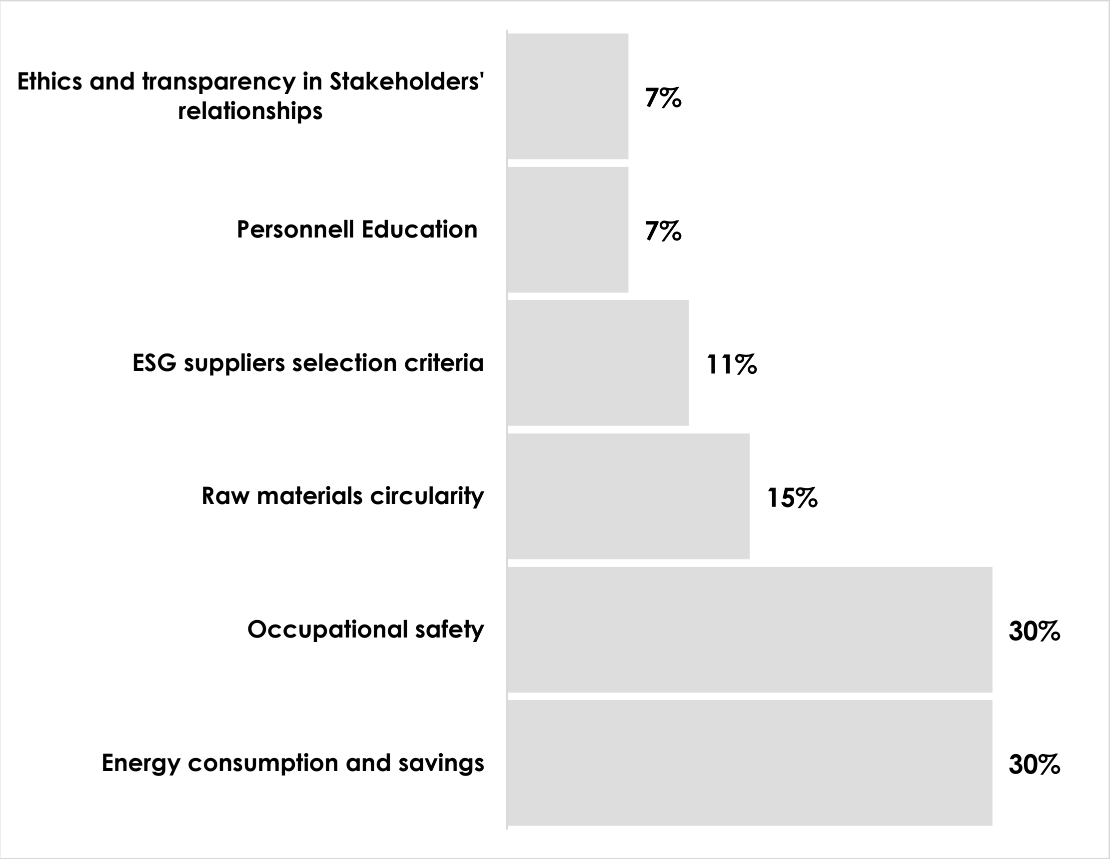
Moreover, **CB has also involved their stakeholders in identifying other relevant factors that the company should consider in the future** to enhance the Company's sustainable development. The results were interesting: no new areas have been identified in which the Company contributes to or hinders the achievement of the Sustainable Development Goals.

Related to the materiality matrix, CB tried to understand which material factor is more relevant to their external stakeholders, based on the steel-sector where it operates. It was questioned – through a quali-quantitative question – to reorder 6 key-factors selected by the management.

All answers are aligned with the CB's choices. **The critical factors of the sectors were identified in energy consumption and occupational safety**, followed by the raw materials circularity.

This highlights that the ESG factors are increasingly perceived as relevant, not only by the companies and for the financial markets and institutions, but also by local communities and Company's stakeholders.

RELEVANT FACTORS FOR CB'S SECTOR



Sustainable Development Goals

In defining the ESG priorities and the Action Plan, careful consideration was given to the **United Nations Sustainable Development Goals** (SDGs).

Key themes and the related targets of the 2030 Agenda for Sustainable Development were selected as clear and relevant references to guide the company toward ambitious, globally shared objectives.

We have identified to which of these targets we can most significantly contribute based on our sector of activity and the topics identified as material.

Material topics

CB has identified and selected the most relevant factors.

CB is committed to **focusing its actual and future energy, activities and efforts on these areas in order to achieve the highest possible level of sustainability and meet its stakeholders' needs.**

Not all factors have the same priority. That's why materiality analysis is essential for leading CB's sustainability policies and risk management to lead in the short and long term, helping to identify risks and opportunities for creating shared value.

On the right side, CB has listed the **seven material topics** identified during the previous stakeholders engagement. They are sorted according to CB's relevance and form the basis of the Company's ESG plan.

Tema materiale	SDGs	Descrizione
Employees health and safety	8 DECENT WORK AND ECONOMIC GROWTH; 5 GENDER EQUALITY	Ensure safe and healthy workplaces. This includes managing occupational safety practices, implementing employee health and well-being programs, and promoting a corporate culture focused on health and safety.
Personnel Education	4 QUALITY EDUCATION; 5 GENDER EQUALITY	Internal training and development programs. Opportunities for growth, benefits to attract, engage, and retain valuable and talented employees.
Ethics and transparency in Stakeholders' relationships	16 PEACE, JUSTICE AND STRONG INSTITUTIONS	Corporate management in compliance with national and international laws, regulations, and standards governing business operations and product use.
Innovative and sustainable product	12 RESPONSIBLE CONSUMPTION AND PRODUCTION; 9 INDUSTRY, INNOVATION AND INFRASTRUCTURE	Implementation of new technologies or development of new components/processes that can reduce the environmental impact of products or increase benefits for society.
Sustainable process	12 RESPONSIBLE CONSUMPTION AND PRODUCTION; 9 INDUSTRY, INNOVATION AND INFRASTRUCTURE	Improvement of production processes and technologies to reduce the consumption of resources (energy and water) and raw materials, and to minimize waste generation and/or ensure proper waste management.
Energy efficiency and GHG emission control	12 RESPONSIBLE CONSUMPTION AND PRODUCTION; 13 CLIMATE ACTION	Reduction of energy consumption and improvement of energy efficiency through the adoption of the best available technologies and the use of renewable energy sources. Limiting greenhouse gas emissions.
Economic stability and generated value for the local community	8 DECENT WORK AND ECONOMIC GROWTH	Company's ability to create economic value and redistribute it to stakeholders. Building long-term relationships with the local communities in which the company operates.

03

Environmental

Environmental responsibility

Environmental protection is fundamental for CB and for a **sustainable development**. The Company pursue its efforts to balance economic development needs with particular attention to environmental impact.

CB has always been committed to proposing and launching different initiatives aimed at constantly **reducing the environmental impacts of its activities**, adopting the best possible practices and solid collaborations with its suppliers and partners.

Company's process requires huge energy amount. It is testing different and innovative solutions capable of creating and using green energy, aimed to increase the energy efficiency and reduce the economic impact of its GHG emissions. It is planned to have the first results in a couple of years.

Besides, CB has applied to the announcement «**Energy Release 2.0**». It is a call for energy-intensive companies, implemented through an aggregating entity. The mechanism provides that energy-intensive companies will receive electricity with Guarantees of Origin at a fixed price for 36 months. In return, the companies commit to building new renewable energy plants (photovoltaic, wind, or hydroelectric) with a total capacity at least twice the amount of energy received, within 40 months.

We summarise up the main goals of our **environmental policy**:

- **Compliance with laws, rules and regulations** relating to the sector and any other requirements signed by the Company;
- Engaging workers and co-workers, guaranteeing a high level of professionality, also regarding to the sustainability topics;
- Choosing sustainable partners, suppliers, customers that aim at reducing their environmental impact. Since our foundation, we have always traced our raw materials, monitoring carefully their provenience and considering that **more than 45% of steel wire rod purchases are from Italy**;
- Waste reduction in compliance with laws, rules and regulations;
- Pollution reduction and avoing unnecessary actions which create it;
- Managing **raw materials** and energy sustainably within the company's plants, with the goal of avoiding waste and monitoring environmental impacts. **Approximately 47% of the raw materials purchased are traceable and recycled, originating from scrap** (steel produced in an electric arc furnace).

EPD Certification

Thanks to the significant efforts made in recent years, all CB’s main products (7-wire strand, 2 and 3-wire strand, wires) are certified with an *EPD (Environmental Product Declaration)*.

It is an international certification that attests and compares the environmental performance of the products and services. The Certification guarantees transparency regarding the environmental impact of both the process and the product and it is able to define the improving areas of the process, together with the carbon offsetting initiatives.

It is a well-recognised methodology used to evaluate the environmental footprint of the product along its entire Life Cycle (*LCA – Life Cycle Assessment*), from the raw material extraction up to its end-of-life disposal or recycling. In this specific case, the downstream phase isn’t considered, as the product is physically integrated with other products during the installation.

The Certification has been issued in compliance with ISO 14025 and validated by an independent third-party organisation.

Referred to the impact evaluation that starts from the LCA, EPD is used by CB as an operative support across the process. It helps the company in continuously enhancing the process, as it helped to identify critical areas in raw material sourcing, production, the supply chain and the delivery to the customers.

Our attention also extends to our supply chain, with which we are highly integrated. Ensuring complete traceability of products and raw materials is a real advantage. Thanks to this system, we can track every single component of the product.

EPD®
THE INTERNATIONAL EPD® SYSTEM

BUREAU VERITAS

Energy efficiency

We deeply consider our responsibility and our duty to give a contribution to the Earth, using its resources in a consciousness way.

CB is doing it with several actions: everyday we look for increasing our machinery energy efficiency and spread it inside the company.

We are committed to **using the resources necessary to carry out our activities as efficiently as possible**, **reducing waste** and **constantly monitoring our consumption**. Energy consumption is a very important environmental indicator to monitor, especially for energy-intensive industries such as the steel sector.

Energy efficiency is a priority for CB: since 2016 it has implement various strategies – such as the installation of two cogeneration units (CHP) for energy and heat used inside the production plant - to reduce the energy consumption. It has allowed the Company to access to the White Certificates (TEE) community. The second cogeneration unit have been implemented **in 2024 for a total investment of €1,5 millions** and it will be fully operating in the following year.

The Power Unit generators are able to produce electricity, heat and cooling, which are used for the business processes, reducing electricity consumption request.

CB has also installed a **solar power system** on the rooftop. It is capable of covering the daily energy needs and, thanks to it, it is able to decrease the energy requested from the public energy grid. Unfortunately, a severe hailstorm damaged the plant in 2023 and it is currently non-operational. The Company is working on repairs and the system is expected to be back in use within the next two years.

Energy Consumption

Energy consumption is the company's second-largest expense after raw materials, making it a critical focus for CB.

In 2024, CB used mainly

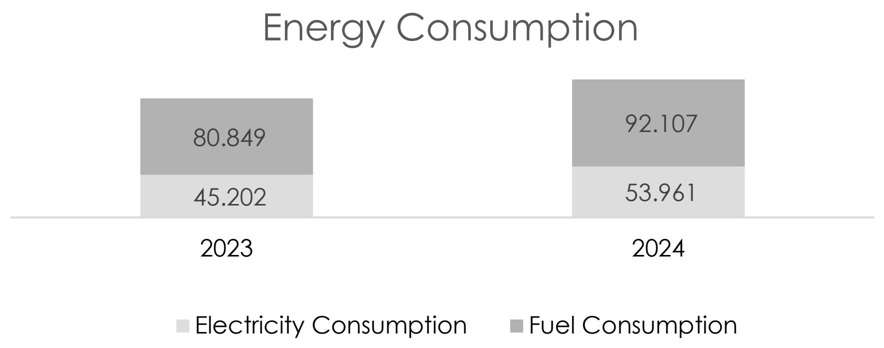
- LNG gas, to fire-up and use the cogeneration units;
- Electric energy, to guarantee the normal and correct use of the machineries and furnaces.

Oil, instead, was exclusively used to fill the tank of the means of transport inside the Company's plants.

In 2024 energy consumption amounted to 146.069 GJ, approximately 4 percent of which came from renewable sources.

As already described, unfortunately the solar panels were damaged in 2023 and since then they haven't been producing green energy.

Comparing 2023 and 2024, CB has produced more pieces last year than the previous one. (46.689 pieces in 2023 vs 61.761 pieces in 2024). Nevertheless, the constant attention to the supply chain and **the energy-efficiency initiatives has lowered the energy intensity per product and Company's overall footprint**. It highlights the constant commitment of the Company in reducing its environmental impact and enhancing its energy efficiency.



Energy consumption (GJ)	**2023**	**2024**
Purchased electricity consumption	44.965	53.961
Electricity self-produced consumption (from solar panels)	237	-
A) Electricity consumption	**45.202**	**53.961**
LNG consumption	80.847	92.105
Oil consumption	2	2
B) Fossil fuels consumption	**80.849**	**92.107**
Total energy consumption (A + B)	**126.051**	**146.069**
From renewable resources (1)	4.630 **(3,7%)**	5.272 **(3,6%)**

Energy Intensity (GJ/tons)	**2023**	**2024**
Energy Consumption (GJ)	126.051	146.069
Products manufactured(tons)	46.689	61.761
Energy Intensity (GJ/tons)	**2,70**	**2,37**

(1) Renewable-energy consumption includes both the self-generated electricity from photovoltaic systems and the share of purchased electricity attributable to renewable sources, calculated using the specific supplier's energy mix (instead last year's Report relied on the national energy mix). For 2024, the supplier's 2023 energy mix has been applied, as it is the most recent data available.

Water and waste

Regarding **water consumption**, CB continuously monitors its water consumption and tries to promote a conscious use. Its commitment is represented also by the **double depuration system** installed in recent years and the water-saving criteria applied for it.

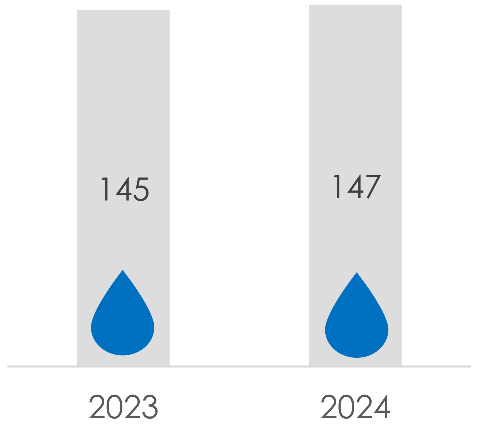
Water use is related with machinery cooling. It can be made through heat exchangers (indirect cooling) or through direct contact with the water (direct cooling).

Water withdrawals directly come from the public water-supply network and are used mainly for **sanitary purposes and production processes**.

Regarding waste, in 2024 CB produced about 3.187 tons of waste and most of them – 93% - are not dangerous.

Waste management is carried out in compliance with the internal procedures and the current legislation. Waste is collected in the production departments in initial collection containers and identified by material type. These containers are periodically emptied out by authorized personnel in designated outdoor areas in containers suitable for disposal. At regular intervals, the temporary storage area is cleared, and the waste is delivered to selected companies for disposal and/or recovery.

Water withdrawals from public water-supply network (megalitres)



Waste (tons)	**2023**	**2024**
No-Dangerous waste	3.526	2.973
Dangerous waste	208	213
Waste	**3.734**	**3.187**

GHG Emissions

CB's products need lots of technical processes which requires high energy consumption and produces GHG gas emissions.

The Company is fully committed in constantly monitoring its GHG emissions inside its reporting perimeter, focusing on mitigation and transition strategies. In particular, CB is aware that collecting and analysing **Scope 1** (related to GHG fuel consumption emissions) and **Scope 2** (related to GHG energy consumption from the national electric network) data are fundamental for the GHG emissions calculations.

Tracking emissions across the entire supply chain is challenging. CB knows that its emissions will always be lower than the entire chain, but it will work hard in defining monitoring systems and a clear action plan to measure and reduce Scope 3 greenhouse-gas emissions.

Adopting the Location Based calculation methodology (which considers in the Scope 2 calculation system the average GHG factor relate to the national energy mix), **CB's total emissions in 2024 amounted to 8.810 tCO2 eq..** Compared to the previous year,they are increasing, as the production volumes has increased too.

Company's commitment to enhance energy efficiency has also been demonstrated through its emission intensity. This year it has slightly **decreased from 0,14 CO_2 equivalent per tons produced – down from last year's 0,16**.

GHG Emissions (tCO_2 eq.)	2023	2024
LNG GHG Emissions	4.233	4.281
Oil GHG Emissions	126	134
A) Scope 1 Emissions	**4.359**	**4.955**
Purchased electricity GHG Emissions	3.212	3.855
B) Scope 2 Emissions – Location Based	**3.212**	**3.855**
Total GHG Emissions (A + B) (1)	**7.571**	**8.810**

GHG Emissions (tCO_2 eq./t)	2023	2024
Scope 1 + 2 Emissions LB (tCO_2 eq.)	7.571	8.810
Products manufactured(tons)	46.689	61.761
Emission Intensity	**0,16**	**0,14**

Other Emissions (tons)	2023	2024
Sulphuric Acid	196	221
Hydrochloric Acid	11	9

(1) In a different way than 2023 Report, the emission factors for electricity in the national energy mix (Location-Based calculation methodology) have been updated. For 2024, the 2023 emission factor was applied, as it is the most recent value published by ISPRA.

04

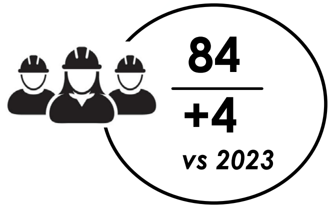
Social

Human Capital

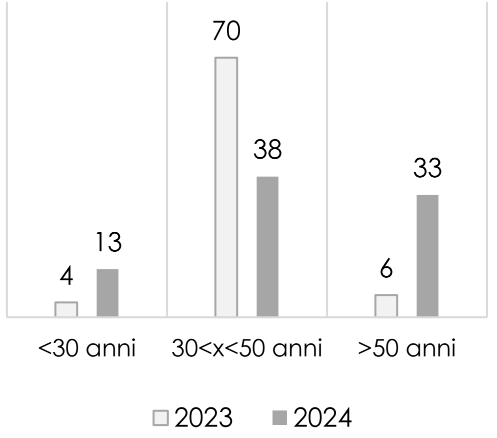
People are the key factor to reach CB’s goals. The Company considers them the most valuable resource, starting with recruitment and continuing through their hiring and integration into the workforce. Therefore CB is continuously:

- **monitoring and guaranteeing high health and security standards** for people inside and outside the company. CB is adopting all PPE in order to guarantee and enhance the best practices in compliance with the law.
- **Ensure impartial treatment in recruitment and personnel management**. We commit to selecting staff on the basis of skills, experience, and potential. We also pledge to maintain an unbiased attitude toward employees, guaranteeing equal opportunities and working conditions for all. Continuous-improvement training plans will be provided to foster every employee’s professional growth.
- **Zero tolerance for discrimination that undermines personal dignity**. We comply fully with all applicable regulations and with the collective labour agreement (100 % of our employees are hired in compliance with national metalworkers’ contract). No distinction is made on political opinion, union activity, religious belief, gender, sexual orientation, ethnicity or nationality, age, health status or any other personal characteristic. Everyone is expected to report insulting, discriminatory, or defamatory behaviour that occurs in the workplace — or, if seriously harmful to the company’s principles, even outside it.
- **Freedom of association**. Through the appropriate corporate functions, we engage with political and trade-union organisations and with the works councils operating within the company, encouraging constructive dialogue and cooperation. We do so without discrimination or unequal treatment and in accordance with the principles of transparency, confidentiality, independence, and integrity.
- **Respect work–life balance**. We support harmony between professional and personal life by providing balanced, flexible working hours and by seeking shared solutions that enable the social, emotional, and cultural development of everyone in the organisation.
- **Foster teamwork and fair collaboration**. We encourage employees to cooperate loyally with colleagues and to participate proactively in team activities, bringing new ideas and solutions that can improve the quality of everyone’s work. We support any initiative that promotes the exchange of information, cooperation, and team spirit—even at a distance and through both traditional and innovative tools.

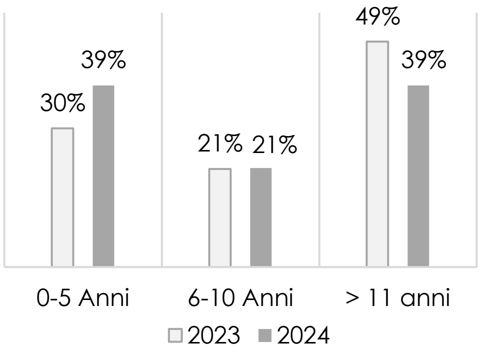
Employees
Al 31/12/2024



Employees by age



Employees by seniority



Our Employees

At the end of 2024, our Human Capital amounted to **84 workers**. We always **prefer to prioritise stable, long-term employment contracts**, resorting to agency labour only when major orders require a temporary increase in our workforce. Having long-term employment is useful during the project planning phase.

All employees are hired exclusively under regular employment contracts in compliance with the National Collective Labour Agreement for Metalworkers with Italian regulations. We protect our employees' well-being by ensuring that all statutory rights are respected. Company management sets remuneration policies according to principles of fairness, taking into account each role's duties, levels of responsibility, and prior experience.

CB's staff is mainly composed by men, especially in the manufacturing department (67 out 84, about 78%). The company recognises that, industry-wide, few women are employed in these departments' roles. Even so, it actively promotes the gender equality – also across other company's departments - and the professional growth of its female workforce inside the Company.

All of ours employees are hired with a permanent contract and have work flexibility. Most of them (98%) have a full time contracts.

In 2024 CB hired 18 new employees – 6 in 2023 – and most of them were under 30 years old. The 14 contract-terminations registered during the year include employees who left the company voluntarily and those who retired (16 in 2023).

A key indicator or understanding workforce stability within the company is the turnover rate. It helps monitor organizational stability and the effectiveness of the company's personnel management.

In 2024 the negative turnover rate was about 16,7% (less than the 20% registered in 2023), while the positive turnover rate was about 21,4% (7,5% in 2023).

Employees	**2023**		**2024**	
	Men	Women	Men	Women
Managers	1		1	
Directors	4		5	
Employees	7	6	5	6
Labourers	61	1	66	1
Total	**73**	**7**	**77**	**7**

Contract Type	**2023**		**2024**	
	Uomini	Donne	Uomini	Donne
Regula employment	73	7	77	7
Temporary contract	-	-	-	-
Total	**73**	**7**	**77**	**7**

Contract Duration	**2023**		**2024**	
	Uomini	Donne	Uomini	Donne
Full-time	73	5	77	5
Part-time	-	2	-	2
Total	**73**	**7**	**77**	**7**

Age	**2023**			**2024**		
	<30	30< x >50	>50	<30	30< x >50	>50
Managers			1			1
Directors		1	3		2	3
Employees	4	7	2	3	3	5
Labourers		62		10	33	24
Total	**4**	**70**	**6**	**13**	**38**	**33**

Welfare

CB work flexibility is guaranteed to ease work-life balance, allowing their employees to stay with their families and sons. It is possible to have flexible work schedules , Smart Working devices, parental leaves and also part-time contracts, if necessary.

Company's cars availabilities are based on the role performed and are linked to the contractual classification level of the assignees. Cars-use are allowed for specific work-related needs and, in specific circumstances, also for personal use as a benefit.

There are a lot of different nationalities in CB. They represent an important value for the Company. Therefore, supporting our employees is fundamental: for this reason CB is building a residence-structure for its employees, offering them 10 mini-apartments – it is expected to be launched in 2027.

It is, also, relevant the welfare supplementary agreement CB has accorded with all its employees – for the period 2022-2024 – which guarantees supplementary welfare benefits and work-life balance, together with economical benefits for its employees. On 29th January 2025 the CB's welfare supplementary agreement has been extended for further 3 years.

Here are some key-points of the agreement:

- A welfare online-platform which allows its workers customised services – such as medical check-ups and reimbursements, educational benefits, energy facilities… - with the possibility to have a supplementary pension, too;
- **Flexible performance bonus** based on Company's productivity, quality, revenues and work-safety with the aim to increase CB's competitiveness. For everyone who decide to convert the performance bonus in welfare bonus, there will be a further 25% bonus;
- 2% Performance bonus based on net profit;
- Further 16 hours of company-paid leave for childcare and 16 additional hours of company-paid leave than the work-permit hours established by the Italian Collective Labour Agreement for Metalworkers;
- Supplementary pension increase than the Italian Collective Labour Agreement for Metalworkers (CCNL);
- Economic increase for night-shifts (22-6);
- Educational break during the working hours to discuss about safety. Annual safety meeting.
- Economic increase for technical employees who use specific machineries;
- Economic increase for technical employees who is tutoring new colleagues;

Safety

Safety and security on work-sites is crucial and it is a relevant topic for us.

Managing employees' safety is our "second" core activity and we express it in our Ethical Code, too. Our main goal is reaching zero-injuries target and to do it we adopt a proactive approach using all technologies available.

In our Headquarter we fully respect the Italian safety law (D.lgs. 81/08), also through our external consultants. The main part of this policy is the "Risk-evaluation Document" (**Documento di Valutazione dei Rischi -** «DVR»), where we individuated the specific and potential risk factors related to our activities.

But we are aware that it isn't enough. We want to constantly improve and a big role is made of the educational part. Thanks to it, we create more and more awareness and responsibility of each team member.

To monitor our progresses, we use specific metrics in safety and security are, measured year by year and reported during the annual meeting. They are:

- Number of training hours: in 2024 employees have been trained for about 600 hours.
- CAPEX in security and safety: some automatic PPE (Personal Protection Equipment) machines were installed for its employees;
- Number of "nearly injuries" – together with monitoring and details of them;

In CB, injuries usually happen due to accidental contusions with "light" machineries or tools, hurts, sudden movements – i.e. falls, muscle strains, sprain. CB always try to avoid these injuries, also though "on the job" educational activities –

In order to reach the Company's goals, CB continuously promotes the development of technical and soft skills. The aim is to increase investments in education and personnel growth, to reinforce individual skills and CB's strategy, wide spreading its values.

Injuries	**2023**	**2024**
On-work injuries (number)	15	12
Harmful injuries(>60d)	*3*	*2*
"Nearly injuries"	17	10
Hours Worked	126.372	145.891
Absences due to injuries (hours)	3.784	1.780
On-work injuries rate	**23,7**	**16,5**
Harmful injuries	**4,7**	**2,7**

Educational hours (mandatory and not)	**2023**		**2024**	
	Hours	Hours per employee	Hours	Hours per employee
Manager	-	-	16	16
Employees	106	5,9	88	5,5
Labourers	730	11,6	558	8,3
Total	**836**	**10,5**	**662**	**7,9**

People engagement in security and safety

Engagement, consciousness and sensibilisation about safety and security are core elements for CB's policy. They are fully in accordance with our goal to prevent all injuries and **reach zero-injuries target**. Everyone, depending on their role within the company, can report any aspect that may impact the safe execution of activities.

We think is fundamental to engage our workers in looking for different and new systems capable to safeguard security and safety. We constantly encourage them to be an active part of this process, through activities that can engage directly them or talking with the security and safety workers' representative (Rappresentanti dei Lavoratori per la Sicurezza - «RLS»).

Our Commitment is not only related to the production, but it is also extended to the whole organisation – such as manager, office workers etc. We include all these categories during our planned safety and security meetings.

CB also has an "**Injuries Committee**" composed by six members: 3 CB's representatives and 3 CB worker's representatives. It has the role to analyse the injuries and deliberate if the injury is Company's fault or Employees' fault. Moreover, CB is committed in detecting "nearly injuries" and organise educational breaks to revise all safety and security policies and procedures.

In compliance with D.lgs. n. 81/2008, CB has nominated a Protection and Prevention Responsible (Responsabile del Servizio di Prevenzione e Protezione - RSPP). He coordinates the prevention and protection services, he goes in the Company and supervise the work-methodology and he takes care of the security and safety environment inside the departments. He is also responsible of the relationships with different organisations and control organisms, coordinating safety workers' representative and Administrators.

D.lgs. n. 81/2008 also established medical check-ups done by a doctor, with the purpose controlling the employees'' health and mental health and issuing a fitness-for-duty assessment for the specific job to which the employee is assigned. The workers' subscription to the "Metasalute Fund" (Fondo Metasalute) is mandatory and automatic by the Italian Collective Labour Agreement for Metalworkers, so CB pays the amount of each employees to the institution.

For managers and directors, FasiOpen is the adopted Welfare platform.

Customers' relationships

CB success is hugely related to the customers' satisfaction. Therefore, offering high-quality products is relevant and maintaining this quality level is challenging. Our quality is one of the highest and, thanks to it, we are able to be one of the most important players in Italy, Europe and in the Mediterraneo's area.

CB's aim to grow in a continuous, sustainable and ethic way, becoming the ideal partner for its stakeholders. So the Company has planned and structured during the time a **certified high-quality system, in compliance with the UNI EN ISO 9001:2015**. It guarantees products and services with specific standard and compliant with the Company requirements.

The ability to meet customer needs and anticipate their expectations represents the key point for the development of CB and is crucial to maintaining and ensuring trust in the relationship. With these premises, CB's aims, in line with the principles of the **Code of Ethics** and in its relations with customers, are:

- Satisfying expectations, with good faith, loyalty, honesty and transparency;
- Guaranteeing higher quality standard of its products, respecting customers' rights and allowing them to return damaged and not compliant products or services with their standards and orders;
- Listening customers' needs and claims in order to enhance the products and the services offered;
- Giving real and transparent information about the product so that the customer is able to make an aware choice. Any communication tool or fake news capable of misleading the customer about the quantity, quality, origin, or source of the products/services offered is prohibited and condemned.
- Refraining from engaging in any behaviour that could in any way compromise the integrity, reliability, or security of the IT or telecommunication systems and data of its clients and end consumers.

Every year, to understand the customer's satisfaction, CB sends a **satisfaction survey** on its website. Recently, we have updated it including some ESG questions, to assess customers' propensity toward our green products.
The questionnaire is crucial also for defining the improvement goals and increasing efficiency in the provision of products and services.

Supply Chain management

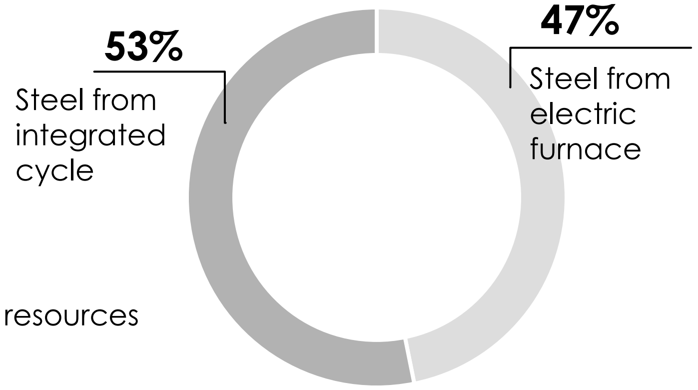
CB Trafilati Acciai strongly believes in creating synergies and strong collaboration with its suppliers, too. They guarantee better performance reliabilities but at the same time they share the same values and Company's expectations, also regarding the Environmental, Social, Governance and ethical codes.

In choosing, selecting, and evaluating the suppliers, transparency and impartiality must be guaranteed with all societies since the dealing phase: these our principles must be followed, as stated in the Ethical Code.

CB's suppliers have a crucial role in the Supply Chain, providing raw materials, consumer products and final products.

In the search and selection of new suppliers, CB consistently aims to enhance the number, quality, and strength of its supplier relationships, with particular attention to:

- Reducing the raw materials costs, maintaining the same quality or enhancing it;
- Improving product quality;
- Improving the services quality (such as the delivery times, the delivery methods, the suppliers' condition terms etc);
- Improving opportunities and flexibility related to the supply chain;
- Reducing potential supply-chain risks – such as business continuity, contingency plan…
- Guaranteeing ESG standards and monitoring those aspects;



CB is really careful to activities that can have a reduced environmental impact – also limiting raw materials and natural resources use - in line with stakeholders' expectations.

For these reasons, the Company places strong emphasis on sourcing raw materials, which represents its main cost, and the provenience of the steel wire rods – i.e. if they are done in an electric furnace with recycled materials and junks or in furnace with iron raw ("Steel from an integrated cycle").

Relationships with Local Communities

Local community is one of the focus of CB. This can be translated concretely not only into actions aimed at eliminating, reducing, and/or mitigating environmental impacts, or initiatives designed to ensure a good work-life balance for employees, but also into **tangible support for projects aimed at improving the quality of life within the local community**.

The Company has stable collaborations with some associations and yearly renews its commitment through amounts, volunteering works and multi-years projects. Together with the Tezze sul Brenta townhall, a new park for children is being built: in this way new generation are able to go outside and play together in a green area.

Moreover, CB is constantly collaborating with the local schools, Technical Institutes and Universities giving them internships opportunities and R&D projects for master and doctoral thesis. It highlights as CB is always available for the new generation, especially for thesis and research projects. In particular, in 2024, a master's student from Università Ca' Foscari has conducted a thesis about the "Ecological Transition Impact on SMEs: Risk and Opportunities", analysing the most recent ESG impacts on SMEs and Companies like CB. In the same year, some Universities – Politecnico di Milano, Università degli Studi di Padova, Università degli Studi di Pisa – have agreed with the Company to start a research project to identify a methodology to monitor the Italian infrastructures.

Thanks to its active participation in the steel sector, the Company maintains and continues in developing institutional relationships with other companies and the steel association.

05

Governance

Business Performance

In 2023 market demand has started to diminish and it protracts in 2024, too.

The main causes were the high costs of production factors, especially electric energy, together with the multiple international and geopolitical uncertainties. Unfortunately, also the European – and in particular the German - economical slowdown has contributed to the weak demand.

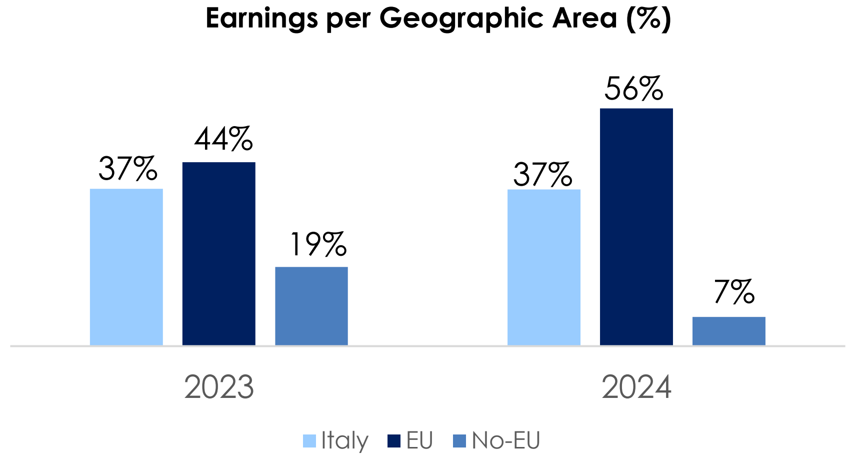
In spite of these external factors influence, CB turnover was about 61 million euros, in line with the historical economic data. Sales, in terms of quantity, have increased both in the domestic (+ 14%) and foreign market (+ 16%). In 2024, the Italian turnover amounted to 37%, the EU's to 56% and 7% others.

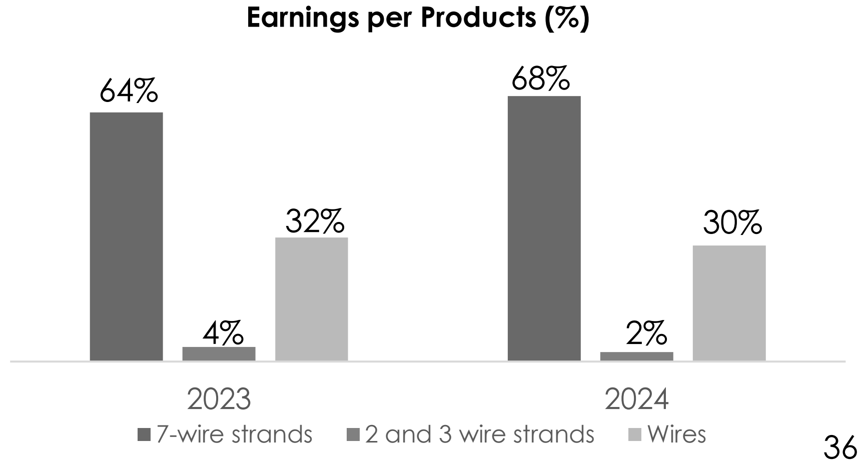
Even US market shares remained the same, sales to Non-EU Countries decreased, due to the duties on import.

The average purchase cost of raw materials, compared to 2023, decreased by approximately 5%. However, this was not enough to offset the decrease in the average selling price, which showed a decline of about 13%.

In order to enhance the supply chain efficiency, every year CB invests in projects to improve the product and process technology, pursuing a sustainable development, too. Many projects have a specific target: reducing the environmental impact and increasing the energy efficiency of them.

Economic Results(€/000)	2023	2024
Revenues	61.482	61.776
Ebitda	2.575	529
Ebit	1.018	(1.002)
Net Profit	478	(1.062)
Capex	1.376	1.748





Economic Value Generated and Distributed

Creating economic value guarantees sustainability and continuity of CB's business through time. Sharing value allows stakeholders to understand the impact of the Company's activities on the community and on the social and economic system.

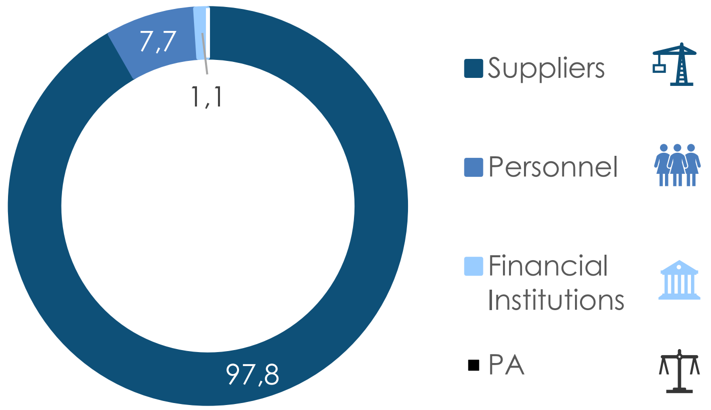
The Income Statement which highlights the value generated and distributed, is prepared based on the income statement for the reference period, with the aim of showing the **economic value directly generated by CB and its distribution to internal and external stakeholders**. The Economic Value Generated refers to net revenues (revenues and other operating income, net of credit losses), while the Economic Value Distributed includes costs reclassified by stakeholders' categories and any dividends distributed. The Economic Value Retained is the difference between Economic Value Generated and Economic Value Distributed, including depreciation and amortization of tangible and intangible assets, provisions, and deferred/advanced taxes.

In 2024 our Economic generated value distributed between the stakeholders' categories was:

1. 97,8% to Suppliers of raw materials, services and instrumental goods;
2. 7,7% to our Human Capital and co-workers – Personnel;
3. 1,1% to Financial Institutions;
4. The remaining part to the Public Administration – as direct and indirect taxes, excluding deferred taxes and taking into account government grants and tax relief for the purchase of capital goods

Economic Results (€/000)	2023	2024
Sales and service earnings	61.482	61.776
Other earning	2.019	728
Economic Total Value Generated	**63.501**	**62.504**
Operative Costs	46.247	61.158
Personnel remuneration	4.197	4.817
Financial remuneration	698	703
Shareholders' remuneration		
PA remuneration	(458)	(268)
Donations	6	2
Economic Total Value Distributed	**50.690**	**66.411**
% Economic value distribute	*80%*	*106%*
Total Economic Value Retained	**12.811**	**(3.907)**

Economic Value Retained



Business Conduct

CB is aware of its and its workers' social and ethical responsibilities importance. It is relevant for people inside and outside the Company and it assures the maximum accuracy in the deal phase and business affairs, protecting CB's reputation.

CB has a responsible approach with the purpose to generate environmental and social value, especially for the community where it works.

The process of impact analysis and management has enabled the organization to gain greater awareness of its responsibilities, adopting a sustainable and responsible approach toward society and the environment.

Organisational and Management Model 231

CB has adopted Organisational and Management Model 231 ("MOG 231"), to ensure the best accuracy, loyalty and transparency conditions of its activities. MOG 231 is compliance with Decreto Legislativo n. 231/2001, which regulates the administrative liability of companies for crimes committed by senior management, employees, or collaborators in the interest or to the advantage of the company itself.

Whistleblowing

CB has implemented the whistleblowing warning system, through a specific procedure. It allows to warn, in anonymous way, an illegal behaviour or attitude made from any Company's workers.

Anticorruption

During the reported period, it hasn't been recorded any behaviour relate to corruption. CB has analysed deeply the potential risks linked to it.

Data Protection

Company has structured an appropriate governance framework, to collect and store personal data.

It has established several internal procedures for data collection and storage, and it provides training to personnel on privacy matters.

Cyber Security

Business continuity is the priority. Nowadays I.T. systems are the base of it and, to guarantee it, we regularly test Company's systems and monitor potential threats, also simulating cyber-attacks.

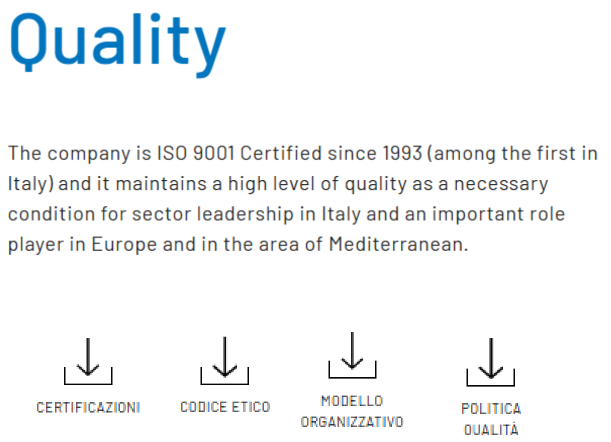
Code of Conduct

Code of Conduct is a core part of the MOG. They have been approved together and it defines the **core standards of an ethical and responsible conduct**. Everyone in the Company must follow daily these codes, together with external people who collaborate with CB.

The document explains all the conducts and procedures of the Company, the main relevant values and it creates a common decisional base for any workers.

To reach this goals, CB adopts these principles:

- Loyalty in business affairs;
- Accuracy, honesty and transparency;
- Impartiality;
- Perseverance and attention to roles and correct use of business' assets;
- Fight to money laundering and receive stolen goods;
- Protection of private information and Company's know-how;
- Security and safety of its workers and co-workers inside Company's departments;
- High quality and security of purchased products and final products;



Risk management

CB is continuously analysing and managing risks to prevent them and take advantage of market opportunities, enhancing its products and services quality. Since its foundation, CB has implemented high-quality systems to manage the Company. It highlights how much for CB having high-security standards and quality is a priority.
The Company has individuated the main non-financial risks, identifying and evaluating the most critical factors and supporting the correct comprehension of the possible impacts that can influence the business activity.

Supply chain risks

- Supply chain risks related to CB's products and services
- Main risks linked to raw materials and service suppliers
- Risks deriving from critical raw materials scarcity

Human Capital risks

- Risks related to the management and development of key personnel for the retention and growth of corporate know-how.
- Risks related to injuries

Environmental risks

- Risks linked to natural resources scarcity – water, fossil fuels, energy, biodiversity etc.. These risks are also strictly connected to climate changes and worldwide consumptions increase.
- Operational risks related to environmental regulations that may constrain the supply chain or cause environmental impacts both internally and externally.
- Extreme climate events risks which can have a huge impact on the logistics and supply chain.

Industry risks

- CB's economic and financial situation is influenced by the industry trend – competitors, innovation, technologies and new potential competitors entrance
- Politicall and economical choices (and risks) which can influence sector and companies' trends.
- Sustainable market trends towards lower-emissions products

06

ESG Action Plan

Our action plan

CB aims to increase its competitiveness and flexibility, towards a business model based on sustainability and capability to catch opportunities and transform them into actions and final products.

Working in compliance with ESG factors is a fundamental requirement for CB's growth: we really believe that Company's performance and its efficiency are correlated to environment and local community well-being.

Considering stakeholders' materiality feedbacks, CB has updated and implemented last-year ESG plan in its strategy. We have updated it, similarly to last year's, in 3 time horizons – short, medium and long term – defining it in a valuable and transparent way.

Stakeholders' expectations have allowed CB to better understand and prioritise each material and relevant topic, in order to maximise the positive impact on CB itself and the surrounded environment. In accordance with these expectations, these goals will be updated on a yearly basis through a process aligned with strategic guidelines, achieved results and best practices, with the aim of further integrating sustainability throughout the entire value chain.

Topic	Commitment	Goals 2025-2027	Actions
Employees' safety and security	Guarantee adequate, healthy and secure workspaces	Zero-injuries and zero-"nearly injuries"	• PPE adoption • Constant updates on safety and security education
Human Resources education and development	Protection and continuous development of human capital, alongside the enhancement of employees' skills.	Development and consolidation of Personnel technical, hard and soft skills	• Creating and supporting workers in attending mandatory and non-mandatory courses • Creating ad-hoc education classes for workers, especially manager, directors and department heads.
Ethic and transparency in business management	Business management in compliance with national and international laws	Enhance actual good standard to the best possible standards	• Constant update of MOG 231, Whistleblowing, Cyber-security system and GDPR • Full commitment in collecting data and publishing voluntary Sustainability Reports
Creating more innovative and sustainable products	Implementing and developing new technologies with lower-emissions	Reducing products footprint and enhancing EPD – Environmental Product Declaration Prioritise responsible supply	• More collaboration with suppliers which use recycled material in their value chain • Boosting partnerships with Universities and Research Centres to improve the final products
Energy efficiency and GHG reduction	Enhancing energy efficiency and green energy solutions. Reducing GHG emissions	Using more green energy	• Restoring damaged solar panels • Investing in solutions which can create electric energy, especially from renewable resource
Economic stability and creating value for the local communities	CB's ability to generate value and distribute it to stakeholders. Creating stable relationships with the community where it operates	More investments in local community projects	• Preferring short supply-chain, supporting and outsourcing part of our production to local suppliers • Supporting scientific, social and cultural no-profit initiatives • Boosting partnerships with Universities and Technical School ("Istituti tecnici") to create and enhance professional paths

ESRS Standard Correlation

ESRS Standard Correlation (VSME)

ESRS Standard	Disclosure	Chapter
ESRS 1 – *General Requirements*	General requirements standards, including reporting perimeter, materiality analysis, reporting structure, time-horizon and compliance with national and even international laws.	Methodological Note - p. 3 2. Materiality Analysis - p. 13-18 6. Piano azione ESG - p. 42-43
ESRS 2 – *General Disclosures*	Governance reports, strategy, risk management and materiality processes.	1. CB S.p.A. - p. 4-12 2. Materiality Analysis - p. 13-18 5. Governance - p. 35-40 6. ESG Action Plan - p. 42-43
ESRS E1 – *Climate Change*	GHG emission, environmental transition plan, physical risks and transition risks, energy use and impacts on business strategy.	3. Environmental - p. 19-25
ESRS E2 – *Pollution*	Air, water and earth emissions. Substances and dangerous substances use. Prevention and reduction of pollution.	3. Environmental - p. 19-25
ESRS E3 – *Water and marine resources)*	Impacts, risks and business policies on hydro-consumption and drain in water environment	3. Environmental - p. 19-25
ESRS E4 – *Biodiversity and ecosystems*	Information on biodiversity risks and impacts, together with protected and sensible areas	Omissis
ESRS E5 – *Resource use and circular economy*	Raw materials efficiency, correct use of them, correct management and recycle of waste. Circular economy strategies	3. Environmental - p. 19-25
ESRS S1 – *Own workforce*	Information on workers – such as safety, security, work conditions, gender gap, equality and competency development	4. Social - p. 26-32
ESRS S2 – *Workers in the value chain*	Work conditions and co-workers' conditions – such as suppliers, subcontractors	1. CB S.p.A. - p. 4-12 4. Social - p. 33
ESRS S3 – *Affected communities*	Company impact on local communities, including human rights and shared values	1. CB S.p.A. - p. 4-12 4. Social - p. 34
ESRS S4 – *Consumers and end-users*	Safeguarding consumers and final users, security and quality products, transparency	1. CB S.p.A. - p. 4-12 4. Social - p. 26-32
ESRS G1 – *Business conduct*	Business ethic, corruption fight, whistleblowing, lobbying e human resource rights	1. CB S.p.A. - p. 4-12 5. Governance - p. 35-40

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