

METALSISTEM®

CONSOLIDATED SUSTAINABILITY STATEMENT 2025

METALSISTEM GROUP

CONSOLIDATED SUSTAINABILITY STATEMENT
2025

METALSISTEM S.P.A.

Viale dell'Industria, 2
38068 - Rovereto (TN)
VAT no. 01626300220
Tax Code 10166300151

METALSISTEM ITALIA S.P.A.

Viale del Lavoro, 1
38068 - Rovereto (TN)
VAT no. 01898020225
Tax Code 01898020225

GAL.TRE S.R.L.

Viale Giovanni Caproni, 3/B
38068 - Rovereto (TN)
VAT no. 01361520222
Tax Code 01361520222

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Letter to Stakeholders

Dear Stakeholders,

The Metalsistem Group presents its first Consolidated Sustainability Statement, a document reflecting the commitment undertaken to integrate the principles of environmental sustainability, social responsibility and ethical corporate governance ever more tangibly into all decisions.

During 2025, the Group launched a series of structured initiatives to strengthen the management and monitoring of its sustainability performance, developing an initial ESG performance measurement system based on dedicated KPIs and a structured data collection and validation process designed to provide a comprehensive view of performance.

In parallel, an analysis and in-depth examination of the main material ESG topics was undertaken through engagement with company stakeholders. This work made it possible to identify the most significant impacts generated by the Group, as well as the main risks and opportunities associated with environmental, social and governance factors, in support of steering strategic choices. These activities laid the foundation for defining a multi-year Sustainability Plan, geared towards the continuous improvement of performance and the creation of long-term value for all stakeholders.

For the Metalsistem Group, sustainability is not a new topic, but a principle that has always guided the journey of the companies comprising it. Among the main initiatives developed over time, relating to the most relevant topics, the following stand out:

- **Energy efficiency and decarbonisation**, through the production and self-consumption of energy from photovoltaic systems, the purchase of electricity from renewable sources certified via Guarantees of Origin, the progressive electrification of consumption, the development of new projects for renewable energy generation and the introduction of electric mobility solutions;
- **Environmental management and circular economy**, through the certification of the environmental management system according to the ISO 14001 standard, the definition of procedures for waste management and traceability, the recovery and recycling of scrap steel, the reuse of packaging materials and the introduction of initiatives for separate waste collection and plastics reduction;
- **Optimisation of production processes and sustainable innovation**, through the use of materials with lower environmental impact, the development of modular and durable products, the introduction of new high-performance lines, the self-production of machinery and the presence of dedicated research and development infrastructure;
- **Digitalisation and management of internal processes**, with the launch of a project for the digitalisation of documents and information flows aimed at improving operational efficiency, traceability and the control of corporate processes;
- **Quality, certifications and collaboration with the research ecosystem**, through the certification of the quality management system according to the ISO 9001 standard, the certification of materials and products and collaboration with standardisation bodies, universities and research centres;
- **Stakeholder engagement and gathering of expectations**, through structured monitoring of customer feedback, communication and engagement initiatives with the sales network and the organisation of events dedicated to strengthening relationships with the market;
- **Governance and integration of ESG factors**, through the formalisation of dedicated sustainability roles, the updating of corporate governance tools and the introduction of whistleblowing channels to support increasingly structured and responsible management.

This document has been prepared in accordance with the new European Sustainability Reporting Standards (ESRS), adopted as a methodological reference to ensure the transparency, reliability and comparability of information.

Sustainability represents a practical and evolving field of action that demands constant commitment, measurement capability and increasing integration into corporate processes. For this reason, I would like to thank all the people who, through their daily contribution, participate in the Group's development and in building an increasingly sustainable and responsible growth model.

Antonello Briosi
Chairman of the Board of Directors



Highlights 2025

117.87
€ MILLION
Turnover at consolidated level *

350
Employees as at 31 December 2025 **

100%
Electricity from renewable sources **

Certifications

ISO 9001:2015
Metalsistem S.p.A.
Gal.Tre S.r.l.

ISO 14001:2015
Metalsistem S.p.A.

ISO 45001:2018
Metalsistem S.p.A.

* The figure is taken from the Consolidated Financial Statements of METALSISTEM GROUP S.p.A. Unipersonale as at 31 December 2025 and refers to the scope of consolidation defined for the purposes of the same Financial Statements, which includes METALSISTEM GROUP S.p.A. Unipersonale (Parent Company), METALSISTEM S.p.A., METALSISTEM ITALIA S.p.A. and GAL.TRE S.r.l..

** The figure refers to the companies included in the scope of this Consolidated Sustainability Statement: METALSISTEM S.p.A., METALSISTEM ITALIA S.p.A. and GAL.TRE S.r.l..

INTRODUCTORY SECTION

METALSISTEM

METALSISTEM GROUP

CONSOLIDATED SUSTAINABILITY STATEMENT

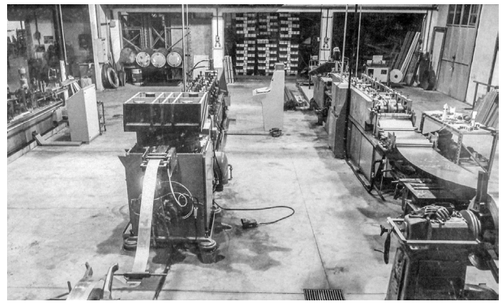
2025

METALSISTEM ITALIA Gruppo METALSISTEM

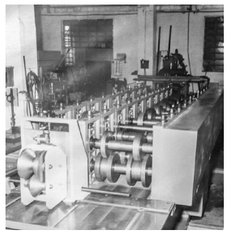
GAL.TRE

The history of the Metalsistem Group

Founded in 1970, Metalsistem began its activity in the design and manufacture of machinery for the cold roll forming of metals, developing distinctive expertise from the outset in the field of steel processing and highly specialised industrial processes. On these foundations, the company progressively consolidated its technical and engineering know-how, complementing production development with intensive and ongoing research and development activities.









This path led to the design and industrialisation of advanced modular systems for industrial storage and archiving, characterised by high flexibility, scalability and component standardisation, capable of meeting a wide range of application needs, from small-scale users to complex industrial settings. The adoption of design principles based on modularity represented a distinctive element of Metalsistem's industrial model, making it possible to combine production efficiency, product quality and reliability, and adaptability of solutions.

The experience acquired over time, the development of various patented solutions and the progressive consolidation of technologies related to the production of galvanised steel profiles have made it possible to achieve high quality and performance standards, recognised through certifications issued by leading international certification bodies, as well as to ensure compliance with applicable regulatory requirements in the various target markets.

In parallel, the Group embarked on a process of organisational growth and expansion, supported both by expansion into international markets and by corporate development transactions, including the acquisition and establishment of new business entities, which have led to the progressive vertical integration of certain phases of the value chain and to the strengthening of distinctive competencies throughout the entire production cycle.

Today, the Metalsistem Group operates as an established industrial player in the material handling and commercial shopfitting solutions sectors, offering products and services characterised by high technological content, certified quality standards and an established presence in major international markets.

KEY MILESTONES IN THE METALSISTEM GROUP'S JOURNEY

1970	Foundation of Metalsistem in Rovereto (TN)
Early 1970s	Commencement of business activities with the design and manufacture of machinery for cold roll forming of metals
1975 - 1977	Evolution towards the production of shelving systems and acquisition of the first premises
1970s - 1980s	Development of innovative storage solutions based on modular design principles
1980	Creation of the first headquarters and industrialisation of shelving systems
1983	Commencement of international expansion, particularly into Northern European markets
1980s - 1990s	Progressive consolidation as a manufacturer of storage and intralogistics systems
1990	Relocation of the headquarters to Viale dell'Industria
1997	Acquisition of an equity interest in GAL.TRE, a company specialising in powder coating
2000s	Expansion of the offering towards integrated solutions for logistics, mass retail and commercial furnishings
2003	Establishment of Fondazione Metalsistem
2009	Establishment of Metalsistem Italia for complex installations
2010s	Diversification into new application fields, including structures for photovoltaics and advanced logistics solutions
2016	Full integration of GAL.TRE into the Group
2020	Celebration of the Group's 50th anniversary
2025	Commencement of a structured sustainability pathway and adoption of an ESG performance measurement system
2026	Publication of the first Consolidated Sustainability Statement

FONDAZIONE METALSISTEM ONLUS

Fondazione METALSISTEM Onlus, established in 2003, represents the tangible expression of the Group's social commitment and was created with the aim of contributing to community development through initiatives of social value. Inspired by the principle of "think globally, act locally", the Foundation promotes and supports projects across key areas of public interest.

Supported initiatives include, for example, backing local and international associations active in the social and healthcare sectors, funding scholarships and educational paths, and supporting integration and welfare assistance projects.

fondazione
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METALSISTEM







01 General disclosures

ESRS 2

Basis for preparation
BP-1 / BP-2

Governance
GOV-1 / GOV-2 / GOV-3 / GOV-4 / GOV-5

Strategy
SBM-1 / SBM-2 / SBM-3 / IRO-1 / IRO-2

ESRS 2

Basis for preparation

BP-1

General basis for preparation of the sustainability statement

This document constitutes the Consolidated Sustainability Statement ("Statement") of the Metalsistem Group (hereinafter also "Group"), prepared on a voluntary basis for the 2025 financial year (1 January – 31 December 2025) in compliance with the principles of the European Sustainability Reporting Standards (ESRS) developed by EFRAG (European Financial Reporting Advisory Group). The document is prepared in accordance with the principles of relevance, faithful representation, comparability, verifiability and understandability of information.

In accordance with the ESRS 1 standard, the reporting is structured into four overarching sections: 1) General disclosures; 2) Environmental information; 3) Social information; 4) Governance information. An introduction, an entity-specific topic and an appendix are also included.

Each of the four overarching sections includes the qualitative and quantitative information necessary to understand the Group's impacts, risks and opportunities in relation to sustainability matters, as well as information on policies, actions, strategic targets and metrics associated with the sustainability matters identified as material as a result of the double materiality assessment. During this assessment process, certain impacts related to the value chain were also taken into consideration, particularly those associated with logistics activities and the procurement of raw materials.

In order to facilitate cross-referencing between the content addressed in this document and the Disclosure Requirements set out by the ESRS associated with material sustainability matters for the Metalsistem Group, the Appendix contains the ESRS Content Index.

The Metalsistem Group has not made use of the option to omit a specific piece of information corresponding to intellectual property, know-how or results of innovation, nor has it made use of the exemption from disclosing information concerning impending developments or matters in the course of negotiation.

The disclosures required by Article 8 of Regulation (EU) 2020/852 (EU Taxonomy) have not been included, given the voluntary nature of this Statement.

REPORTING BOUNDARY

The reporting boundary refers to the Metalsistem Group, which comprises the companies Metalsistem S.p.A., Metalsistem Italia S.p.A. and GAL.TRE S.r.l.[1].

[1] In order to provide a comprehensive and complete representation of the Group's business model and shareholdings, it should be noted that there are also certain non-controlling shareholdings held by METALSISTEM GROUP S.p.A. Unipersonale in the following companies: METALSISTEM ROMA S.R.L.; PFGE SRL; SOTEA SISTEM S.R.L.; METALSISTEM AUSTRALIA STORAGE AND DISPLAY SOLUTIONS PTY LTD; SIDAC IBERIA SA; SIDAC ITALIA S.R.L.; METALSISTEM MARCHE S.R.L.; AMBROSI S.R.L.; ENGINBUILD S.R.L.; ITALIA INGEGNERIA S.R.L.; BLOCK SISTEM CENTRO METALSISTEM - S.R.L.; GRUPPOSEI IMMOBILIARE S.R.L.; METALSISTEM EMILIA ROMAGNA S.R.L.; METALSISTEM INTERNATIONAL S.R.L.; METALSISTEM INTRALOGISTICA S.R.L.; METALSISTEM LIGURIA S.R.L.; METALSISTEM LOMBARDIA S.R.L.; METALSISTEM PIEMONTE S.R.L. - BERTERO GRUPPO METALSISTEM; METALSISTEM SARDEGNA S.R.L.; METALSISTEM SOLUTIONS S.R.L. - SOCIETÀ BENEFIT; SIDAC MED S.R.L.; SIDAC SOLUTIONS S.R.L.; SIDAC VENETO S.R.L.; TEKNOSISTEM S.R.L.; GL SISTEM S.R.L.; VIERRE SISTEM S.R.L.; SMETAR S.R.L.; METALSISTEM CALABRIA S.R.L.; METALSISTEM LINE S.R.L.; CREDITO LOMBARDO VENETO S.P.A.; AEROTEC S.P.A.; TEC HOLIDAY S.P.A.; THE EQUITY CLUB S.R.L..

COMPANY NAME	BUSINESS ACTIVITIES	SHARE CAPITAL	REGISTERED OFFICE	SHARE HELD
Metalsistem S.p.A.	Designs and manufactures both material handling and commercial shopfitting solutions, as well as the machinery for its own production lines	€ 40,000,000	Rovereto (TN), Italy	**100%**
Metalsistem Italia S.p.A.	Manufactures racking systems of high design and manufacturing complexity	€ 10,000,000	Rovereto (TN), Italy	**100%**
GAL.TRE S.r.l.	Performs thermosetting powder coating	€ 98,800	Rovereto (TN), Italy	**100%**

Investee companies, whether held directly or through subsidiaries, have been excluded from the reporting boundary due to the voluntary nature of sustainability reporting.

BP-2

Disclosures in relation to specific circumstances

TIME HORIZONS

Consistently with the provisions of the ESRS 1 standard - section 6.4, the time horizons assumed within the Statement are modelled on the provisions of financial reporting standards.

TIME HORIZON	DESCRIPTION
Short-term	< 12 months, consistently with what is defined in the Consolidated Financial Statements of the Metalsistem Group
Medium-term	From the end of the short-term time horizon up to 5 years
Long-term	> 5 years

TRANSITIONAL PROVISIONS (PHASE-IN)

In accordance with the transitional provisions set out in ESRS 1, the Metalsistem Group has excluded from its 2025 sustainability reporting value chain information that is currently unavailable or cannot be fully verified, including, among other items, indirect greenhouse gas emissions (Scope 3).

ESTIMATES

Any reliance on estimates within this Statement is explicitly stated in the relevant sections and is limited solely to cases where it was not possible to obtain complete and accurate data, in order to ensure the overall reliability and quality of the information reported.

Forward-looking information, including that concerning future objectives and development trajectories, is prepared based on the current context and operating conditions available at the time of drafting and, as such, is subject to potential variations depending on changes in the regulatory framework and market dynamics.

INCORPORATION BY REFERENCE

Any information incorporated from other corporate documents is explicitly indicated and included by means of specific reference, in compliance with the applicable provisions.

Governance

GOV-1

The role of the administrative, management and supervisory bodies

The corporate governance system of the Metalsistem Group is based on the traditional management and control model and consists of the following administrative, management and supervisory bodies: Shareholders' Meeting, Board of Directors, Board of Statutory Auditors, Independent Audit Firm and Supervisory Body, each with roles and responsibilities defined by current legislation and the Articles of Association. The Group's governance structure aims to ensure transparency of processes, organisational robustness and the creation of sustainable value over the medium to long term. Furthermore, to ensure a coherent and coordinated management of sustainability matters, the Board of Directors was informed of the material impacts, risks and opportunities identified by the double materiality assessment, which it submitted for approval alongside this document.

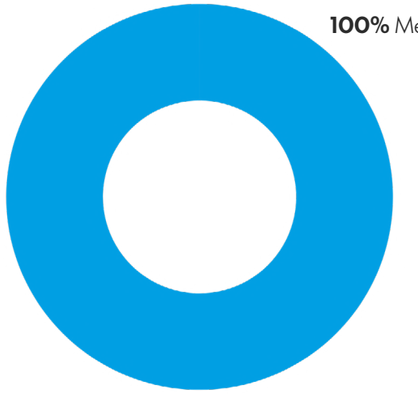
The Board of Directors of the parent company (METALSISTEM GROUP S.p.A. Unipersonale) is composed of 3 members and performs management functions, defines strategic direction and oversees the sustainability reporting process.

BOARD OF DIRECTORS		
OFFICE	MEMBER	AGE
Chairman	Antonello Briosi	> 50
Deputy Chairman and Director	Mirco Briosi	30 - 50
Director	Sergio Francesconi	> 50

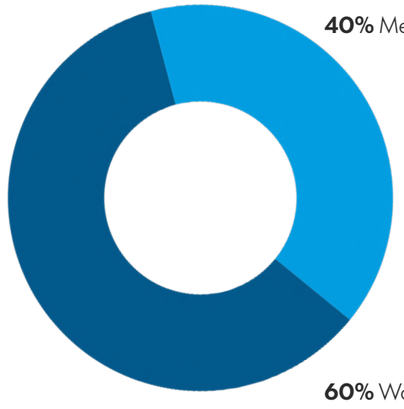
The Board of Statutory Auditors is the body responsible for legal supervision and oversight, tasked with supervising compliance with the law and the Articles of Association, observance of the principles of correct administration, and the adequacy of the organisational, administrative, and accounting structure. The Board of Statutory Auditors of the Metalsistem Group consists of 3 standing auditors (including a Chairman of the Board) and 2 alternate auditors.

BOARD OF STATUTORY AUDITORS		
OFFICE	MEMBER	AGE
Chairman	Claudio Tovazzi	> 50
Standing auditor	Maria Rosaria Fait	> 50
Standing auditor	Eva Manfrini	30 - 50
Alternate auditor	Efrem Grazzi	30 - 50
Alternate auditor	Isabella Mellarini	> 50

COMPOSITION OF THE BOARD OF DIRECTORS



COMPOSITION OF THE BOARD OF STATUTORY AUDITORS



In compliance with the relevant statutory provisions, the statutory auditing activity is carried out by an independent audit firm.

Metalsistem's Board of Directors has established a Supervisory Body (Organismo di Vigilanza - OdV) meeting the requirements of autonomy, independence, professionalism and continuity of action laid down by Legislative Decree 231/2001. The Supervisory Body is entrusted with the task of monitoring the effective implementation of the company's Organisation, Management and Control Model, verifying compliance with it and promoting its updating, in order to guarantee its ongoing consistency with the company structure and with the evolution of the regulatory framework.

During 2024, an ESG Manager was also appointed by resolution of the Board of Directors, tasked with coordinating, directing and supervising sustainability initiatives across the Group, as part of the path undertaken.

GOV-2

Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies

During the financial year, the administrative and supervisory bodies received regular updates on sustainability aspects, including: the process and results of the double materiality assessment; the Sustainability Plan; the sustainability reporting process; and the contents subject to disclosure.

The material impacts, risks and opportunities identified through the double materiality assessment, as well as the policies, actions, targets and metrics derived from that assessment, were shared with the Group's senior management functions.

GOV-3

Integration of sustainability-related performance in incentive schemes

During the reporting period, the Metalsistem Group did not implement incentive schemes linked to the achievement of sustainability targets.

GOV-4

Statement on due diligence

The Metalsistem Group recognises the importance of ensuring that its activities are conducted responsibly and without causing harm to the environment and people. For this reason, even in the absence of a structured due diligence procedure, the Group has initiated an assessment of the impacts generated by its own operations and by the value chain. This process took shape in the double materiality assessment which, through the engagement of key stakeholders, identified in a unified framework the actual and potential impacts, risks and opportunities relating to the sustainability matters most material to the Group.

The table below provides references to the sections of this Statement where the main initiatives implemented are described.

CORE ELEMENTS OF DUE DILIGENCE	SECTIONS OF THE METALSISTEM GROUP CONSOLIDATED SUSTAINABILITY STATEMENT
a) Embedding due diligence in governance, strategy and business model	GOV-2 – Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies
	GOV-4 – Statement on due diligence
	SBM-3 - Material impacts, risks and opportunities and their interaction with strategy and business model
b) Engaging with affected stakeholders in all key steps of the due diligence	SBM-2 – Interests and views of stakeholders
	S1-2 – Processes for engaging with own workforce and workers' representatives about impacts
	S4-2 – Processes for engaging with consumers and end-users about impacts
c) Identifying and assessing adverse impacts	IRO-1 - Description of the process to identify and assess material impacts, risks and opportunities
d) Taking actions to address those adverse impacts	S1-4 – Taking action on material impacts on own workforce, and approaches to managing material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions
	S4-4 – Taking action on material impacts on consumers and end-users, and approaches to managing material risks and pursuing material opportunities related to consumers and end-users, and effectiveness of those actions
e) Tracking the effectiveness of these efforts and communicating	E1 Climate change – Metrics and targets E5 Resource use and circular economy – Metrics and targets S1 Own workforce – Metrics and targets S4 Consumers and end-users – Metrics and targets G1 Business conduct – Metrics and targets

GOV-5

Risk management and internal controls over sustainability reporting

The sustainability reporting process requires the collection and processing of a considerable amount of information and documentation, involving various business functions and personnel. This structure, by its nature, can expose the company to specific operational and reporting risks, related in particular to the timeliness of flows, the accuracy of data and the completeness of non-financial disclosures, as well as the possibility of misalignments between sources, non-uniform interpretations or consolidation errors.

To mitigate these risks and ensure the consistency, traceability and reliability of the disclosed information, the Board of Directors supervised the entire preparation phase of the sustainability reporting. In addition, the information collection and validation process was structured to involve the competent functions. For each piece of data and information, defined roles and responsibilities were identified: a data owner, responsible for collecting and updating the relevant information, and a validator, responsible for verifying its completeness and reliability before its inclusion in the reporting documents. The activities were carried out with the support of an IT platform, which enables structured and controlled management of information flows.

Strategy

SBM-1

Strategy, business model and value chain

The Metalsistem Group operates in the material handling and commercial shopfitting solutions sector, offering modular steel systems characterised by high flexibility and adaptability, designed for the organisation of storage and retail spaces, warehouse logistics and goods handling, with an established industrial presence in Italy and ongoing expansion into international markets.

The structured integration between research and development activities and the industrial process represents a distinctive element of the Group's growth model, enabling the continuous development of technologically advanced solutions, the optimisation of production processes, and the creation of a proprietary patent portfolio, and contributing to raising industry standards in terms of performance, reliability and safety.

COMPANIES

The Group's operational structure consists of three companies, which together form the Group's commercial offering.

METALSISTEM S.P.A.

Registered office: Viale dell'Industria 2, 38068, Rovereto (TN)

Local units: Via G. Marconi 3, 38068, Rovereto (TN), Viale Caproni 50, 38068, Rovereto (TN), Viale del Lavoro 3, 38068, Rovereto (TN), Via Mandolossa 100, 25064, Gussago (BS), Villaggio Europa 8, 25020, Gambara (BS), Via Friuli 32, 31045, Motta di Livenza (TV).

Metalsistem S.p.A. represents the industrial core of the Group. The headquarters and related industrial plants are located in Rovereto, as well as in Gussago, Gambara and Motta di Livenza. The company is characterised by an industrial model in which design, production and technological development are closely integrated. The company combines product innovation with the ability to manufacture custom machinery and systems for its own production lines, so as to respond precisely to technical requirements and support the evolution of the solutions offered. Research and development activities are supported by dedicated facilities and initiatives, including a studies and research centre, and testing and verification infrastructure, such as the Metalseismic Test Tower, dedicated to seismic testing.

METALSISTEM ITALIA S.P.A.

Registered office: Viale del Lavoro 1, 38068, Rovereto (TN)

Local unit: Via Friuli 32, 31045, Motta di Livenza (TV)

Established in 2009 with the aim of creating racking systems with high design complexity in Italy, Metalsistem Italia strengthens the Group's ability to manage complex contracts across the national territory. The company operates with two locations – one in Rovereto and one in Motta di Livenza – both equipped with technical facilities specialised in the design and assembly of turnkey solutions and a stock warehouse to guarantee prompt delivery. Metalsistem Italia stands out for its ability to offer a customised service for each customer, from space organisation up to installation, ensuring reliable solutions.

GAL.TRE S.R.L.

Registered office: Viale Caproni 3/B, 38068, Rovereto (TN)

GAL.TRE is an industrial business specialising in thermosetting powder coating. The Metalsistem Group acquired its initial equity interests in GAL.TRE in 1997, subsequently acquiring full ownership in 2016. In addition to both series-production and customised coating services, GAL.TRE offers a wide range of support activities, including dedicated transport services, packaging, material storage logistics, technical consulting and laboratory testing upon request, contributing to ensuring operational continuity and efficiency along the Group's entire supply chain.

PRODUCTS OF THE METALSISTEM GROUP

> ***Quality, excellence, service. A reliable Partner with competitive solutions capable of ensuring the highest industry standards.***

1. FOR STORAGE

Storage and goods handling systems

The Group's offering consists of a portfolio of steel solutions dedicated to goods management and space organisation, designed for static configurations and automated applications.

With specialised solutions for the logistics sector and, more generally, the industrial sector, the main product categories offered include modular systems for storage and material handling, which can include pallet racking, cantilever, drive-in, mobile shelving, dynamic gravity flow solutions, stainless steel shelving, light modular shelving and seismic-resistant racking.

2. FOR DISPLAY AND SHOPFITTING

Solutions for goods display and shopfitting

Alongside the industrial segment, through the SIDAC brand, the Group also operates in display outfitting, offering solutions for large-scale retail and retail outlets of various sizes, including product display shelving, checkout counters and commercial furniture accessories, with a wide availability of modular finishes.

3. FOR ENERGY PRODUCTION

Solutions for renewable energy

The Group has developed dedicated know-how in modular structures to support the installation, in open fields, on roofs or greenhouses, of systems for the production of renewable energy.

4. FOR INDOOR AND OUTDOOR ENVIRONMENTS

Furnishing products

These areas are complemented by a stainless steel furnishing concept, Superinox, designed for modern environments, suitable for both indoor and outdoor use, and galvanised or stainless steel modular solutions for the construction of fences.

METALSISTEM GROUP SERVICES

Alongside the supply of its solutions, the Metalsistem Group provides an integrated range of services covering the entire life cycle of products, from the preliminary analysis phase through to operational management and modification, extension or reconfiguration interventions over time.

Activities begin with on-site technical surveys, carried out both on existing systems and on areas to be fitted out, including through the use of advanced measuring instruments. The design phase is developed on these foundations, conducted by the technical team through the analysis of client requirements and operational and spatial characteristics, in compliance with the reference guidelines and technical manuals.

Once the design is complete, the Group ensures the installation of the systems by specialised personnel and

standardised procedures, up to final commissioning, aimed at verifying the compliance and full functionality of the completed structures.

During the operational phase, inspection and monitoring services are provided, carried out by qualified personnel, aimed at verifying stability, structural integrity and correct installation of anchors, as well as identifying any critical issues. These activities are also conducted in line with the provisions of the UNI EN 15635 standard and involve the preparation of technical reports useful for planning any preventive corrective actions.



In addition to this, throughout the life cycle of all products, the Group provides maintenance services structured into initial, periodic and extraordinary inspections, defined on the basis of customised plans and aimed at maintaining the best conditions of safety, operational efficiency and compliance with applicable regulations.

In the presence of specific design requirements or in the event of new installations and significant modifications, the Group also performs seismic validation activities which, through a series of structural analyses carried out using Metalsistem's proprietary expertise and machinery, involve the verification of connections and anchors and the assessment of load distribution.

The offering is completed by system dismantling and reconfiguration services, aimed at supporting refurbishment, relocation or decommissioning operations, through planned activities that include preliminary analysis, modular dismantling, packaging and cataloguing of components, with the aim of encouraging their reuse and optimising the management of all systems already available to the customer.

Through the company GAL.TRE, the Group offers surface treatments and finishes using thermosetting powder coating, carried out using systems equipped with a double-booth system that allows the simultaneous management of multiple colour cycles and the application, in a single step, of two-layer anti-corrosion treatments (primer and topcoat). The process is supported by systems for monitoring operating parameters, aimed at ensuring traceability, uniformity, quality control and sustainability of all treatments. Depending on the specific applications, different types of powders are used: epoxy and epoxy-polyester for indoor use, and polyurethane and polyester for outdoor applications, characterised by high resistance to weathering and UV rays.

The treatments find application in numerous sectors, including construction, structural steelwork, furniture and architecture, automotive, agriculture, industry and electronics.

VALUE CHAIN

The Metalsistem Group operates in the material handling and commercial shelving sector through an integrated business model that combines design and manufacturing activities for solutions dedicated to various business areas.

Upstream activities

Upstream in its value chain, the Group interacts primarily with suppliers of raw materials and semi-finished products. In particular, the Group purchases steel in the form of IPE beams, galvanised and pickled strip, sheet metal and flat rolled products, which it subsequently uses in the manufacturing of its products. Backed by fifty years of experience, the Metalsistem Group is able to oversee directly all the processes underlying the creation of its solutions.

Core business

The core business of the Metalsistem Group is the design and manufacturing of modular steel solutions for the management, organisation and enhancement of spaces, primarily dedicated to goods storage and material handling for logistics and industry (shelving, racking and systems, including automated ones), as well as for outfitting and display in retail premises.

For the Group, innovation has always been an enabling factor to maintain high standards of performance, safety and reliability across all solutions, to respond precisely to specific technical requirements and to support their ongoing evolution.

In support of this approach, the Group fosters constant dialogue with the technical-scientific ecosystem and supply chain players, structuring partnerships with industry associations, universities and research centres. The various partners with whom the Group collaborates include CISI (Italian Industrial Racking Manufacturers Association), the University of Trento, the Polytechnic University of Milan, the Edmund Mach Foundation and the I.S.P.E.S.L. (National Institute for Occupational Safety and Prevention). All partnerships aim to translate research into concrete, measurable results, ensuring the highest quality and technical standards for all implementations.

Metalsistem also has its own Studies and Research Centre (CSR) that supports its industrial activities. The CSR includes a department specialised in the development of highly innovative solutions and products, based on simulations and empirical tests. Thanks to this ability to integrate innovation into its business model, the Group has obtained numerous patents and certifications in terms of quality and safety.



Also in order to combine research with industrial application, the Group has set up the Metalseismic Test Tower in Rovereto, a full-scale seismic testing infrastructure for large structures. The tower allows tests to be conducted on specimens over 20 metres high in a protected environment and with adaptable geometric configurations, in order to calibrate simulation models and ensure high standards of design and structural implementation.

Downstream activities

Downstream in the value chain, the Metalsistem Group interacts, directly or indirectly, with the users of its products mainly through a network of over 200 specialised dealers and through a network of commercial companies across the territory, which guarantee proximity and continuity in client relationships.

Key clients include logistics operators and warehouse managers, industrial and manufacturing companies, retail and large-scale retail entities, as well as installers and developers of photovoltaic systems. Furthermore, the Group also offers design and surveying, assembly, maintenance and inspection, seismic validation and dismantling services, to ensure continuous support throughout the entire life cycle of the solution, from design through to subsequent upgrades and modifications.



THE METALSISTEM GROUP SUSTAINABILITY STRATEGY

The Metalsistem Group considers the integration of sustainability into its strategic vision not only as a commitment aligned with company values and responsibility towards the environment and people, but as a management lever capable of strengthening solidity, operational continuity and the capacity for long-term growth. In a context characterised by the continuous evolution of stakeholder expectations, market dynamics and regulatory requirements, attention to ESG factors represents a key element in improving efficiency, managing risks, seizing development opportunities and consolidating trusting relationships throughout the entire value chain.

From this perspective, in 2025 the Group launched a structured process to measure its environmental and social impacts, in accordance with the European ESRS standards. This initiative contributed to a systematic analysis of company activities, enabling the identification and understanding of the main impacts, risks and opportunities related to sustainability issues. In parallel, it fostered greater clarity in defining roles, processes and information bases to support decision-making processes. Based on the evidence emerging from the double materiality assessment, the Group identified specific targets, which led to the definition of a Sustainability Plan that will ensure Group growth geared towards sustainability and responsibility in the actions taken.

This approach makes it possible to integrate sustainability topics into decision-making and operational processes, defining interventions that are measurable over time. The pillars of the Group's strategy – outlined below – are also consistent with the Sustainable Development Goals (SDGs) of the United Nations 2030 Agenda.

PILLARS	TARGETS	SDGs
Greenhouse gas emissions	Promote the reduction of greenhouse gas emissions through increasing use of energy from renewable sources, in particular leveraging in-house production and self-consumption, and promoting the electrification of consumption and the energy efficiency of processes and systems	7 AFFORDABLE AND CLEAN ENERGY; 13 CLIMATE ACTION
Responsible consumption and production	Promote responsible consumption and production patterns, reducing waste as much as possible through reduction, reuse and recycling practices	12 RESPONSIBLE CONSUMPTION AND PRODUCTION
Value of people	Promote professional development, well-being and health and safety of people, ensuring an inclusive working environment and fostering the dissemination of a corporate culture geared towards growth, enhancement of skills and safety	8 DECENT WORK AND ECONOMIC GROWTH; 10 REDUCED INEQUALITIES
Client centricity	Maximise the value generated for clients through the proactive management of requirements and the building of solid, long-lasting relationships based on transparency, fairness and professionalism	9 INDUSTRY, INNOVATION AND INFRASTRUCTURE; 12 RESPONSIBLE CONSUMPTION AND PRODUCTION
Innovation and research	Integrate research, innovation and the adoption of advanced digital technologies into business processes to increase the Group's efficiency, sustainability and competitiveness, while ensuring the security of all data	7 AFFORDABLE AND CLEAN ENERGY; 9 INDUSTRY, INNOVATION AND INFRASTRUCTURE
Ethical governance and ESG strategy	Ensure a governance system based on the principles of ethics, transparency, legality and accountability, as a prerequisite for sustainable growth of the Group and for effective corporate decision-making and control processes	16 PEACE, JUSTICE AND STRONG INSTITUTIONS

SBM-2

Interests and views of stakeholders

THE STAKEHOLDERS OF THE METALSISTEM GROUP

The Metalsistem Group is committed to consolidating dialogue with all stakeholders involved, directly and indirectly, in corporate activities. Maintaining structured relationships makes it possible to understand and incorporate the expectations of all stakeholders into the definition of its strategy and sustainability targets. The stakeholder categories identified by the Group and the method and frequency of engagement are reported in detail below.





STAKEHOLDER CATEGORY	ENGAGEMENT METHOD	FREQUENCY
Employees	Internal communications, regular meetings, training, whistleblowing and feedback channels	Continuous and periodic
Clients	Customer care, satisfaction feedback collection, digital and social channels, dedicated portal	Continuous
Suppliers and strategic partners	Technical meetings, qualification procedures, contracts and Code of Ethics	Periodic / contract basis
Local community	Local projects, partnerships with local authorities, educational institutions, universities, agreements	Periodic / project-based
Institutions and regulatory bodies	Regulatory compliance, formal communications	Continuous
Trade associations	Newsletters and informational updates, regular communications and event participation	Periodic
Financial institutions	Reports on company performance and outlook, questionnaires	Periodic
Shareholders	Periodic reports, financial statements and corporate communications, meetings and general meetings	Periodic

Stakeholder engagement activities allowed the Group to incorporate the expectations and views of its stakeholders into the double materiality assessment as well, ensuring their involvement in identifying and assessing the materiality of the impacts, risks and opportunities associated with the Group's activities.



SBM-3

Material impacts, risks and opportunities and their interaction with strategy and business model

During 2025, the Metalsistem Group launched a double materiality analysis process, identifying the material impacts, risks and opportunities linked to sustainability matters, in accordance with the European Sustainability Reporting Standards (ESRS).

The results of the double materiality analysis, in addition to forming the backbone of the sustainability reporting, provide the foundation for defining the Group's strategy, which translates into short- and medium-to-long-term targets and actions.

For further information on the policies, actions and measures adopted by the Metalsistem Group to manage material impacts, risks and opportunities, please refer to the chapters "Environmental information", "Social information" and "Governance information".

The impacts, risks and opportunities identified as material, their location within the value chain and the reference time horizon are reported below.

ESRS E1 - CLIMATE CHANGE					
IRO DESCRIPTION	IRO	NATURE	TYPE	VALUE CHAIN	TIME HORIZON
Risk of incurring additional costs and administrative burdens connected with the entry into force of new regulations on emissions reduction	Risk			Own operations Value chain	Short - Medium
Risk of harming corporate reputation and losing stakeholder trust due to the failure to reduce greenhouse gas emissions generated	Risk			Own operations Value chain	Medium

ESRS E5 - RESOURCE USE AND CIRCULAR ECONOMY					
IRO DESCRIPTION	IRO	NATURE	TYPE	VALUE CHAIN	TIME HORIZON
Risk of incurring costs for the management, treatment and disposal of waste produced	Risk			Own operations	Short

ESRS S1 - OWN WORKFORCE					
IRO DESCRIPTION	IRO	NATURE	TYPE	VALUE CHAIN	TIME HORIZON
Workplace accidents	Impact	Negative	Actual	Own operations	Short
Implementation of a structured system for the management and monitoring of accidents, incidents and near misses	Impact	Positive	Actual	Own operations	Short
Inadequacy of the accident prevention controls and procedures implemented	Impact	Negative	Potential	Own operations	Medium
Implementation of corporate welfare programmes	Impact	Positive	Actual	Own operations	Short
Organisation of activities and set-up of company spaces for team building	Impact	Positive	Actual	Own operations	Short
Provision of training to personnel for skills development	Impact	Positive	Actual	Own operations	Short
Failure to update employees' skills	Impact	Negative	Potential	Own operations	Short

ESRS S4 - CONSUMERS AND END-USERS					
IRO DESCRIPTION	IRO	NATURE	TYPE	VALUE CHAIN	TIME HORIZON
Customer care through the prompt handling of requests and complaints	Impact	Positive	Actual	Own operations Value chain	Short
Non-conformity regarding the communication of technical characteristics and product performance	Impact	Negative	Potential	Own operations Value chain	Short
Incidents of leakage, theft or loss of customer or other stakeholder data	Impact	Negative	Potential	Own operations Value chain	Short

ESRS G1 - BUSINESS CONDUCT					
IRO DESCRIPTION	IRO	NATURE	TYPE	VALUE CHAIN	TIME HORIZON
Development of a corporate culture based on the principles of ethics, fairness, responsibility and transparency towards all stakeholders	Impact	Positive	Actual	Own operations	Short
Non-compliant behaviour or breaches of ethical principles by company personnel or partners	Impact	Negative	Potential	Own operations Value chain	Short
Failure to update or ineffective implementation of the Code of Ethics or the Organisation, Management and Control Model	Impact	Negative	Potential	Own operations	Medium
Adoption of management and infrastructural systems for the protection of corporate, customer, employee and all stakeholder data	Impact	Positive	Actual	Own operations	Short

ENTITY-SPECIFIC					
IRO DESCRIPTION	IRO	NATURE	TYPE	VALUE CHAIN	TIME HORIZON
Guarantee of high standards of product quality, strength and long-term durability through the use of certified materials and advanced production processes	Impact	Positive	Actual	Own operations	Short
Development of innovative solutions thanks to the presence of an internal Studies and Research Centre and collaboration with experts, universities and research centres	Impact	Positive	Actual	Own operations	Medium
Risk of incurring significant costs related to the maintenance of internal research facilities	Risk			Own operations	Short
Opportunity to increase revenues thanks to the introduction of technologically advanced and differentiated solutions	Opportunity			Own operations	Medium

IRO-1

Description of the process to identify and assess material impacts, risks and opportunities

The double materiality assessment is the process that makes it possible to identify sustainability-related impacts, risks and opportunities deemed material, and consists of the impact materiality assessment and the financial materiality assessment. A sustainability topic is considered material if it is material from the impact perspective or from the financial perspective, or from both.

In 2025, the Metalsistem Group conducted this assessment applying the requirements defined by the ESRS and the "EFRAG IG1 Materiality Assessment Implementation Guidance" published by EFRAG.

IMPACT MATERIALITY ASSESSMENT

It analyses the negative and positive, actual and potential effects that own operations and those carried out along the value chain exert or may exert on the environment and on people in the short, medium and long term. A sustainability matter is material from the perspective of impact assessment when these effects have a material impact on people or the environment.

FINANCIAL MATERIALITY ASSESSMENT

It analyses the financial effects that a "sustainability matter" has or could have on the Group. A "sustainability matter" is material from a financial perspective when the economic and financial risks and opportunities linked to it materially affect the financial position, financial performance, cash flows, access to finance or cost of capital over the short, medium or long term.

DOUBLE MATERIALITY ASSESSMENT

The double materiality process conducted by the Metalsistem Group was structured into the following phases:

1. Understanding the internal and external context of the Group and mapping of "key affected stakeholders";
2. Impact materiality: identification and assessment of impacts;
3. Financial materiality: identification and assessment of economic-financial risks and opportunities;
4. Analysis of the outcomes of the double materiality process.



1. Understanding the internal and external context of the Group and mapping of key stakeholders

The objective of this initial phase is to gain an overview of all potentially material "sustainability matters" linked to own operations and the value chain. To this end, an analysis of the reference sector and the Group's operating context was carried out, with a particular focus on industry trends, best practices and evolving sustainability-related factors. The analysis also took into account the topics identified in the ESRS and in the standards applicable to the relevant sector.

The context analysis was supplemented by an in-depth review of the Group's activities, which led to the mapping of own operations and relationships with actors along both the upstream and downstream value chain, enabling the identification of areas and stages where impacts, risks and opportunities linked to sustainability topics may arise, with potential effects on performance, operational continuity and the ability to generate value over time.

Based on the analyses carried out, key affected stakeholders were therefore identified, namely the main internal and external stakeholders that are, or could be, affected or influenced by the operations of the Group companies and by interactions along the upstream and downstream value chain.

The results of these activities represent the inputs for defining and analysing impacts, risks and opportunities (IROs).

2. Impact materiality: identification and assessment of impacts

All negative and positive, actual and potential impacts that the Group generates or could generate on people and the environment were mapped, using a bottom-up approach, to the topics defined by Application Requirement 16 of ESRS 1 in order to ensure consistent and comparable classification, avoid duplication, and ensure that each impact is framed within a standard-recognised boundary, facilitating the understanding and comparability of the analysis and reporting.

The list of impacts, structured according to ESRS categories, was validated by the Sustainability Strategic Committee and subjected to a materiality assessment by key affected stakeholders and the Committee itself through the administration of a questionnaire.

The prioritisation of topics was conducted by defining specific materiality thresholds. These thresholds, decisive in determining whether a topic is material, were established by the Strategic Committee based on the statistical distribution of the opinions expressed by stakeholders.

For this analysis, the Committee also considered the Group's strategic sustainable development guidelines to ensure consistency between the process outcomes and the overall approach of the strategy. The evaluations expressed by the various stakeholder groups were aggregated without applying differential weighting to the different categories.

3. Financial materiality: identification and assessment of risks and opportunities

The financial risks and opportunities that affect or could affect the composition of assets and liabilities, financial performance, cash flows and the Group's ability to access funding sources are identified starting from the impacts outlined during the context analysis and impact materiality phases.

Risks and opportunities were discussed with the relevant company functions with the aim of determining the magnitude of potential effects on the Group's key financial indicators, as well as the related likelihood of occurrence and time horizon. This analysis made it possible to link the sustainability dimension with the Group's economic and financial performance, establishing a direct connection between the sustainability strategy and the industrial development strategy.

4. Analysis of the outcomes of the double materiality process

A sustainability topic can be defined as material when it is material from the impact perspective, the financial perspective, or both.

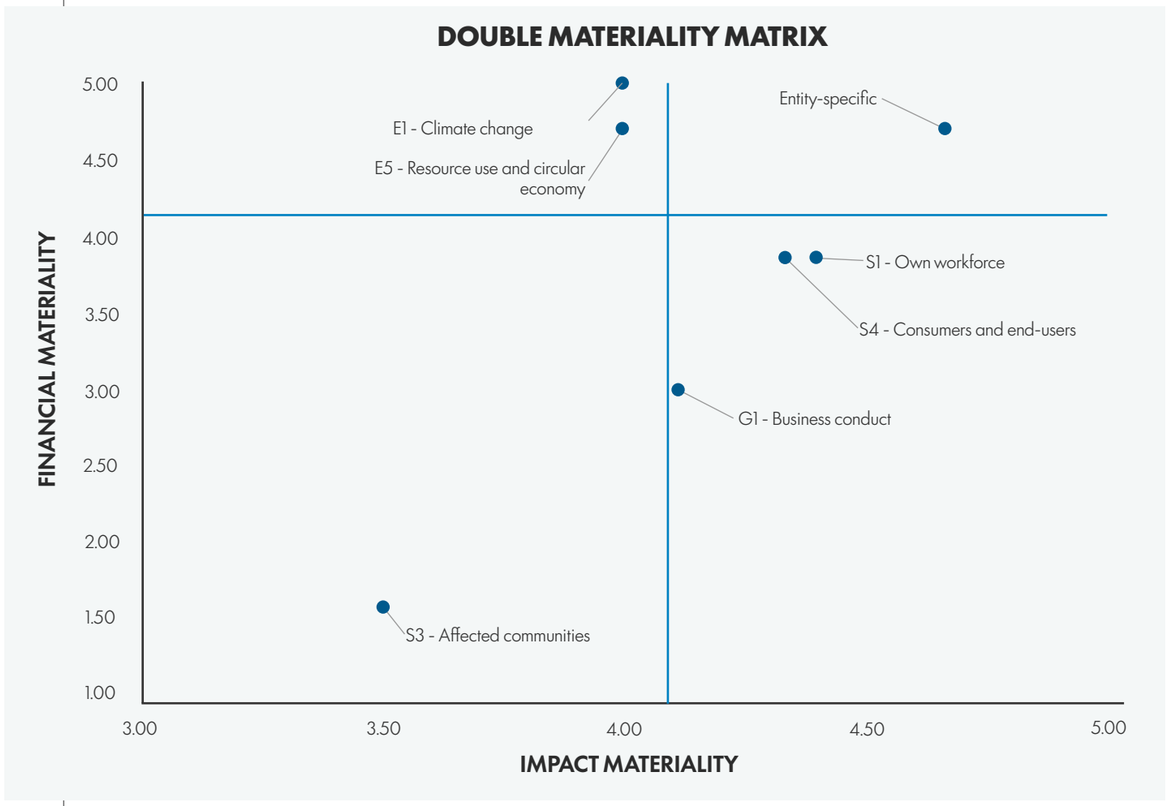
The results of the materiality assessments of impacts, risks and opportunities were aggregated and consolidated into an overall framework, identifying 21 material impacts, risks and opportunities for the Metalsistem Group.

Alongside these findings, an entity-specific topic linked to innovation, research and development and product quality was also identified as material, as these are considered key levers to support the Group's competitiveness and ensure the delivery of reliable, durable and safe solutions. This area represents a top priority for the Group, as it has always been one of the foundational factors of its competitive advantage.

The following table sets out the details of the material topics.

ESRS	MATERIAL TOPIC
ESRS E1 – Climate change	Climate change
ESRS E5 – Resource use and circular economy	Resource use and circular economy
ESRS S1 – Own workforce	Own workforce
ESRS S4 – Consumers and end-users	Consumers and end-users
ESRS G1 – Business conduct	Business conduct
Additional information – Entity-specific	Innovation, research and development and product quality

The results of the entire process are shown graphically in the double materiality matrix.



ESRS E2 - Pollution, E3 - Water and marine resources, E4 - Biodiversity and ecosystems, S2 - Workers in the value chain and S3 - Affected communities were not found to be material in relation to the nature and characteristics of the activities carried out by the Metalsistem Group.

In order to ensure that the assessment remains aligned with the evolution of the regulatory framework and the operating context, the double materiality process will be updated periodically.

IRO-2

Disclosure Requirements in ESRS covered by the undertaking's sustainability statement

This paragraph refers to the following contents presented in the Appendix:

- Disclosure Requirements included in this Consolidated Sustainability Statement;
- Table of datapoints deriving from other EU legislation.



02
Environmental information

ESRS E1 - CLIMATE CHANGE
E1-1 / SBM-3 / E1-2 / E1-3 / E1-4 / E1-5 / E1-6

ESRS E5 - RESOURCE USE AND CIRCULAR ECONOMY
E5-1 / E5-2 / E5-3 / E5-4 / E5-5

ESRS E1

Climate change

E1-1

Transition plan for climate change mitigation

The evolution towards a sustainable business model represents a priority strategic direction for the Metalsistem Group, consistent with the Group's international positioning and its strong commitment to environmental sustainability. Although a transition plan for the reduction of greenhouse gas emissions has not been formalised, the Metalsistem Group, aware of its role and the responsibilities associated with the generated environmental impacts, has embarked on a sustainability journey oriented towards energy efficiency and progressive decarbonisation that translates into concrete actions: from the measurement and monitoring of its emissions to the progressive electrification of consumption, from an energy procurement strategy based on renewable sources and self-generation through photovoltaic systems to the introduction of electric mobility solutions and production efficiency interventions. These initiatives are part of a broader pathway of progressive development and consolidation of the Group's energy and environmental policies, aimed at ensuring continuity and consistency in the investments made over time.

Starting from 2024, on a half-yearly basis, the Metalsistem Group determines its greenhouse gas (GHG) emissions, with particular reference to direct and indirect emissions related to energy consumption (Scope 1 and Scope 2), in order to strengthen internal awareness regarding the climate impacts generated and to lay the groundwork for defining the sustainable development strategy. This process has therefore taken on, first and foremost, managerial relevance, contributing to the definition of monitoring systems supporting management and internal decision-making processes and, starting from financial year 2025, also serving to share environmental performance transparently with its stakeholders.



SBM-3

Material impacts, risks and opportunities and their interaction with strategy and business model

In the first year of reporting in accordance with the ESRS standards, the Metalsistem Group initiated a process aimed at identifying and assessing the risks and opportunities associated with climate change.

Two significant risks emerged from the double materiality analysis: the first, regulatory in nature, relates to the possibility that the introduction or tightening of the regulatory framework to combat greenhouse gas emissions could lead to an increase in burdens and compliance requirements for the Group. The second, reputational in nature, is attributable to the potential deterioration of stakeholder trust should the Metalsistem Group companies fail to demonstrate tangible progress in curbing their GHG emissions. These risks are progressively integrated into strategic assessment and planning processes, in order to oversee their potential effects on the business model and guide the definition of actions and targets aimed at their mitigation. To support this strategic direction, the Group has adopted an approach to meeting its energy needs through renewable energy, either generated on-site or purchased from the grid and backed by Guarantees of Origin. The Group has also set targets to increase its installed solar photovoltaic capacity and gradually replace its existing company vehicles with electric alternatives.

E1-2

Policies related to climate change mitigation and adaptation

The Metalsistem Group's oversight of impacts, risks and opportunities related to climate change is based on a structured system of formalised instruments, which guide the integration of the environmental dimension into decision-making and operational processes. The Code of Ethics and the Quality, Environment and Occupational Health and Safety Policy constitute the main reference points for defining the principles, commitments, and management methods adopted by the Group.

QUALITY, ENVIRONMENT AND OCCUPATIONAL HEALTH AND SAFETY POLICY

The Metalsistem Quality, Environment and Occupational Health and Safety Policy forms the strategic and operational framework for defining actions, processes, and responsibilities regarding quality, environment, health and safety, and applies across all organisational levels and to all interested parties. The principles formalised therein are summarised below:

- regulatory compliance and adherence to applicable provisions regarding environmental protection;
- optimisation of business processes and reduction of environmental impacts associated with production activities, by reducing the use of natural resources and waste generation, utilising the best available technologies, and relying on renewable and eco-compatible energy sources;
- preventive management of environmental and climate risks, through the analysis of non-conformities, the adoption of corrective measures, and the conduct of regular audits;
- involvement and awareness-raising of internal resources and stakeholders on environmental issues, through training, information, and collaboration with interested parties.

The Metalsistem Group ensures continuous oversight of environmental management systems, ensuring their implementation and maintenance across production sites, in compliance with the ISO 14001 standard.

CODE OF ETHICS

In its Code of Ethics, Metalsistem sets out the principles and guidelines governing the management of environmental issues, which form an integral element of the organisation and conduct of company activities. In line with these guidelines, policies are defined, operational guidelines are adopted, and performance monitoring tools based on specific indicators are utilised. All recipients of the Code of Ethics are required to adopt behaviours consistent with these principles, operating in compliance with applicable legislation and minimising resource consumption and atmospheric emissions.

The Metalsistem Group intends to continue the path of structuring and formalising its guidance instruments. In particular, the drafting of a GHG Policy and an Energy Policy is planned, with the aim of defining in a structured manner the principles, criteria and guidelines to strengthen the oversight of greenhouse gas emissions and energy consumption management, and to guide corporate choices towards improving environmental performance and curbing climate impacts.



E1-3

Actions and resources in relation to climate change policies

The Metalsistem Group has developed a structured set of actions to help address the challenges associated with climate change and reduce generated GHG emissions, foster the transition towards renewable energy sources, and enhance the efficiency of its processes.

The initiatives undertaken focus on four main fronts: (1) procurement and self-generation of electricity from renewable sources; (2) electrification of consumption; (3) sustainable mobility; and (4) optimisation of production processes and materials used. These areas reflect an integrated approach to mitigating climate impacts, acting on both direct and indirect emission sources.

1. Self-generation and procurement of electricity from renewable sources

The Metalsistem Group intervenes directly in reducing GHG emissions through an energy model based on the integration of internal production via photovoltaic systems and the procurement of electricity from renewable sources from the grid, achieving full coverage of its electricity needs with energy 100% from renewable sources. This result is also grounded in self-generation capacity: approximately 12,000 photovoltaic panels are installed at the Metalsistem and GAL.TRE facilities, capable of generating over 2,500 MWh of electricity, supplemented, for the remainder, by the purchase of 100% renewable electricity certified by Guarantees of Origin by all Metalsistem Group companies. The use of energy from renewable sources does not represent a future goal, but rather an already consolidated component of the sustainable development strategy, reflecting full awareness of the Group's role and responsibilities in the context of the climate transition. The project to build a new photovoltaic field on company-owned land adjacent to the Gambara plant also fits into this direction, intended to fully cover the electricity needs of all peripheral branches, further expanding self-generation capacity and strengthening the Group's energy autonomy.

The integration between production capacity and technological innovation represents a distinctive element of the Group, which is not limited to the use of renewable energy, but actively contributes to the development of solutions for its generation, as an integral part of its industrial model and corporate value proposition.



2. Electrification of consumption

The Group has launched initiatives to electrify energy consumption, aimed at progressively replacing natural gas, a fossil fuel, with energy carriers with lower emission intensity, in line with the pathway of reducing greenhouse gas emissions and decarbonising operational activities. In this context, the heating system of the Metalsistem plant in Viale dell'Industria was converted, transitioning from gas-powered to an electric solution. This intervention allows for the reduction of direct GHG emissions (Scope 1) and fosters the progressive orientation of consumption towards an energy mix characterised by a higher share of renewable sources.

Furthermore, in the same facility, the complete replacement of lighting fixtures with new high-efficiency LED units was completed during 2025, bringing benefits in terms of energy consumption efficiency.

3. Sustainable mobility

The Metalsistem Group has embarked on a progressive renewal of the company car fleet, oriented towards replacing internal combustion engine (diesel) vehicles with electric-drive solutions. During 2025, an electric vehicle was acquired, and the addition of a further vehicle is planned for 2026. In addition, in the expansion of the Rovereto headquarters, several charging points for electric vehicles will be installed to incentivise the adoption of corporate mobility options with reduced environmental impact.

4. Optimisation of production processes and materials used

Measures aimed at reducing environmental impacts also directly involve products and production processes, which Metalsistem has progressively redesigned from a sustainable perspective. In particular, the company has long invested in the development of hot-dip galvanised products using the Sendzimir process, characterised by high durability and whose intrinsic anti-corrosive properties eliminate the need for additional surface treatments. The adoption of this manufacturing paradigm allows for the minimisation of welding and coating stages, delivering tangible benefits in terms of reducing energy consumption, eliminating process gas use and curbing atmospheric emissions of volatile compounds associated with these processes. This approach is part of a forward-looking industrial vision, oriented towards the efficiency of production processes and the reduction of environmental impacts throughout the entire product life cycle.

For systems requiring additional surface treatments, GAL.TRE applies a coating process using powders free from harmful substances. For products intended for outdoor environments, powders with high resistance to atmospheric agents and UV rays are used, ensuring greater protection and durability over time.

The initiatives undertaken by Group companies aimed at reducing environmental impacts and optimising production processes also include interventions carried out at the Metalsistem Gussago plant and at the GAL.TRE company, aimed at technological modernisation and increasing the efficiency of coating activities. Specifically, these interventions took the form of revamping the coating ovens, through the adoption of custom-designed hybrid electric/gas solutions to ensure high levels of operational flexibility and production continuity. The dual configuration makes it possible to exploit the electricity self-generated by photovoltaic systems, reducing the reliance on gas and contributing to the containment of energy consumption and greenhouse gas emissions associated with the coating stage.

ESRS E1 - CLIMATE CHANGE	
TOPIC	ACTIONS
GHG emissions	Production and self-consumption of electricity via photovoltaic systems
	Purchase of electricity from renewable sources, covered by Guarantees of Origin
	Replacement of the plant heating system from gas-powered to electric-powered
	Complete replacement of lighting fixtures at the Viale dell'Industria plant with new LED units
	Purchase of an electric car
	Launch of the photovoltaic field project at the Gambara site
	Use of pre-galvanised steel, offering corrosion resistance without requiring coating treatments, contributing to the reduction of volatile compound emissions
	Revamping of coating ovens at the Gussago premises with a hybrid electricity-methane power system
	Installation of a hybrid electric/gas coating system by GALTRE

E1-4

Targets related to climate change mitigation and adaptation

The Metalsistem Group recognises climate change as one of the major global challenges and, conscious of the contribution of its operations to greenhouse gas emissions, adopts a proactive approach oriented towards their mitigation. In this context, the decarbonisation of corporate activities represents a central area of intervention in the Group's sustainability strategy, for which specific targets have been defined aimed at curbing climate impacts and progressively reducing the carbon footprint over the long term.

The set targets are structured along two main, complementary lines: on the one hand, strengthening monitoring, measurement and governance systems for energy consumption and greenhouse gas emissions; on the other, optimising processes and progressively reducing direct and indirect emissions associated with operational activities.

With reference to the first line, the Group intends to continue consolidating a structured and systematic system for quantifying and monitoring greenhouse gas emissions, both direct (Scope 1) and indirect (Scope 2), including through the preparation of the GHG Inventory. The adoption of this tool is part of an already structured system of information and reporting controls, which includes regular reporting of key performance indicators internally and the preparation of the Consolidated Sustainability Statement on an annual basis, with the objective of further strengthening the traceability and quality of information and developing the Group's ability to systematically monitor its greenhouse gas emissions, supporting decision-making processes and guiding the identification of improvement actions. In parallel, the Metalsistem Group plans to formalise strategic guidelines on the matter by preparing an Energy Policy and a Policy dedicated to the management of GHG emissions, aimed at defining a comprehensive framework of reference for the governance of energy and climate issues.

The second line is instead focused on identifying and implementing operational levers aimed at reducing emissions along the production cycle, in a context characterised by electricity procurement already entirely covered by renewable sources. In this area, the Group aims to intervene in production processes and assets, by expanding the installed capacity of the photovoltaic system at the Gambara site and reinforcing a low-emission corporate mobility model, through the purchase of additional electric vehicles to supplement the existing fleet, and the development of dedicated charging infrastructure in the expansion of the Rovereto headquarters.

ESRS E1 - CLIMATE CHANGE		
TARGETS	SCOPE	BASELINE
Monitoring of direct and indirect greenhouse gas emissions (Scope 1 and 2)	Metalsistem Group	2025
Preparation of the GHG Inventory	Metalsistem Group	2025
Purchase of electricity with Guarantee of Origin certification	Metalsistem Group	2025
Expansion of the capacity of the photovoltaic system installed at the Gambara site	Metalsistem	2025
Installation of charging points for electric cars in the expansion of the Rovereto headquarters	Metalsistem	2025
Purchase of electric vehicles	Metalsistem Group	2025
Preparation of an Energy Policy	Metalsistem Group	2025
Preparation of a GHG Policy	Metalsistem Group	2025



E1-5

Energy consumption and mix

The total energy consumption of the Metalsistem Group in 2025 is equal to 20,044.69 MWh. The Group's entire electricity requirement is met through energy from renewable sources. Furthermore, compared to 2024, there was a 2% increase in the amount of energy produced and self-consumed by the photovoltaic plants of Metalsistem and GAL.TRE, demonstrating the progressive strengthening of the Group's renewable generation capacity.

ENERGY CONSUMPTION AND MIX	CONSUMPTION (MWh)
Consumption of purchased or acquired electricity, heat, steam and cooling from renewable sources	5,739.07
Consumption of self-generated renewable energy without the use of fuels	1,634.61
Total electricity consumption	**7,373.67**
of which from renewable sources	**100%**

ENERGY CONSUMPTION AND MIX	CONSUMPTION (MWh)
Consumption of fuel from coal and coal products	-
Consumption of fuel from crude oil and petroleum products	354.93
Consumption of fuel from natural gas	12,316.09
Consumption of fuels from other non-renewable sources	-
Consumption of purchased or acquired electricity, heat, steam and cooling from fossil sources	-
Total energy consumption from fossil sources	**12,671.02**
Consumption from nuclear sources	-
Total consumption from nuclear sources	**-**
Consumption of fuels from renewable sources (biomass, bio-waste, biogas, renewable hydrogen, etc.)	-
Total consumption of fuels from renewable sources	**-**

ENERGY GENERATION (MWh)	2025
Energy generation from non-renewable sources	0
Energy generation from renewable sources	2,634.71
Total energy generation from non-renewable and renewable sources	**2,634.71**

Metalsistem Group companies operate within the following activity categories.

COMPANIES	ACTIVITY	NACE CODE
Metalsistem	Cold forming or folding of open sections and profiled sheets (primary activity)	24.33
	Manufacture of lifting and handling equipment	28.22
	Manufacture of metal structures and parts of structures	25.11
	Manufacture of plastic products	22.2
	Manufacture of other consumer electronics	26.40
	Manufacture of office and shop furniture and other furniture for collective spaces	31.0
	Electrical installation	43.21
	Other building installation activities n.e.c.	43.24
	Wholesale of electrical household appliances	46.43
	Wholesale of computers, computer peripheral equipment and software	46.50
	Computer programming activities	62.10
Metalsistem Italia	Non-specialised wholesale trade (primary activity)	46.90
	Activities of holding companies	64.21
	Other financial service activities, except insurance and pension funding	64.99
GAL.TRE	Treatment and coating of metals (primary activity)	25.61

Within the scope of the classification of high climate impact sectors provided for by the CSRD, in accordance with Regulation (EC) No. 1893/2006, the primary activities of all companies included in the reporting scope were attributed to high climate impact categories, for the purposes of this Consolidated Sustainability Statement. Certain secondary activities of the Group, on the other hand, are not included within this scope. However, considering their limited impact on consolidated revenue, it was deemed appropriate to attribute all revenue to high climate impact sectors.

ENERGY INTENSITY	UNIT OF MEASURE	2025
Total energy consumption from activities in high climate impact sectors per net revenue from activities in high climate impact sectors (a) [2]	MWh	20,044.69
Net revenue from activities in high climate impact sectors (b) [3]	Euro	117,867,475
Energy intensity - MWh/euro (a/b) [4]	**MWh / euro**	**0.00017**
Total revenue [5]	Euro	117,867,475

2. All data refer to the companies included within the scope of this report.

3. The net revenue figure assumed for the calculation is that resulting from the consolidated financial statements prepared by METALSISTEM GROUP S.p.A. Unipersonale.

4. All data refer to the companies included within the scope of this report.

5. The net revenue figure assumed for the calculation is that resulting from the consolidated financial statements prepared by METALSISTEM GROUP S.p.A. Unipersonale.

E1-6

Gross Scopes 1, 2, 3 and Total GHG emissions

The Metalsistem Group monitors its Scope 1 and Scope 2 GHG emissions. Direct emissions (Scope 1) include those generated by assets owned or controlled by the Group; Scope 2 emissions, on the other hand, consider indirect emissions associated with electricity purchased from third parties and consumed by Group companies. Scope 3 emissions, arising along the value chain, both upstream and downstream, were not reported in this financial year, in consideration of the voluntary nature of the disclosure and pursuant to the transitional provisions provided for by ESRS 1.

Emissions were calculated in accordance with the "GHG Protocol Corporate Accounting and Reporting Standard", using specific emission factors, expressed in tonnes of CO_2 equivalent per unit of consumption for each energy carrier. These factors make it possible to translate consumption data into comparable and reliable emissions values.

VARIABLE	DESCRIPTION	UNIT OF MEASURE	2025
Natural gas	Natural gas	tCO_2eq	2,325.74
Vehicles	Diesel	tCO_2eq	86.65
Fugitive emissions	Fugitive emissions	tCO_2eq	9.40
Total Scope 1		**tCO_2eq**	**2,421.78**
Purchased electricity	Purchased electricity from the grid - location-based	tCO_2eq	1,604.07
Purchased electricity	Purchased electricity from the grid - market-based	tCO_2eq	0
Total emissions			
Total GHG emissions	Total GHG emissions (Scope 1 and Scope 2 location-based)	tCO_2eq	4,025.85
Total GHG emissions	Total GHG emissions (Scope 1 and Scope 2 market-based)	tCO_2eq	2,421.78

Scope 2 emissions were calculated applying both reporting methods provided for by the GHG Protocol: the location-based method, which quantifies emissions based on the average emission factor of the national electricity generation mix, representative of the grid emissions intensity of the country where consumption takes place, and the market-based method, which takes into account the Group's contractual energy supply arrangements. In the latter case, an emission factor equal to zero is attributed to the share of electricity from renewable sources covered by Guarantees of Origin (GOs).

The emission factors used for the calculation were derived from the UK Government GHG Conversion Factors for Company Reporting (DEFRA) and the AIB Supplier Mix (Europe) - 2025.

GHG INTENSITY PER NET REVENUE	2025
GHG intensity per net revenue ($tCO_2eq/€$)	
Total GHG emissions (location-based) per net revenue [6]	0.000034
Total GHG emissions (market-based) per net revenue [6]	0.000021

6. The net revenue figure assumed for the calculation is that resulting from the consolidated financial statements prepared by METALSISTEM GROUP S.p.A. Unipersonale.

ESRS E5

Resource use and circular economy

E5-1

Policies related to resource use and circular economy

The efficient use of resources and the adoption of models based on circular economy principles are of strategic importance to the Metalsistem Group, given the nature of its manufacturing activities, which involve significant use of raw materials – particularly steel – and the resulting generation of industrial waste at various stages of processing and coating operations. In this context, the optimisation of resource use and the sustainable management of production residues act not only as drivers of operational efficiency, but also as defining elements of the corporate sustainability strategy, aimed at reducing environmental impacts and progressively improving Group performance.

These principles have also been formalised within the Quality, Environment and Occupational Health and Safety Policy adopted by Metalsistem, through which the company commits to:

- optimising business processes and resource use through the adoption of best available technologies;
- minimising the use of natural resources and substances hazardous to health and the environment, as well as the generation of waste and emissions, ensuring environmental protection, the safeguarding of worker health and safety, and the quality of products and services offered.

These commitments are overseen under the Environmental Management System, certified in accordance with the UNI EN ISO 14001:2015 standard for the company Metalsistem, and translate into operational practices aimed, on the one hand, at optimising resource use across the entire production cycle and, on the other, at the recovery, reuse and recycling of materials.



E5-2

Actions and resources related to resource use and circular economy

The Metalsistem Group has progressively developed a comprehensive set of actions and tools designed to promote efficient resource use and integrate circular economy principles into its production processes. The products developed by the Group, by their very design, are intrinsically consistent with this approach: modular, simple and functional structures for the creation of industrial storage and shelving solutions, capable of meeting diverse needs, from individual households to large industries, and designed to be reconfigured, reused and evolved over time. Alongside this dimension is the Group's ability to oversee the entire life cycle of its solutions, providing maintenance, inspection and repair services that enable work on individual components without requiring the decommissioning of the entire system, as well as dismantling activities and end-of-use component management aimed at their recovery and reuse. In particular, the systematic cataloguing of elements allows their residual potential to be enhanced and fosters their reuse in new configurations.

STEEL SELECTION AND RECOVERY

Steel represents the core of the Metalsistem Group's manufacturing activity, which focuses on its processing and transformation to create systems for industrial storage, archiving and commercial space fitting. The steel used is selected according to stringent technical criteria and comes from controlled supply chains, in order to guarantee high quality standards, reliable structural performance and durability over time, in line with technical requirements and application needs in various operating contexts.

Steel is also at the centre of the Group's sustainability commitment, given its inherent recyclability and the possibility of reintroducing it into steelmaking production cycles without significant loss of mechanical and performance properties. The Group's procurement choices are based on these properties, prioritising the use of remelted structural steel derived from scrap, thereby helping to reduce reliance on virgin resources and decreasing the environmental impact associated with mining activities and primary production.

In turn, steel offcuts and scrap generated by the manufacturing process of Metalsistem Group companies are sent to steel mills for complete recycling and reintegration of the material into the steel cycle. A portion of these materials is also subject to internal reuse in the construction and upgrading of company infrastructure, such as, for example, external fencing and office furnishings, consequently extending the material's life cycle and reducing the need for new procurement.



As part of initiatives aimed at improving operational efficiency and strengthening production process control systems, the Metalsistem Group launched a project to develop its scrap monitoring system. The aim is to increase the level of detail and reliability of available information, in order to support more conscious and proactive management of material flows and potential inefficiencies. In particular, a transition is underway from an aggregate departmental recording system to a more granular analysis model, based on data collection at the level of individual production lines.

MATERIAL REDUCTION

Alongside the measures relating to procurement and the recovery of steel scrap, there are further initiatives aimed at curbing resource consumption in support activities as well. Specifically, the Metalsistem Group has begun a progressive process of digitising documentation related to certain company processes, including personnel management, production quality control and administrative processes.

Specific attention is also paid to the management of cardboard packaging, which is partially reused to protect products during shipping. This practice allows for the optimisation of material use, a reduction in waste generation, and the promotion of more efficient resource use within logistics activities.

With regard to the daily habits of its people as well, the Group promotes the reduction of single-use materials and the adoption of more sustainable behaviours. To this end, water dispensers have been installed at company sites and reusable water bottles distributed to all employees, fostering the elimination of plastic bottles in the workplace; similar attention is paid to the responsible management of paper, through proper waste separation practices and the use of 100% recycled paper certified with the Ecolabel.

WASTE MANAGEMENT

Waste management within the Group companies is governed by specific operating procedures that define in a structured manner the methods of classification, collection, temporary storage, and dispatch for recovery or disposal. During 2025, the process of redefining the internal waste collection system by primary producers (line operators) was completed at Metalsistem, also redesigning the equipment on the line and the resulting methods of waste sorting and final transfer to collection points.

ESRS E5 - RESOURCE USE AND CIRCULAR ECONOMY	
TOPIC	ACTIONS
Management of waste and processing residues	Sending steel offcuts or scrap to steel mills for complete recycling
	Reuse of production scrap for the creation and improvement of company infrastructure
	Launch of a project to review the scrap monitoring system, transitioning from departmental recording to an analysis by individual production lines
	Reuse of part of the cardboard packaging to protect materials during shipping
	Installation of a water dispenser for employees and distribution of reusable bottles, with elimination of plastic bottles
	Formalisation of a waste management procedure and operating instructions for filling out the waste loading and unloading register and the Waste Identification Form
	Completion of the process of redefining the waste collection system by line operators

E5-3

Targets related to resource use and circular economy

The Metalsistem Group intends to strengthen its commitment to responsible resource use by maintaining a structured monitoring system for consumption and waste generated by its operational activities. This approach aims to progressively identify further opportunities for efficiency, both in terms of reducing impacts and optimising processes.

Within this framework lies the target of continuing the internal process digitisation project, launched in 2025, aimed at further reducing the use of paper in administrative, managerial and production activities.

ESRS E5 - RESOURCE USE AND CIRCULAR ECONOMY		
TARGETS	SCOPE	BASELINE
Continuation of the internal process digitisation project	Metalsistem Group	2025

E5-4

Resource inflows

Inflows of materials to the Metalsistem Group mainly consist of steel, which represents the main raw material used in production processes and is purchased in the form of IPE beams, galvanised and pickled steel strips, sheet metal and flat rolled products, used to manufacture components for storage systems and metal structures. In addition to these input materials, powder coatings are used in surface treatment processes, and plastics are used to produce accessory components. The picture is completed by materials intended for packaging and handling finished products, such as pallets and packaging solutions.

ESRS E5 - RESOURCE USE AND CIRCULAR ECONOMY				
INCOMING MATERIALS[7]	UNIT OF MEASURE	TOTAL QUANTITY	OF WHICH TECHNICAL MATERIALS	OF WHICH BIOLOGICAL MATERIALS
IPE beams	No.	12,492	12,492	-
Sheet metal	t	588	588	-
Steel strips	t	48,955	48,955	-
Plastic	t	129	129	-
Powder coating	t	230	230	-
Various packaging	No.	790,395	71,940	718,455
FE strapping	t	48	48	-
Strapping	m	3,906,000	3,906,000	-

7. The data refer to purchases made by the companies Metalsistem and GAL.TRE.

Data relating to incoming products are processed from information extracted from company ERP systems, which systematically track all incoming movements.

E5-5

Resource outflows

PRODUCTS AND MATERIALS

Metalsistem Group products are designed to ensure high standards of durability and longevity. The use of hot-dip galvanised steel via the Sendzimir process ensures superior corrosion resistance compared to alternative materials, helping to extend the useful life of the installed solutions. For systems requiring further surface treatments, GAL.TRE applies thermosetting powder coating cycles with a two-layer anti-corrosion treatment; for outdoor installations, powders with high resistance to atmospheric agents and UV rays are used, ensuring high protection over time.

The modular nature of the solutions offered also promotes the reconfigurability and adaptability of the systems to the needs of different categories of users, reducing the need for complete replacements. At the end of their useful life, steel, an intrinsically recyclable material, can be reintroduced into steel manufacturing processes without significant alterations to its original properties.

WASTE

In 2025, the Metalsistem Group generated a total of 6,192.70 tonnes of waste, of which 97% is classified as non-hazardous. The composition of the waste generated reflects the nature of the manufacturing activities of the Metalsistem Group companies. Consequently, the predominant category consists of ferrous metal waste, in particular filings, turnings and dust resulting from steel processing, which together account for approximately 90% of the total generated. Process sludges, aqueous liquid wastes and packaging materials are also generated, although with a lower impact on the total.

Ferrous metal waste is sent to steel mills for recovery; this process allows the material to be reintroduced into the production cycle and contributes significantly to reducing the share of waste destined for disposal.

WASTE TYPE	UNIT OF MEASURE	2025
Total	**t**	**6,192.70**
Hazardous waste	t	163.75
Non-hazardous waste	t	6,028.96



03 Social information

ESRS S1 - OWN WORKFORCE

SBM-3 / S1-1 / S1-2 / S1-3 / S1-4 / S1-5 / S1-6 / S1-7 / S1-8 / S1-9 / S1-10 / S1-12 / S1-13 S1-14 / S1-17

ESRS S4 - CONSUMERS AND END-USERS

SBM-3 / S4-1 / S4-2 / S4-3 / S4-4 / S4-5

ESRS S1

Own workforce

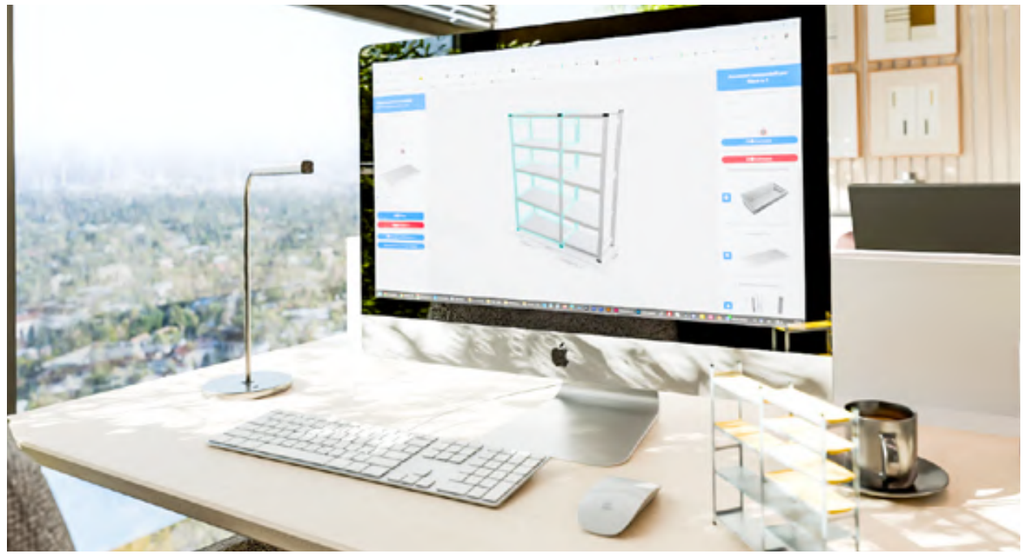
SBM-3

Material impacts, risks and opportunities and their interaction with strategy and business model

The workforce represents a central resource for the Metalsistem Group, whose value is expressed in the quality of skills, the experience gained and the daily dedication of its people, who contribute decisively to operational solidity and the organisation's growth and development journey. Human capital management is therefore considered a priority area, overseen through structured policies and initiatives aimed at ensuring high safety standards, promoting organisational well-being, fostering the enhancement of individual skills and providing an increasingly inclusive and stimulating working environment.

As part of the double materiality process conducted during 2025, the Metalsistem Group identified certain impacts, both positive and negative, actual and potential, connected to its own workforce composed of employees (middle managers, office and production workers) and non-employees (agency workers and quasi-subordinate workers).

With reference to the topic of health and safety at work, the impacts identified by the Group are closely linked to the operational conditions in which production activities take place and the effectiveness of the prevention and protection systems adopted. Accidents indeed represent a negative impact capable of affecting not only the physical and psychological integrity of workers, but also organisational efficiency and production continuity. Strengthening the systems for detecting, analysing and monitoring accidents, incidents and near misses contributes to improving the Metalsistem Group's ability to oversee operational risks more effectively, fostering a systematic interpretation of individual events and the timely identification of any recurring criticalities and related corrective measures. Employee



well-being represents a complementary dimension closely linked to the management of health and safety at work. The introduction of welfare programmes, together with the design and set-up of corporate spaces for social interaction and engagement among employees, represents an actual positive impact on people's well-being, as it helps foster work-life balance, strengthen internal cohesion, improve the corporate climate and consolidate the level of engagement.

Investing in training and skills updating pathways for employees represents an additional enabling factor for enhancing human capital and strengthening the Group's ability to evolve alongside its reference context and customer expectations. In this perspective, structured planning of training plans and their continuity over time are an essential prerequisite to ensure alignment between internal skills assets and actual organisational needs.

Within the scope of the analysis carried out, no material risks or opportunities connected to the management of own workforce emerged. Furthermore, the Metalsistem Group did not identify any exposure to child labour or forced labour risks, taking into account the nature of the activities carried out and the geographical context in which the companies included in the reporting scope operate.

S1-1

Policies related to own workforce

Metalsistem has defined a comprehensive system of principles and commitments regarding own workforce management, formalised in the Code of Ethics and in the Quality, Environment and Occupational Health and Safety Policy. These instruments outline a values and behavioural framework applied across all Group companies and binding on all employees, contractors and, more generally, on all recipients who, in various capacities, contribute to carrying out business activities.

QUALITY, ENVIRONMENT AND OCCUPATIONAL HEALTH AND SAFETY POLICY

The Metalsistem Group is committed to protecting the health and safety of workers and all third parties accessing corporate premises, by maintaining safe and healthy working environments and introducing tools to analyse incidents, accidents and occupational diseases, in order to identify their causes and prevent their occurrence and recurrence. To reinforce the effectiveness of the measures adopted, the Group promotes the dissemination of a corporate health and safety culture and the adoption of responsible behaviours, through information, awareness-raising and training activities addressed to all workers based on their position, role and duties performed.

The Occupational Health and Safety Management System, certified according to the UNI ISO 45001:2018 standard for Metalsistem, represents the instrument through which health and safety protection principles are translated into operational practices and systematically and continuously supervised.

The Quality, Environment and Occupational Health and Safety Policy is part of a system of values that puts people at the centre, promoting an organisational model oriented towards well-being, understood not only as safeguarding physical integrity, but also as creating a working environment capable of fostering stability, involvement and full professional development.

CODE OF ETHICS

Employees represent a primary and strategic resource for corporate development, whose physical and moral integrity, respect for fundamental rights, and professional and personal growth are subject to constant protection and attention by all Metalsistem Group companies. Within this framework of key principles, the Group undertakes to offer safe work environments and ensure appropriate conditions for carrying out activities, adopt a structured system for the prevention and control of workplace accidents, and ensure equal opportunities and non-discrimination in all selection, training, evaluation and career advancement processes. The Group also combats all forms of bullying and labour exploitation, recognising merit and skills as the reference parameters for salary and career progression, and promotes a management climate capable of motivating and rewarding everyone's contribution, both individually and as a team.

The Policy, the Code of Ethics and the commitments undertaken within them are incorporated into corporate processes and supported by continuous monitoring, control and updating tools, in order to ensure their effective implementation and consistency with the evolution of the regulatory and organisational context. These instruments help define a human capital management model geared towards protecting people, developing skills and improving working conditions.



S1-2

Processes for engaging with own workforce and workers' representatives about impacts

The Metalsistem Group recognises the importance of open and ongoing dialogue with its employees and promotes their active involvement as key levers to encourage participation, strengthen the sense of belonging and contribute to creating an inclusive and collaborative working environment, while fostering motivation and alignment with corporate objectives. To this end, specific mechanisms for internal dialogue and discussion have already been implemented. At Metalsistem, monthly meetings are organised between Production Coordinators and Workers' Health and Safety Representatives (RLS), aimed at sharing progress on key business aspects, such as production and dispatch targets, quality and safety monitoring, as well as headcount requirements.

Furthermore, during 2025, Metalsistem Group employees were directly involved in the double materiality analysis process as key stakeholders, to actively contribute to identifying the most material impacts on people and the environment generated by the Metalsistem Group's activities and its value chain.

S1-3

Processes to remediate negative impacts and channels for own workforce to raise concerns

The only actual material negative impact identified on own workforce is represented by the occurrence of workplace accidents and harm to employees' health. To mitigate this impact, the Metalsistem Group has adopted a structured prevention and control system that includes risk identification and assessment, the implementation of a structured system for monitoring accidents, incidents and near misses, as well as the implementation of organisational, technical and training measures aimed at ensuring safe working conditions and promoting continuous improvement in health and safety.

In addition, certain potential negative impacts that could arise in specific operational circumstances were identified, with possible repercussions on working conditions and employee well-being. These impacts were subject to careful analysis, aimed at raising internal awareness regarding their potential occurrence and evaluating the adoption of appropriate preventive measures.

Any issues concerning personnel, as well as breaches of national or European Union regulatory provisions, administrative, accounting, civil or criminal offences, or conduct relevant under Legislative Decree 231/2001, can be reported through the whistleblowing channel adopted by Metalsistem in compliance with Legislative Decree 24/2023, accessible via the employee portal. The system guarantees the confidentiality of the whistleblower's identity, personal data protection and the absence of any form of retaliation. Alongside this tool, employees can also contact their line manager directly to raise any concerns, issues or requirements, using a more immediate communication method.

During 2025, no reports concerning alleged unlawful conduct were received through the established channels.

S1-4

Taking action on material impacts on own workforce, and approaches to managing material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions

The Metalsistem Group has implemented a set of initiatives aimed at managing the material impacts identified in relation to the workforce, structured across several areas: protecting employee health and safety, developing and enhancing personal and professional skills, and continuously improving working conditions.

HEALTH AND SAFETY OF EMPLOYEES

Safeguarding the physical integrity and health of workers is an absolute priority for the Metalsistem Group. Over time, the Group's approach to managing this topic has undergone a major evolution, moving from a reactive approach to a proactive prevention-oriented model, with actions targeted at eliminating causes related to operational dynamics and improper movements. Confirming this structured approach, Metalsistem has voluntarily adopted an occupational health and safety management system certified in accordance with the UNI ISO 45001:2018 standard — which provides a framework for implementing and maintaining adequate measures to identify, assess and manage risks related to workers' health and safety — and systematically monitors accidents, occupational diseases and near misses, as well as their underlying causes. Furthermore, the reinforcement of oversight and inspection activities, with particular attention to the onboarding phases of new employees and the supervision of agency workers, contributes to further consolidating risk management and promoting increasingly safe operational behaviours.



Risk Assessment Documents (DVR) have been drawn up by all Group companies for all company sites in accordance with the provisions of Legislative Decree 81/2008, based on the analysis of risks associated with activities and work environments, in order to ensure their identification, prevention and management. In 2025, Metalsistem updated the risk assessments related to the manual handling of loads for the Viale dell'Industria, Via Marconi, Viale del Lavoro, Motta di Livenza, Gambara and Gussago sites. During the same financial year, at the request of the Workers' Health and Safety Representatives (RLS), a sampling campaign was also conducted to detect pollutants, with particular reference to heavy vehicle exhaust gases in the dedicated shipping lane at the Viale dell'Industria plant. Monitoring activities will be integrated into the review process of the risk assessment document for exposure to carcinogens.

In terms of technical measures to reduce operational risks in the workplace, at the Viale dell'Industria site, palletising systems were replaced with newly designed systems capable of further optimising packaging activities and limiting manual load handling operations.

Regarding personal protective equipment (PPE), Metalsistem has initiated a structured review and optimisation of the equipment provided, with particular reference to hand protection. Furthermore, in the context of PPE supply management, the company conducted a systematic analysis via corporate software in 2025 to verify consistency between operational risks and the actual availability and use of PPE. Following the findings, targeted corrective actions were implemented, including upgrading equipment, information sessions and strengthening tracking activities, with the aim of ensuring effective risk oversight and alignment with company procedures.

EMPLOYEE WELFARE

The Metalsistem Group actively promotes the well-being of its employees through a comprehensive set of welfare initiatives aimed at improving the quality of work and personal life, promoting work-life balance and strengthening the sense of belonging. The measures introduced include:

- the **Metalsistem Fitness Centre**, a 500 m^2 corporate gym, including a wellness centre, squash court and dedicated spaces for social interaction, also accessible to employees' family members, aimed at promoting physical and psychological well-being, healthy lifestyles and strengthening internal socialisation and cohesion;
- the **company canteen service**, with a company contribution covering two thirds of the total cost;
- membership in the **Metasalute Supplementary Healthcare Fund** for Metalworking Industry Employees;
- **specific protection measures for working mothers** in the early stages of their children's lives and for **employees suffering from severe illnesses.**

Metalsistem Management also provides the welfare measures set out in the National Collective Bargaining Agreement (CCNL) for the Metalworking Industry, complementing them with further forms of financial support for employees, such as granting shopping vouchers for purchasing food items. The performance bonus, governed by company supplementary agreements and determined on the basis of collective productivity and quality indicators and individual parameters, represents a further tool for recognising the workforce's contribution to achieving corporate results.

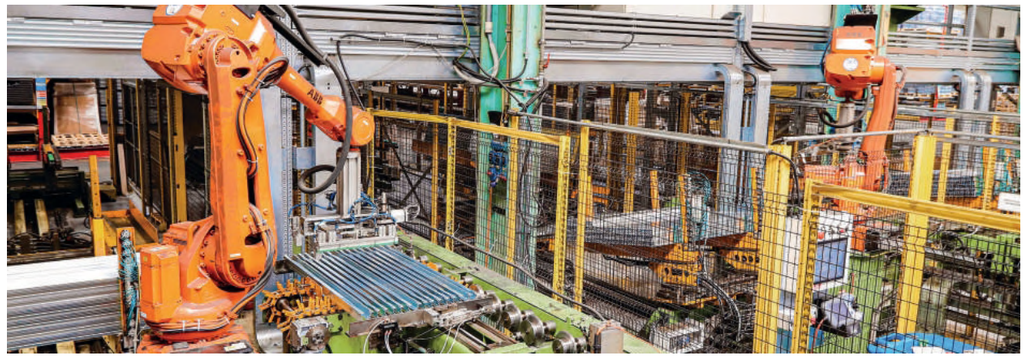
As regards GAL.TRE, shopping vouchers and performance bonuses were paid out to employees during 2025, in line with company agreements and the applicable collective bargaining agreement.

Complementing these initiatives, the Metalsistem Group enhances the relational dimension among employees and their sense of belonging through the provision of spaces for team building and the organisation of social and sharing occasions, such as company dinners and toasts.



TRAINING AND SKILLS DEVELOPMENT

The Metalsistem Group recognises continuous training as a fundamental tool for the personal and professional growth of its employees and for maintaining the high product quality standards required by customers. To this end, alongside mandatory training courses required by current health and safety legislation, training activities cover various subject areas: technical training programmes; development of managerial and coordination skills; use of company IT systems and software tools supporting operational activities; and strengthening interpersonal and communication skills.



ESRS S1 - OWN WORKFORCE	
TOPIC	**ACTIONS**
Health and safety of employees	Certification of Metalsistem's health and safety management system in accordance with the ISO 45001 standard
	Structured monitoring by Metalsistem of workplace accidents, occupational diseases and near misses
	Updating of risk assessments related to manual handling of loads for the Viale dell'Industria, Via Marconi, Viale del Lavoro, Motta di Livenza, Gambara and Gussago sites
	Conducting new sampling campaigns to detect pollutants
	Replacement of palletising systems
	Review and optimisation of PPE provision
Employee welfare	Introduction of a benefits system for employees
	Set-up of corporate spaces for team building
	Organisation of social gatherings for employees
Training and skills development	Provision of non-mandatory training to employees

S1-5

Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities

In line with the priorities identified through the double materiality assessment, the Metalsistem Group has defined a set of targets for future financial years aimed at mitigating material negative impacts and enhancing positive ones.

With regard to occupational health and safety, the Group intends to focus on strengthening existing safeguards and extending the good practices already adopted by Metalsistem to GALTRE as well, alongside the installation of further technologies aimed at reducing workers' exposure to physical and mechanical risks, in continuity with the initiatives already launched in 2025.

With reference to the welfare dimension, the Group plans to consolidate and further develop programmes supporting employee well-being, expanding existing initiatives with new dedicated measures and promoting get-togethers and socialisation opportunities in order to strengthen the sense of belonging and internal cohesion.

Finally, as regards staff skills development, the Group intends to launch new non-mandatory training pathways, with a particular focus on the topic of cybersecurity, whose relevance is growing in the operational context.

ESRS S1 - OWN WORKFORCE		
TARGETS	**SCOPE**	**BASELINE**
Structured monitoring of near misses	GALTRE	2025
Implementation of an intervention aimed at improving thermal comfort in the workplace during summer	GALTRE	2025
Installation of technologies to reduce workers' exposure to physical and mechanical risks	Metalsistem Group	2025
Implementation of welfare programmes for employees	Metalsistem Group	2025
Organisation of socialisation events/ opportunities for employees	Metalsistem Group	2025
Launch of new training courses	Metalsistem Group	2025
Provision of training on the topic of cybersecurity	Metalsistem Group	2025

S1-6

Characteristics of the undertaking's employees

As at 31 December 2025, the total number of employees of the Metalsistem Group is 350 [8], of which 11% are female. Data on the Group's own workforce were extracted from the company management system of the companies included in the reporting scope, which represents the centralised source for the ongoing collection and updating of personnel-related information.

Number of employees by gender

GENDER	NUMBER OF EMPLOYEES
Men	311
Women	39
Other [9]	-
Not reported	-
Total employees	350

8. The figures in this chapter are reported considering the actual headcount (HC) as at 31 December 2025, excluding workers whose employment relationship ceased as of that date.

9. Gender as specified by the employees themselves.

In 2025, 97% of employees are employed under permanent employment contracts.

Number of employees by contract type and gender

WOMEN	MEN	OTHER [10]	NOT REPORTED	TOTAL
Number of employees				
39	311	-	-	350
Number of permanent employees				
39	299	-	-	338
Number of temporary employees				
0	12	-	-	12
Number of non-guaranteed hours employees				
-	-	-	-	-
Number of full-time employees				
34	306	-	-	340
Number of part-time employees				
5	5	-	-	10

10. Gender as specified by the employees themselves.

Turnover

	VALUE
Number of employees	350
Number of employees who left	5
Employee turnover rate	1.43%

During 2025, 5 employees left the Metalsistem Group. The turnover rate, calculated as the ratio between the number of leavers during the financial year and the number of employees still employed at the end of the same period, is 1.43%.

S1-7

Characteristics of non-employees in the undertaking's own workforce

During 2025, the Metalsistem Group relied on the collaboration of various external professionals, engaged in particular in the production departments of the Rovereto, Gussago and Gambara plants, and at GAL.TRE and Metalsistem Italia.

S1-8

Collective bargaining coverage and social dialogue

All employees of the Metalsistem Group are covered by collective bargaining agreements.

	COLLECTIVE BARGAINING COVERAGE		SOCIAL DIALOGUE
COVERAGE RATE	EMPLOYEES - EEA	EMPLOYEES - NON-EEA	WORKPLACE REPRESENTATION (EEA ONLY)
0 - 19%	-	-	-
20 - 39%	-	-	-
40 - 59%	-	-	-
60 - 79%	-	-	-
80 - 100%	Italy	-	-



S1-9

Diversity metrics

The Metalsistem Group recognises diversity as a fundamental value and an enabling factor for the sustainable growth of the organisation. Valuing individual differences in terms of gender, age, cultural background, skills and professional backgrounds is a key element in fostering product innovation, improving decision-making processes and strengthening the ability to adapt to changes in the operating context.

Breakdown of top management by gender

	NUMBER	%
Women	2	15%
Men	11	85%
Other	-	-
Not reported	-	-
Total	13	100%

For the purposes of this reporting, "top management" means those individuals positioned at the first and second hierarchical levels below the administrative and supervisory bodies in the organisational charts of Group companies.

Employees broken down by professional category

	MEN	WOMEN	TOTAL
Executives	0	0	0
Middle managers	1	0	1
Office workers	78	28	106
Production workers	232	11	243
Total	**311**	**39**	**350**

S1-10

Adequate wages

The Metalsistem Group ensures that all its employees receive pay in line with the provisions of the applicable national collective bargaining agreement and adequate for the responsibilities, skills and experience required for individual roles.

S1-12

Persons with disabilities

In compliance with Law 68/99 and Art. 14 of Legislative Decree 276/2003, Metalsistem promotes the employment inclusion of persons with disabilities, integrating them into its workforce and fostering inclusion pathways in settings capable of ensuring safe and adequate working conditions and in an environment where diversity is valued.

Thanks to the collaboration with Dal Barba Locanda e Pastificio Cooperativa Sociale dal Barba - one of the most significant initiatives of Fondazione Metalsistem - Metalsistem offers workers with disabilities the opportunity to work on dedicated projects, whilst remaining an integral part of the company workforce, actively contributing to the development of the local industrial fabric. The initiative represents a tangible example of how a regulatory obligation can be translated into an opportunity to create social value.

S1-13

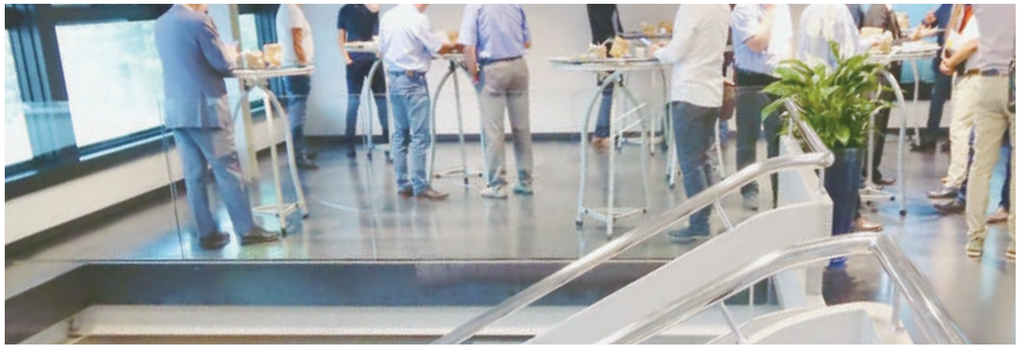
Training and skills development metrics

During 2025, the Metalsistem Group provided a total of 5,957 hours of training to its employees, including 2,164 mandatory hours on occupational health and safety pursuant to Legislative Decree 81/2008 and applicable regulations regarding qualifications for the use of equipment and devices, and 3,793 hours of non-mandatory training.

The training content covers numerous thematic areas. The most significant, in terms of hours delivered, relates to occupational health and safety, with courses dedicated to risk prevention and qualifications for the use of specific equipment. This is complemented by an operational training component aimed at acquiring practical skills related to department activities, the application of internal procedures, and the correct use of vehicles, machinery and devices. The training pathways also cover topics relating to quality and corporate process management and include measures aimed at the development of soft skills.

Training

	NUMBER OF TRAINING HOURS DELIVERED	AVERAGE TRAINING HOURS
Total	5,957	17.02



S1-14

Health and safety metrics

For the Metalsistem Group, safeguarding workers' health and safety represents a priority area, managed through a certified management system and structured monitoring of accident events. The Group recognises that every accident or near miss is an indicator to be examined closely, regardless of its severity, and that prevention requires a continuous commitment at all levels of the organisation.

During 2025, a total of 6 accidents occurred; among these, the most serious, which occurred while commuting, resulted in a total absence from work of 175 days. The accident rate is calculated by dividing the number of accidents occurring in the period by the total number of hours worked, multiplying the result by one million, in order to obtain a standardised and comparable indicator.

Data on the occupational health and safety performance of own workforce

OCCUPATIONAL HEALTH AND SAFETY	EMPLOYEES
Percentage of employees covered by the undertaking's health and safety management system based on legal requirements and/or recognised standards or guidelines	100%
Number of fatalities resulting from work-related injuries and work-related ill health	0
Number of recordable work-related accidents	6
of which commuting accidents	1
Hours worked	606,217.50
Recordable work-related accident rate (including commuting accident)	9.90
Number of cases of recordable work-related ill health, subject to legal restrictions on data collection	0
Number of days lost to work-related injuries and fatalities from work-related accidents (including commuting accident), work-related ill health and fatalities resulting from ill health	222

Metalsistem periodically prepares an accident report, which is analysed and evaluated during the periodic occupational health and safety meeting provided for by Art. 35 of Legislative Decree 81/2008.

S1-17

Incidents, complaints and severe human rights impacts

During 2025, there were no incidents of discrimination or harassment concerning human rights or on grounds of gender, racial or ethnic origin, nationality, religion or personal beliefs, disability, age, sexual orientation or other personal characteristics; furthermore, no reports were submitted by workers via the whistleblowing channel or other grievance mechanisms. The Group received no fines, penalties or claims for compensation attributable to incidents or complaints concerning working conditions and workers' rights.

Finally, during the reporting period there were no severe human rights incidents involving the Group's own workforce, nor any cases attributable to forced labour, human trafficking or child labour.

ESRS S4

Consumers and end-users

SBM-3

Material impacts, risks and opportunities and their interaction with strategy and business model

The Metalsistem Group maintains direct and indirect relationships with a wide range of customers and end-users, which includes logistics operators, manufacturing companies, retail and large-scale distribution companies, installers and developers of photovoltaic systems. The quality of the relationships established with these stakeholders, in terms of reliability, transparency and responsiveness, represents a central element of the Group's business model.

The double materiality analysis, conducted during financial year 2025 in accordance with standard ESRS 2 IRO-1, enabled the identification of certain material, positive and negative, actual and potential impacts related to the management of customer relationships.

As regards actual positive impacts, customer care, pursued through a prompt and effective response to requests and any complaints, represents a distinctive feature of the Group's business model and commercial strategy, translating into strengthened customer trust and satisfaction. At the same time, the Metalsistem Group oversees the topic of security of processed data through the adoption of dedicated organisational safeguards and technical tools, to preserve the confidentiality of customer information and ensure management in compliance with the highest security standards.

The double materiality process did not reveal any material actual negative impacts. However, a potential negative impact was identified in connection with possible non-conformity in the communication of product technical characteristics and performance. Information that is incomplete, inaccurate or not compliant with sector standards could in fact lead customers to make purchase or installation decisions that do not match their needs, with possible repercussions on product safety, the effectiveness of the solutions adopted and the reputation of the Metalsistem Group. A further potential negative impact is attributable to possible incidents of unauthorised access, theft or unlawful disclosure of confidential customer data. Such events could negatively affect the quality of business relationships and the credibility of the Group companies.



S4-1

Policies related to consumers and end-users

Metalsistem and GAL.TRE have implemented a Quality Management System compliant with the UNI EN ISO 9001 standard, ensuring a structured approach geared towards the continuous improvement of processes and the quality of products and services offered.

Metalsistem's Integrated Quality, Environment and Occupational Health and Safety Policy, whose key principles are shared by all Group companies, sets out the following commitments:

- accurately identify the needs and expectations of customers, developing solutions and services capable of ensuring high quality standards and performance compliant with defined requirements;
- establish relationships of mutual trust with customers as a fundamental prerequisite for value creation and sustainable development;
- monitor and improve customer satisfaction over time through an integrated system for managing and controlling company performance in the areas of quality, safety and the environment.

The safeguarding of privacy and customer data protection represent further areas of primary importance for the Metalsistem Group, which operates in compliance with EU Regulation 2016/679 (GDPR) and applicable national legislation.

S4-2

Processes for engaging with consumers and end-users about impacts

The Metalsistem Group has not yet structured a formalised and recurring customer engagement process specifically geared towards identifying and managing the material impacts that concern them. However, direct contact with the customer is an integral part of the Group's operating model, which pairs its solutions with a suite of technical and commercial support services and tools — from design to testing, from maintenance to periodic inspections — maintaining an ongoing and close relationship with its customers throughout the entire product life cycle, which is also made possible by a solid network of partners and dealers across 80 countries. These are complemented by structured communication and engagement initiatives targeting the sales network, including the collection of feedback received from customers via a satisfaction survey, the circulation of periodic informational notices, and the organisation of events dedicated to professional updates and strengthening relationships with the sales network.

Furthermore, Metalsistem has developed a structured model for monitoring customer complaints, based on a system of indicators that measures trends in relation to operating volumes. Data collection takes place periodically through the collection and classification of quality events by type and organisational area for a systematic assessment of the main causes and their percentage incidence. The data are analysed and consolidated into dedicated reporting to support the monitoring of quality performance and the identification of areas for improvement.

S4-3

Processes to remediate negative impacts and channels for consumers and end-users to raise concerns

The Metalsistem Group's most material potential negative impact relates to possible non-conformity in the technical characteristics and performance of products. To prevent or mitigate this potential negative impact, the Group adopts product quality control and monitoring processes integrated into its Quality Management System.

Any concerns or issues may be reported through the Group's sales network, which ensures a direct and ongoing point of contact with customers. The complaint management system enables incoming reports to be collected, recorded and handled, ensuring timely responses and a structured, effective approach to their resolution.



S4-4

Taking action on material impacts on consumers and end-users, and approaches to managing material risks and pursuing material opportunities related to consumers and end-users, and effectiveness of those actions

Consistently with the impacts identified as material in relation to consumers and end-users, the Metalsistem Group has implemented a series of initiatives aimed at strengthening the quality of customer relationships and ensuring structured oversight over the technical characteristics and performance of its products.

QUALITY OF PROCESSES AND PRODUCTS

Metalsistem ensures high quality standards through a system of product and process certifications aimed at supervising production processes, regulatory compliance and the reliability of its solutions. The Group adopts a quality management system compliant with the UNI EN ISO 9001 standard, which defines a structured framework of processes, responsibilities and controls. Indeed, quality is not considered an isolated element, but an integrated principle that accompanies the entire development cycle of the product, from design through to final production, and of the services offered.

With regard to products, Metalsistem holds the CE mark certifying their conformity with the UNI EN 1090-1 standard, within the scope of the factory production control (FPC) system. This is complemented by the CISI (Italian Industrial Racking Manufacturers Association) quality and safety mark, which certifies shelving and racking in terms of compliance with sector-specific technical and safety requirements. With regard to manufacturing processes, the welding process complies with the UNI EN ISO 3834-2 standard, which defines quality requirements for fusion welding of metallic materials and helps ensure the reliability and strength of structural joints. The framework is completed by membership of the F.E.M. - European Materials Handling Federation, the European benchmark for defining technical guidelines in the field of storage systems.

The rigour in the product development and validation phase is also reflected in the execution of structural tests and full-scale seismic checks at the Metalseismic Test Tower, ensuring performance over time even under extreme conditions.



CUSTOMER RELATIONSHIP MANAGEMENT

The Metalsistem Group monitors customer satisfaction levels through the administration of a structured questionnaire. This tool allows for the collection of detailed evaluations on a quantitative scale throughout the entire customer relationship process, from commercial stages through to delivery and after-sales. In particular, the questionnaire analyses various areas, including: response times for commercial quotations and requests, completeness of the information provided, management of non-conformity, communication quality, effectiveness of digital and technical tools, logistics aspects, packaging, and loads. The perceived quality of products, ease of assembly, and adequacy of the product range offered are also subject to evaluation.

The data collected are used to monitor company performance over time, identify any critical areas, and define continuous improvement actions for products and services offered, in line with the principles of the Quality Management System.

In order to strengthen engagement and dialogue with its commercial ecosystem and customers, Metalsistem has developed a set of initiatives geared towards sharing strategic information, consolidating long-term relationships, and gathering useful feedback for future product development. These include:

- the organisation of the **METALSISTEM I/O event**, an annual two-day event that engages and brings together the entire sales network at Metalsistem's headquarters to share the Group's key developments, create new connections, and strengthen ties with the brand;
- the distribution of **METALSISTEM Informa**, periodic communications dedicated to updating customers on product developments, operational improvements, and new solutions.

ESRS S4 - CONSUMERS AND END-USERS	
TOPIC	**ACTIONS**
Customer relationship management	Collection and monitoring of feedback received from customers
	Organisation of the annual METALSISTEM I/O event, a two-day event involving the sales network and business partners, dedicated to updates on products and innovations, creating new connections, and strengthening ties with the brand
	Distribution of METALSISTEM Informa

S4-5

Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities

The Metalsistem Group recognises that strengthening the relationship with its customers is a continuous process that requires not only meeting current operational needs, but also anticipating emerging expectations in terms of structural performance, safety, versatility, and quality. From this perspective, the Group intends to continue consolidating dialogue with its sales network, enriching customer events with specific in-depth sessions on sustainability topics, with the aim of promoting greater awareness of values, commitments undertaken, and the path pursued, as well as fostering the sharing of best practices along the entire value chain.

ESRS S4 - CONSUMERS AND END-USERS		
TARGETS	**SCOPE**	**BASELINE**
Organisation of events dedicated to customers, with specific in-depth sessions on sustainability topics	Metalsistem Group	2025

04 Governance information

ESRS G1 - BUSINESS CONDUCT

GOV-1 / IRO-1 / G1-1 / G1-2 / G1-3 / G1-4

ESRS G1

Business conduct

GOV-1

The role of the administrative, management and supervisory bodies

The Metalsistem Group adopts a traditional governance model, structured into the administrative, management and supervisory bodies required by applicable legislation.

The Board of Directors, composed of three members, exercises the functions of management and strategic direction, as well as supervising the sustainability reporting process. In this context, the Board was informed about material impacts, risks and opportunities, identified through the double materiality assessment, and examined and approved the relevant outcomes together with this Statement.

For a comprehensive description of the Group's governance structure, please refer to section ESRS 2 GOV-1 – The role of the administrative, management and supervisory bodies.

IRO-1

Description of the process to identify and assess material impacts, risks and opportunities

As part of the double materiality assessment conducted during financial year 2025, the Metalsistem Group identified ethical governance and ESG strategy, as well as cybersecurity and data protection, as material corporate governance topics. The identification process considered the Group's activities, relationships with its stakeholders, and applicable regulatory requirements, with a particular focus on the operational context and emerging risks linked to information management and business conduct.

With regard to ethical governance, the Group identified as an actual positive impact the development of a corporate culture based on principles of ethics, integrity, responsibility and transparency towards all stakeholders, an element that helps strengthen the Group's reputation and stakeholder trust over the medium term. Against this positive impact, two potential negative impacts were identified: the risk of non-compliant behaviour or breaches of ethical principles by personnel or business partners, and the risk of failure to update or the ineffective application of the Code of Ethics or the Organisation, Management and Control Model adopted pursuant to Legislative Decree 231/2001.

In the area of cybersecurity and data protection, the Group identified an actual positive impact resulting from the adoption of management and infrastructure systems for the protection of company, customer, employee, and general stakeholder data. In contrast, a potential negative impact is associated with the risk of data leak, theft, or loss incidents, with possible consequences both for its own operations and along the value chain.

G1-1

Business conduct policies and corporate culture

The Metalsistem Group promotes conduct consistent with company principles and applicable regulations among all individuals through the application of an Organisation, Management and Control Model (OMCM), adopted by Metalsistem and applicable to all Group entities covered by this Statement, as well as binding on parties acting on behalf of or in the interest of the companies.

This system is structured, starting from a Code of Ethics that defines the fundamental values guiding corporate action, through policies, procedures, and rules of conduct aimed at defining and promoting the principles of ethics, integrity, transparency, and responsibility throughout the value chain. The risk prevention and control system is based on:

- the conduct expected from employees, collaborators, and business partners;
- safeguards for the prevention and management of risks related to the commission of unlawful acts, including pursuant to applicable legislation;
- the procedures for managing and protecting stakeholders' personal data, in compliance with applicable legislation regarding privacy and information security.

These tools are periodically updated to ensure their alignment with the relevant regulatory context and industry best practices, as well as their effectiveness in mitigating operational, legal, and reputational risks.

To ensure the proper definition of a sustainability governance system, during 2024 the Group also established the ESG Manager role, responsible for coordinating, guiding and monitoring sustainability initiatives across the Group. This function ensures liaison between the various business areas, supports the integration of ESG factors into decision-making processes, and contributes to defining and overseeing sustainability objectives, including those related to reporting, as required by ESRS standards.

CODE OF ETHICS

Metalsistem's Code of Ethics represents the cornerstone of the Group's value system and defines the principles of conduct that must bind and guide the actions of the company and all individuals acting on its behalf or in its interest. The Code of Ethics serves as a pivotal tool of the Organisation, Management and Control Model (pursuant to Legislative Decree 231/2001), with the purpose of preventing unlawful conduct and promoting a corporate culture founded on legality, responsibility, and sustainability.

The Code of Ethics identifies a comprehensive and coherent set of ethical principles that apply across all company activities and stakeholder relationships.

THE METALSISTEM GROUP'S PRINCIPLES

The Group recognises and promotes the following principles:

- **Honesty** – All corporate activities must be carried out in full compliance with applicable legislation, internal regulations, and ethical principles. Under no circumstances may the pursuit of the company's interest justify conduct that is contrary to the law or non-compliant with values of integrity and loyalty;

- **Impartiality** – Business decisions and the conduct of those to whom the Code applies must be free from any form of direct or indirect discrimination based on personal factors such as age, gender, nationality, religion, opinions, or personal circumstances, ensuring fair treatment across all relationships;

- **Confidentiality** – The Group ensures the protection of information in its possession and the personal data of stakeholders, committing to processing it lawfully, fairly, and transparently, solely for purposes connected to corporate activities and in compliance with applicable legislation;

- **Integrity of the person** – The Group promotes and protects the dignity, health and safety of workers, ensuring adequate working conditions and a respectful, inclusive environment. Any conduct that harms the individual, violates fundamental rights, or involves any coercive practice is prohibited;

- **Quality of products and services** – The Group's activities are geared towards customer satisfaction and protection through the provision of products and services compliant with high quality standards, following an approach based on continuous improvement and the reliability of the solutions offered;

- **Diligence and fairness in contract performance** – Contractual relations must be managed in accordance with principles of good faith, fairness, and reliability. The Group undertakes to honour its commitments and not to exploit any situations of vulnerability or information asymmetry of counterparties;

- **Management of conflicts of interest** – Recipients of the Code of Ethics must avoid situations, even potential ones, where personal interests may interfere with those of the company. Any conflict situations must be promptly disclosed and managed transparently, in compliance with the principle of trust underlying every relationship;

- **Protection of intellectual property and know-how** – The Group safeguards its industrial and intellectual property rights and promotes respect for those of third parties. Any improper use of patents, trademarks, distinctive signs, or confidential information is prohibited, as is any form of counterfeiting or unfair competition;

- **Repudiation of terrorism and subversion of democratic order** – The Group rejects any form of involvement in activities linked to terrorism or subversive phenomena and undertakes not to enter into relationships, whether direct or indirect, with entities involved in such activities;

- **Environmental protection** – The Metalsistem Group integrates environmental sustainability principles into its operations, committing to reducing environmental impacts, using resources efficiently, and promoting sustainable behaviours, including through monitoring, awareness-raising, and continuous improvement activities;

- **Prevention of money laundering and compliance with tax principles** – The Group adopts measures aimed at preventing money laundering and the financing of illicit activities, verifying the reliability of counterparties and ensuring transparency in economic and financial transactions. Furthermore, it operates in compliance with tax regulations, adopting a responsible approach to tax risk management;

- **Fairness in relations with Public Administration** – Relations with public bodies and officials must be based on maximum transparency, fairness, and traceability. Any form of promising, offering, or granting undue advantages, whether direct or indirect, aimed at influencing decisions or obtaining benefits, is strictly prohibited;

- **Fairness in participating in public tenders** – Participation in tender procedures must comply with principles of integrity, transparency, and fair competition, ensuring the accuracy and completeness of the information provided and the actual capacity to fulfil commitments undertaken;

- **Transparency in corporate communications and accounting records** – The Group ensures that all economic, financial, and balance sheet information is recorded and represented in a true, complete, and accurate manner, guaranteeing the traceability of transactions and compliance with applicable legal provisions.

Supervision of the implementation, effectiveness, and adequacy of the Code is entrusted to the Supervisory Body, which ensures monitoring of compliance with its provisions, manages reports of potential violations (including via whistleblowing channels), and proposes any updates to the Board of Directors, in line with legal, organisational, and industry best practice developments.

ORGANISATION, MANAGEMENT AND CONTROL MODEL PURSUANT TO LEGISLATIVE DECREE 231/2001

Metalsistem has adopted an Organisation, Management and Control Model pursuant to Legislative Decree 231/2001, aimed at preventing offences that may give rise to the Company's administrative liability.

The Model is structured into a General Part, which defines the principles, components, and protocols of the administrative liability management system, and a Special Part, dedicated to the individual categories of offences provided for by the Decree. Oversight of the Model is assigned to a collegiate Supervisory Body, equipped with independent powers of initiative and control, which reports directly to the Board of Directors and is tasked with monitoring the effectiveness, adequacy, and observance of the Model, as well as promoting training and the dissemination of its contents to all recipients. The Model is integrated with the Code of Ethics and a disciplinary system providing for penalties graduated according to the severity of the violations, applicable to employees, managers, directors, and third parties.

PERSONAL DATA PROCESSING POLICY

Metalsistem processes the personal data of its stakeholders — including customers, suppliers and employees — in compliance with EU Regulation 2016/679 (GDPR) and current national data protection legislation. Processing is grounded on the principles of lawfulness, fairness, and transparency, purpose limitation, and data minimisation, and is carried out by implementing technical and organisational measures suitable to ensure security and confidentiality. Data are retained strictly for the time necessary to achieve the purposes for which they were collected and are not disclosed to third parties, except within the limits laid down by law or for the provision of outsourced services.

Management of IT infrastructure is the responsibility of Metalsistem, which has carried out a significant upgrade of its network, ranging from the implementation of fibre optics to the deployment of two servers located in separate buildings. This configuration ensures business continuity even in the event of an outage at the primary Data Processing Centre, allowing the secondary system to take over without service interruption. With regard to training and awareness-raising activities, dedicated courses on recognising cyber threats were delivered, focusing in particular on phishing techniques and managing potentially harmful emails, aimed at personnel most exposed to these risks, including reception, purchasing, and sales functions. Thanks to these safeguards, no data breach or data theft incidents occurred during 2025.

G1-2

Management of relationships with suppliers

The Metalsistem Group relies on a network of suppliers consisting predominantly of operators located in Italy and other European countries. This geographic concentration allows operations within contexts characterised by a consolidated, stringent regulatory framework regarding worker rights protection, environmental protection, and anti-corruption, structurally contributing to mitigating the main ESG risks associated with the supply chain.

Even in the presence of such "contextual" safeguards, the Group adopts a precautionary approach oriented towards continuous improvement, recognising that geographic location does not remove the need to evaluate and monitor supplier performance in terms of ethical, social, and environmental aspects. In this context, the Code of Ethics represents a key guiding and monitoring tool, defining the principles and standards of conduct that must be shared and respected across the entire value chain.



The Code of Ethics, implemented through specific operating procedures, provides that suppliers are selected not only on the basis of economic and quality criteria, but also in terms of their reliability and ability to operate in line with the company's ethical values, including the principles of legality, fairness, transparency and respect for human rights. Suppliers are also required to comply with corporate standards regarding quality, health and safety at work, and environmental protection, as essential elements for establishing and maintaining long-lasting and responsible business relationships.

The Group promotes a collaborative approach towards its business partners, fostering the sharing of the principles set out in the Code of Ethics and monitoring, as far as possible, adherence to them, including through qualification and evaluation processes. In the event of conduct not aligned with the reference ethical and regulatory principles, Metalsistem reserves the right to adopt appropriate corrective measures, up to and including the possible termination of the business relationship.

This approach allows the Group to strengthen the resilience and reliability of its supply chain, contributing to the prevention of sustainability risks and the creation of sustainable value over the long term.

G1-3

Prevention and detection of corruption and bribery

The Metalsistem Group considers the prevention of corruption an essential element of its corporate conduct and a fundamental prerequisite for ensuring the integrity, transparency and sustainability of its activities. In this context, the Group is committed to operating in full compliance with applicable legislation and the ethical principles that guide its action, adopting a structured approach to managing corruption and bribery risks in all relationships.

The main safeguard adopted by Metalsistem is represented by the Organisation, Management and Control Model pursuant to Legislative Decree 231/2001, which includes, among the relevant offences, corruption offences against the Public Administration and private entities. The Model identifies the company areas most exposed to such risks and defines specific operating protocols aimed at preventing these phenomena, through:

- formalisation and traceability of decision-making processes;
- separation of roles and responsibilities (segregation of duties) in sensitive processes;
- adoption of authorisation and control procedures;
- obligation to report any anomalies or risk situations.



The control system is reinforced by the role of the Supervisory Body, equipped with autonomous powers of initiative and control, which ensures continuous monitoring of the effectiveness and adequacy of the Model, verifying its actual application within company processes. The Supervisory Body receives and analyses the information flows from the various company departments, handles any reports, and reports periodically to the top corporate bodies, including the Board of Directors and the Board of Statutory Auditors, on the outcomes of the control activities and any areas for improvement.

To support these safeguards, Metalsistem has established a whistleblowing system accessible to employees, contractors and other relevant stakeholders, through which it is possible to report, in a confidential and protected manner, behaviours, acts or omissions deemed not compliant with the Code of Ethics, the 231 Model or applicable legislation. The system guarantees the protection of the whistleblower's identity, the confidentiality of information, and the absolute prohibition of any form of retaliation, in line with applicable legislation on the subject.

During 2025, no reports were received through the whistleblowing channel, confirming the absence of critical issues identified via this tool and, at the same time, the need to continue awareness-raising activities and the dissemination of a culture of legality within the organisation.

G1-4

Incidents of corruption or bribery

During 2025, there were no incidents of corruption or bribery, nor were any fines or sanctions imposed for breaches of applicable legislation. Furthermore, no convictions were recorded against the Group companies or their representatives in connection with such matters.



05
Entity-specific

ENTITY-SPECIFIC - Innovation, research and development and product quality

SBM-3 / MDR-P / MDR-A / MDR-T

ENTITY-SPECIFIC

Innovation, research and development and product quality

SBM-3

Material impacts, risks and opportunities and their interaction with strategy and business model

Innovation, research and development and product quality represent a material topic for the Metalsistem Group, closely linked to its business model and its ability to maintain a competitive position in its reference market.

The double materiality assessment conducted during 2025 revealed, in relation to this topic, two actual positive impacts, one risk and one opportunity. The positive impacts relate to ensuring high quality standards for its products, thanks to the use of certified materials and advanced production processes that guarantee strength and durability over time, and the ability to develop innovative solutions, supported by the presence of an in-house Studies and Research Centre and an established network of collaborations with universities, research centres and reliable partners.

These activities expose the Group to a financial risk, connected with significant costs for maintaining all research and development activities. This risk is, however, balanced by a material opportunity: the ability to introduce technologically advanced solutions to the market that have always sustained the Group's competitive position, thanks to the ability to meet the needs of a customer base increasingly attentive to innovation and to the technical characteristics of all solutions.

The materiality of this topic for the Metalsistem Group is not limited to individual initiatives, but reflects a strategic choice that has always guided the Group's actions and direction.

Innovation and quality represent central elements of the Metalsistem Group's business model and constitute a distinctive hallmark of its industrial identity. The Group continuously invests in developing dedicated research infrastructure, adopting proprietary production processes and achieving certifications, strengthening over time an integrated system oriented towards operational excellence.

This commitment is further enhanced by an ongoing dialogue with the academic and scientific communities, which helps foster a dynamic approach focused on continuous innovation. The ability to translate applied research into concrete, reliable and technologically advanced solutions enables the Group to effectively address market needs and maintain a distinctive competitive position.

In this context, innovation and quality represent not only growth drivers, but also fundamental tools to ensure the economic sustainability of investments over the long term, ensuring that the resources employed in research and development translate into tangible value for the Group and its stakeholders.

MDR-P

Policies related to innovation, research and development and product quality

The Metalsistem Group has not adopted a dedicated policy on the topic of innovation, research and development and product quality. However, the Quality, Environment and Occupational Health and Safety Policy adopted by Metalsistem defines several relevant principles regarding innovation, research and development. The Policy sets out the commitment to foster technological innovation and the continuous improvement of the quality of products and services offered across every process, to effectively meet the needs of all customers by providing high value-added solutions.

These principles form the foundation of the Group's management system, which enables innovation and quality to be translated into every process and every action carried out. This approach is what has allowed the Group to grow and establish relationships of trust with its customers, based on expertise and technical capabilities.

MDR-A

Actions and resources related to innovation, research and development and product quality

The Metalsistem Group oversees the topic of innovation and quality through an integrated system of initiatives covering the entire development cycle of its solutions, from applied research to design, from process certification to partnerships with the academic and scientific communities.

At the core of this approach is the Studies and Research Centre, an internal structure dedicated to developing innovative solutions through analysis and experimentation activities. This centre has enabled the Group to develop and patent advanced systems, as well as to ensure high product quality and safety standards. To support research activities, Metalsistem also has the Metalseismic Test Tower, a unique facility for performing full-scale seismic tests on structures over 20 metres high, in a controlled environment and with adaptable configurations. This infrastructure allows numerical models to be validated and calibrated, contributing to improved design reliability and performance.

The Group's technological independence is further strengthened by its ability to design and manufacture specific machinery internally, developed to meet production needs that cannot be satisfied by standard market solutions.

In parallel, Metalsistem leverages a structured network of relationships with leading standardisation bodies and academic institutions. The Group participates in industry projects with UNI (Italian Organisation for Standardisation) and CISI (Italian Industrial Racking Manufacturers Association) and actively collaborates with universities and research centres, including the University of Trento, the Politecnico di Milano, the Edmund Mach Foundation and I.S.P.E.S.L., with the aim of transferring scientific knowledge into concrete industrial applications to continuously improve processes and the solutions offered.

Quality management is also reflected in the adoption of a management system certified in accordance with the UNI EN ISO 9001 standard and the use of high-quality raw materials, such as 3.1 certified high-strength structural steel (EN 10204). At the design level, the adoption of modular principles makes it possible to build structures composed of independent and easily replaceable components, improving their durability and simplifying maintenance activities.

During 2025, the Group further strengthened its offering by introducing two new product lines featuring structural reinforcements, capable of increasing load capacities and improving overall technical performance, thereby expanding the solutions available to its customers.

ENTITY-SPECIFIC	
TOPIC	ACTIONS
Innovation, research and development and product quality	Presence of an in-house Studies and Research Centre and the Metalseismic Test Tower
	Construction of modular structures made of independent, individually replaceable components
	Certification of products and purchased raw materials (3.1 certified high-strength structural steel according to EN 10204)
	In-house manufacturing of machinery to meet specific production requirements
	Collaboration with UNI and CISI on specific projects, with the University of Trento and the Politecnico di Milano, the Edmund Mach Foundation and I.S.P.E.S.L.
	Certification of the quality management system in accordance with the ISO 9001 standard
	Introduction of two new product lines incorporating structural reinforcements that allow for higher load capacities (reinforced TS)

MDR-T

Targets related to innovation, research and development and product quality

Consistent with the strategic role attributed to innovation, research and development and product quality, the Metalsistem Group has defined two core targets for growth, focused on strengthening technical performance and expanding its offering. The Group plans, on the one hand, to introduce structural reinforcements to an additional product line, through the development of the reinforced Unibuild solution, and, on the other hand, to launch the production of a new series of pallet racking beams.

These initiatives are part of a pathway already initiated in 2025, aimed at improving the load capacity, reliability and adaptability of the solutions offered. In this context, product development represents a key driver to leverage applied research activities, allowing the Group to translate technical skills and engineering capabilities into concrete innovations capable of responding effectively to the evolving needs of the market and customers.

ENTITY-SPECIFIC		
TARGETS	SCOPE	BASELINE
Introduction of structural reinforcements to an additional product line (reinforced Unibuild)	Metalsistem Group	2025
Launch of production of a new range of pallet racking beams	Metalsistem Group	2025

06 Appendix

Appendix

Disclosure Requirements included in this Consolidated Sustainability Statement

The following table sets out the Disclosure Requirements that are material to the Metalsistem Group, which form the basis for preparation of this Consolidated Sustainability Statement.

DISCLOSURE	DESCRIPTION OF DISCLOSURE	PAGE
GENERAL DISCLOSURES		
ESRS 2 – General disclosures	BP-1 – General basis for preparation of the sustainability statement	15 - 16
	BP-2 – Disclosures in relation to specific circumstances	16
	GOV-1 – The role of the administrative, management and supervisory bodies	17 - 18
	GOV-2 – Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies	18
	GOV-3 – Integration of sustainability-related performance in incentive schemes	19
	GOV-4 – Statement on due diligence	19
	GOV-5 – Risk management and internal controls over sustainability reporting	20
	SBM-1 – Strategy, business model and value chain	20 - 26
	SBM-2 – Interests and views of stakeholders	27 - 28
	SBM-3 - Material impacts, risks and opportunities and their interaction with strategy and business model	29 - 31
	IRO-1 - Description of the process to identify and assess material impacts, risks and opportunities	32 - 35
	IRO-2 – Disclosure Requirements in ESRS covered by the undertaking's sustainability statement	35
ENVIRONMENTAL INFORMATION		
ESRS E1 – Climate change	ESRS 2 GOV-3 – Integration of sustainability-related performance in incentive schemes	19
	E1-1 – Transition plan for climate change mitigation	37
	ESRS 2 SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model	38
	ESRS 2 IRO-1 – Description of the processes to identify and assess material climate-related impacts, risks and opportunities	32
	E1-2 – Policies related to climate change mitigation and adaptation	38 - 39
	E1-3 – Actions and resources in relation to climate change policies	40 - 42
	E1-4 – Targets related to climate change mitigation and adaptation	42 - 43

DISCLOSURE	DESCRIPTION OF DISCLOSURE	PAGE
ESRS E1 – Climate change	E1-5 – Energy consumption and mix	44 - 45
	E1-6 – Gross Scopes 1, 2, 3 and Total GHG emissions	46 Data on Scope 3 GHG emissions omitted (disclosure subject to phase-in)
	E1-7 – GHG removals and GHG mitigation projects financed through carbon credits	Not material
	E1-8 – Internal carbon pricing	Not material
	E1-9 – Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	Disclosure subject to phase-in
ESRS E5 – Resource use and circular economy	E5-1 – Policies related to resource use and circular economy	47
	E5-2 – Actions and resources related to resource use and circular economy	48 - 49
	E5-3 – Targets related to resource use and circular economy	50
	E5-4 – Resource inflows	50 - 51
	E5-5 – Resource outflows	51
	E5-6 – Anticipated financial effects from material resource use and circular economy-related risks and opportunities	Disclosure subject to phase-in
SOCIAL INFORMATION		
ESRS S1 – Own workforce	ESRS 2 SBM-2 – Interests and views of stakeholders	27 - 28
	ESRS 2 SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model	53 - 54
	S1-1 – Policies related to own workforce	54 - 55
	S1-2 – Processes for engaging with own workforce and workers' representatives about impacts	56
	S1-3 – Processes to remediate negative impacts and channels for own workforce to raise concerns	56
	S1-4 – Taking action on material impacts on own workforce, and approaches to managing material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions	57 - 60
	S1-5 – Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	60 - 61
	S1-6 – Characteristics of the undertaking's employees	61 - 62
	S1-7 – Characteristics of non-employees in the undertaking's own workforce	63
	S1-8 – Collective bargaining coverage and social dialogue	63
	S1-9 – Diversity metrics	64 Breakdown of employees by age group not available
	S1-10 – Adequate wages	64
	S1-11 – Social protection	Disclosure subject to phase-in
	S1-12 – Persons with disabilities	65

DISCLOSURE	DESCRIPTION OF DISCLOSURE	PAGE
ESRS S1 – Own workforce	S1-13 – Training and skills development metrics	65
	S1-14 – Health and safety metrics	66
	S1-15 – Work-life balance metrics	Disclosure subject to phase-in
	S1-16 – Remuneration metrics (pay gap and total remuneration)	Disclosure subject to phase-in
	S1-17 – Incidents, complaints and severe human rights impacts	66
ESRS S4 – Consumers and end-users	ESRS 2 SBM-2 – Interests and views of stakeholders	27
	ESRS 2 SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model	67
	S4-1 – Policies related to consumers and end-users	68
	S4-2 – Processes for engaging with consumers and end-users about impacts	68
	S4-3 – Processes to remediate negative impacts and channels for consumers and end-users to raise concerns	69
	S4-4 – Taking action on material impacts on consumers and end-users, and approaches to managing material risks and pursuing material opportunities related to consumers and end-users, and effectiveness of those actions	69 - 71
	S4-5 – Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	71
GOVERNANCE INFORMATION		
ESRS G1 – Business conduct	ESRS 2 GOV-1 – The role of the administrative, management and supervisory bodies	73
	ESRS 2 IRO-1 – Description of the process to identify and assess material impacts, risks and opportunities	73
	G1-1 – Business conduct policies and corporate culture	74 - 77
	G1-2 – Management of relationships with suppliers	77
	G1-3 – Prevention and detection of corruption and bribery	78 - 79
	G1-4 – Incidents of corruption or bribery	79
	G1-5 – Political influence and lobbying activities	Not material following the double materiality assessment process
	G1-6 – Payment practices	Not material following the double materiality assessment process

TABLE OF DATAPOINTS DERIVING FROM OTHER EU LEGISLATION

The table illustrates, pursuant to Appendix B of ESRS 2, the ESRS 2 and topical ESRS datapoints deriving from other EU legislation.

DISCLOSURE REQUIREMENT AND RELATED DATAPOINT	OBLIGATIONS FROM OTHER EU LEGISLATION	DISCLOSURE WITHIN THIS DOCUMENT
GENERAL DISCLOSURES		
ESRS 2 GOV-1 Board's gender diversity, paragraph 21 (d)	SFDR: Annex I, Table 1, Indicator no. 13 Benchmark Regulation: Commission Delegated Regulation (EU) 2020/1816, Annex II	17 - 18
ESRS 2 GOV-1 Percentage of board members who are independent, paragraph 21 (e)	Benchmark Regulation: Delegated Regulation (EU) 2020/1816, Annex II	17 - 18
ESRS 2 GOV-4 Statement on due diligence, paragraph 30	SFDR: Annex I, Table 3, Indicator no. 10	19
ESRS 2 SBM-1 Involvement in activities related to fossil fuel activities, paragraph 40 (d) i	SFDR: Annex I, Table 1, Indicator no. 4 Pillar 3: Article 449a of Regulation (EU) No. 575/2013; Commission Implementing Regulation (EU) 2022/2453, Table 1: Qualitative information on Environmental risk and Table 2: Qualitative information on Social risk Benchmark Regulation: Delegated Regulation (EU) 2020/1816, Annex II	Not applicable
ESRS 2 SBM-1 Involvement in activities related to chemical production, paragraph 40 (d) ii	SFDR: Annex I, Table 2, Indicator no. 9 Benchmark Regulation: Delegated Regulation (EU) 2020/1816, Annex II	Not applicable
ESRS 2 SBM-1 Involvement in activities related to controversial weapons, paragraph 40 (d) iii	SFDR: Annex I, Table 1, Indicator no. 14 Benchmark Regulation: Article 12(1) of Delegated Regulation (EU) 2020/1818; Delegated Regulation (EU) 2020/1816, Annex II	Not applicable
ESRS 2 SBM-1 Involvement in activities related to the cultivation and production of tobacco, paragraph 40 (d) iv	Benchmark Regulation: Article 12(1) of Delegated Regulation (EU) 2020/1818; Delegated Regulation (EU) 2020/1816, Annex II	Not applicable
ENVIRONMENTAL INFORMATION		
ESRS E1-1 Transition plan to reach climate neutrality by 2050, paragraph 14	EU Climate Law: Article 2(1) of Regulation (EU) 2021/1119	37
ESRS E1-1 Undertakings excluded from Paris-aligned Benchmarks, paragraph 16 (g)	Pillar 3: Article 449a of Regulation (EU) No. 575/2013; Commission Implementing Regulation (EU) 2022/2453, Template 1: Banking book – Climate change transition risk indicators: Credit quality of exposures by sector, emissions and residual maturity Benchmark Regulation: Article 12(1), letters (d) to (g), and paragraph 2, of Delegated Regulation (EU) 2020/1818	37

DISCLOSURE REQUIREMENT AND RELATED DATAPOINT	OBLIGATIONS FROM OTHER EU LEGISLATION	DISCLOSURE WITHIN THIS DOCUMENT
ENVIRONMENTAL INFORMATION		
ESRS E1-4 GHG emission reduction targets, paragraph 34	SFDR: Annex I, Table 2, Indicator no. 4 Pillar 3: Article 449a of Regulation (EU) No. 575/2013; Commission Implementing Regulation (EU) 2022/2453, Template 3: Banking book – Climate change transition risk indicators: Alignment metrics Benchmark Regulation: Article 6 of Delegated Regulation (EU) 2020/1818	42 - 43
ESRS E1-5 Energy consumption and mix, paragraph 37	SFDR: Annex I, Table 1, Indicator no. 5	44 - 45
ESRS E1-5 Energy consumption from fossil sources disaggregated by sources (only high climate impact sectors), paragraph 38	SFDR: Annex I, Table 1, Indicator no. 5 and Annex I, Table 2, Indicator no. 5	44 - 45
ESRS E1-5 Energy intensity associated with activities in high climate impact sectors, paragraphs 40 to 43	SFDR: Annex I, Table 1, Indicator no. 6	45
ESRS E1-6 Gross Scope 1, 2, 3 and Total GHG emissions, paragraph 44	SFDR: Annex I, Table 1, Indicators no. 1 and 2 Pillar 3: Article 449a of Regulation (EU) No. 575/2013; Commission Implementing Regulation (EU) 2022/2453, Template 1: Banking book – Climate change transition risk indicators: Credit quality of exposures by sector, emissions and residual maturity Benchmark Regulation: Article 5(1), Article 6 and Article 8(1) of Delegated Regulation (EU) 2020/1818	46 Data on Scope 3 GHG emissions omitted (disclosure subject to phase-in)
ESRS E1-6 Gross GHG emissions intensity, paragraphs 53 to 55	SFDR: Annex I, Table 1, Indicator no. 3 Pillar 3: Article 449a of Regulation (EU) No. 575/2013; Commission Implementing Regulation (EU) 2022/2453, Template 3: Banking book – Climate change transition risk indicators: Alignment metrics Benchmark Regulation: Article 8(1) of Delegated Regulation (EU) 2020/1818	46
ESRS E1-7 GHG removals and carbon credits, paragraph 56	EU Climate Law: Article 2(1) of Regulation (EU) 2021/1119	Not material
ESRS E1-9 Exposure of the benchmark portfolio to climate-related physical risks, paragraph 66	Benchmark Regulation: Delegated Regulation (EU) 2020/1818, Annex II; Delegated Regulation (EU) 2020/1816, Annex II	Disclosure subject to phase-in

DISCLOSURE REQUIREMENT AND RELATED DATAPOINT	OBLIGATIONS FROM OTHER EU LEGISLATION	DISCLOSURE WITHIN THIS DOCUMENT
ENVIRONMENTAL INFORMATION		
ESRS E1-9 Disaggregation of monetary amounts by acute and chronic physical risk, paragraph 66 (a) ESRS E1-9 Location of significant assets at material physical risk, paragraph 66 (c)	Pillar 3: Article 449a of Regulation (EU) No. 575/2013; paragraphs 46 and 47 of Commission Implementing Regulation (EU) 2022/2453; Template 5: Banking book – Climate change physical risk indicators: Exposures subject to physical risk	Disclosure subject to phase-in
ESRS E1-9 Breakdown of the carrying value of its real estate assets by energy-efficiency classes, paragraph 67 (c)	Pillar 3: Article 449a of Regulation (EU) No. 575/2013; point 34 of Commission Implementing Regulation (EU) 2022/2453; Template 2: Banking book – Climate change transition risk indicators: Loans collateralised by immovable property - Energy efficiency of collateral	Disclosure subject to phase-in
ESRS E1-9 Degree of exposure of the portfolio to climate-related opportunities, paragraph 69	Benchmark Regulation: Delegated Regulation (EU) 2020/1818, Annex II	Disclosure subject to phase-in
ESRS E2-4 Amount of each pollutant listed in Annex II of the E-PRTR Regulation (European Pollutant Release and Transfer Register) emitted to air, water, and soil, paragraph 28	SFDR: Annex I, Table 1, Indicator no. 8; Annex I, Table 2, Indicator no. 2; Annex I, Table 2, Indicator no. 1; Annex I, Table 2, Indicator no. 3	Not material
ESRS E3-1 Water and marine resources, paragraph 9	SFDR: Annex I, Table 2, Indicator no. 7	Not material
ESRS E3-1 Dedicated policy, paragraph 13	SFDR: Annex I, Table 2, Indicator no. 8	Not material
ESRS E3-1 Sustainable oceans and seas, paragraph 14	SFDR: Annex I, Table 2, Indicator no. 12	Not material
ESRS E3-4 Total water recycled and reused, paragraph 28 (c)	SFDR: Annex I, Table 2, Indicator no. 6.2	Not material
ESRS E3-4 Total water consumption in m^3 per net revenue on own operations, paragraph 29	SFDR: Annex I, Table 2, Indicator no. 6.1	Not material
ESRS 2 SBM-3 - E4 paragraph 16 (a) i	SFDR: Annex I, Table 1, Indicator no. 7	Not material
ESRS 2 SBM-3 - E4 paragraph 16 (b)	SFDR: Annex I, Table 2, Indicator no. 10	Not material
ESRS 2 SBM-3 - E4 paragraph 16 (c)	SFDR: Annex I, Table 2, Indicator no. 14	Not material
ESRS E4-2 Sustainable land / agriculture practices or policies, paragraph 24 (b)	SFDR: Annex I, Table 2, Indicator no. 11	Not material
ESRS E4-2 Sustainable oceans / seas practices or policies, paragraph 24 (c)	SFDR: Annex I, Table 2, Indicator no. 12	Not material
ESRS E4-2 Policies to address deforestation, paragraph 24 (d)	SFDR: Annex I, Table 2, Indicator no. 15	Not material
ESRS E5-5 Non-recycled waste, paragraph 37 (d)	SFDR: Annex I, Table 2, Indicator no. 13	51
ESRS E5-5 Hazardous waste and radioactive waste, paragraph 39	SFDR: Annex I, Table 1, Indicator no. 9	51

DISCLOSURE REQUIREMENT AND RELATED DATAPOINT	OBLIGATIONS FROM OTHER EU LEGISLATION	DISCLOSURE WITHIN THIS DOCUMENT
SOCIAL INFORMATION		
ESRS 2 - SBM-3 - S1 Risk of incidents of forced labour, paragraph 14 (f)	SFDR: Annex I, Table 3, Indicator no. 13	53 - 54
ESRS 2 - SBM-3 - S1 Risk of incidents of child labour, paragraph 14 (g)	SFDR: Annex I, Table 3, Indicator no. 12	53 - 54
ESRS S1-1 Human rights policy commitments, paragraph 20	SFDR: Annex I, Table 3, Indicator no. 9 and Annex I, Table 1, Indicator no. 11	54 - 55
ESRS S1-1 Due diligence policies on issues addressed by the fundamental International Labour Organisation Conventions 1 to 8, paragraph 21	Benchmark Regulation: Delegated Regulation (EU) 2020/1816, Annex II	54 - 55
ESRS S1-1 Processes and measures for preventing trafficking in human beings, paragraph 22	SFDR: Annex I, Table 3, Indicator no. 11	54 - 55
ESRS S1-1 Workplace accident prevention policy or management system, paragraph 23	SFDR: Annex I, Table 3, Indicator no. 1	54 - 55
ESRS S1-3 Grievance/complaints handling mechanisms, paragraph 32 (c)	SFDR: Annex I, Table 3, Indicator no. 5	56
ESRS S1-14 Number of fatalities and number and rate of work-related accidents, paragraph 88 (b) and (c)	SFDR: Annex I, Table 3, Indicator no. 2 Benchmark Regulation: Delegated Regulation (EU) 2020/1816, Annex II	66
ESRS S1-14 Number of days lost to injuries, accidents, fatalities or illnesses, paragraph 88 (e)	SFDR: Annex I, Table 3, Indicator no. 3	66
ESRS S1-16 Unadjusted gender pay gap, paragraph 97 (a)	SFDR: Annex I, Table 1, Indicator no. 12 Benchmark Regulation: Delegated Regulation (EU) 2020/1816, Annex II	Disclosure subject to phase-in
ESRS S1-16 Excessive CEO pay ratio, paragraph 97 (b)	SFDR: Annex I, Table 3, Indicator no. 8	Disclosure subject to phase-in
ESRS S1-17 Incidents of discrimination, paragraph 103 (a)	SFDR: Annex I, Table 3, Indicator no. 7	66
ESRS S1-17 Non-respect of UNGPs on Business and Human Rights and OECD guidelines, paragraph 104 (a)	SFDR: Annex I, Table 1, Indicator no. 10 and Annex I, Table 3, Indicator no. 14 Benchmark Regulation: Delegated Regulation (EU) 2020/1816, Annex II; Delegated Regulation (EU) 2020/1818 Art 12 (1)	66
ESRS 2 - SBM-3 - S2 Significant risk of child labour or forced labour in the value chain, paragraph 11 (b)	SFDR: Annex I, Table 3, Indicators no. 12 and 13	Not material

DISCLOSURE REQUIREMENT AND RELATED DATAPOINT	OBLIGATIONS FROM OTHER EU LEGISLATION	DISCLOSURE WITHIN THIS DOCUMENT
SOCIAL INFORMATION		
ESRS S2-1 Human rights policy commitments, paragraph 17	SFDR: Annex I, Table 3, Indicator no. 9 and Annex I, Table 1, Indicator no. 11	Not material
ESRS S2-1 Policies related to value chain workers, paragraph 18	SFDR: Annex I, Table 3, Indicators no. 11 and 4	Not material
ESRS S2-1 Non-respect of UNGPs on Business and Human Rights principles and OECD guidelines, paragraph 19	SFDR: Annex I, Table 1, Indicator no. 10 Benchmark Regulation: Delegated Regulation (EU) 2020/1816, Annex II; Delegated Regulation (EU) 2020/1818, Art 12 (1)	Not material
ESRS S2-1 Due diligence policies on issues addressed by the fundamental International Labour Organisation Conventions 1 to 8, paragraph 19	Benchmark Regulation: Delegated Regulation (EU) 2020/1816, Annex II	Not material
ESRS S2-4 Human rights issues and incidents connected to its upstream and downstream value chain, paragraph 36	SFDR: Annex I, Table 3, Indicator no. 14	Not material
ESRS S3-1 Human rights policy commitments, paragraph 16	SFDR: Annex I, Table 3, Indicator no. 9 and Annex I, Table 1, Indicator no. 11	Not material
ESRS S3-1 Non-respect of UNGPs on Business and Human Rights, ILO principles or OECD guidelines, paragraph 17	SFDR: Annex I, Table 1, Indicator no. 10 Benchmark Regulation: Delegated Regulation (EU) 2020/1816, Annex II; Delegated Regulation (EU) 2020/1818, Art 12 (1)	Not material
ESRS S3-4 Human rights issues and incidents, paragraph 36	SFDR: Annex I, Table 3, Indicator no. 14	Not material
ESRS S4-1 Policies related to consumers and end-users, paragraph 16	SFDR: Annex I, Table 3, Indicator no. 9 and Annex I, Table 1, Indicator no. 11	68
ESRS S4-1 Non-respect of UNGPs on Business and Human Rights and OECD guidelines, paragraph 17	SFDR: Annex I, Table 1, Indicator no. 10 Benchmark Regulation: Delegated Regulation (EU) 2020/1816, Annex II; Delegated Regulation (EU) 2020/1818, Art 12 (1)	68
ESRS S4-4 Human rights issues and incidents, paragraph 35	SFDR: Annex I, Table 3, Indicator no. 14	69 - 71

DISCLOSURE REQUIREMENT AND RELATED DATAPOINT	OBLIGATIONS FROM OTHER EU LEGISLATION	DISCLOSURE WITHIN THIS DOCUMENT
GOVERNANCE INFORMATION		
ESRS G1-1 United Nations Convention against Corruption, paragraph 10 (b)	SFDR: Annex I, Table 3, Indicator no. 15	74 - 77
ESRS G1-1 Protection of whistle-blowers, paragraph 10 (d)	SFDR: Annex I, Table 3, Indicator no. 6	74 - 77
ESRS G1-4 Fines for violation of anti-corruption and anti-bribery laws, paragraph 24 (a)	SFDR: Annex I, Table 3, Indicator no. 17 Benchmark Regulation: Delegated Regulation (EU) 2020/1816, Annex II	79
ESRS G1-4 Standards of anti-corruption and anti-bribery, paragraph 24 (b)	SFDR: Annex I, Table 3, Indicator no. 16	79

METALSISTEM GROUP

CONSOLIDATED SUSTAINABILITY STATEMENT

2025

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