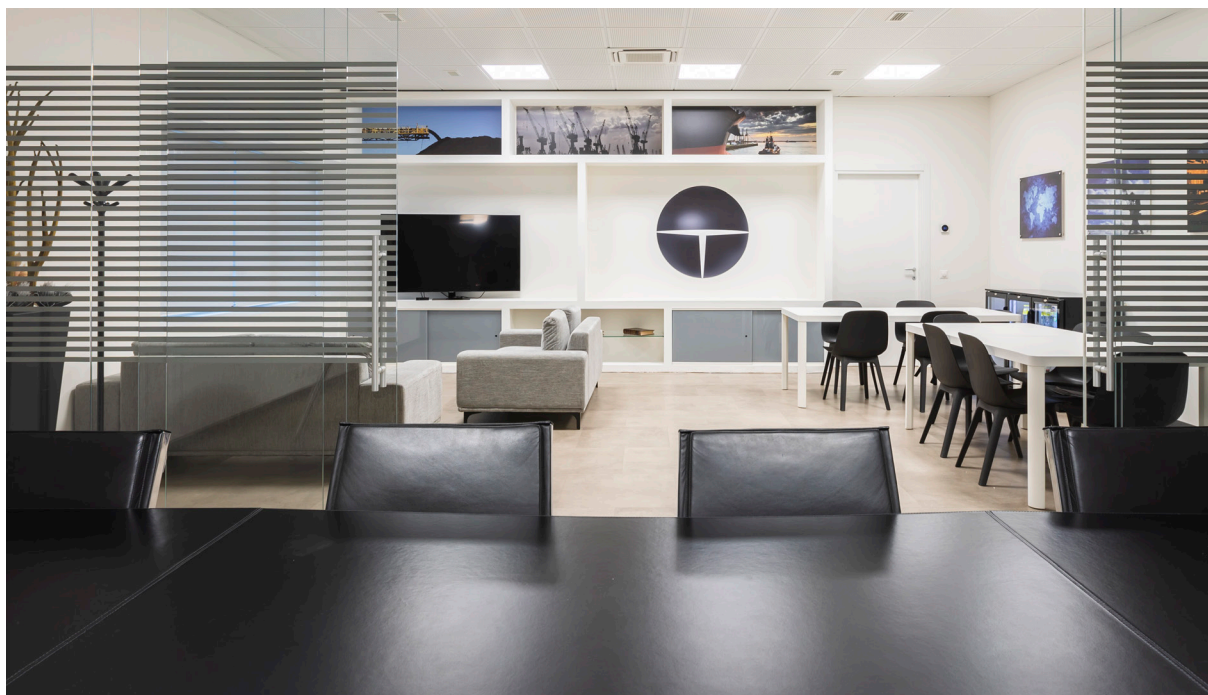


Sustainability Report



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1. Group's Profile

Trasteel Group carries out its business in the steel sector through processing and trading activities.

As of today, the Group is made up of trading and steel-processing companies. The trading activities are carried on by Trasteel International SA, Trasteel Distribution GmbH, Trasteel trading DMCC and CMP S.r.l., which is the trading company of the Profilmec group. The materials traded are steel, raw materials for steel and refractories making, electrodes, gas, non-ferrous metals, refractories and energy.

The processing activities are performed in different countries, given the location of the firms which are part of the Group.

In Italy, the activities are brought on in Racconigi (Torino), where the Profilmec S.p.a.'s plant is based, in Sesto al Reghena (Pordenone), where Ispadue S.p.a. is located, in Massa, where Tamac S.r.l. is located, in Lombardore (Torino), where LIFI S.r.l. is located, and in San Giorgio di Nogaro (Udine), where Officine Tecnosider S.r.l. is located.

Other companies of the Group are located in different countries. In particular, Trasteel Engineering Polska sp.zo.o. is located in Warsaw (Poland), Trasteel Inginerie S.r.l. in Galati (Romania) and Yugotub d.o.o. in Nova Pazova (Serbia).

Moreover, other two companies, precisely ROLM S.r.l., whose location is in Cavallerleone (Cuneo), and Trasteel Makina ve Ticaret A.S. / Fematek Uluslararası Ticaret A.S., located in Izmir and Istanbul (Turkey), carry on different activities when compared with the others. In particular, the former is specialized in the design, manufacture, revamping and installation of high-tech machines for tube production and sheet metal processing, while the latter produces a broad range of heavy carpentry products to satisfy various commercial and industrial requirements.

The Group carries out its business in the steel sector through processing and trading activities.

2. Our ESG Journey

Trasteel Group (the Group) is strongly and fully committed to its environmental, social and governance responsibilities.

The attention on its long-term impact and reputation within society, its customer and supplier base, as well as its employees is part of the core principles of the Group. This is why, over the past months, a division dedicated to all ESG topics was formally appointed with the goal of determining a structured plan and defining all the targets and actions to be undertaken. By integrating a dedicated internal team, Trasteel Group aims to foster a strong awareness across all its subsidiaries and to give them a unique, comprehensive, and direct platform to interface with management.

As the Group continues developing its ESG agenda, 2023 was therefore an important year in terms of actions taken. The Group began to formalize many of the pre-existing activities and adopted the language and concepts that are becoming standardized within the wider business community.

It is a chapter that has just started, however, Trasteel Group has clear objectives and will constantly work on spreading awareness among its employees, clients and suppliers

Creating a fully sustainable business is doable, and through the adoption of the best technologies, professionals and reporting methods, the next two years will surely prove to be a critical step forward for the whole Group.

In this very first year, after preparatory activities to obtain scorecards from a known third party, we have launched our ESG reporting process and will unveil a range of ESG metrics in our Sustainability Report. For this very first year, we've adhered to several key guidelines. First, we've adopted the GRI Standard, a globally recognized framework of interconnected standards. Second, we've established a robust reporting process, fostering extensive engagement within the Group. This involved assigning an "ESG Focal Point" to each company within our purview, providing them with training and one-on-one sessions to grasp the data collection process. We've also outlined a core set of data to collect for our first year of ESG reporting.

However, given our global presence, conducting a materiality analysis will be crucial. This assessment will delve into the effects—both positive and negative—on our stakeholders and financials. It is a tool to pinpoint and rank significant issues, guiding our future actions. Through this analysis, we will be able to craft a furthermore detailed ESG path, outlining goals pertaining to the most vital sustainability concerns.

In the fiscal year 2023, we established ESG targets for fiscal year 2024 based on our internal assessments of relevant topics where the Group aims to take action. The ESG Journey serves as an initial internal analysis, to be further developed in next year's materiality analysis. We are fully dedicated to instituting a governance framework that will serve as a strong foundation for our ESG Journey.

This includes defining ESG governance to guide the formulation and monitoring of action plans and targets, ensuring that all ESG issues for our group of companies are fully integrated into our business strategy and operations.

Our ESG path started by forming an "ESG Committee" in 2023 to appoint

Trasteel Group has clear objectives and will constantly work on spreading awareness among its employees, clients and suppliers.

the individual responsible for defining and implementing the ESG reporting process and data collection. We then delineated the reporting scope and established a network of managers and ESG Focal Points to serve as ambassadors within each company of the Group that participated in the data gathering process.

These individuals are tasked with providing necessary information and data to assess the current status and initiate required actions and improvements at both corporate and company levels. The network comprises 18 Focal Points, representing all 12 entities involved in the data collection process across 6 different countries.

	2024	2025	2026
Annual Report evolutions	Sustainability Report with reference to GRI Standards	Annual Report GRI in accordance	Annual Report GRI in accordance
ESG Activities	<ul style="list-style-type: none"> • Creation of ESG internal awareness training sessions for all ESG Focal Points • Identification of reporting perimeter and progress • Collection of basic ESG data • Creation of an ESG Committe 	<ul style="list-style-type: none"> • Materiality analysis • Definition of ESG Plan • Approach to Scope 3 emissions calculation 	<ul style="list-style-type: none"> • Double materiality analysis to further define financial impacts on (and of) all material topics • Stakeholder engagement activities to further inform Materiality Analysis and to assess the relevance of different topics • Monitoring ESG targets and actions • Scope 3 Emission in accordance with GHG Protocol
ESG main outcome	ESG internal awareness and publication of the first Sustainability Report	ESG first comprehensive info for stakeholders	Annual Report with ESG data assurance

3. Sector Challenges and the Evolution of Regulatory Framework

3.1 Sector Challenges

The steel industry is a significant contributor to global greenhouse gas emissions, accounting for around 5% of CO₂ emissions in the EU and 7% globally. With demand expected to increase by 30% by 2050, urgent action is needed to prevent being locked into carbon-intensive practices. As the world moves towards net zero emissions, the steel sector is pivotal due to its substantial environmental impact. However, achieving net zero emissions poses challenges, notably from the use of carbon-intensive raw materials and energy-intensive operations.

Efforts towards net-zero alignment are gaining traction within the industry, with increasing projects focused on developing low-emission steel production processes. Technologies like hydrogen-based direct reduction of iron are showing promise, exemplified by initiatives like H2 Green Steel. Policy developments in various regions, such as the EU's Green Deal Industrial Plan and the US's Inflation Reduction Act, are providing significant funding for industrial decarbonization efforts, particularly in advancing hydrogen and carbon capture technologies.

Internationally, collaboration on steel decarbonization is on the rise, as seen with initiatives like the Breakthrough Agenda launched at COP26, which aims to define near-zero emissions steel standards and drive investments.

COP27 and COP28 witnessed significant commitments towards industrial decarbonization, including the endorsement of Steel Standards Principles and pledges for the procurement of low-carbon steel by major economies like Canada, Germany, the UK, and the US. These commitments highlight the global momentum towards a decarbonized steel industry, indicating its significance in the transition towards sustainability.

These commitments highlight the global momentum towards a decarbonized steel industry, indicating its significance in the transition towards sustainability.

3.2 Evolution of Regulatory Framework

The Swiss Parliament has implemented new obligations regarding reporting, transparency, and due diligence, which became effective in 2022. Articles 964a–c of the Swiss Code of Obligations (CO) pertain to reporting requirements concerning environmental, social, and governance (ESG) issues for large Swiss public interest entities (PIE). These obligations start to take effect in the calendar year 2023, with the reporting mandate beginning in 2024. To ensure future consistency and comparability in reporting, companies are encouraged to adopt the disclosure requirements outlined by the Task Force on Climate-related Financial Disclosures (TCFD) for their environmental reporting starting from the calendar year 2024.

In addition, new sustainability reporting mandates within the European Union (EU) have extensive extraterritorial implications and are poised to significantly alter the reporting landscape. In November 2022, the European Council and the European Parliament approved the final text of the Corporate Sustainability Reporting Directive (CSRD), which will necessitate sus-

tainability reporting and assurance far beyond current practices for most companies and surpasses the CO reporting requirements.

The CSRD encompasses all companies with significant operations in the EU, including non-listed Swiss companies with even just one subsidiary or branch in the EU. These requirements will be phased in, starting from January 1, 2024, and continuing until January 1, 2028.

For Swiss companies, navigating which regulations apply and when may pose a challenge.

**2025 (FY 2024)**

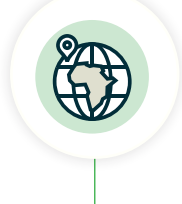
For companies already required to report additional financial information under the DNF (listed companies with more than 500 employees).

**2026 (FY 2025)**

For all mid-capitalization/large companies exceeding two of the following limits: 250 employees; EUR 50 million turnover; balance sheet assets EUR 25 million

**2027 (FY 2026)**

For listed SMEs (10 to 250 employees), the reporting obligation can be deferred for two years, with lighter standards.

**2029 (FY 2028)**

Third-country companies with a net turnover exceeding 150 million in the EU with at least one subsidiary or branch in the UE that exceeds certain criteria

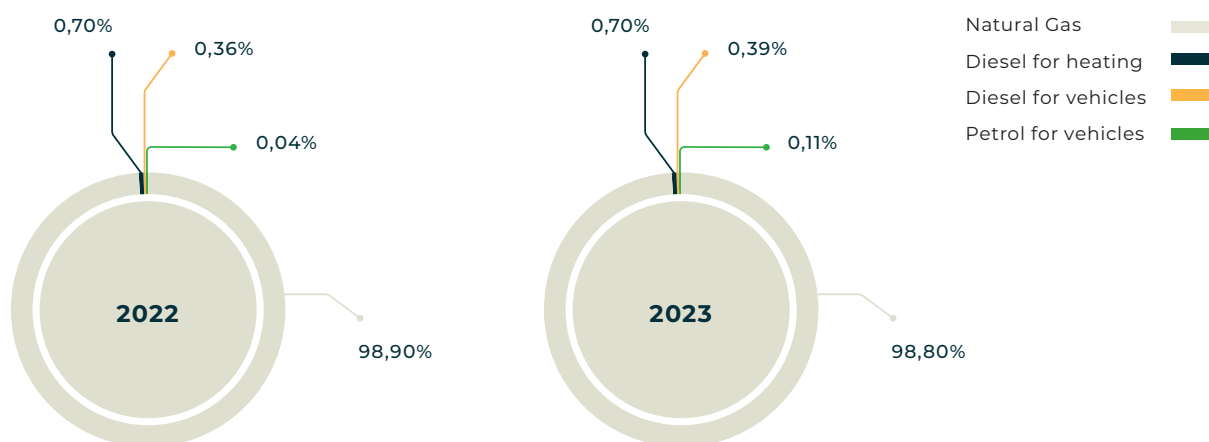


4. Scope 1 and Scope 2 Emissions

Providing a comprehensive account of energy use and emissions marks a significant step in assessing the Group's environmental impact. This effort aims to establish enhancement measures within the Companies, focusing on monitoring both direct (Scope 1) and indirect (Scope 2) greenhouse gas (GHG) emissions.

For the years 2022 and 2023, we have compiled and presented data on fuel and electricity consumption in the tables below. The Group's total fuel consumption rose from 518.506,69 GJ in 2022 to 593.398,08 GJ in 2023, reflecting a 14% increase. This rise is attributed to an expanded operational scope in 2023 and higher production levels in 2023. Similarly, electricity consumption increased by 22%, from 118.081,39 GJ to 143.852,06 GJ, driven by the same factors.

It is important to point out that two of the most energy-intensive companies in the group, namely Profilmec S.p.a. and Ispadue S.p.a., have made many innovations concerning the machinery used within the finished product production process. In fact, between 2022 and 2023, 11 high-frequency welders have been installed that guaranteed energy savings of 30% compared to their previous ones.



Electricity Consumption	Unit of measurement	2022		2023	
		Total	Total GJ	Total	Total GJ
Electricity purchased from the national grid	kWh	32.800.387,00	118.081,39	39.958.906,40	143.852,06
of which from renewable energy sources (certified)	kWh	57.741,00	207,87	395.959,68	1.425,45
Total electricity consumed	kWh	32.800.387,00	118.081,39	39.958.906,40	143.852,06

The chart below displays that the most significant fuel consumption derives from Natural Gas, with a total consumption of 14.360,169 m³ in 2022 and 16.099.226,82 m³ in 2023, and Diesel for heating and production processes, with a consumption of 100.299 L in 2022 and 114.050 L in 2023. Regarding the first one, a large amount of Natural Gas is used to feed the furnace operating in Officine Tecnosider S.r.l., a steel rerolling plant with a production capacity of 400.000 metric tons/year of plates. In fact, during 2022 and 2023 a total consumption of 13.730.338,00 m³ and 15.326.425,00 m³ respectively has been registered in the plant.

The following graphic illustrates that the structure of Direct (Scope 1) GHG emissions mirrors the situation of the energy consumption, showing an increase from 29.373,28 tCO₂eq in 2022 to 33.355,75 tCO₂eq in 2023. This rise is due to the incorporation of additional companies into the Group's boundary, as detailed in the Methodology.

Regarding our energy Indirect (Scope 2) GHG emissions, the trend between the two reported years is quite linear to the rise happened in the Direct (Scope 1) GHG emissions. Indeed, even for what concerns the two scenarios, meaning location-based and market-based, there has been a slight increase between 2022 and 2023 passing from 25.295,51 tCO₂eq, considering the sum of location and market-based calculation, to 30.673,26 tCO₂eq always considering the sum of the two different calculations.

Greenhouse gas emissions - tCO ₂ eq		2022	2023
Scope 1	Direct emissions from combustion	29.373,28	33.341,42
	Emissions from refrigerant gas leaks	0,00	14,33
	Total Scope 1	29.373,28	33.355,75
Scope 2	Location-based	10.332,12	12.587,06
	Market-based	14.963,39	18.086,20
Total	Scope I and Scope II (location-based)	39.705,40	45.942,81
	Scope I and Scope II (market-based)	44.336,67	51.441,96



5. People of Trasteel

5.1 Employment

The Group's recent expansion has been significant, facilitated by the abilities, dedication, energy, and participation of its most valuable resource: "people behind Steel", which represents the "motto" of the company.

On the one hand, the Trasteel Group's expansion is based on the principles and attributes that have guided the company since its founding in 2009.

The Group is prepared to maintain the unique characteristics of a family business in a highly competitive global marketplace. However, in order to help every person reach their full potential and thrive, more formal HR procedures and systems must be developed as a result of this continuous process.

In recent years, the Trasteel Group has experienced strong growth in employment thanks to the strategy of several acquisitions concluded since 2020. In fact, the acquisition of Officine Tecnosider S.r.l., a company with 118 employees to date, was concluded in 2020 and started the whole process that continued in the next years.

The year 2022 certainly represented a decisive turning point here, as the Group completed the incorporation of Trasteel Makina ve Ticaret A.S. / Fematek Uluslararası Ticaret A.S. and Profilmec Group, one of the largest tube producers in Europe formed by Profilmec S.p.a., Ispadue S.p.a., ROLM S.r.l., specialized in the design, manufacture, revamping and installation of high-tech machines for tube production and sheet metal processing, CMP S.r.l., the commercial branch of the Profilmec Group, and SIM S.r.l., a joint venture with a major steel producer and processor.

Both strongly contributed to the growth of the group's workforce, with 135 employees Trasteel Makina ve Ticaret A.S. / Fematek Uluslararası Ticaret A.S. and 411 Profilmec Group.

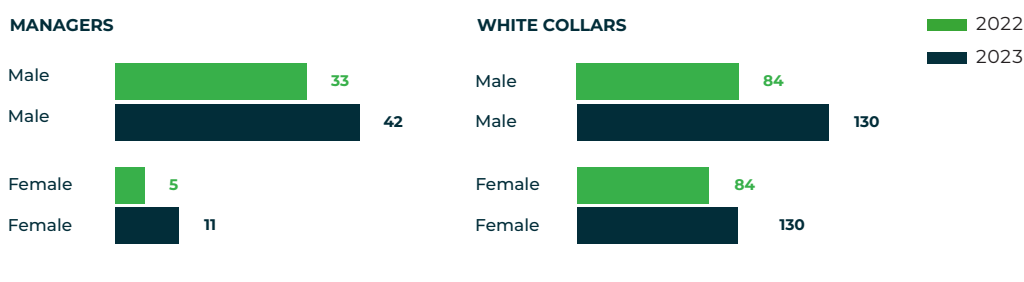
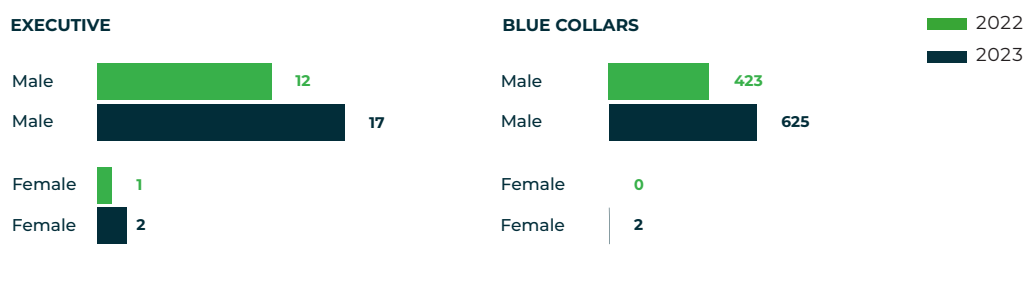
The Group's recent expansion has been significant, facilitated by the abilities, dedication, energy, and participation of its most valuable resource: "people behind Steel".

The growth process also continued in 2023, when the acquisitions of Yugotub d.o.o. in May, LIFI S.r.l. in June, and Trasteel Engineering Polska sp.zo.o. and Trasteel Ingerie S.r.l. in November were completed. The above-mentioned companies now have 79, 25, 16 and 14 employees respectively.

2020	Officine Tecnosider S.r.l.
2022	Profilmec S.p.a. Ispadue S.p.a. ROLM S.r.l. Trasteel Makina ve Ticaret A.S. Fematek Uluslararası Ticaret A.S.
2023	LIFI S.r.l. Trasteel Engineering Polska sp.zo.o. Trasteel Ingerie S.r.l. Yugotub d.o.o.

In this general growth scenario, growth is also evident in the individual companies.

In fact, all the companies that make up the group have seen their number of employees increase in the years taken into consideration in this data collection, i.e. 2022 and 2023.



The number of women in the Group has climbed from 74 to 98 over the reporting year, with the percentage going from 11,82% in 2022 to 10,75% in 2023. At the same time, the total number of women has increased in every job category. The following table demonstrates that, at the end of 2022, women managers made up 13,16% of the total, but by the end of 2023, there had been a significant rise in this percentage, reaching 20,75%.

A closer look at the distribution of white-collar workers reveals a more notable gender balance.

In 2022, women made up 44,74% of all white-collar workers. Even in 2023, when women still made up 38,97% of the sector, there was a slight decline toward parity, which was also explained by the reporting perimeter's expansion.

In contrast, blue-collar women still represent a small part of the total given also the nature of the work activities.

Moreover, as reported in the table below, the vast majority of the Group's employees signed permanent and full-time contracts.

Total number of employees by employment contract (permanent and temporary), by gender

Type of contract	2022			2023		
	Male	Female	Total	Male	Female	Total
Permanent	531	68	599	777	98	875
Temporary	21	6	27	37	0	37
Total	552	74	626	814	98	912
Blue Collars	100,00%	0,00%	100%	99,68%	0,32%	100%
Total	88%	12%	100%	89%	11%	100%

Total number of part-time and full-time employees by gender + Employees with non-guaranteed hours

non-guaranteed hours	2022			2023		
	Male	Female	Total	Male	Female	Total
Full-time	539	53	592	799	76	875
Part-time	13	21	34	15	22	37
Non-guaranteed hours	0	0	0	0	0	0
Percentage part-time	2,36%	28,38%	5,43%	1,84%	22,45%	4,06%
Total	552	74	626	814	98	912

5.2 Health and Safety

The Trasteel Group consistently emphasizes the importance of health and safety. For instance, almost all Group companies adhere to the ISO 45001:2018 Safety Management System Policy. New equipment and machinery have been introduced to mitigate risks, including new lasers for in-line hot plate measurements, robot islands for labeling and marking plates, a new 50-ton overhead crane with a rotating block, a new slab cutter, and a jib crane for handling specimens.

The Group places the utmost importance on the safety and well-being of its employees, aiming to cultivate a strong health and safety culture and regularly developing strategies to enhance working conditions and safety awareness. This involves implementing specific procedures, offering training courses, and enforcing internal regulations.

Over the past two years Trasteel's facilities have been confirmed as safe environments due to a stringent safety culture applied to all roles and categories. In 2022, workers spent a total of 1.001.820 hours in the Group's offices and facilities. The overall rate increased from 27,95% to 50,13% in 2023 due to an expanded reporting perimeter.

In 2022, there were 28 accidents, including two severe ones, while in 2023, accidents rose to 87, particularly in Group companies with high recruitment rates, such as Trasteel Makina ve Ticaret A.S./Fematek Uluslararası Ticaret A.S. which witnessed a high rate of turnover between "old" and new employees. Less experienced newcomers are more prone to accidents. To address this, the Group has implemented corrective measures after thorough incident reviews, focusing on preventing common accidents like cuts and bruises from tool and machine use indeed, the vast majority of the incidents, precisely 63 out of 87, derives from cuts, splinters and sprains.

Moreover, given the willingness to keep under control the injuries' rate, each company of the Group has to include the data regarding this topic in the reporting package discussed weekly to analyze the trend.

The Group continuously demonstrates its commitment to employee safety and well-being, recognizing that attention to health and safety is essential for both staff welfare and overall operations. Investing in health and safety training and in the implementation of new machineries is vital to protect the Group's most valuable asset: People.

Work-related injuries (Employees)

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

Temporary data (Employees)

Hours	2022	2023
Hours worked	1.001.820	1.735.509

Rate	2022	2023
Rate of recordable work-related injuries	27,95%	50,13%
Rate of high-consequence work-related injuries (excluding fatalities)	2,00%	0,00%
Rate of fatalities as a result of work-related injury	0,00%	0,00%

6. ESG Appendix

6.1 ESG Data

Employees

Company	2022	2023
Trasteel Trading Holding SA	16	21
Trasteel International SA	55	61
Profilmec S.p.a.	171	175
Ispadue S.p.a.	217	219
LIFI S.r.l.	-	25
ROLM S.r.l.	18	17
Yugotub d.o.o.	-	79
Officine Tecnosider S.r.l.	112	118
Tamac S.r.l.	37	42
Trasteel Engineering Polska sp.zo.o.	-	4
Trasteel Inginerie S.r.l.	-	14
Trasteel Makina ve Ticaret A.S. / Fematek Uluslararası Ticaret A.S.	-	137

Gender

	2022	2023
Female	74	98
Male	552	814

Company	Type of contract	2022	2023
Trasteel Trading Holding SA	Perm / Temp	15 / 1	20 / 1
Trasteel International SA	Perm / Temp	55 / -	61 / -
Profilmec S.p.a.	Perm / Temp	170 / 1	171 / 4
Ispadue S.p.a.	Perm / Temp	211 / 6	205 / 14
LIFI S.r.l.	Perm / Temp	-	25 / -
ROLM S.r.l.	Perm / Temp	17 / 1	17 / -

Yugotub d.o.o.	Perm / Temp	-	67 / 12
Officine Tecnosider S.r.l.	Perm / Temp	101 / 11	113 / 5
Tamac S.r.l.	Perm / Temp	36 / 1	41 / 1
Trasteel Engineering Polska sp.zo.o.	Perm / Temp	-	4 / -
Trasteel Ingerie S.r.l.	Perm / Temp	-	14 / -
Trasteel Makina ve Ticaret A.S. / Fematek Uluslararası Ticaret A.S.	Perm / Temp	-	131 / 6

Gender	Type of contract	2022	2023
Female	Perm / Temp	68 / 6	98 / -
Male	Perm / Temp	531 / 21	777 / 37

Company	Full Time / Part Time	2022	2023
Trasteel Trading Holding SA	Full / Part	11 / 5	16 / 5
Trasteel International SA	Full / Part	47 / 8	52 / 9
Profilmec S.p.a.	Full / Part	162 / 9	166 / 9
Ispadue S.p.a.	Full / Part	208 / 9	210 / 9
LIFI S.r.l.	Full / Part	-	25 / 0
ROLM S.r.l.	Full / Part	17 / 1	16 / 1
Yugotub d.o.o.	Full / Part	-	79 / -
Officine Tecnosider S.r.l.	Full / Part	110 / 2	115 / 3
Tamac S.r.l.	Full / Part	37 / -	42 / -
Trasteel Engineering Polska sp.zo.o.	Full / Part	-	4 / -
Trasteel Ingerie S.r.l.	Full / Part	-	13 / 1
Trasteel Makina ve Ticaret A.S. / Fematek Uluslararası Ticaret A.S.	Full / Part	-	137 / -

Gender	Full Time / Part Time	2022	2023
Female	Full / Part	53 / 21	76 / 22
Male	Full / Part	539 / 13	799 / 15

New employee hires and employees turnover

Company	2022	Rate 2022	2023	Rate 2023
Trasteel Trading Holding SA	3	18,70%	4	19,04%
Trasteel International SA	11	20,00%	8	13,11%
Profilmec S.p.a.	6	3,50%	14	8,00%
Ispadue S.p.a.	7	3,22%	23	10,50%
LIFI S.r.l.	-	-	5	20,00%
ROLM S.r.l.	2	11,11%	0	-
Yugotub d.o.o.	-	-	4	5,06%
Officine Tecnosider S.r.l.	27	24,10%	23	19,40%
Tamac S.r.l.	11	29,72%	6	14,30%
Trasteel Engineering Polska sp.zo.o.	-	-	2	50,00%
Trasteel Ingerie S.r.l.	-	-	3	21,43%
Trasteel Makina ve Ticaret A.S. / Fematek Uluslararası Ticaret A.S.	-	-	155	113,13%

Gender and Age	2022	Rate 2022	2023	Rate 2023
Female	8	10,81%	9	29,23%
Male	59	10,70%	238	9,18%
Under 30	23	27,39%	87	65,61%
30-50	27	10,60%	121	28,74%
Over 50	17	5,92%	39	10,90%

Company	Turnover 2022	Rate 2022	Turnover 2023	Rate 2023
Trasteel Trading Holding SA	1	6,25%	1	4,76%
Trasteel International SA	6	10,91%	4	6,56%
Profilmec S.p.a.	6	3,50%	10	5,71%
Ispadue S.p.a.	21	9,68%	21	9,59
LIFI S.r.l.	-	-	2	8,00%
ROLM S.r.l.	0	-	1	5,88%
Yugotub d.o.o.	-	-	1	1,27%
Officine Tecnosider S.r.l.	38	33,93%	17	14,41%

Tamac S.r.l.	0	-	1	2,38%
Trasteel Engineering Polska sp.zo.o.	-	-	2	50,00%
Trasteel Ingerie S.r.l.	-	-	3	21,43%
Trasteel Makina ve Ticaret A.S. / Fematek Uluslararası Ticaret A.S.	-	-	153	111,68%

Gender and age	Turnover 2022	Rate 2022	Turnover 2023	Rate 2023
Female	2	2,70%	5	5,10%
Male	71	12,86%	211	25,92%
Under 30	19	22,62%	46	34,59%
30-50	29	11,37%	78	18,53%
Over 50	25	8,71%	92	25,70%

6.2 GRI Context Index

Statement of use	Trasteel Trading Holding SA has reported the information cited in this GRI content index for the period 01.01.2022 - 31.12.2023 with reference to the GRI Standards.	
GRI 1:	Foundation 2021	
	GRI Standard	Paragraph
GRI 2: General Disclosures 2021	2-1 Organizational details	1. Group's Profile
	2-2 Entities included in the organization's sustainability reporting	7. Methodology and Notes
	2-3 Reporting period, frequency and contact point (contact point: esg@trasteel.com)	7. Methodology and Notes
	2-7 Employees	5.1 Employment
GRI 302: Energy 2016	302-1 Energy consumption within the organization	4. Scope 1 and Scope 2 Emissions
GRI 305: Emissions 2016	305-1 Direct (Scope 1) GHG emissions	4. Scope 1 and Scope 2 Emissions
	305-2 Energy indirect (Scope 2) GHG emissions	
GRI 401: Employment 2016	401-1 New employee hires and employee turnover	6.1 ESG Data
GRI 403: Occupational Health and Safety 2018	403-9 Work-related injuries	5.3 Health & Safety
GRI 405: Diversity and Equal Opportunity 2016	405-1 Diversity of governance bodies and employees	5.1 Employment
GRI 406: Non-discrimination 2016	406-1 Incidents of discrimination and corrective actions taken	Nothing to report
GRI 418: Customer Privacy 2016	418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data	Nothing to report

7. Methodology and notes

For the first time, ESG disclosure is made publicly available through the Group's website in an effort to improve transparency and ease of understanding on the company's sustainability journey.

As shown in the "GRI Content Index" table, this document was created by reporting on a subset of the "GRI Sustainability Reporting Standards" that the Global Reporting Initiative (GRI) has released.

This sustainability report aligns with the principles outlined by the GRI Standards 2021 for defining its contents. It ensures:

Accuracy: The document provides sufficient detail for stakeholders to effectively understand and assess the Group's sustainability performance during the reporting period.

Transparency: Clear language and the use of infographics make the Group's performance accessible and understandable for stakeholders.

Comparability: Performance indicators for the 2022-2023 period are accompanied by commentary to enable comparison and assessment of the Group's performance over time.

Completeness: The report comprehensively covers the GRI Standards, addressing the most significant environmental, social, and economic impacts of the Group's activities, facilitating a thorough evaluation of its performance.

Timeliness: Events between January 1, 2022, and December 31, 2023, relevant for stakeholders' assessment of the Group's sustainability performance, are duly considered in this disclosure.

Verifiability: The information presented has undergone gathering, recording, compilation, and analysis to ensure quality and can be examined to establish its validity.

7.1 Specifics regarding the Reporting Perimeter

Concerning the perimeter reporting, and thus the number of companies that were included and excluded from the study, there are some specifications to be made. In fact, some companies belonging to the Group were totally excluded from the data collection, due to their minimal impact on the final result of the analysis in some cases and due to the fact that they were not fully controlled in another case.

In particular, on the one hand, Trasteel Distribution GmbH (Dusseldorf), Trasteel Trading DMCC (Dubai) and Trasteel Asia Pte Ltd., which wholly controls Shanghai Yilin International Trading Company Ltd, were excluded due to the little impact they would have had on the aggregate figure, the same reason why Trasteel Makina Ticaret A.S. / Fematek Uluslararası Ticaret A.S. was also excluded from 2022 but included in 2023 given its greater impact on the environmental and social side.

On the other hand, due to the 50% shareholding of a major steel producer and processor, SIM S.r.l. was not included in the data collection process. Lastly, Trasteel Energy SA has been included in Trasteel International SA's data gathering.

In this scenario, there are further details that need to be given in order to better explain how the data collection took place. As can also be seen from the acquisition timeline, some of the companies in the group were acquired in 2023 and, for this reason, were excluded from the data collection for 2022. In this case we are talking about LIFI S.r.l., Yugotub d.o.o., Trasteel Engineering Polska sp.zo.o. and Trasteel Ingerie S.r.l..



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