

Industrial expertise,  
quality, sustainability:  
a tried-and-tested model

Sustainability Report

2025





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quality, sustainability:  
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# Letter to Stakeholders

## **Dear readers,**

We are pleased to present Padana Tubi's 2025 Sustainability Report.

This report marks the continuation of our journey in reporting on environmental, social and corporate governance impacts, a journey that began five years ago.

Geopolitical events and regulatory measures These factors influenced global economic trends during the year, with a range of effects on the steel industry.

The start of the new Trump administration in the United States led first to the reintroduction, without any exemptions, of 25% tariffs on imported steel and, shortly afterwards, to an increase to 50%, which remains in force today.

In March, the European Union presented its long-awaited 'Action Plan on Steel and Metals', setting out a number of guidelines for the revitalisation of the steel industry, which is regarded as a strategic sector for the continent.

The plan is based on a number of key issues: access to sustainable and competitive energy sources; the CBAM mechanism to combat 'carbon leakage'; a review of safeguard quotas to protect against imports from third countries; the promotion of the circular economy and scrap-based processes; economic incentives for decarbonisation projects; and the protection of jobs. Although the plan is commendable in principle, it still lacks concrete and effective measures.

Also in early 2025, the European Commission adopted the Omnibus Package, which contains a number of regulatory amendments to the CSRD (Corporate Sustainability Reporting Directive) and CSDDD (Corporate Sustainability Due Diligence Directive) and provides for a postponement of their implementation.

Following these changes and their transposition into Italian law, Padana Tubi falls outside the scope of entities required to report on ESG matters.

Nevertheless, recognising the strategic importance of these issues and with a view to ensuring transparent communication with our stakeholders, we have decided not to discontinue the publication of this report, in accordance with GRI standards.

The CBAM legislation, which came into full force at the start of 2026, whilst commendable for its aim of promoting low-impact technologies, is not only complex in terms of its administrative implications but also lacks operational regulations; there is a lack of clarity regarding the actual costs that importers will face, and it appears to lack the supply-chain perspective that would be necessary for the measure to be truly effective.

The mechanism also applies to welded tubes (as well as coils) may, however, provide protection for our own production too.

From a strictly business perspective, you will read that, during the year, the company decided to expand its plant on Via Roncaglio by approximately 8,000 square metres in order to increase its storage capacity for carbon steel products. The administrative process required to start the building works should be completed in 2026.

Work has also begun on modernising and replacing some coil-cutting lines, with the usual focus on improving safety standards.

In the new stainless steel production warehouse, the installation of the plant has been completed; both the cutting line and the profiling line have passed their initial start-up tests, and their output is expected to stabilise gradually during 2026.

Existing organisational and product certifications, such as ISO 9001, ISO 45001, ISO 14001, ISO 14064 and EPDs for all product families, have been renewed and maintained, and ISO 50001 certification for energy efficiency has been obtained.

We continue to place a high priority on workers' health and safety, with a view to continuous improvement and as part of specific company initiatives, which we outline in detail below.

In the 2025 financial year too, the company achieved financial results of the highest calibre, which serve as a numerical illustration of the long-term sustainability of its economic, social and environmental model, as well as the value of its relationships.

We welcome any suggestions you may have, and we hope you enjoy reading these pages.

*Alfieri Family*

# 2025 highlights

## In summary

Year of incorporation

**1970**

Covered production area

**400,000**sqm

Sites and local units

**14**

Countries served

**60**

Certifications

UNI EN ISO 9001:2015  
UNI EN ISO 14001:2015  
UNI EN ISO 45001:2018  
UNI EN ISO 50001:2018  
UNI EN ISO 14064, EPD  
REG UE 305/2011  
UKCA  
PED

## Social Sustainability

Number of employees

**803**

+7% compared to 2024

Employees on open-ended contracts

**91%**

Hours of training provided

**9,597**

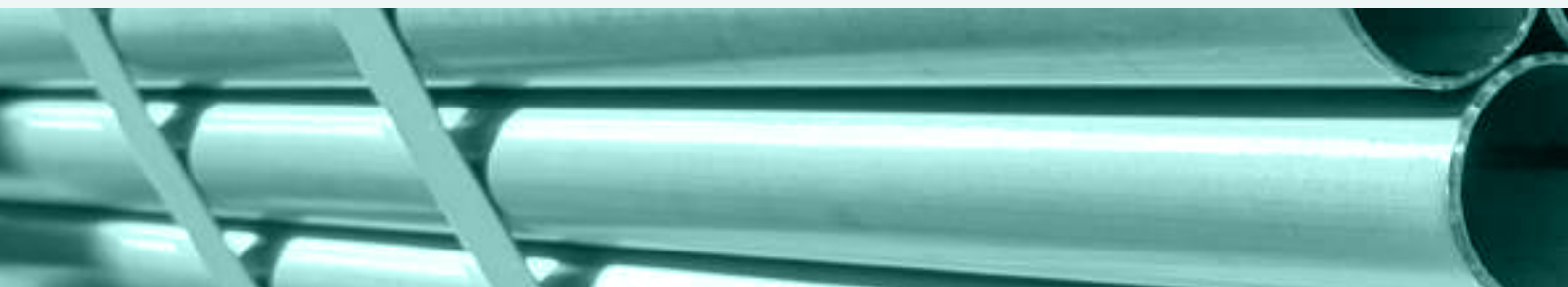
+57% compared to 2022

of which hours of training on occupational health and safety

**8,287**

Amount donated to support the local area

€ **269,830**





## Environmental Sustainability

Waste sent for recovery

**99%**

Non-hazardous waste

**98%**

Energy consumption within  
th organisation

**298,471** GJ

-11% compared to 2024

Photovoltaic-generated energy

**11,830** GJ

Self-generated energy consumed

**72%**

Electricity from renewable sources

**100%**

## Economic Sustainability

Turnover

€ **886,150,150**

Production value

€ **886,272,886**

Net profit

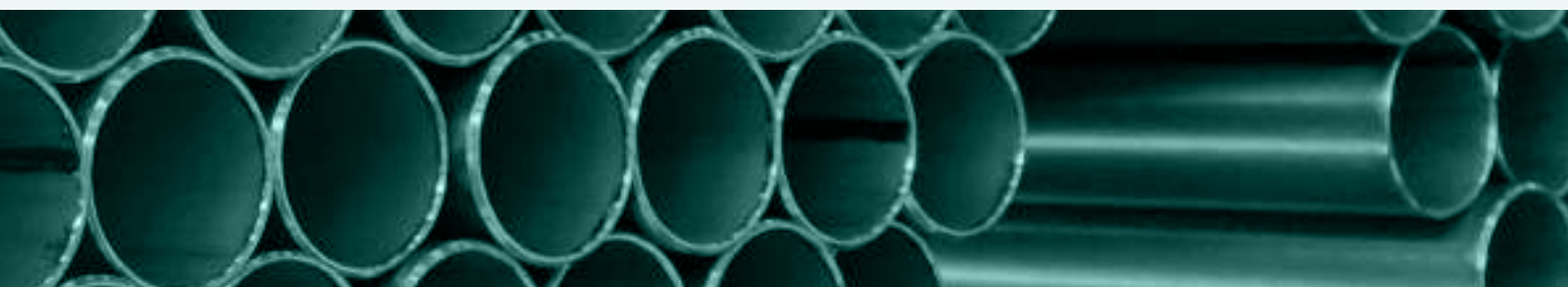
€ **39,883,717**

Capital expenditure

€ **17,983,139**

Tonnes of steel sold

More than **800,000**



# 1.



# Padana Tubi: an industrial history that looks beyond borders



# Identity and development over time

|                                                              |                                                   |                                                      |                  |                           |                          |
|--------------------------------------------------------------|---------------------------------------------------|------------------------------------------------------|------------------|---------------------------|--------------------------|
| PRODUCED BY:                                                 | 400,000<br>SQUARE<br>METRES OF<br>COVERED<br>AREA | OVER 800,000<br>TONNES OF<br>TUBES SOLD<br>EACH YEAR | 803<br>EMPLOYEES | 60<br>COUNTRIES<br>SERVED | 73%<br>EXPORT<br>SALES   |
| • BLACK AND GALVANISED<br>CARBON STEEL TUBES AND<br>PROFILES |                                                   |                                                      |                  |                           | 27%<br>SALES<br>IN ITALY |
| • STAINLESS STEEL TUBES<br>AND PROFILES                      |                                                   |                                                      |                  |                           |                          |
| • FLAT CARBON STEEL SHEETS                                   |                                                   |                                                      |                  |                           |                          |

**Padana Tubi & Profilati Acciaio S.p.A. is one of Europe's leading manufacturers and suppliers of welded tubes, primarily intended for structural applications in carbon steel and stainless steel. In addition to these activities, the company also sells galvanised tubes and markets sheet metal and offcuts.**

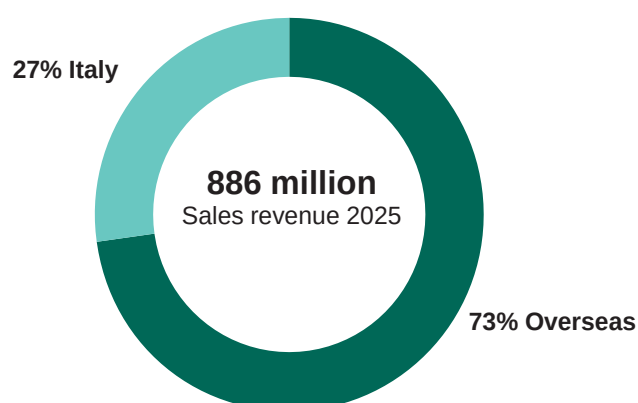
Founded in 1970 in Guastalla by the Alfieri family, Padana Tubi began its growth by manufacturing welded carbon steel tubes. A path of steady growth led, in 1989, to the introduction of stainless steel tubes, significantly expanding the product range. In the years that followed, gradual and targeted investment enabled the construction of new plants, the expansion of the product range and the diversification of raw materials, contributing to the development of the product portfolio.

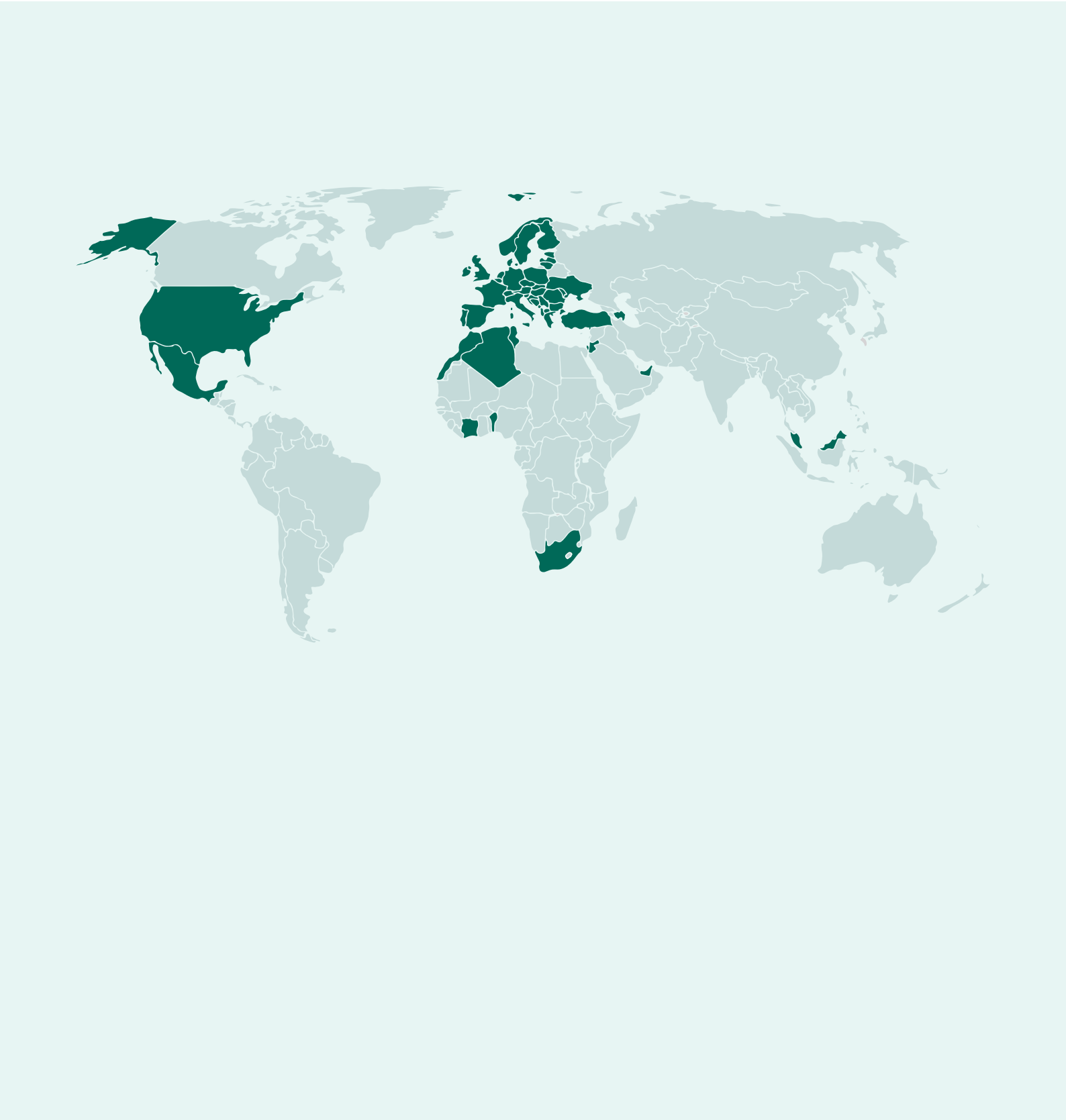
Today, Padana Tubi has **803 employees** and operates across a **total area** of approximately **400,000 square metres**, with all its **plants located in Guastalla (RE)**.

Its presence on the European market translates into annual sales of over **800,000 tonnes of steel tubes**.

**The link with the Emilia region remains a distinctive feature**, particularly in an industrial context characterised by trends towards offshoring. This strong local presence goes hand in hand with a well-established international presence: the sales network extends to **over 60 countries** and **sales** are split between **27% on the Italian market** and **73% abroad**, mainly in Europe.

## 2025 REVENUES BY GEOGRAPHICAL AREA





# The stages of an evolution driven by investment and innovation

## 1969-1970

### Origins

On 13 October 1969, Padana Tubi & Profilati Acciaio S.p.A. was established in Guastalla by the Alfieri family. The company began operations with 14 employees and two production lines: one dedicated to the longitudinal slitting of coils and the other to the production of tubes.

## 1989-1994

### Entry into stainless steel

In 1989, production of stainless steel tubes began with the installation of TIG welding lines. In 1994, production of high-frequency (HF) welded tubes began.

## 1998

### The expansion of the operational footprint

Padana Tubi purchased its first plots of land in Via Roncaglio and a larger plot in Reggiolo, marking the start of a phase of expansion in its carbon steel tube business.

## 1975-1976

### The first industrial investments

In 1975, a plot of land was purchased in San Giacomo, which was subsequently used for the production of stainless steel. In 1976, the 'Elephant' tube production line came into operation, expanding the range to include large-diameter, thick-walled carbon steel tubes.

## 1995-1996

### Quality certification and expansion of services

In 1995, Padana Tubi was awarded ISO 9001 certification. The following year, the company introduced new surface finishing processes for stainless steel, including satin finishing and polishing, thereby expanding the range of services offered to customers.

## 2000-2003

### The strengthening of the plants

In 2000, the plant on Via Roncaglio came into operation, equipped with four new production lines, as well as galvanising and levelling facilities. Subsequently, following the acquisition of the former Alfieri Legnami industrial site, a further extension was carried out to the original site on Via Portamurata.

## 2007-2008

### New technologies and CE marking

In 2007, the first SMS Meer production line began operating in Via Roncaglio, marking the company's entry into the market for large-diameter structural tubes. In 2008, the company was awarded the Factory Production Control certificate (CE marking) for its carbon steel products (Roncaglio and Porta Murata plants).

## 2019-2020

### Safety and new infrastructure

In 2019, Padana Tubi obtained ISO 45001:2018 certification and began construction of Warehouse O on Via Salati, which was to house a new longitudinal cutting line and a second SMS Group production line for high-strength carbon steel structural tubes.

## 2023-2024

### Business continuity and new certifications

In 2023 and 2024, Padana Tubi published its second and third Sustainability Reports and updated its organisational carbon footprint in accordance with ISO 14064.

The expansion of the plant continues with the construction of Warehouse P, which is to house a new stainless steel production line, and a new office building is being built to support Warehouse O.

The process of obtaining an EPD (Environmental Product Declaration) for five product families has also been completed.

## 2011-2016

### New facilities and business organisation

Five new warehouses were built and the 12" stainless steel production line was installed. At the same time, the relocation and modernisation of the laser production lines to a dedicated facility got under way.

In 2015, the company adopted the Organisational, Management and Control Model in accordance with Legislative Decree 231/2001. In 2016, it obtained the OHSAS 18001:2007 certification for occupational health and safety management.

## 2021-2022

### Environmental management and reporting

In 2021, the company was awarded ISO 14001:2015 certification. In 2022, reporting activities began with the publication of the first Sustainability Report, and ISO 14064 certification was obtained for the measurement of the carbon footprint. In the same year, Warehouse O was completed and production began on the second SMS line, in addition to the installation of a photovoltaic system.

At the same time, the laser production lines were relocated and modernised in a dedicated facility.

## 2025

### Investments in systems, safety and energy management

In 2025, Padana Tubi completed a multi-year programme of measures to improve the safety of its roll forming machines and was awarded ISO 50001 certification. The new Warehouse P on Via Caduti dei Lager is being completed, where work is beginning on commissioning the slitter and the 10" stainless steel HF line, which is set to reach full capacity in 2026.

The Company has approved the expansion of Plant B, with an increase in storage expected to be operational from 2027. In the second half of the year, work began on the foundations for a new slitter in Via Portamurata, with installation scheduled for completion by the end of 2026. Work continued on measures to reduce noise in the workplace.

# Industrial structure and business model

GRI 2-1 | GRI 2-2

|                          |                                                               |                                                                                                                    |                                                                                   |                                                                                                                |
|--------------------------|---------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------|
| 14 PRODUCTION FACILITIES | 3,640 kWp INSTALLED PHOTOVOLTAIC CAPACITY AT COMPANY PREMISES | COMMISSIONING OF THE 14TH PLANT (P) DEDICATED TO THE STAINLESS STEEL DIVISION, FEATURING A NEW PHOTOVOLTAIC SYSTEM | UPGRADING OF EQUIPMENT AND WORK VEHICLES, INCLUDING WORK ON ROAD SIGNS AND PAVING | 2026 OBJECTIVE: EXTENSION OF PLANT B TO INCREASE STORAGE CAPACITY AND INSTALL A NEW SLITTER IN VIA PORTAMURATA |
|--------------------------|---------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------|

Padana Tubi ranks amongst the leading companies in the sector thanks to a solid business model based on quality, innovation and safety. The company's competitiveness stems from strategic decisions relating to the selection of raw materials, the use of advanced industrial technologies in production processes, a focus on customers, and the management of the safety and wellbeing of its people.

## Production facilities

Padana Tubi's production facilities are all located in **Guastalla**, where the company was founded and continues to grow. The head office, situated at **Via Portamurata**, houses the **general management** and one of the plants dedicated to the production of carbon steel tubes.

In addition to this, there are:

- **Five main production sites;**
- **Eight ancillary facilities**, used for secondary processing and the storage of raw materials and finished products.

The industrial base has been gradually expanded in recent years. In **2024**, a **support office for Plant O** was completed; it now operates independently. In **2025**, the **fourteenth plant (Plant P)** came into operation, where work began on commissioning the slitter and the new 10" stainless steel HF line, which is due to reach full capacity in 2026.

In May **2025**, the **extension of Plant B** was approved, adding approximately 8,000 m<sup>2</sup> to increase the storage area. Work is scheduled to begin in the first half of 2026, with the project due to become operational in 2027.

In the **second half of 2025**, work began on the foundations for a new slitter in **Via Portamurata**, which will replace a line that is no longer performing to standard. Installation and interconnection are scheduled to be completed by the end of 2026.



TABLE 1 – PREMISES AND LOCAL UNITS

|          | ADDRESS              | PRODUCTION                           |
|----------|----------------------|--------------------------------------|
| <b>A</b> | Via Portamurata      | CARBON – CARBON STEEL/HEAD OFFICE    |
| <b>B</b> | Via Roncaglio        | CARBON – CARBON STEEL                |
| <b>C</b> | Via Dossetti         | STAINLESS STEEL                      |
| <b>D</b> | Via De Gasperi       | STAINLESS STEEL                      |
| <b>E</b> | Via Togliatti        | STAINLESS STEEL                      |
| <b>F</b> | Via Ferrari          | STAINLESS STEEL                      |
| <b>G</b> | Via Dossetti         | STAINLESS STEEL                      |
| <b>H</b> | Via Nenni            | STAINLESS STEEL                      |
| <b>I</b> | Via Dossetti         | CARBON – CARBON STEEL                |
| <b>L</b> | Via Nenni            | STAINLESS STEEL                      |
| <b>M</b> | Via Dossetti         | STAINLESS STEEL                      |
| <b>N</b> | Via Portamurata      | CARBON – CARBON STEEL                |
| <b>O</b> | Via Salati           | CARBON – CARBON STEEL                |
| <b>P</b> | Via Caduti dei Lager | STAINLESS STEEL<br>(new 10" HF line) |

## Work on systems, safety and equipment

In **2025**, further work on the production lines was completed, bringing to a close a multi-year project dedicated to raising the standards of **safety on the roll-forming machines**.

Work has continued on **measures to reduce noise in the workplace**, with the installation of soundproof booths on a slitter and a profiling line, as well as the purchase of a new booth for a further line, due to be delivered in spring 2026. Furthermore, **the use of silencers has been extended** across the various departments.

The replacement of **small automatic strapping machines** has continued, and **chip breakers have been installed** on several production lines at Plant A, with plans to extend this to the production lines on Via Roncaglio in 2026.

The movement of vehicles both inside and outside the premises has become increasingly important for safety, with measures taken in relation to equipment, signage, flooring and operating procedures aimed at preventing collisions and accidents involving pedestrians.



## Energy and photovoltaic systems

The large surface area of the plants has enabled the installation of **photovoltaic systems** with a total rated power of **3,640 kWp**. The new **P Plant** has been fitted with an 861.82 kWp photovoltaic system. In **2025**, the company obtained **ISO 50001 certification**, thereby completing its integrated management system and strengthening its focus on energy efficiency measures.

## The product range

**Padana Tubi ranks amongst Europe’s leading manufacturers of welded tubular products, thanks to its long-term investment, customer focus, delivery times and product quality.**

|                                                                |                                                                                                                        |                                 |  |
|----------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------|---------------------------------|--|
| 2 PRODUCTION DIVISIONS:<br>STAINLESS STEEL<br>AND CARBON STEEL | INSTALLATION OF A<br>NEW PRODUCTION LINE<br>FOR LARGE-DIAMETER,<br>THICK-WALLED TUBES –<br>STAINLESS STEEL<br>DIVISION | 2026 OBJECTIVE:<br>RANGE UPDATE |  |
|----------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------|---------------------------------|--|

The product range is manufactured in accordance with the relevant standards and is divided into two main divisions:

- Carbon steel
- Stainless steel

**Steel is at the heart of Padana Tubi’s production:** a recyclable material that can be reintroduced into production cycles, whilst retaining its properties and contributing to the efficient use of resources.





# Carbon steel division



The Carbon Division's production comprises the following types:

- **Structural tubes** in accordance with UNI EN 10219-1;
- **Pickled tubes for precision applications** in accordance with UNI EN 10219-1 or UNI EN 10305-3 (only square-rectangular profiles);
- **Tubes from galvanised strip** for precision applications in accordance with UNI EN 10305-3;
- **Sheet metal** (black, galvanised, pickled, buckled and striated);
- **Strips;**
- **Special profiles and window frames.**

## Raw materials

The coils used in the production of tubes comply with the UNI EN 10025-2 standard, which sets out the technical conditions for the supply of non-alloy steels intended for structural applications, and with the UNI EN 10051 standard, which relates to dimensional and shape tolerances.

For the production of galvanised tubes, the coils used comply with the UNI EN 10346 standard, which sets out the technical conditions for the supply of flat steel products galvanised using the Sendzimir method, via a continuous hot-dip coating process, intended for cold forming.

## Product range

The range includes:

- Round tubes with diameters from 12 to 457.2 mm and thickness from 1.5 to 18 mm;
- Square tubes ranging from 10×10 to 350×350 mm and with thicknesses from 1.5 to 18 mm;
- Rectangular tubes from 15×10 to 500×200 mm with thickness from 1.5 to 18 mm;
- Tubes from galvanised strip with thicknesses from 1.5 to 4 mm;
- Square-rectangular tubes from galvanised strip with thicknesses from 1.5 to 3 mm in accordance with UNI EN 10305-3;
- Sheet metal (black, galvanised, pickled, buckled and striated) in standard formats and thickness from 1 to 10 mm.

Profile lengths vary from 4,500 mm to 18,000 mm.

For galvanised products, at the customer's request, it is possible to coat the weld – the only part left uncoated due to the removal of the outer weld bead – using a gun that atomises a zinc wire into a fine spray. The company also offers hot-dip galvanising or electrogalvanising services on a contract basis.

In 2023, with the commissioning of the 18" SMS line, Padana Tubi expanded its product range to include large-diameter, thick-walled tubes, with diameters of up to 457.2 mm and wall thickness of up to 18 mm.

|                                                                                   |                                                                                   |                                                                                   |                                                                                    |                                                                                     |                                                                                     |
|-----------------------------------------------------------------------------------|-----------------------------------------------------------------------------------|-----------------------------------------------------------------------------------|------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------|
|  |  |  |   |  |  |
|  |  |  |  |  |  |
| <b>Structural round tubes</b><br>Theoretical weight<br>kg/metre                   | <b>Structural square tubes</b><br>Theoretical weight<br>kg/metre                  | <b>Structural rectangular tubes</b><br>Theoretical weight<br>kg/metre             | <b>Thick-walled structural round tubes</b><br>Theoretical weight<br>kg/metre       | <b>Thick-walled structural rectangular tubes</b><br>Theoretical weight<br>kg/metre  | <b>Pickled and galvanised round tubes</b><br>Theoretical weight<br>kg/metre         |

## Steel grade

Structural carbon steel:

- S235JRH
- S275J0H
- S275J2H
- S355JH
- S355J2H

Pickled steel:

- S235JRH
- E220+CR2=S2 for precision applications

Galvanised steel:

- DX51D
- E220 CR2=S4 for precision applications

## Checks

The following steps are carried out during the production process:

- dimensional checks in accordance with EN 10219-2 and EN 10305-3;
- visual inspections in accordance with EN 10219-2 and EN 10305-3;
- crushing tests for round tubes in accordance with UNI EN ISO 8492;
- Inspection of welds produced using the HF method, carried out using the eddy-current method in accordance with standard UNI EN ISO 10893-2 (formerly UNI EN 10246-3).

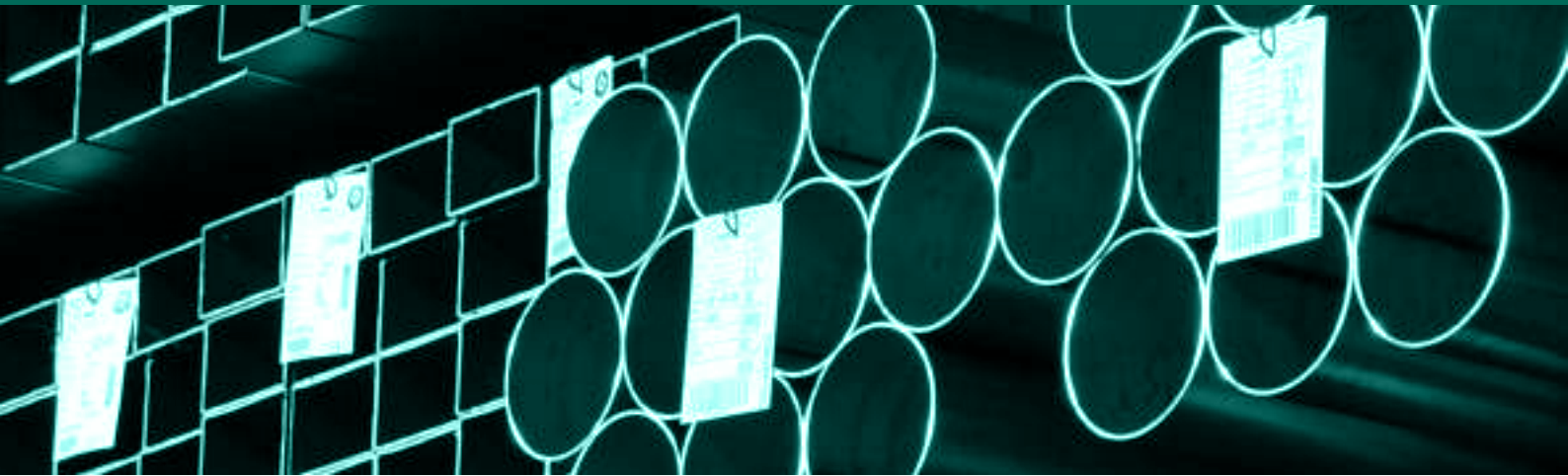
Compliance checks continue to be carried out in the company's laboratories, where the machinery used is certified and undergoes regular maintenance.

The following tests are carried out on the tube samples:

- UNI EN ISO 6892-1 tensile test;
- UNI EN ISO 148-1 impact test;
- spectrometric checks to determine chemical composition;
- macrographic checks on thermally altered areas.

The results of the above tests are shown on each accompanying 3.1 certificate.

# Stainless steel division



The stainless steel Division's production comprises the following types:

- **Round tubes** with two types of weld: HF (EN 10296-2) and LASER (EN 10217-7);
- **Square/rectangular tubes.**

The following surface finishes are also available: standard in-line brushed, satin, and high-gloss.

## Raw materials

The coils used for tube production comply with the **EN 10088-2** and **EN 10028-7 standards**.

The steel used is cold-rolled to a thickness of up to and including 1.6 mm, and hot-rolled from 2 mm to 6 mm.

## Product range

The range includes:

- Round tubes with diameters from 6.0 to 323.9 mm with thickness from 1 mm to 6 mm;
- Square tubes from 10×10 to 200×200 mm with thickness from 1 mm to 6 mm;
- Rectangular tubes from 20×10 to 300×100 mm with thicknesses from 1 to 6 mm.

The standard length of the tubular sections is 6,000 mm; on request, lengths ranging from 4,500 to 12,000 mm can be arranged with the Sales Department.

Since 2014, the range of stainless steel products has been expanded with the introduction of large-diameter, thick-walled tubes. In 2024, the range of HF-welded stainless steel tubes was also expanded with the introduction of the 120x120 and 150x100 sizes, up to a wall thickness of 6 mm.

Construction work on the new Warehouse P in Via Caduti dei Lager has been completed, and commissioning of the slitter and the 10" Inox HF line has begun, with the facility due to reach full capacity in 2026.

## Steel grade

- 304L (1.4307)-Cr 17,5 a 19,5-Ni 8,00 a 10,00;
- 316L (1.4404)-Cr 16,5 a 18,5-Ni 10,00 a 13,00-Mo 2,00 a 2,5;
- 316Ti (1.4751)-Cr 16,5 a 18,5-Ni 10,5 a 13,5 Mo 2,00 a 2,5.

|                                                                                   |                                                                                   |                                                                                   |                                                                                    |                                                                                     |
|-----------------------------------------------------------------------------------|-----------------------------------------------------------------------------------|-----------------------------------------------------------------------------------|------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------|
|  |  |  |   |  |
|  |  |  |  |  |
| <b>Round tubes</b><br>Theoretical weight<br>kg/metre                              | <b>Square tubes</b><br>Theoretical weight<br>kg/metre                             | <b>Rectangular tubes</b><br>Theoretical weight<br>kg/metre                        | <b>Rolled round tubes</b><br>Theoretical weight<br>kg/metre                        | <b>Oval tubes</b><br>Theoretical weight<br>kg/metre                                 |

## Checks

The following steps are carried out during the production process:

- dimensional checks in accordance with standards EN 10217-7, EN 10296-2, EN 10219-2 and EN 10378;
- visual inspections in accordance with standards EN 10217-7, EN 10296-2, EN 10219-2 and EN 10378;
- widening tests for round tubes in accordance with UNI EN ISO 8495;
- inspection of welds produced using the HF/LASER method, carried out using the eddy-current method in accordance with standard UNI EN ISO 10893-1 and UNI EN ISO 10893-2.

Conformity checks are continuing at Padana Tubi's laboratories. The following tests are carried out on the tube samples:

- UNI EN ISO 6892-1 tensile test;
- UNI EN ISO 148-1 impact test;
- spectrometric checks to determine chemical composition;
- macrographic checks on thermally altered areas.

The test results are set out in the accompanying 3.1 Certificate.

# The value chain: structure and stages of the process

The activities that make up Padana Tubi's value chain are divided into three broad categories, each of which makes a strategic contribution to value creation:

- 1. Upstream:** this includes processes involving suppliers of goods and services, in particular steelworks, located both in Italy and abroad, in European and non-European countries;
- 2. Own operations:** this includes the processes carried out within Padana Tubi's plants, from the processing of raw materials to the manufacture of the finished product;
- 3. Downstream:** this refers to the stages following the distribution of the finished product to end customers, both in Italy and abroad, right through to the end of its life.

The value chain extends along a process that runs from **raw material extraction** to **end-of-life product recovery**, involving various **stakeholders** at every stage of the production process.

The graph below clearly illustrates this.

Where

Non-EU/EU

EU (Italy)

What

Upstream

Own operations

Raw materials production

Procurement

Inbound transport/  
logistics

Storage and preliminary processing

Mining

Transport of  
raw materials  
and scrap to  
the steelworksProduction  
of Coils

Coils

Storage at  
the Port of  
RavennaOn-site  
storage of  
coils, auxiliary  
materials and  
packaging

Cutting coils

Storage of semi-  
finished productsSteel recycling  
and scrap  
productionAuxiliary  
materials

Packaging

Customs  
Inspection

Who

Padana Tubi Human Resources

Supplier of goods and services

Public administration and institutions

Certification and inspection bodies



## Upstream: from raw material extraction to production

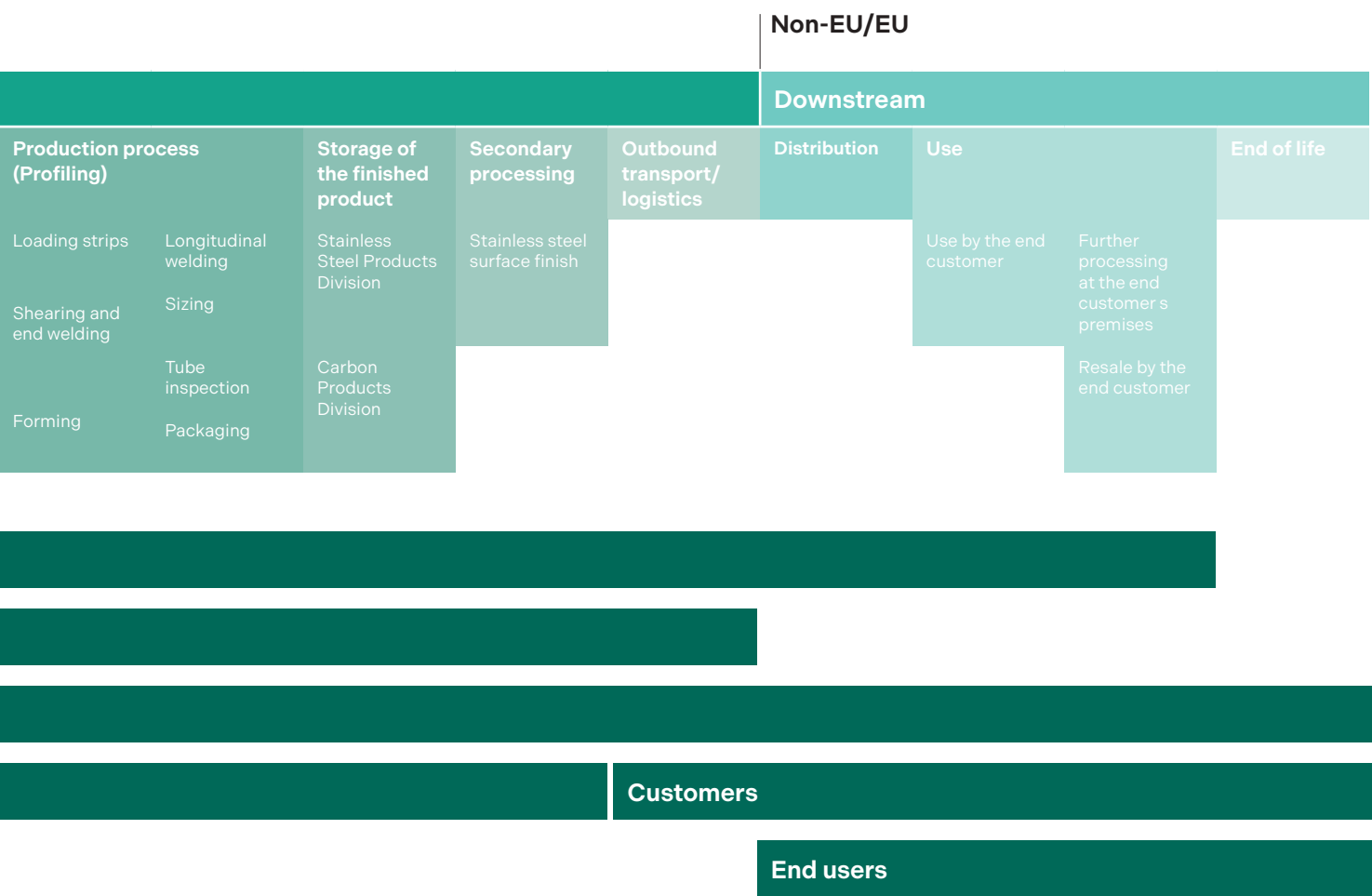
The **first stage of the value chain** involves the **extraction and production of raw materials** for steel production, which can be obtained either through mining or by **recycling steel scrap**. Steel recycling allows the material to be reintroduced into production cycles, thereby reducing the need for virgin raw materials.

The **raw materials** are then **processed** by steelworks **into coils** – that is, sheets of steel wound into coils – which constitute Padana Tubi’s **main source of supply**. At this stage, the company also sources auxiliary materials and packaging materials for its finished products. All purchased materials are then transported to the company’s plants and stored pending processing.

Raw materials and auxiliary materials are transported by various means, including **shipment by sea, which is mainly used for carbon steel** and, in some cases, for stainless steel.

In such cases, the material is temporarily **stored at the Port of Ravenna** before being transported to Padana Tubi’s plants.

Once they reach their destination, the coils undergo **preliminary processing**, which involves cutting and the temporary storage of the semi-finished products. The material is cut lengthways, producing strips of varying widths depending on the diameter of the tubes or sections to be produced.

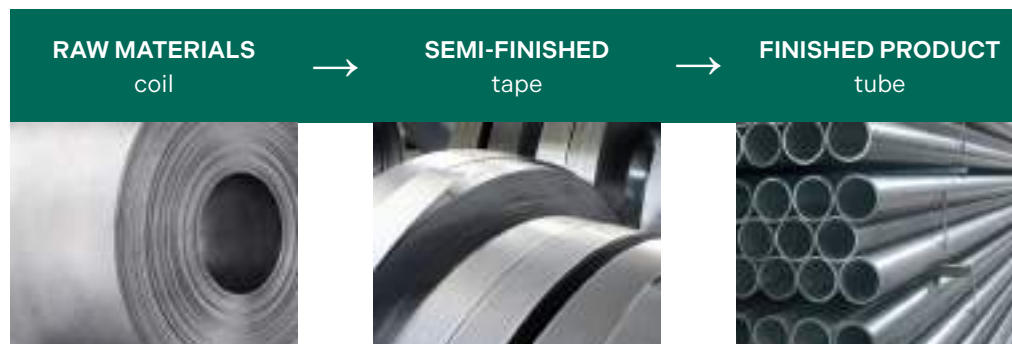


## Internal activities: the production process

The core stage of the in-house operations is the **roll-forming process**, in which the strips are progressively shaped until the final form of the tube or profile is achieved. This process is carried out using a series of rotating rollers that shape the steel.

The **main stages of the production process** include:

- **shearing and end welding of the strip;**
- **forming;**
- **longitudinal welding;**
- **sizing;**
- **tube quality control;**
- **packaging.**



The finished product is stored pending **distribution to customers** or it may undergo further processing. These include, for the tubes produced by the stainless steel division, surface finishes such as satin finishing and polishing, which affect the product's aesthetic and surface characteristics. Padana Tubi does not have a **design and development** phase, as its products are manufactured in accordance with national and international regulations or on the basis of market standards. The variants relate to **length, size and raw material**, depending on customer requirements.

The entire **production process is managed digitally** using software that enables the tracking of production stages, from the receipt of raw materials right through to the dispatch of the finished product.

## Downstream: distribution, use and end-of-life

Once production is complete, the finished products are distributed to customers, who can use them, resell them or subject them to further processing. Although the stages of use and resale are managed directly by customers, they nevertheless represent a significant stage in the product life cycle, with implications for the overall dynamics of the supply chain. At the end of their useful life, the products are recovered and sent for disposal or recycling, thereby entering the steel recovery system and reducing the need for virgin raw materials.

## Stakeholders along the value chain

In line with the stages depicted in the value chain, **stakeholders are spread across the various stages of the process.**

The **upstream phase** includes suppliers of goods and services, in particular steelworks, as well as the public administration and the institutions that regulate the import flows of raw materials.

**Own operations** include the company's employees, certification and inspection bodies, suppliers of goods and services, and customers, with whom the company interacts during its operational and administrative activities.

In the **downstream phase**, the main stakeholders are customers and end-users, as well as the local and international institutions that regulate the marketing of products.

## Compliance with and observance of international sanctions

Since 2022, following the outbreak of the war in Ukraine, **Padana Tubi has severed all business ties with Russian companies**, whether as suppliers or as customers.

The company has implemented **measures aimed at ensuring compliance with European prohibitions and sanctions**, through **checks on counterparties' details** and the request for compliance declarations.

# 2.



# The governance of Padana Tubi



# Organisational structure and corporate structure

GRI 2-9 | GRI 2-10 | GRI 2-11 | GRI 2-26 | GRI 405-1

**BoD:**  
50% WOMEN  
50% MEN

3 OUT OF 11 MEMBERS  
OF THE GOVERNING  
BODIES (BOARD OF  
DIRECTORS AND  
BOARD OF AUDITORS)  
AGED BETWEEN  
30 AND 50

5  
ATTORNEYS

Since 2021, Padana Tubi has been controlled by a sole shareholder and is subject to management and coordination by Padana Holding S.r.l..

The company's **corporate governance** system follows a **traditional model**, in which the corporate bodies are represented by:

- **Shareholders' Meeting**
- **Board of Directors**
- **Board of Statutory Auditors**

## Board of Directors (BoD)

The **Board of Directors** has the broadest powers to manage the company, with the authority to carry out all acts of ordinary and extraordinary administration necessary to achieve the company's objectives, with the exception of those reserved for the Shareholders' Meeting by law or the Articles of Association.

The Board of Directors currently comprises **six members**, who will remain in office until the financial statements for the year ending 31.12.2025 have been approved. The company is led by the Alfieri family, with **Anna Alfieri** serving as **Chair**. The composition of the Board of Directors reflects gender balance, with three men and three women. In terms of age, five members are over 50 and one is aged between 30 and 50.

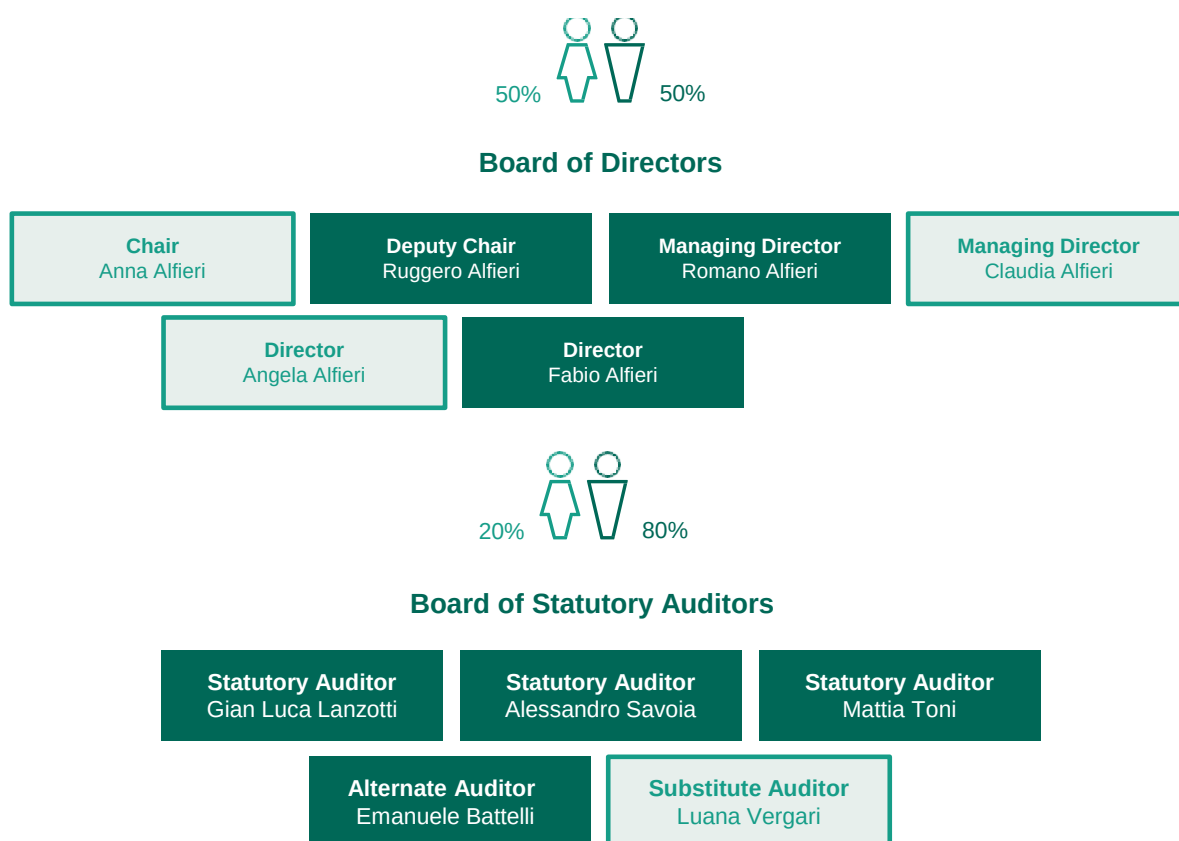
## Board of Statutory Auditors

The **Board of Statutory Auditors** is responsible for **monitoring** compliance with the law and the Articles of Association, ensuring the principle of sound management and the adequacy of the Company's organisational structure.

The body comprises **five members**, comprising: three standing auditors and two alternate auditors. Two members are aged between 30 and 50, whilst three are over 50; in terms of gender, the body comprises four men and one woman.



FIGURE 2 – COMPOSITION OF THE CORPORATE BODIES AS AT 31.12.2025



Padana Tubi has implemented a **system of powers of attorney** for contractors who operate independently within their respective areas of responsibility, in order to make the delegated powers clear to third parties as well.

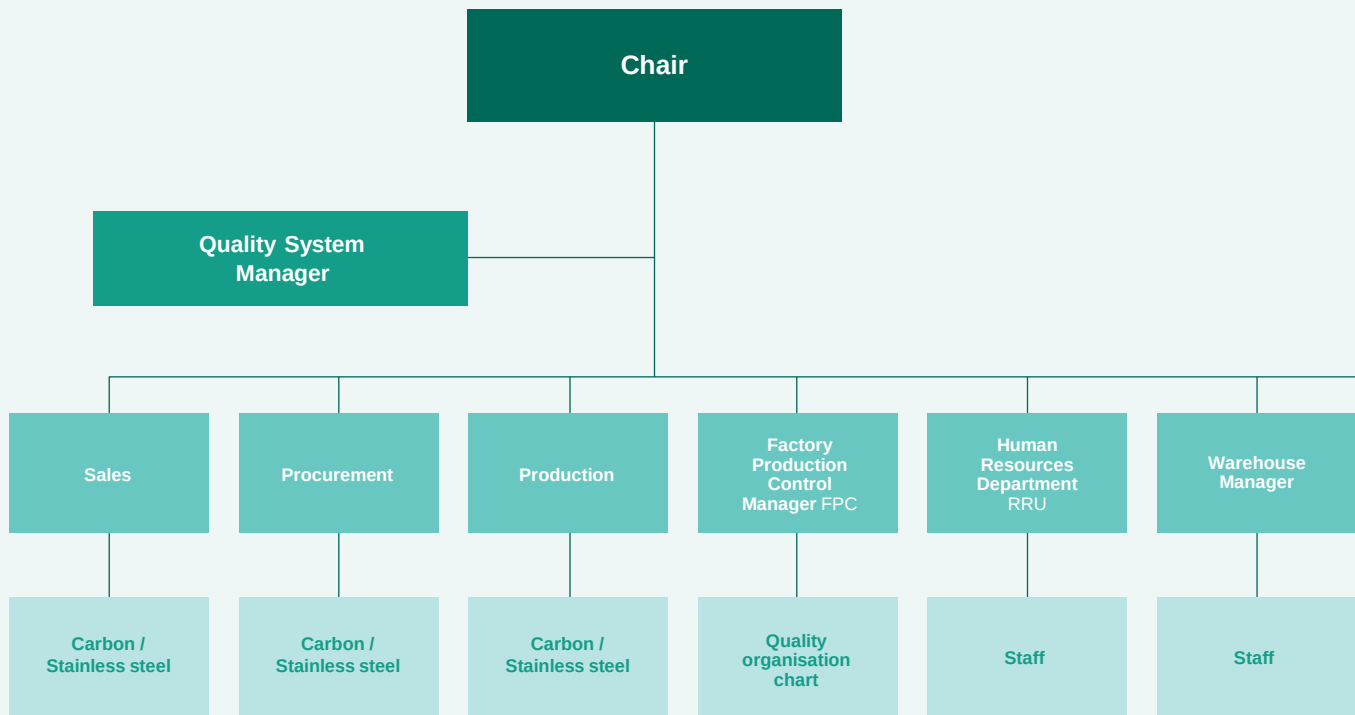
In particular, five key figures hold positions of responsibility in specific areas such as **construction sites, the environment, health and safety, and staff management**.



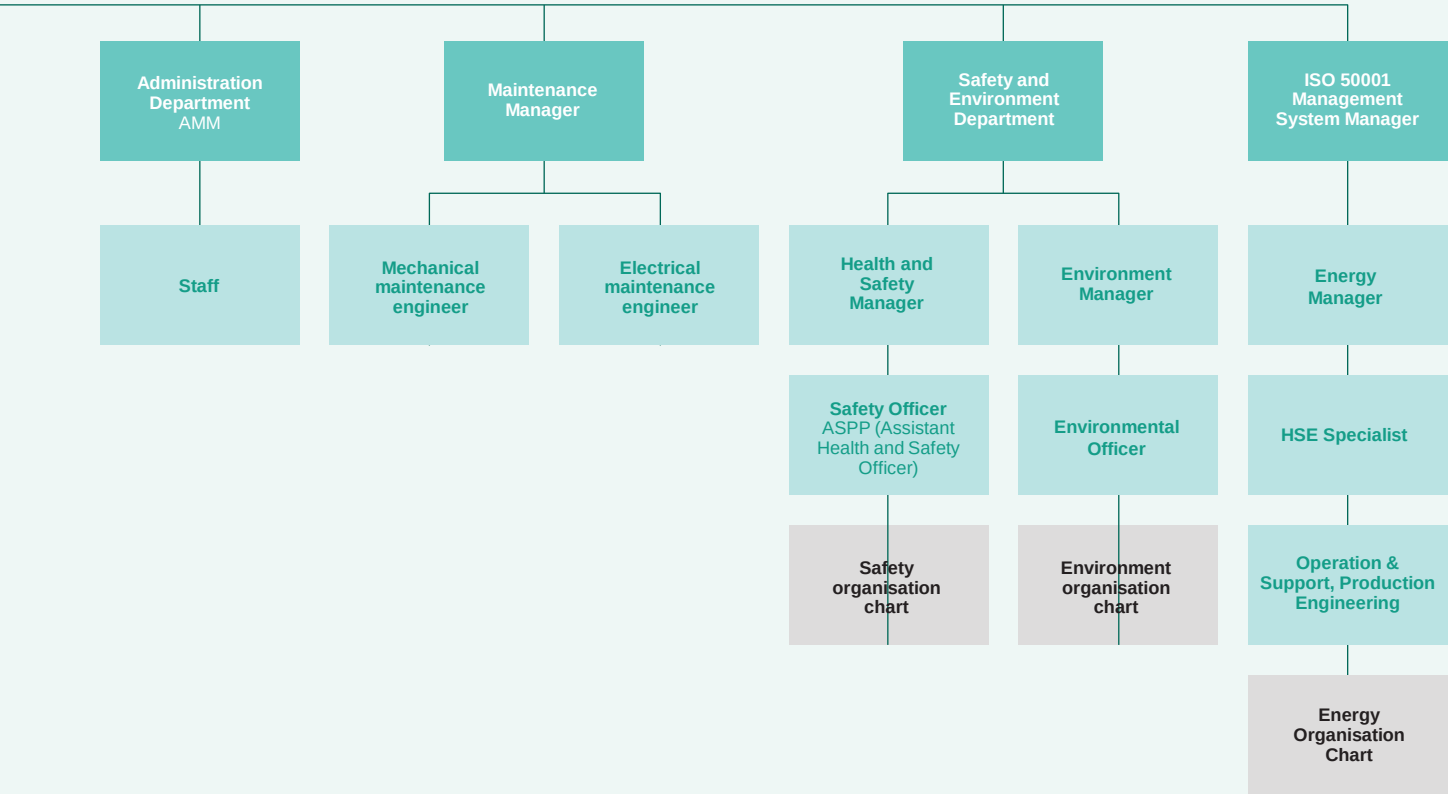
## Organisation chart

As at **31 December 2025**, Padana Tubi has a **workforce of 803 people**, organised according to a **general organisational chart** and organisational charts dedicated to **Environment and Safety** and **Quality and Energy**.

The company is divided into **two major divisions: Carbon Division and Stainless Steel Division**. Set out below is the **first organisational level** of the entire company structure:



\*The organisation chart was last updated on 22.09.2025



# Ethics and integrity in business management

NO WHISTLEBLOWING  
REPORTS RECEIVED

SDGs 8,9,10,16

**Corporate responsibility, which extends to governance, is based on adherence to ethical principles, regulatory compliance and integrity. These factors help to ensure that the business is managed with transparency and integrity.**

The development of **ethical culture** within the organisation requires a constant commitment, which takes the form of **employee training**, the adoption of **internal control** systems and the implementation of **dedicated policies and initiatives**. The aim is to prevent and combat improper or unlawful conduct, ensuring that internal and external relations are consistent with the principles of fairness and legality.

Padana Tubi adopted a **Code of Ethics** and an **Organisational and Control Model pursuant to Legislative Decree 231/2001** in 2015. The Model and the Code of Ethics were subsequently updated and approved by the Board of Directors in 2018, 2020, 2022 and 2024, following the introduction of new predicate offences.

## The Code of Ethics and guiding principles

The Code of Ethics sets out the principles and rules of conduct that Padana Tubi recognises as fundamental and undertakes to promote amongst its corporate bodies, employees and all those who have dealings with the company.

Adherence to these principles is a requirement for all counterparties working with Padana Tubi.

In carrying out its activities and pursuing its corporate objectives, Padana Tubi is guided by the following principles:

FIGURE 3 – PADANA TUBI'S ETHICAL PRINCIPLES

|                                                  |                                     |
|--------------------------------------------------|-------------------------------------|
| Legality                                         | Protection of competition           |
| Impartiality                                     | Prevention of money laundering      |
| Transparency and integrity                       | Preventing corruption               |
| Loyalty and good faith                           | Mitigation of cybercrime            |
| Value of people and human resources              | Protection of intellectual property |
| Confidentiality and privacy protection           | Proper management of public funding |
| Prevention of conflicts of interest              | Proper management of sponsorships   |
| Occupational safety and environmental protection |                                     |

## The 231 Model and the control system

The Organisational, Management and Control Model, as required by Legislative Decree 231/2001, consists of a General Section and Specific Sections relating to the various predicate offences applicable to the company.

The Code of Ethics and the General Section of the Model are available on the company's website, in the "*Sustainability – Governance*" section.

Information regarding Model 231 is communicated to stakeholders through various channels: notices included at the bottom of company emails – inviting recipients to read them and to adhere to the principles set out therein – references included in purchase orders, regular circulars addressed to staff, documentation provided to new recruits, training sessions for office staff and supervisors, and specific meetings for the latter.

The Model and the Code of Ethics are also made available at the entrance areas to the plants (weights), where full copies are available for anyone interested to consult.

## Supervisory Board

The **Supervisory Body** was appointed by the Board of Directors following the adoption of the 231 Model in 2015 and is renewed periodically. It **consists of two external members** and **one internal member**, and its operations are governed by specific regulations. **The function of the Supervisory Board is to monitor compliance with the procedures set out in the organisation model**, interfacing directly with the BoD in the event of violations or risk situations.

This work is carried out by analysing the information flows submitted quarterly by the contacts responsible for the various business processes, through regular meetings with certain heads of department in the areas most at risk, and through regular discussions with the Board of Directors and the Board of Statutory Auditors.

In addition to investigating any reports received, the Body carries out checks on the main business processes, scheduling annual audits and focusing on those most exposed to risk, including: the procurement of goods, services and consultancy; production and marketing management; tax management and tax offences; cash and financial flow management; occupational health and safety management; cybersecurity management; management of sponsorships, donations and gifts; relations with and compliance with public bodies; and staff selection, recruitment and management.

During 2025, the Supervisory Body carried out regular audits of the processes set out above, by analysing the information flows received from managers and conducting spot checks, without identifying any anomalies or significant issues for the purposes of Legislative Decree 231/2001.

During the year, regular meetings were also held with the Board of Statutory Auditors to discuss their respective monitoring activities, as well as discussions with representatives of the Board of Directors on key corporate issues.

In conclusion, the monitoring activities carried out **in relation to the year 2025 revealed no breaches of Model 231 or of the provisions contained in Legislative Decree 231/2001**; the procedures adopted by the Company appear, on the whole, to have been correctly applied and are adequate to prevent the commission of the offences provided for by the legislation.

The Body draws up half-yearly reports for the Board of Directors, in accordance with the relevant data protection regulations, and, where necessary, has a dedicated budget for engaging external consultants.

In addition to the provisions of the Model and the Code of Ethics, the Body also takes into account the procedures adopted by the Company in the context of its ISO 9001, ISO 45001 and ISO 14001 certifications.

## Whistleblowing system

The Supervisory Body handles reports received through dedicated channels – email address, post boxes located at each site, ordinary post and the online platform – and carries out the necessary checks to ascertain their validity, before informing the Board of Directors regarding any corrective or disciplinary action.

During **2023**, in accordance with Legislative Decree 24/2023 and within the required timeframe, the Company implemented its **whistleblowing system** by introducing a dedicated online platform (**Whistleblowing**), accessible via the company website in the “Sustainability – Whistleblowing” section.

Reports are handled in accordance with data protection legislation and in a way that ensures the confidentiality of those making the reports. The latest update to Model 231 also introduced a specific section on sanctions designed to protect whistleblowers (General Part 4.6). In addition to safeguarding anonymity, those involved in the verification process are required not to disclose any information that comes to light during the investigations, by signing the relevant forms provided by the Data Controller.

# Management systems and certifications: a structured process over time

---

## Certifications and compliance:

- UNI EN ISO 9001:2015
  - UNI EN ISO 14001:2015
  - UNI EN ISO 45001:2018
  - UNI EN ISO 50001:2018
  - UNI EN ISO 14064-1:2019
  - Environmental Product Declaration (EPD)
  - Regulation (EU) No 305/2011
  - UKCA (UK Conformity Assessed) marking
  - Directive 2014/68/EU (PED)
- 

Padana Tubi has adopted an **Integrated Management System (IMS)** covering **Environment, Health, Safety and Energy**, in accordance with the standards **UNI EN ISO 14001:2015, UNI EN ISO 45001:2018 and UNI CEI EN ISO 50001:2018**.

This approach supports a structured management of business processes, with a focus on the protection of people, risk prevention and the management of environmental and energy-related aspects. The certifications obtained attest to the adoption of internationally recognised standards and guide the company in pursuing objectives consistent with those set out in the Quality, Environment, Health and Safety, and Energy Policy.

In **1996**, Padana Tubi was awarded **UNI EN ISO 9001:2015** certification, having introduced a quality management system to support its processes. Over the years, the company has continued to raise its standards, thereby consolidating its market position.

In **2019**, the transition from **OHSAS 18001:2007** (obtained in 2016) to **UNI EN ISO 45001:2018** was completed, in keeping with the company's ongoing commitment to **health and safety**. In **2021**, the company was awarded **UNI EN ISO 14001:2015** certification for environmental management, thereby improving its oversight of environmental issues.

In **2022**, Padana Tubi obtained **UNI EN ISO 14064-1:2019** certification relating to the **Organisational Carbon Footprint (CFO)**, thereby embarking on a process of **quantifying and monitoring greenhouse gas emissions**.

The certification was subsequently renewed in 2023, 2024 and 2025. The process will continue in 2026 with an update to the study and the certification.

In **2023**, the company obtained the Environmental Product Declaration (**EPD**) for **five product families**, with the process completed in January 2024. This approach enables the provision of objective and comparable information on the environmental characteristics of products, to help customers make informed choices.

## 2. THE GOVERNANCE OF PADANA TUBI

In **2025** UNI CEI EN ISO 50001:2018 certification was achieved, following the implementation of an **Energy Management System** aimed at improving energy efficiency and optimising consumption.

**In 2026, the quality management system is planned to be integrated with the environmental, health, safety and energy management system, and the certifications are to be extended to the new Warehouse P, with the exception of ISO 50001, which already covers it.**

All certifications are available for viewing on the company's website.

| UNI ISO 13485                                                                                                    | DESCRIPTION                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | RELEASE DATE                                                                                                                                                                                                           |
|------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>UNI CEI EN ISO 50001</b><br> | <p>The UNI CEI EN ISO 50001 standard sets out the requirements for implementing an Energy Management System (EMS), aimed at monitoring and improving energy performance.</p> <p>Padana Tubi has chosen to adopt this certification in order to <b>systematically manage its energy performance and its Energy Management System (EMS)</b>, thereby supporting monitoring and improvement over time.</p>                                                                                                                                                                  | 17/07/2025                                                                                                                                                                                                             |
| <b>UNI EN ISO 45001</b><br>     | <p>The UNI EN ISO 45001 standard sets out the requirements for occupational health and safety management systems, with the aim of preventing accidents and occupational illnesses. The adoption of this standard supports risk management and the organisation of health and safety activities.</p> <p>Padana Tubi has chosen to adopt this certification to <b>strengthen its policies</b> on the prevention and management of risks associated with accidents and occupational diseases, ensuring that its workplaces are safe and comply with industry standards.</p> | 29.04.2019<br><i>(previously certified to OHSAS 18001 from 05.05.2016 to 04.05.2019).</i>                                                                                                                              |
| <b>UNI EN ISO 9001</b><br>    | <p>The UNI EN ISO 9001 certification relates to quality management systems and is based on process control and a risk-based approach. It supports the monitoring of business activities and the structured management of processes, helping to ensure consistency in the products and services offered.</p> <p>Padana Tubi has chosen to obtain certification to <b>ensure high quality standards in its business processes</b>, with the aim of guaranteeing maximum customer satisfaction, supported by <b>an approach focused on continuous improvement</b>.</p>      | <p><b>1996:</b> first certification for the <b>stainless steel department</b> (IGQ).</p> <p><b>2013:</b> extension to carbon steel/stainless steel.</p> <p><b>2024:</b> extension to the <b>O. production site</b></p> |
| <b>UNI EN ISO 14001</b><br>   | <p>ISO 14001 certification confirms the implementation of a structured environmental management system, designed to monitor environmental aspects and ensure compliance with applicable regulatory requirements.</p> <p>Padana Tubi has chosen to obtain certification in order to <b>integrate environmental management into its business processes</b>.</p>                                                                                                                                                                                                            | <p><b>2021:</b> first certification.</p> <p><b>2023:</b> certification renewal and extension to the production site O.</p>                                                                                             |
| <b>UNI EN ISO 14064</b><br>   | <p>The ISO 14064 standards provide a methodological framework for quantifying and reporting greenhouse gas (GHG) emissions, supporting the collection and monitoring of data.</p> <p>Padana Tubi has chosen to obtain certification to <b>measure and monitor its carbon footprint</b>, expressed in tonnes of CO<sub>2</sub>equivalent, and to have comparable data over time.</p>                                                                                                                                                                                      | 06/09/2022<br>(first issue).                                                                                                                                                                                           |



| UNI ISO 13485                                                                                                                                           | DESCRIPTION                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | RELEASE DATE                 |
|---------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------|
| <b>REGULATION (EU) No 305/2011</b><br>                                 | <p>Regulation (EU) No 305/2011 lays down harmonised conditions for the marketing of construction products within the European Union, setting out performance requirements and declaration procedures.</p> <p>It ensures that products comply with the requirements for placing them on the European market, whilst ensuring consistency in technical information and declarations of performance.</p> <p>Padana Tubi has chosen to obtain this certification in order to <b>comply with the relevant standards and ensure that its products meet the requirements for placing them on the market.</b></p>                                                                                        | 30/09/2008<br>(first issue). |
| <b>UKCA – UK Conformity Assessed</b><br>                             | <p>The UKCA (UK Conformity Assessed) marking is the mark required for the marketing of products in the Great Britain market (England, Wales and Scotland).</p> <p>It certifies compliance with the technical and regulatory requirements currently in force in the United Kingdom, thereby ensuring that products intended for that market can continue to be sold.</p> <p>Padana Tubi has <b>aligned itself with the requirements of the UKCA Regulation</b>, ensuring that its products comply with these requirements in order to <b>continue to market them in the United Kingdom</b>, thereby guaranteeing continuity and access to the UK market.</p>                                      | 16/01/2023<br>(first issue). |
| <b>DIRECTIVE 2014/68/EU (Pressure Equipment Directive – PED)</b><br> | <p>Directive 2014/68/EU regulates the design, manufacture and conformity assessment of pressure equipment, and applies to products with a maximum allowable pressure exceeding 0.5 bar.</p> <p>It sets out harmonised technical and safety requirements at European level concerning the design, manufacture and testing of pressure equipment, to support product conformity and their placing on the market.</p> <p>Padana Tubi has voluntarily chosen to obtain certification <b>to meet the standards set out in the European Directive</b>, ensuring that its products comply with the design, manufacture, testing and conformity criteria laid down for pressure equipment.</p>           | 15/12/2017<br>(first issue). |
| <b>ENVIRONMENTAL PRODUCT DECLARATION (EPD)</b><br>                   | <p>The Environmental Product Declaration (EPD) is a document that provides verified information on the environmental characteristics of a product, based on a Life Cycle Assessment (LCA) study.</p> <p>It enables the analysis and publication of data on resource consumption and emissions associated with the various stages of a product's life cycle, with reference to certified product families.</p> <p>Padana Tubi has been awarded the <b>Environmental Product Declaration for five product families</b>, analysing their resource consumption and the environmental aspects associated with the various product references throughout the different stages of their life cycle.</p> | 10/01/2024<br>(first issue). |

# 3.



# Padana Tubi's ESG strategy





# Integrating ESG issues: vision and action

In recent years, the steel sector has undergone significant developments, with a growing focus on environmental, social and governance (ESG) issues relating to production processes. Investment in this area is on the rise and is gradually extending to the entire supply chain.

In this context, **Padana Tubi has integrated ESG issues into its corporate strategy**, embarking on a process that is reflected in its operational decisions and the tools it has adopted. The publication of the fifth Sustainability Report marks a further step in this process and serves as a means of sharing information with stakeholders.

Strategic choices and key business decisions form part of a **medium- to long-term vision, which translates into actions across various areas:**

- Management system and product certifications;
- Monitoring of emissions and management of energy consumption, using measurement and analysis tools;
- Quantification of the environmental footprint;
- Empowering people through skills development and professional growth.

This approach sets out how Padana Tubi translates its decisions into tangible results across the various areas of the business.



# The role of stakeholders in Padana Tubi's decision-making

**Stakeholders are parties who can influence a company's activities or be influenced by them. Padana Tubi maintains direct and ongoing relationships with its stakeholders, based on constant dialogue.**

**Stakeholder mapping** provides a **structured overview of the company's key strategic relationships**, identifying the relevant parties and determining how to engage them in line with their various interests.

Needs and expectations are identified across a range of areas.

Shareholders and banks focus on profitability and profit growth, financial strength and the quality of financial information.

Customers demand reliable products that meet the required standards, whilst suppliers value long-term relationships, seeking stability, flexibility and efficiency in their processes.

The public administration is interested in the company's contribution to the local area, in terms of the economy and employment. At the same time, Padana Tubi develops relationships within the local community, collaborating with schools, trade unions and trade associations, and participating in key organisations within the manufacturing and steel sectors, including Confindustria Reggio Emilia, Centro Inox and Unisider.

**FIGURE 4 – PADANA TUBI'S STAKEHOLDER MAP**



| STAKEHOLDER                                   | INTERESTS                                                                                                                                                                                                                                                                                   | ENGAGEMENT                                                                                                                                                                                                                                                                                                                        | RESULTS                                                                                                                                                                                                                                                                                                                            |
|-----------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>SHAREHOLDERS</b>                           | <ul style="list-style-type: none"> <li>Long-term economic and social sustainability.</li> </ul>                                                                                                                                                                                             | <ul style="list-style-type: none"> <li>Attendance at Shareholders' Meetings and Board Meetings.</li> </ul>                                                                                                                                                                                                                        | <ul style="list-style-type: none"> <li>Sharing the Organisation's economic and social results.</li> </ul>                                                                                                                                                                                                                          |
| <b>HUMAN RESOURCES</b>                        | <ul style="list-style-type: none"> <li>Job stability;</li> <li>Career paths;</li> <li>Occupational health and safety.</li> </ul>                                                                                                                                                            | <ul style="list-style-type: none"> <li>Training courses;</li> <li>Direct and individual meetings/ contacts;</li> <li>Communications by email.</li> </ul>                                                                                                                                                                          | <ul style="list-style-type: none"> <li>Development of the company's know-how and skills;</li> <li>Update with respect to changes in company protocols/disclosures.</li> </ul>                                                                                                                                                      |
| <b>FINANCIAL COMMUNITY</b>                    | <ul style="list-style-type: none"> <li>Short- and long-term capital and financial solidity;</li> <li>Continuity of the relationship;</li> <li>Transparency.</li> </ul>                                                                                                                      | <ul style="list-style-type: none"> <li>Direct contacts;</li> <li>Communications by email;</li> <li>Sharing of financial statements.</li> </ul>                                                                                                                                                                                    | <ul style="list-style-type: none"> <li>Sharing the Organisation's financial results (financial statements).</li> </ul>                                                                                                                                                                                                             |
| <b>CUSTOMERS</b>                              | <ul style="list-style-type: none"> <li>Product quality and service level;</li> <li>Accuracy of prices;</li> <li>Consistency and reliability.</li> </ul>                                                                                                                                     | <ul style="list-style-type: none"> <li>Individual direct contacts;</li> <li>Quality control service;</li> <li>Logistics service;</li> <li>Corporate website;</li> <li>Restricted-access e-commerce portal;</li> <li>Materiality analysis survey.</li> </ul>                                                                       | <ul style="list-style-type: none"> <li>Response to customer needs;</li> <li>Transparency in relationships;</li> <li>Survey of ESG issues of importance to customers.</li> </ul>                                                                                                                                                    |
| <b>PUBLIC ADMINISTRATION AND INSTITUTIONS</b> | <ul style="list-style-type: none"> <li>Compliance with laws and technical standards;</li> <li>Dialogue;</li> <li>Information transparency.</li> </ul>                                                                                                                                       | <ul style="list-style-type: none"> <li>Exchange of information;</li> <li>Materiality analysis survey.</li> </ul>                                                                                                                                                                                                                  | <ul style="list-style-type: none"> <li>Compliance with regulatory and technical requirements;</li> <li>Dialogue with public bodies;</li> <li>Identification of ESG issues relevant to the public sector.</li> </ul>                                                                                                                |
| <b>SUPPLIERS OF GOODS AND SERVICES</b>        | <ul style="list-style-type: none"> <li>Financial stability;</li> <li>Business and volume growth;</li> <li>Continuity of the relationship;</li> <li>Health and safety at work;</li> <li>Flexible organisation and efficient logistics;</li> <li>Technical expertise and prestige.</li> </ul> | <ul style="list-style-type: none"> <li>Individual direct contacts;</li> <li>Forwarding of financial statements on request;</li> <li>Volume agreements;</li> <li>Materiality analysis survey;</li> <li>Supplier evaluation survey;</li> <li>Code of Conduct for Suppliers.</li> </ul>                                              | <ul style="list-style-type: none"> <li>Sharing of know-how and technological innovation;</li> <li>Discussion of strategic objectives and projects;</li> <li>Survey of ESG issues of importance to suppliers;</li> <li>Monitoring of social and environmental information and best practice throughout the supply chain.</li> </ul> |
| <b>TERRITORY AND COMMUNITY</b>                | <ul style="list-style-type: none"> <li>Employment growth;</li> <li>Integration and youth engagement;</li> <li>Economic support for projects;</li> <li>Support for local initiatives;</li> <li>Professional integration of young people.</li> </ul>                                          | <ul style="list-style-type: none"> <li>Donations and support for initiatives;</li> <li>Initiatives for the development and economic growth of the local area;</li> <li>Indirect communication through the media.</li> </ul>                                                                                                       | <ul style="list-style-type: none"> <li>Circulation and sharing of economic, environmental and social values;</li> <li>Transparent dialogue and recognition of role in the community.</li> </ul>                                                                                                                                    |
| <b>CERTIFICATION AND INSPECTION BODIES</b>    | <ul style="list-style-type: none"> <li>Compliance with the relevant standards;</li> <li>Compliance with regulatory requirements.</li> </ul>                                                                                                                                                 | <ul style="list-style-type: none"> <li>Regular audits to maintain and renew certifications.</li> </ul>                                                                                                                                                                                                                            | <ul style="list-style-type: none"> <li>Maintenance of certification and its validity.</li> </ul>                                                                                                                                                                                                                                   |
| <b>INDUSTRIAL RELATIONS</b>                   | <ul style="list-style-type: none"> <li>Constructive dialogue among social parties;</li> <li>Involvement in initiatives for the territory;</li> <li>Participation in refresher courses;</li> <li>Consultancy services.</li> </ul>                                                            | <ul style="list-style-type: none"> <li>Participation in round-table discussions and meetings (e.g. Confindustria Reggio Emilia);</li> <li>Direct contacts, emails, newsletters;</li> <li>Communications via the website;</li> <li>Surveys for new regulatory proposals;</li> <li>Regular meetings with social parties.</li> </ul> | <ul style="list-style-type: none"> <li>Sharing new technical and quality standards within the sector;</li> <li>Sharing of corporate safety performance;</li> <li>Knowledge of business performance and needs of local companies.</li> </ul>                                                                                        |

Stakeholder engagement is a key factor in understanding expectations and priorities, helping to guide business decisions. During **2023**, Padana Tubi carried out a structured programme of **stakeholder engagement**, involving a select group of key stakeholders, including some of its main customers and suppliers and the Municipality of Guastalla. The consultation process enabled the gathering of **useful insights for identifying priority ESG issues in the medium to long term** and has led to the **definition of the materiality matrix**, which forms the basis for previous reports and for the **double materiality analysis carried out in 2024 in relation to the CSRD Directive**, as discussed in more detail in the following paragraph.





# Double materiality analysis

With the aim of enhancing the transparency of the information provided, starting with the 2024 Sustainability Report, Padana Tubi has, on a voluntary basis – and ahead of the regulatory requirements introduced by the European Corporate Sustainability Reporting Directive (CSRD) – launched the double materiality analysis.

The analysis, carried out with the support of an external consultancy firm, made it possible to **assess** both the **impacts generated by the company's activities along its value chain on the environment and people (materiality of impact)**, as well as the **ESG risks and opportunities** capable of influencing the business model and economic and financial performance in the short, medium and long term (**financial materiality**).

The materiality process was carried out in several stages, in accordance with the ESRS requirements and the guidance set out in the technical document *"Implementation guidance for the materiality assessment"* drafted and published by EFRAG (European Financial Reporting Advisory Group):

## Understanding and analysing the context

An in-depth analysis was carried out of internal activities, commercial relationships and the wider context, with the aim of identifying the key stakeholders involved in the processes. This analysis has enabled the mapping of the **Padana Tubi Value Chain**, which is presented in the relevant section, and to gather the information needed to identify the impacts, risks and opportunities to be taken into account in the reporting process.

## Mapping Impacts, Risks and Opportunities (IROs)

Following the sector analysis, an alignment was carried out between the sustainability issues (environmental, social and governance) described in the thematic ESRS (the "ESRS 1 – General Requirements" standard) and the material topics identified in the 2023 Sustainability Report. The impacts – both positive and negative, actual and potential – as well as the risks and opportunities associated with potentially material sustainability issues were therefore identified.

## The Board's assessment of the IROs

For each issue analysed, the working group comprising senior management and internal management assessed the relevant positive or negative impacts – whether actual or potential – in terms of significance<sup>1</sup>, as well as the risks and opportunities generated or potentially arising from these<sup>2</sup> with respect to the company's financial assets. The assessment took into account the views of internal stakeholders, including the Chief Executive, in order to ensure a representative and consistent perspective.

---

1. The assessment was based on the significance of the severity, irreversibility and likelihood of the impacts, using a qualitative and quantitative scale ranging from 1 to 5.

2. The assessment was based on the likelihood of occurrence and the extent of the financial impact, using a qualitative/quantitative scale of 1 to 5.

## Identification of double materiality sustainability issues

Following the assessment, the results were discussed and the sustainability issues relevant to Padana Tubi were identified in terms of their impact and/or financial significance, excluding those deemed insignificant on the basis of a materiality threshold defined by the average of the scores obtained.

Below is a graphical representation of the findings, presented in the form of a matrix with the assessment of the significance of the impact on the horizontal axis and the assessment of the financial significance on the vertical axis. The matrix sets out the results of the double materiality assessment carried out, which aimed to illustrate the interdependence between impact materiality and financial materiality in relation to the sustainability areas. In the matrix, we have chosen to highlight the materiality thresholds that were taken into account, namely the average values of the ratings assigned.



## Relevant topics and links

The table below provides a summary of the **results of Padana Tubi's double materiality analysis** in relation to sustainability issues; the topics have been aligned with the terminology used in the previous reporting period.

| TOPICAL ESRS                             | IMPACT SIGNIFICANCE <sup>3</sup> | FINANCIAL SIGNIFICANCE | FINAL MATERIALITY  | KEY SUSTAINABILITY ISSUES                                                                                        |
|------------------------------------------|----------------------------------|------------------------|--------------------|------------------------------------------------------------------------------------------------------------------|
| <b>E1</b><br>Climate change              |                                  |                        | Material topic     | Energy management<br>Air emissions                                                                               |
| <b>E2</b><br>Pollution                   |                                  |                        | Material topic     | -                                                                                                                |
| <b>E3</b><br>Water and marine resources  |                                  |                        | Non-material topic | Water and water stress                                                                                           |
| <b>E4</b><br>Biodiversity and ecosystems |                                  |                        | Non-material topic | -                                                                                                                |
| <b>E5</b><br>Circular economy            |                                  |                        | Material topic     | Materials management and circular economy<br>Waste management                                                    |
| <b>S1</b><br>Own workforce               |                                  |                        | Material topic     | Occupational health and safety<br>Development of employee skills<br>Diversity, inclusion and equal opportunities |
| <b>S2</b><br>Workers in the value chain  |                                  |                        | Non-material topic | -                                                                                                                |
| <b>S3</b><br>Affected communities        |                                  |                        | Material topic     | -                                                                                                                |
| <b>S4</b><br>Consumers and end users     |                                  |                        | Material topic     | Product/service quality and traceability<br>Focus on customer satisfaction                                       |
| <b>G1</b><br>Business conduct            |                                  |                        | Material topic     | Transparency, ethics and integrity                                                                               |
| <b>G1</b><br>Corruption and bribery      |                                  |                        | Non-material topic | Fight against corruption                                                                                         |

For a comprehensive discussion of the relevant IROs associated with the sustainability issues identified as material, please refer to the section *Appendix – Impacts, Risks and Opportunities*.

3. The grey cells represent the issues that did not emerge as significant, whilst the coloured cells reflect the issues that emerged as material in terms of materiality of impact or financial materiality.



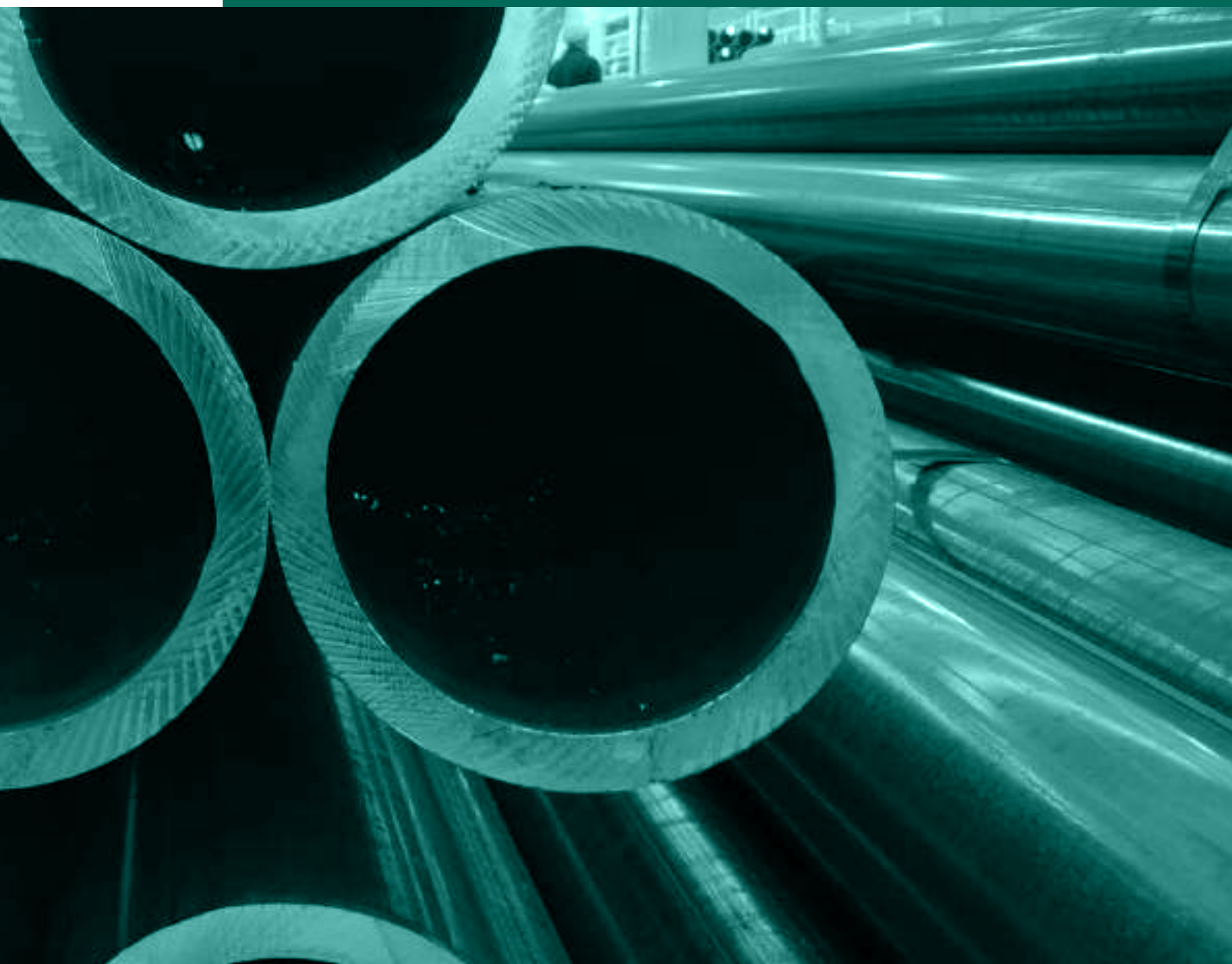




# 4.



# Financial performance and business continuity





# Economic and financial performance

In **2025**, the steel sector continued to operate in a **complex global environment**, characterised by a **slight reduction in carbon steel shipment volumes** and **more dynamic growth in the stainless steel sector**.

The **fall in turnover** was **primarily due to the decline in average steel prices**, reflecting macroeconomic and geopolitical trends that have affected the entire supply chain.

In the early months of the year, a number of events helped to shape the international market. In the United States, **the start of the new Trump presidency led to the reintroduction of 25% tariffs on imported steel**, which were subsequently **raised to 50%** and remain in force to this day.

**In Europe**, the Commission has presented the long-awaited **Action Plan on Steel and Metals**, which sets out **guidelines for the revitalisation of the European steel industry**, a sector considered strategic for the continent. The plan addresses issues such as access to sustainable and competitive energy sources, the CBAM mechanism to combat carbon leakage, the review of safeguard quotas, the promotion of the circular economy and scrap-based processes, incentives for decarbonisation, and the protection of jobs. Whilst the plan is commendable in principle, it still lacks genuinely effective operational measures.

The CBAM legislation, which was in a transitional phase until 2025 and will become permanent from 2026, continues to present a challenge for operators, both due to its administrative impact and the lack of clear implementing regulations and clarity on costs for importers. Extending the mechanism to include welded tubes, as well as coils, could, however, have a protective effect on European production.

On the demand side, the European steel market remained broadly stable, with particular weakness in countries such as France and, to some extent, Germany. **Energy prices have remained high, with significant variations across EU countries**, whilst the **price of scrap metal**, despite being recognised as a strategic raw material in the green transition, has remained at **historically low levels**. **Imports of tubes from third countries** (Turkey, Vietnam, China and the Far East) remained **significant, contributing to a highly competitive market**.

**These conditions have had a varying impact** on the two business divisions. In the **carbon steel sector**, following a positive first quarter, demand gradually weakened in the second and third quarters, showing **signs of improvement only towards the end of the year**, with a more favourable outlook for early 2026. In the **stainless steel segment**, on the other hand, there was a more balanced and steady recovery, with **prices holding up well in the first five months**, followed by a gradual decline that became particularly marked from August onwards and an initial stabilisation in December.

**In 2025, despite the numerous challenges described above, turnover stood at 886,150,150 euros**, representing a fall of 6.4% compared with 2024. **The value of production stood at 886,272,886 euros**, down by 6.1% compared with the previous year.

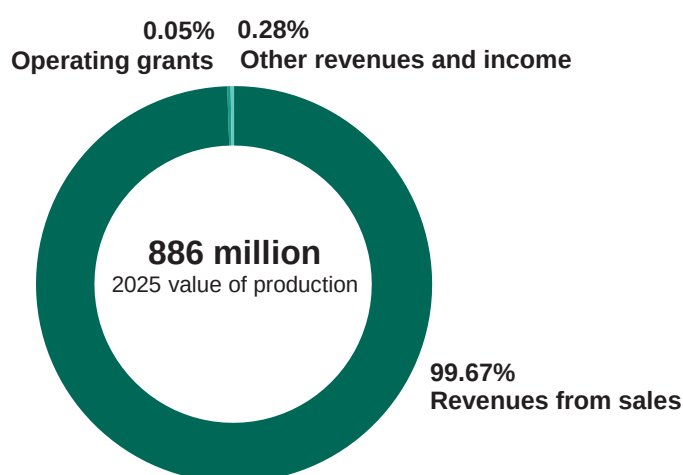
Despite the unfavourable conditions, **operating profitability showed a significant improvement. EBITDA rose to € 91,195,406, an increase of 14.9%. The EBITDA-to-production-value ratio rose from 8% to 10%, reflecting an improvement in operating efficiency.**

**Net profit stood at 39,883,717 euros**, representing a slight decrease of 4.5% compared with 2024, whilst remaining at very solid levels.

**Shareholders' equity rose to € 881,950,861, an increase of 4.1%. The net financial position stood at € 514,982,532, up 11.4%, reflecting support for investment and the trend in working capital.**

**In 2025, investment in plant and machinery amounted to 17,983,139 euros**, representing a 49% decrease compared with the exceptional peak in 2024 (35,691,280 euros). This decline is due to the largest investments being concentrated in the previous year, in particular for the completion of Warehouse P, which was finished in 2025. Despite the decline, these are nonetheless high-quality projects, which once again demonstrate the company's ongoing commitment to pursuing its objectives of growth and continuous improvement. Notable initiatives include the start of commissioning of the slitter and the 10" stainless steel HF line, alongside the continuation of work aimed at improving the efficiency and safety of the production lines.

## 2025 VALUE OF PRODUCTION



**TABLE 2 – KEY ECONOMIC AND FINANCIAL FIGURES FOR PADANA TUBI**

| ECONOMIC DATA (€)            | 2024        | 2025        |
|------------------------------|-------------|-------------|
| Turnover                     | 946,960,509 | 886,150,150 |
| Production value             | 944,010,499 | 886,272,886 |
| Net profit                   | 41,774,485  | 39,883,717  |
| EBITDA                       | 79,331,967  | 91,195,406  |
| EBITDA/Value of Production % | 0.08        | 0.10        |
| FINANCIAL DATA               | 2024        | 2025        |
| Shareholders' Equity         | 847,049,873 | 881,950,861 |
| Net financial position (NFP) | 462,283,298 | 514,982,532 |
| Capital Expenditure          | 35,691,280  | 17,983,139  |

# Direct economic value generated and distributed

**Padana Tubi recognises the importance of a balanced distribution of the economic value generated through its business**, which directly and indirectly involves all the stakeholders who contribute to the company's growth on a daily basis.

The table below shows the value generated and distributed, prepared on the basis of the income statement for the reporting period, in accordance with GRI standards. To enable comparison across years, the figure for 2024 is also included.

The aim is to set out clearly and transparently **how financial resources are channelled to its internal and external stakeholders**: employees, suppliers of goods, services and capital, the public sector and local communities.

The **economic value generated** corresponds to the value of production as shown in the annual financial statements (Revenue from sales and services and Other operating revenue), supplemented by financial income and changes in inventories of work in progress, semi-finished and finished products.

The **distributed economic value** represents the share of wealth allocated to the main categories of stakeholders who contribute to the company's activities.

The item 'Suppliers – Operating Costs' also includes stocks of raw materials, ancillary materials, consumables and goods.

The **retained economic value** represents the portion retained within the company and comprises depreciation and amortisation of tangible and intangible assets, as well as the profit for the financial year net of dividends paid.

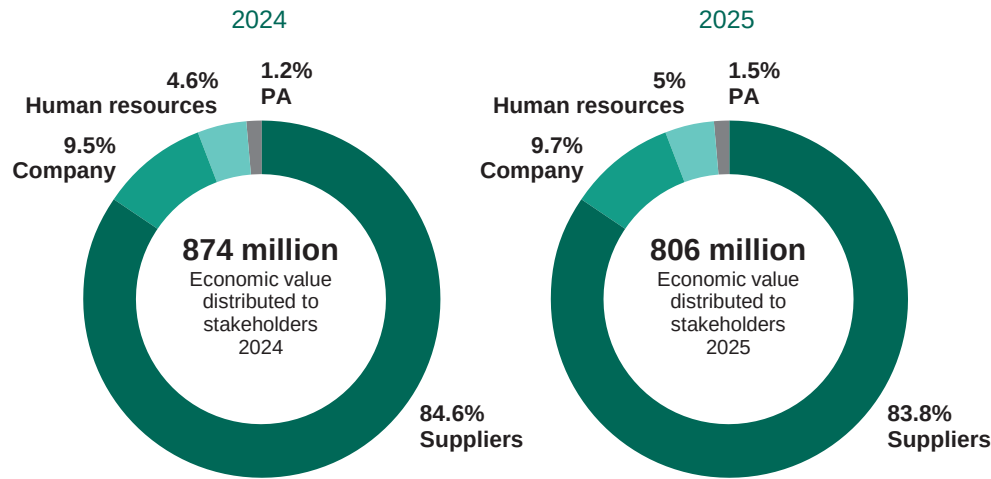
**In 2025, Padana Tubi generated an economic value of 893,293,815 euros**, representing a 7.6% decline compared with the previous year.

**The economic value distributed to stakeholders amounted to € 806,285,370, corresponding to 90% of the total generated.**

The **largest share went to suppliers (83.8%)**, followed by employees (5%), the public sector (1.5%) and the local community (0.05%).

**The value retained by the company, representing the difference between the economic value generated and that distributed, amounted to 87,008,445 euros**, a slight decrease of 5% compared with 2024.

FIGURE 6 – DISTRIBUTION OF ADDED VALUE AMONG STAKEHOLDERS



For further information on the financial reconciliation relating to retained earnings and the net profit for the period covered by this document, please refer to the Company's 2025 annual financial statements.



# 5.





# Quality and control throughout the production processes



# Quality Management System



UNI EN ISO 9001:2015  
CERTIFICATION

NO CASES OF  
NON-COMPLIANCE  
RELATING TO  
PRODUCT HEALTH  
AND SAFETY

2025:  
LAUNCH OF THE  
TQM PROJECT FOR  
QUALITY DIGITISATION

2026 OBJECTIVE:  
NEW SLITTER AND  
UPGRADES TO  
VARIOUS COLD ROLL  
FORMING LINES

## SDGs 8,9,12

Ensuring high standards of product quality is a key priority for Padana Tubi. The company operates with the aim of ensuring continuity and reliability in its service, meeting market needs through controlled and structured processes.

Padana Tubi has implemented a **UNI EN ISO 9001-certified management system**, which sets out operating procedures and control criteria throughout the entire production cycle. To support this system, the company has adopted a **Policy on Quality, the Environment, Health and Safety at Work, and Energy**, together with procedures and operating instructions that govern its activities and ensure consistency over time.

## Product traceability, reliability and safety

To maintain high quality standards, Padana Tubi carries out **constant monitoring of its products and production processes**. Scheduled and periodic audits enable continuous monitoring of the company's activities and of **compliance with procedures**. Inspections are carried out more frequently in the areas considered most important, including the sales department, carbon steel production, stainless steel production and the procurement department. The entire company system is, however, audited at least once a year.

A key element is the **traceability system, which enables the monitoring of batches of raw materials and finished products**. This activity is governed by a specific procedure that complies with product regulations and is supported by a dedicated management system.

## FACTORS CONTRIBUTING TO QUALITY

- appropriate incoming checks on the supply of raw materials
- regular checks on production processes
- the use of cutting-edge technologies and specialist expertise to test finished products in accordance with the relevant standards.

Every coil, every strip cut from a coil and every tube produced from a strip is identified by a unique batch code, which makes it possible to trace the product's history at any time.

| 1<br>Incoming checks                                                                                                                                                                                                                                                                                                                                                                                        | 2<br>Process controls                                                                                                                                                                                                                                                                         | 3<br>Technical analysis and state-of-the-art technology                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>Incoming materials are carefully selected and undergo 'Receiving Checks', which include the following:</p> <ul style="list-style-type: none"> <li>• the determination of sample sizes; the procedures for carrying out checks; the criteria for accepting materials; guidelines for record-keeping;</li> <li>• the identification of compliant and, where applicable, non-compliant material.</li> </ul> | <p>The production processes are supported by a set of <b>operating procedures/ instructions</b> indicating the criteria and methods to be followed to keep the tube manufacturing parameters under control and ensure that products comply with standards and meet customer requirements.</p> | <p>Specific checks are run during each production stage, such as:</p> <ul style="list-style-type: none"> <li>• <b>Checks on maintaining welding efficiency</b> using the UNI EN ISO 10893-2 eddy current method;</li> <li>• <b>Dimensional checks carried out using regularly calibrated instruments;</b></li> <li>• <b>Control of surface appearance;</b></li> <li>• <b>Recording of results</b> on ISO 9001:2015 codified forms so that the results obtained can be correctly interpreted.</li> </ul> <p><b>In the in-house laboratory, qualified technicians use state-of-the-art technology and equipment</b> to conduct specific tests on the finished products and ensure compliance with reference standards and, in particular, with the CE/PED directive.</p> |

## Laboratories and technology for quality control

Padana Tubi has two laboratories dedicated to the quality control of raw materials and finished products: the first is located at the Portamurata production site and the second, which opened in 2023, is in the San Giacomo industrial estate. Both are equipped with state-of-the-art instrumentation for carrying out hardness, tensile and impact tests, chemical analyses, and macrographic and micrographic examinations of the base material and the heat-affected zone, with particular attention paid to the quality of the welds on the profiles.

The checks carried out make it possible to verify that the products comply with the technical specifications set out in the relevant standards, in particular:

- For the carbon division, the requirements for the factory production control certificate set out in standard EN 10219-1 apply;
- For the INOX division, every product undergoes specific quality control certification, in line with the quality specifications for longitudinally welded austenitic steel tubes, in accordance with the Pressure Equipment Directive 2014/68/EU and the technical specifications of standard 10217.

Padana Tubi also carries out health and safety assessments as part of its production processes. Particular attention is paid to the welding of stainless steel tubes, a process that requires rigorous controls to manage welding fumes, given the presence of alloying elements such as chromium and nickel. To protect workers, a dedicated health and safety protocol has been adopted, complementing the standard safety measures in the metalworking sector.

Thanks to meticulous quality management and constant monitoring of production processes, **over the last two years, there have been no recorded instances of non-compliance relating to the health and safety impacts of products and services in accordance with current regulations.**



## Digitisation of controls: the TQM project

In **2025**, with the aim of further refining the system, Padana Tubi launched the **TQM Project**, which has **two main functions**:

**Document distribution:** operational instructions relating to quality and safety, together with procedures, dimensional tolerance tables, machine manuals and non-conformity reports, are made available and can be accessed via the line-side PCs at all production plants.

**Production inspection records:** quality checks on the product (dimensions, welds, appearance and other parameters) are recorded digitally during the various stages of the production process.

The results of the checks can be viewed in real time by the quality department, area managers and department heads.

The system also provides for access via personal login details, thereby making staff accountable for entering and managing data.

## Performance testing in accordance with the EC Directive

The CE marking requires manufacturers to adopt a manufacturing and inspection plan (FPC), which involves the continuous verification of the performance characteristics of the profiles.

To ensure compliance with the required standards, **Padana Tubi carries out thorough tests in its in-house laboratory, using advanced methods to assess the properties of the materials.** The main tests carried out include:

- **Tensile test in accordance with standard UNI EN ISO 6892-1:** this involves subjecting a standardised specimen to an increasing uniaxial tensile load until it breaks.  
The test makes it possible to determine key parameters for assessing the quality of steel: elongation, tensile strength and yield strength;
- **Impact test in accordance with standard UNI EN ISO 148-1:** carried out by releasing a free-falling pendulum onto a test specimen supported at both ends, enables the measurement of the steel's toughness, that is, its ability to absorb energy before fracture;
- **Chemical analysis:** carried out using a mass spectrometer, this enables the composition of the metal alloy to be determined and the steel's weldability index (CEV) to be calculated, a key parameter for ensuring the integrity of welded joints;
- **Non-destructive testing of welds in accordance with standard UNI EN ISO 10893-2:** carried out directly on the production line using the eddy current method, enables the detection of any discontinuities or imperfections in the material without compromising its integrity.

## Investments in innovation and the digitalisation of processes

In recent years, Padana Tubi has channelled its **investments into technological innovation and the digitalisation of processes**, with a focus on consumption and resource management, with the aim of improving productivity and developing an increasingly integrated system across its various production lines.

The **Digitalisation 4.0 programme** has introduced **tools for the continuous monitoring of production activities**, enabling the analysis of data relating to costs, breakdowns, response times and consumption. This approach makes it possible to **identify anomalies and areas for improvement**, supporting process management; and, thanks to the monitoring of consumption – a requirement for obtaining and maintaining ISO 50001 certification – it encourages greater attention to the use of resources and improved energy efficiency.



In this context, **a software prototype has been developed**, alongside platforms and applications designed to manage and coordinate production. By interfacing with the factory's information systems, these tools enable the operational conditions of machinery and production systems to be monitored, assessing parameters such as efficiency, maintainability and quality.

In **2025**, further **work on the production lines was completed, bringing to a close a multi-year project aimed at raising the standards of safety on the roll-forming machines**. Work has continued on reducing noise in the workplace through the **installation of soundproof booths** and the **increased use of silencers in the departments**.

At the same time, the **replacement of the automatic strapping machines** continued, and **chip breakers were installed** on several production lines, helping to improve safety conditions for operators.

During 2025, **commissioning of the slitter** and the **10" stainless steel HF line at the new P Plant began**. In the second half of the year, **work also began on the foundations for a new slitter in Via Portamurata**, intended to replace a line that was no longer performing to standard and scheduled for installation by the end of 2026.

The measures implemented form part of an ongoing process of evolution in production processes, which is progressively focusing on automation, quality and safety, alongside more precise management of consumption and the resources used.

### 2026 goals

- Revamping of several cold roll forming lines
- Installation of 7 new welding generators
- Completion of installation of the new cutting line in Via Portamurata
- LED relamping in Plants A and B
- Installation of CCTV cameras and smart signage to prevent workers being struck by vehicles and to prevent collisions between vehicles.

# Customer relations and monitoring customer satisfaction

## SDG 8

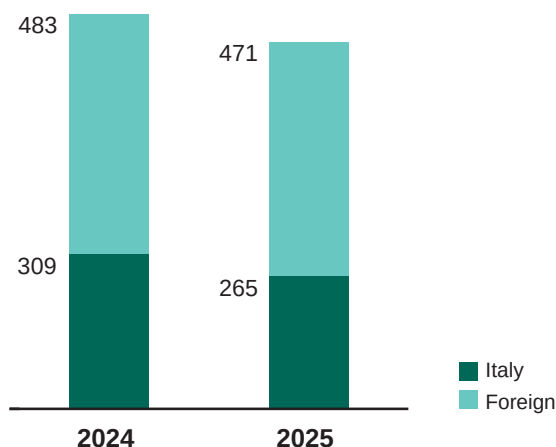
Customer relations and customer satisfaction levels are key factors in the company's market positioning. A lasting relationship is built on service quality, operational continuity and clear and effective communication. Padana Tubi builds relationships with its customers through an approach focused on listening and understanding customer needs, with the aim of ensuring consistency between market demands and the solutions offered.

Padana Tubi's customers are mainly **steel distributors** and **service centres**, which either resell the products or carry out further processing before sale, including cutting to length, surface treatments, laser drilling and shaping of the tube ends.

**As at 31 December 2025, Padana Tubi had 736 customers with outstanding balances, of whom 265 were in Italy and 471 abroad, with a significant presence in the European market.**

**Customer relations** are also managed through **constant monitoring of overall satisfaction** and **the analysis of complaints**. Reports not submitted via Non-Conformity Reports are recorded in the 'Non-Conformity Management' tab, which enables the causes to be identified and corrective actions to be defined. Customer satisfaction levels remained positive in 2025 as well. To support the handling of enquiries and further improve the customer experience, Padana Tubi has developed an e-commerce system integrated with its business management software. The platform enables customers to submit requests digitally, with automated processing that optimises response times and order entry.

### CUSTOMERS BY LOCATION



6.



# Suppliers and supply chain management





# Supplier selection and evaluation

Supply chain management requires structured monitoring and ongoing assessment of suppliers, including with regard to social and environmental aspects.

The selection of partners is based on a number of factors, including the quality of products and services, compliance with current regulations, and adherence to ethical and operational criteria. This approach enables the company to monitor the supply chain and encourage suppliers to comply with the standards adopted by the company.

When selecting its suppliers, Padana Tubi takes into account factors such as stability, reliability and ethical conduct, which are key to building long-term relationships.

|                          |                                           |                                                                          |                                                        |
|--------------------------|-------------------------------------------|--------------------------------------------------------------------------|--------------------------------------------------------|
| 864<br>SUPPLIERS BY 2025 | 64%<br>BUDGET SPENT ON<br>LOCAL SUPPLIERS | 45%<br>NUMBER OF<br>NEW SUPPLIERS<br>ASSESSED FROM AN<br>ESG PERSPECTIVE | 2025<br>ADOPTION OF THE<br>SUPPLIER CODE<br>OF CONDUCT |
|--------------------------|-------------------------------------------|--------------------------------------------------------------------------|--------------------------------------------------------|

To strengthen its supply chain management, in 2024 Padana Tubi launched, with the support of external consultants, a **strategic consultancy programme aimed at conducting an in-depth analysis of its procurement processes**. The aim of this initiative is to identify risks and opportunities for improvement within the supply chain, with a particular focus on ESG aspects.

In the medium to long term, the company intends to develop initiatives aimed at:

- to improve the **sustainability of operations**;
- to reduce the **environmental impact**;
- to strengthen compliance with **ethical standards** throughout the supply chain;
- to strengthen **transparency in relations with suppliers**.

In 2025, a **Code of Conduct for Suppliers** was drawn up, setting out the guiding principles for commercial relations and the expectations placed on partners.

The Code reflects the principles adopted by Padana Tubi, including:

- conducting business in accordance with the principles of integrity and corporate ethics;
- behaving fairly with employees, customers, suppliers and the communities in which we operate;
- operating in compliance with environmental regulations, paying particular attention to managing the impacts of our activities.



The Code also sets out the expectations regarding suppliers of goods and services, including:

- **compliance with applicable regulations and principles of ethical conduct** (anti-corruption, competition and the management of conflicts of interest);
- data protection and the protection of intellectual property;
- compliance with **labour legislation, human rights** and **ethical social conduct** (respect and dignity, prohibition of discrimination, equal opportunities; workers' rights; health and safety at work; protection against harassment; working hours, remuneration and benefits; freedom of association);
- **responsibility for environmental issues** and **compliance with regulations** in this area, including the management of hazardous substances and compliance with the REACH and RoHS regulations.

Compliance with the provisions of the Code is an important factor in the process of selecting and assessing suppliers.

## Composition of the supply chain

Padana Tubi's supply chain is divided into several categories, each with a specific role within the production cycle:

- **Raw material suppliers** (steelworks), for the supply of carbon steel and stainless steel coils;
- **Service and consultancy providers**, which also include external processes such as galvanising, satin finishing and polishing;
- **Suppliers of consumables and secondary materials**, including packaging and lubricating oils;
- **Suppliers of equipment, plant and maintenance services** to support the day-to-day running of the plants;
- **Suppliers of goods and general/administrative expenses**, including telephone services, entertainment expenses and stationery costs;
- **Transport operators**, responsible for the handling of raw materials and the delivery of products;
- **Agents and Customs**, involved in managing the logistical and administrative aspects of import and export activities.

In 2025, purchases of carbon steel raw materials (76%) were concentrated mainly in Italy at steelworks that have been part of Padana Tubi's supply chain for many years. In the stainless steel sector, however, purchases are distributed evenly between Italy and overseas. The structured organisation of the supply network enables procurement activities to be managed on an ongoing basis, in line with the company's production requirements.

**During the reporting period, Padana Tubi worked with 864 active suppliers, with total expenditure amounting to 760,466,945.16 euros<sup>4</sup>.**

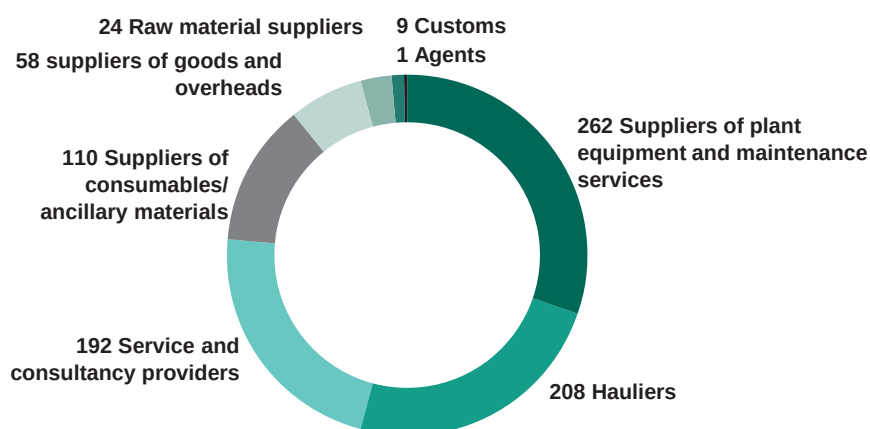
An analysis of the composition of the supply network shows that the majority of suppliers fall into the following categories:

- Suppliers of equipment, plant and maintenance services (30%);
- Transport operators (24 per cent);
- Service and consultancy providers and suppliers of consumables, which together account for 36 per cent.

<sup>4</sup> Please note that, with effect from 2024, the basis for calculating expenditure on supplies has changed, and only taxable supplies are now taken into account.

The remaining categories complete the supply chain, helping to ensure the continuity of production and operational activities.

#### TYPES OF SUPPLIERS – 2025 CLASSIFICATION



The significant role of **local and national sourcing** for Padana Tubi is confirmed once again for 2025: **64% of total expenditure was allocated to suppliers based in Italy**, from which almost all the supplies of materials, maintenance services, equipment and plant required for production activities originate.

As highlighted in the opening pages of this Sustainability Report and as reaffirmed above, Padana Tubi has, over the years, consistently prioritised the procurement of goods and services within Italy. This decision was not dictated solely by a sense of belonging to the local area, but also by operational considerations, including:

- Reduced costs and transport times: sourcing locally minimises logistics and shipping costs and reduces delivery times, enabling faster stock management.
- Greater responsiveness and flexibility: being physically close enables us to deal with emergencies, rapid pick-ups or changes to orders almost immediately, reducing the risk of production stoppages.
- Building relationships based on trust: working with local suppliers makes it easier to establish a direct and stable relationship, which is essential for securing high-quality products and personalised support.
- Sustainability and environmental impact: reducing the distance goods are transported leads to a reduction in transport-related CO<sub>2</sub> emissions, in line with a company policy focused on managing environmental issues.

At the same time, **the overseas market continues to account for a significant proportion of sales (73% overseas, 27% in Italy)**. In line with this distribution, transport services are also predominantly linked to overseas markets, accounting for 68% – roughly double the proportion of those carried out within the country.

The structure of the supply network and associated services reflects the company's operational structure and the geographical distribution of its activities.

More specifically, as regards raw material suppliers, 64% of total expenditure in 2025 was allocated to suppliers based in Italy. These figures highlight the role of local and national sourcing in the company's supply chain structure, as well as in Padana Tubi's strategy.

## Supplier assessment: requirements and tools

**Relationships with suppliers are a key element in supply chain management. Padana Tubi cultivates these relationships on an ongoing basis, building them on the principles of integrity, transparency and professionalism, and fostering long-term partnerships.**

Suppliers are selected and purchasing terms are set using objective criteria, based on technical and economic parameters such as quality, price, guarantees offered and suitability for the company's needs.

Padana Tubi also verifies that suppliers comply with occupational health and safety regulations, as well as their obligations regarding pay, social security contributions and tax. The company works with qualified firms and professionals, requiring them to adhere to the principles of the Code of Ethics and promoting compliance with the Organisational, Management and Control Model in accordance with Legislative Decree 231/2001.

Over time, the supplier assessment process has gradually been expanded to include social and environmental criteria. **Since 2023, a questionnaire has been introduced for new suppliers**, designed to gather information on these matters.

The survey is in addition to the documentation required to commence the collaboration, including a Chamber of Commerce certificate, DURC, DURF and, for steelworks, specific documentation such as DoP, REACH, RoHS II III and Conflict Minerals. Where available, EPD studies, LEED certifications and data relating to the Organisation Carbon Footprint are also requested, together with information on environmental management systems, waste management, the adoption of Model 231 and workplace safety practices.

**There are 97 new suppliers**, of whom 90 were mapped. **The response rate was 49%, whilst** the proportion of suppliers assessed against environmental and social criteria stood at 45%. During the year, **a Code of Conduct was drawn up and sent to all suppliers**. The initiative involved suppliers from the last five years, totalling 824 entities. Of these, 623 provided a response, whilst 589 returned the signed form; 25 suppliers also submitted their internal documentation (code of ethics, code of conduct, etc.) and invited Padana Tubi to review it.

For the purposes of a more in-depth analysis of the response rate, it should be noted that some of the suppliers included in the analysis are no longer active; in some cases, these were one-off suppliers or entities that have undergone corporate changes (mergers, disposals or wound-ups). Other suppliers, however, were unable to return the countersigned documentation due to their internal policies. However, having already adopted their own code of conduct, they have confirmed that the required principles are, in any case, being upheld.

## Privacy and data management

Padana Tubi guarantees the protection and management of customers' and suppliers' personal data in accordance with current data protection legislation.

**The information collected is processed in accordance with the law and in compliance with the safety measures adopted by the company.**

Through the Privacy Register, Padana Tubi monitors any reports of breaches of customer privacy. During the three-year period 2023–2025, no breaches or cyber-attacks were recorded.

7.





# People in the company's evolution





# Workforce composition and staff structure

GRI 2-7 | GRI 2-8 | GRI 2-30 | GRI 401-1 | GRI 404-1 | GRI 405-1 | GRI 406-1



People are at the heart of Padana Tubi, contributing directly to the development of its business and the evolution of the organisation.

**803  
EMPLOYEES  
(+7% COMPARED  
TO 2024)**

**93% MEN  
89% MANUAL  
WORKERS**

**91%  
STAFF  
RECRUITED ON  
PERMANENT  
CONTRACTS**

**99%  
FULL-TIME  
EMPLOYEES**

**56%  
RESOURCES  
AGED  
BETWEEN  
30 AND 50**

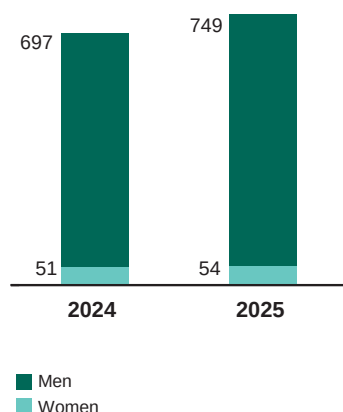
Staff management is guided by the principles of the Code of Ethics, promoting a working environment based on mutual respect, dialogue and a focus on working conditions.

**As at 31.12.2025, the company had 803 employees (+7% compared with 2024), of whom 749 were men and 54 were women.**

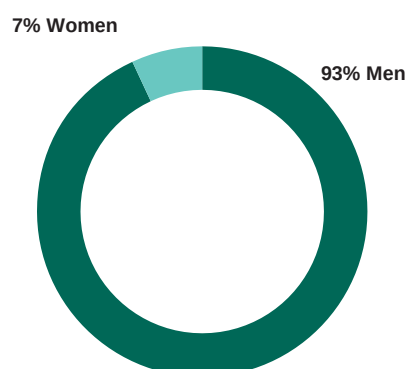
**The gender breakdown remains stable compared with the previous year: 93% of the workforce are men and 7% are women**, mainly in clerical roles, a sector in which the proportion of women reached 58% in 2025. This distribution reflects the characteristics of the sector in question, which has historically been dominated by men.

As regards age, 56% of employees are aged between 30 and 50, 27% are over 50 and 17% are under 30. In 2025, there was a slight decrease in the middle age group (-3%), stability among the over-50s and an increase among the under-30s (2%).

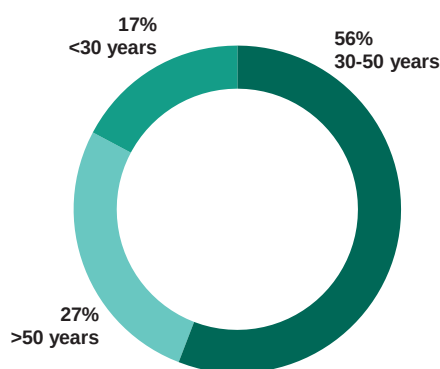
## PADANA TUBI EMPLOYEES



## EMPLOYEES BY GENDER AS AT 31.12.2025



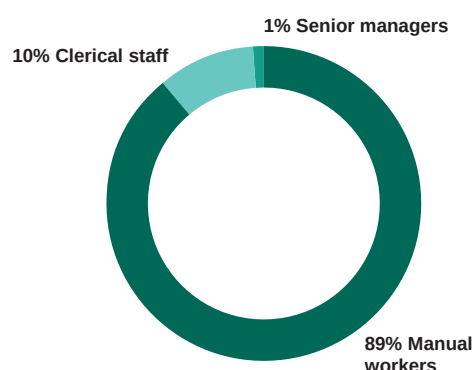
## EMPLOYEES BY AGE AS AT 31.12.2025



When analysing the workforce by professional category, the largest group is that of **manual workers**, which, as at 31 December 2025, comprised 718 employees, accounting for **89%** of the total. Next come **office staff** (79), who account for **10%** of the workforce, of whom 46 are women, and the **managers** (6), **1%** of the workforce, of whom 2 are women.

This breakdown reflects the **operational structure of Padana Tubi**, in which the **majority** of staff is **deployed directly in production processes**.

## STAFF BY PROFESSIONAL CATEGORY AS AT 31 DECEMBER 2025



**Padana Tubi favours permanent contracts, which in 2025 will cover 91% of its staff, and full-time contracts (99%).**

The remainder consists of fixed-term contracts involving 70 employees.

The company handles all recruitment directly and does not use agency workers. This approach enables us to maintain a direct and stable relationship with staff, whilst fostering a stronger sense of belonging amongst employees.

Padana Tubi does not engage non-employees for any significant activities within the organisation. However, where necessary, it calls upon specialist professionals for specific tasks, such as advanced maintenance, the construction of systems and buildings, cleaning and sanitisation, and specialist consultancy.

The data highlight an employment structure geared towards the continuity of employment relationships and the development of in-house skills over time.

## EMPLOYEES BY TYPE OF CONTRACT AS AT 31.12.2025



The management of employment policies and working conditions for all Padana Tubi employees is governed by national legislation, the National Collective Labour Agreement for the Metalworking and Plant Installation Industry, and a supplementary company agreement, which further strengthens the protections afforded to staff.

## New employee hires and employee turnover

**In 2025, the company recorded 123 new hires** (4 women and 119 men) and **65 departures** (1 woman and 64 men) due to voluntary resignations, contract terminations and retirements.

The focus on youth employment is confirmed by the fact that **around 52% of new recruits are under 30**, whilst **38%** involved workers **aged between 30 and 50**.

A voluntary vocational training programme has been put in place for newly recruited young people, in line with the provisions of the company agreement.

The rate of new hires<sup>5</sup> rose compared with the previous year, rising from 10% in 2024 to 16% in 2025. Most of the new hires are for staff working at the plant. These new hires were made both to support the commissioning of new plant and to improve the efficiency of existing departments..

The outflow turnover rate<sup>6</sup>, on the other hand, remained stable at 9 per cent.

**Overall, net staff turnover remained positive at 7%**, reflecting a positive balance between new hires and departures and contributing to the gradual strengthening of in-house expertise.

## Parental leave

During the year, 56 employees took parental leave, of whom 52 were men and 4 were women.

The return-to-work rate was 100 per cent for men and 50 per cent for women.

The figure for female staff is influenced by the small sample size and possible timing effects.

Padana Tubi continues to monitor this indicator and to promote measures to support a return to work and a healthy work-life balance.

<sup>5</sup> The incoming turnover rate (or positive turnover rate) is the ratio between the number of people hired during the period and the total number of employees at the beginning of the year.

<sup>6</sup> The exit turnover rate (or negative turnover rate) is the ratio between the number of people who left the company during the period and the total number of employees at the beginning of the year.

# Continuous professional development and maximising potential

## SDGs 4, 8

Human resources management at Padana Tubi encompasses training, development and engagement, with the aim of enhancing employees' skills and supporting their professional development.

Professional development is seen as an ongoing process that enables employees to update and expand their skills, thereby responding ever more effectively to the needs of operational activities.

Padana Tubi recognises that training is a key factor in maintaining quality, ensuring safety and the smooth running of its business model.

9,597  
HOURS OF TRAINING  
(+18% COMPARED  
WITH 2024 AND +57%  
COMPARED WITH 2022)

12  
AVERAGE NUMBER OF  
TRAINING HOURS PER  
YEAR PER EMPLOYEE

TOPICS COVERED:

- OCCUPATIONAL HEALTH AND SAFETY
- CYBER SECURITY
- ENVIRONMENTAL MANAGEMENT SYSTEM
- CBAM
- NEW CUSTOMS CODE
- TAX UPDATES
- HOW TO READ THE PAYSリップ PROPERLY

The steel industry requires a high level of technical specialisation, continuous process improvement and careful management of energy resources. These aspects, which relate to the value chain, have an impact on the organisation of activities and on relations with stakeholders, particularly employees.

**In this context, Padana Tubi promotes a staff-management approach based on compliance with regulations, with a particular focus on health and safety at work, complementing these aspects with initiatives dedicated to training and professional development.**

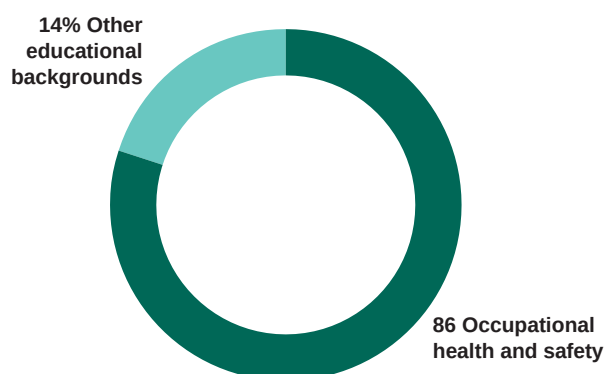
Technological advances in plant systems and the increasing complexity of technical roles mean that skills must be constantly updated. To this end, the company runs targeted training programmes designed to enhance people's knowledge and experience.

The annual training programme comprises both compulsory courses and refresher and technical development courses, delivered in collaboration with specialist external organisations.

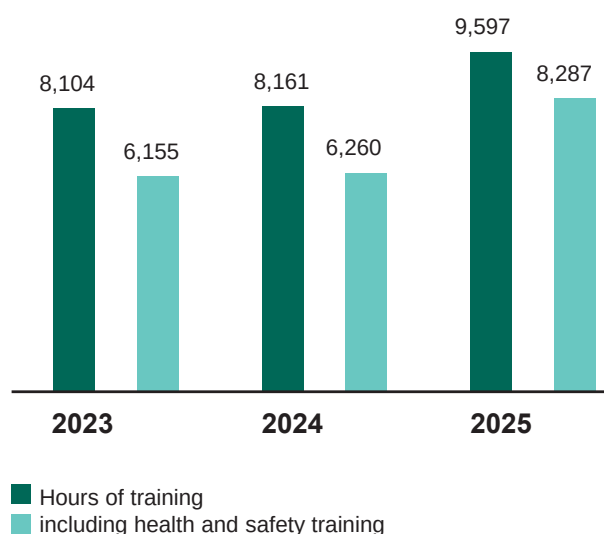
**In 2025, the total number of training hours provided to employees stood at 9,597, a significant increase compared with the previous year (+18%) and, in particular, compared with 2022 (+57%).**



## TRAINING HOURS IN 2025



## TOTAL TRAINING HOURS FOR 2023–2025



Of these, **8,287 hours – equivalent to 80% of the total – were devoted to the topic of health and safety at work**, through general and specific training courses as provided for in Article 37(2) of Legislative Decree 81/08.

For further information on the training activities carried out in this area, please refer to the section entitled *“Health and safety: a priority in day-to-day activities”*. Alongside compulsory training, Padana Tubi has continued to run initiatives focused on professional development and providing information on cross-cutting issues. In 2025, employees took part in training activities covering:

- the content and application of **Decree 231/2001**;
- how to **read the payslip** properly;
- vocational training courses on **updating job roles, quality management**, and **tax and fiscal compliance**.

In 2024, the objective of providing training hours on **cyber security and IT security was achieved, supplemented** by a **refresher course on the environmental management system** that had been put in place, to clarify to staff the procedures and objectives required under ISO 14001.

In addition, training courses were held on regulatory and administrative updates, such as those on the CBAM regulations and the new Customs Code, as well as courses on how to read payslips, which continued into 2025.

In 2025, employees received an average of 12 hours of training, with manual workers showing the highest level of participation, totalling 8,287 hours in all.

In 2025, **Padana Tubi stepped up its awareness-raising campaigns focused on safety**, recognising the importance of this issue within the operational context in which its business operates. In addition, **training courses on the Energy Management System (UNI CEI EN ISO 50001:2018) have been launched, aimed at employees**.

# Equal opportunities and a focus on the wellbeing of its people

## SDGs 8,10

Adherence to the principles of diversity, equity and inclusion means valuing people and promoting working conditions based on respect and fairness. Padana Tubi opposes all forms of discrimination and promotes equal opportunities for professional development, within a framework that prioritises safety and the quality of the working environment.

### BENEFITS:

- 200-EURO SHOPPING VOUCHER
- MEDICAL AND HEALTHCARE SERVICES
- SCHOLARSHIPS FOR EMPLOYEES' CHILDREN

### 2025:

PREVENTION AND WELLBEING INITIATIVES (ON-SITE FLU VACCINATION, PSA AND COLORECTAL SCREENING) AND SESSIONS FOCUSING ON WOMEN'S HEALTH

The company operates in accordance with the fundamental conventions of the International Labour Organisation (ILO) ratified by Italy and, during the reporting period, **no incidents of discrimination were recorded**.

As of 2025, Padana Tubi's workforce includes 35 people from protected groups. Padana Tubi recognises and supports the right to freedom of association and collective bargaining, maintaining an ongoing dialogue with trade union representatives to ensure compliance with regulations and the well-being of its workers. Collective bargaining applies to 100 per cent of employees, in accordance with the provisions of the National Collective Labour Agreement for the Metalworking and Mechanical Engineering Sector at both the first and second levels.

The Organisation, Management and Control Model and the Code of Ethics define all aspects to be protected in relations with staff and social partners. In accordance with the provisions of the collective agreement, employees are entitled to a **flexible benefits scheme**, which includes the annual provision of **shopping vouchers** worth 200 euros and access to **healthcare programmes**, such as the Metasalute Fund.

In 2025, in line with the provisions of the supplementary company agreement, **scholarships worth 400 euros were awarded to two employees' children** who had obtained their school-leaving certificate during the year, achieving high marks.

From 2022, there will also be the **option to convert the company bonus into a welfare credit**. This scheme, provided for under the second-level collective bargaining agreement, has been further enhanced by the company, which pays an additional amount equal to 10% of the converted sum.

In 2025, Padana Tubi launched initiatives focused on prevention and workers' health, including voluntary flu vaccinations, PSA screening for men over 50, screening for colorectal cancer for men and women over 40 (or with a family history of the condition), and in-depth sessions on women's health, organised with the support of doctors from the Santa Maria Hospital in Reggio Emilia.

These initiatives form part of a programme launched in previous years, including the awareness campaign launched in 2020 to mark the company's fiftieth anniversary, which focused on healthy lifestyles and the prevention of cardiovascular disease.



# Health and safety: a priority in day-to-day operations

GRI 403-1 | GRI 403-2 | GRI 403-3 | GRI 403-4 | GRI 403-5 | GRI 403-6 | GRI 403-7 | GRI 403-8 | GRI 403-9 | GRI 403-10

SDGs 3,8

For Padana Tubi, safeguarding the health and safety of its employees is a key priority, closely linked to the continuity and effectiveness of the company’s operations.

The company promotes a shared safety culture, based on the active involvement of all employees and constant monitoring of operating conditions. This approach enables all aspects relating to health and safety to be closely monitored, thereby strengthening the ability to prevent risks and ensure suitable working environments.

|                                           |                                                    |                                                                |  |
|-------------------------------------------|----------------------------------------------------|----------------------------------------------------------------|--|
| CERTIFICATION<br>UNI EN ISO<br>45001:2018 | 8,287<br>HOURS OF HEALTH<br>AND SAFETY<br>TRAINING | 2024:<br>AWARENESS<br>CAMPAIGN: ‘SAFETY<br>IS A STATE OF MIND’ |  |
|-------------------------------------------|----------------------------------------------------|----------------------------------------------------------------|--|

In its day-to-day operations, which involve the handling of heavy loads and the use of complex machinery, Padana Tubi pays constant attention to safety in the workplace.

To strengthen its safety and health management system, the company has voluntarily chosen to implement and certify its **Occupational Health and Safety Management System in accordance with the UNI EN ISO 45001:2018 standard**. This is a commitment that encompasses all operational contexts and aims to strengthen prevention and protection measures to safeguard people. In line with the principles set out in the Integrated Policy, Padana Tubi is committed to:

- to encourage the active involvement of staff, by promoting shared responsibility for maintaining safe working conditions;
- to adopt tools, procedures and operating methods aimed at reducing risks and preventing accidents and occupational diseases.

## The Prevention and Protection service

At Padana Tubi, every member of staff plays a part in maintaining a safe working environment by behaving responsibly to protect their own safety and that of others.

The **Health and Safety Management System** provides for all workers to **report any non-compliance** identified during operational activities, via the **Health and Safety Service**.

Reports – whether named or anonymous – are recorded in a specific register, which forms an integral part of the Management System, and, where necessary, trigger the implementation of any corrective actions, which are monitored until they are closed. This tool complements the more traditional methods of reporting, which involve direct discussion with company managers or the Workers' Safety Representative (RLS).

All injuries, accidents or near-misses are analysed by the Health and Safety Service, which, where necessary, carries out interviews with the workers involved or those who were aware of the incident, in order to identify the most effective preventive measures to prevent such events from happening again. To round off this work, meetings are held periodically with supervisors and department heads to analyse the reports received and share the findings of the analyses carried out on any incidents recorded.

## Occupational Medicine

Padana Tubi provides a structured and accessible **occupational health** system, with the aim of continuously safeguarding the health of its employees. The quality of the service and ease of access for workers are ensured through a number of structured measures:

- the development of a bespoke **health protocol** based on an analysis of risk assessment documents;
- **regular inspections** by the occupational health doctor whenever there are changes in working conditions, critical issues arise or doubts are raised regarding a worker's suitability for a specific role;
- **the option for employees** to voluntarily request **medical examinations in addition to the standard ones**, should any factors arise that might affect their fitness for work.

In addition to these activities, there is the opportunity, offered annually, to receive a free flu vaccination as a preventative measure to protect public health.



## Work-related injuries

There were no fatal accidents during the reporting period. There has also been a slight fall in the total number of accidents compared with the previous year. However, the claims recorded were more severe than in previous years: **the frequency index fell (-7%)**, whilst the severity index showed an increase. In most cases, the incidents recorded can be attributed to operational procedures that could be improved, rather than to problems with plant or equipment.

The number of days lost due to injury rose by around +42,8% compared with 2024, although it was 31% lower than in 2019. This figure confirms, over the long term, the effectiveness of safety-related initiatives and training activities.

The injuries were mainly caused by collisions, falls, slips and road accidents.

As further evidence of its commitment to this issue, Padana Tubi launched the **"Safety is a state of mind"** awareness campaign in 2024, involving over 600 employees. The initiative is aimed at reducing incidents caused by distraction, carelessness or failure to follow operating procedures. During 2025, meetings were also organised for machine operators and production line supervisors with the aim of strengthening their role in safety management.

Following every accident, an analysis of the causes is carried out to identify – and, where possible, eliminate – the risk factors at source. Where this is not feasible, temporary or permanent corrective measures are put in place to mitigate residual risks and improve operational safety.

## Noise Risk

Padana Tubi's workspaces are characterised by large open-plan areas, where noise management is a key consideration, both for workers directly involved in production and for staff working in neighbouring areas. For this reason, the company **constantly monitors noise levels** and takes action, where necessary, by **installing sound-absorbing enclosures or dedicated silencers**.

In line with the work begun in previous years, **efforts to reduce the risk of noise exposure in the workplace continued in 2025**. The noise abatement project, which began in 2023 at Plant B and was completed in September 2024, involved a series of targeted measures, including:

- enclosures and acoustic screening for sections of the production lines (in addition to those already in place), with particular attention to the areas with the highest noise levels;
- replacement of the nozzles on compressed-air blowers with new-generation components featuring noise-reduction technology.

In addition to these measures, new **soundproof booths** were installed.

**In 2025, work continued with the installation of soundproof enclosures on a slitter and a profiling line**, as well as **the purchase of a cutting booth for an additional profile** (delivery scheduled for spring 2026), continuing the projects already launched in 2023 and 2024. At the same time, there has been a significant increase in the focus on the use of silencers across the various departments.

## Safety in handling

The management of the movement of vehicles and people, both inside and outside the plants, was another area of focus.

Over the course of the year, **improvements were made to signage and floor surfaces**, along with the replacement of some equipment and work vehicles, and a strengthening of operational procedures.

These measures have been complemented by the introduction of specific devices designed to prevent collisions and accidents involving pedestrians.

## Security training

**Padana Tubi regularly organises training and induction programmes on health and safety at work, in line with current legislation and the operational requirements of the various departments.**

**The training programmes cover both general and specific topics and are accompanied by awareness-raising activities, with the aim of encouraging careful and appropriate behaviour in the course of daily activities.**

Each year, the company draws up a structured training plan, which is subject to updates, and uses accredited organisations and qualified professionals to deliver the courses, most of which take place on-site at the company's premises.

In 2025, a total of **8,287 hours of health and safety training were delivered**, an increase of **32% compared with 2024** and 37% compared with 2022. This figure confirms the ongoing commitment to promoting proper operating practice across all areas of the organisation.

The main training activities carried out during the three-year period 2023–2025 focused on:

- Safety training for all workers (general and specific, in accordance with the State-Regions Agreement);
- Training for managers, supervisors and worker safety representatives;
- Fire safety and first aid courses;
- Operating procedures for carrying out the various tasks on production facilities safely;
- Training for work at height and in confined spaces;
- Training for live-line work;
- Refresher courses for prevention and protection managers and workers;
- Training in the use of equipment, including overhead cranes, forklift trucks, mobile elevating work platforms (MEWPs), tractors, defibrillators (AEDs) and oxy-acetylene torches, as well as courses leading to a welding certificate.

# 8.





The local area and  
the community:  
a bond renewed  
and strengthened



# Our contribution to the local area and communities

**For Padana Tubi, its commitment to the local area takes the form of an ongoing relationship with local communities, through initiatives that contribute to the social, cultural and economic development of the area in which it operates.**

The company's ties with the Municipality of Guastalla and the surrounding areas have been deeply rooted since its very beginnings; over time, it has helped to create stable employment and strengthen the local economic fabric.

Over the years, Padana Tubi has taken part in social, cultural and sporting initiatives, supporting healthcare facilities, schools, associations and organisations active in the local area.

## Initiatives and areas of focus

**269,830 EURO  
DONATIONS MADE  
IN 2025**

**OF WHICH 152,080 EUROS  
IS EARMARKED FOR  
SUPPORTING SOCIAL  
INITIATIVES IN THE FIELDS  
OF SOCIAL AND HEALTH  
CARE AND MEDICAL AND  
SCIENTIFIC RESEARCH**

In 2025, Padana Tubi reaffirmed and expanded its support for the local community, **backing social, healthcare, educational and cultural initiatives** to a **total value of 269,830 euros**. The initiatives involved third sector organisations, voluntary associations, healthcare providers and local parishes, with a particular focus on prevention, health and support for the most vulnerable members of the community.

## Socio-Health Care and Medical-Scientific Research

In 2025, the company allocated **152,080 euros** to initiatives in **the fields of healthcare, social care and research**.

Padana Tubi has organised a comprehensive health awareness programme for all staff, comprising a number of initiatives:

- **Free prostate cancer screening appointments**, in collaboration with the Guastalla Cancer Prevention Association, including a free PSA Reflex test prior to the appointment;
- **"Women's Health" sessions**, led by Dr Lorenzo Aguzzoli, Director of the Complex Unit of Obstetrics and Gynaecological Oncology at the Santa Maria Nuova Hospital in Reggio Emilia, divided into age groups (up to 40 years and over 41 years);



- **Awareness programme on gastrointestinal diseases**, in collaboration with APRO ETS and the Department of Gastroenterology and Digestive Endoscopy at Arcispedale Santa Maria Nuova. The sessions, led by specialist medical staff, explored the prevention, diagnosis and treatment of the main gastrointestinal conditions. Subsequently, employees aged over 40 were offered the opportunity to undergo screening for faecal occult blood and, in cases of a hereditary or family history of risk, to be referred to the relevant hospital department for management.

In collaboration with Guastalla Town Council, an event open to the public was also organised featuring the **Fujifilm EndoRunner Truck**, equipped with endoscopy stations and simulators for demonstration and training purposes.

## Social initiatives and volunteering

In 2025, Padana Tubi allocated **76,700 euros** to **social, sporting and voluntary initiatives**, of which **24,200 euros** went to **organisations working towards inclusion**, supporting families and promoting educational and recreational activities, and **52,500 euros** for **social activities and the maintenance of local religious heritage**.

## School and education

In 2025, the company allocated **16,050 euros** to **support local schools**, reaffirming its commitment to the education of the younger generation.

## Culture and artistic heritage

In 2025, **25,000 euros** were allocated to the **preservation and promotion of local cultural heritage**.

| SUPPORT FOR THE LOCAL AREA (€)                    | 2024           | 2025           |
|---------------------------------------------------|----------------|----------------|
| Socio-Health Care and Medical-Scientific Research | 68,250         | 152,080        |
| Social initiatives and volunteering               | 166,950        | 76,700         |
| School and education                              | 13,000         | 16,050         |
| Culture and Heritage                              | 10,000         | 25,000         |
| <b>Total</b>                                      | <b>258,200</b> | <b>269,830</b> |

# 9.



# Natural resources and the environment: management and monitoring



# Environmental awareness and the use of resources



**Padana Tubi conducts its business with a focus on environmental considerations, committing itself to reducing the impact of its processes and to the efficient management of natural resources.**

Padana Tubi's commitment to the environment is reflected in concrete and measurable actions, structured around three main areas at both a strategic and operational level:



**Prevention and reduction of emissions to protect the air and the climate**



**Efficient management of materials and energy in accordance with the principles of the circular economy**



**Responsible and transparent waste management**

## Steel and its life cycle

### SDGs 3,11,12

**Steel is one of the most widely recycled materials in the world and, thanks to its properties, can be remelted several times without any significant loss of its mechanical properties. This is why it represents a significant resource in production models geared towards the circular economy.**

**In this context, the management of incoming and outgoing materials plays a central role, with the aim of extending their life cycle through recovery, reuse and repurposing. This translates into targeted operational decisions and careful monitoring of the resources deployed.**

Steel and the steel industry play a central role in numerous industrial sectors – from manufacturing to agriculture, and from transport to infrastructure – thanks to the material's strength, durability and versatility. The quality of the steel makes it possible, in fact, to construct durable and safe structures. At the end of its service life, steel can be recovered and remelted without any significant loss of quality or deterioration in its mechanical properties: it is therefore, to all intents and purposes, a permanent material.

The steel industry is also undergoing a process of change linked to reducing emissions and improving process efficiency. The entire supply chain is involved in developing technological and organisational solutions aimed at improving environmental performance.

Padana Tubi fits into this context with **a progressive focus on managing the environmental aspects associated with its operations.**

In this context, the company operates in order:

- to reduce energy intensity per unit of output;
- to improve the efficiency of production processes;
- to increase the use of energy from renewable sources;
- to monitor CO<sub>2</sub> emissions associated with the company's activities.

## Materials used in production processes

The **main raw materials** used by Padana Tubi include:

- **raw materials** (carbon steel and stainless steel coils, galvanised coils, hot-rolled non-alloy steel);
- **materials used in the production process** but not present in the finished product (oils and lubricants for machinery, blades and brushes);
- **packaging materials**<sup>7</sup> (plastic stretch film, lifting straps, metal strapping) and **wood**.

Excluding raw materials, there was a 10% reduction in packaging materials in 2025 compared with the previous year, due in particular to the increased use of lifting straps and, to a lesser extent, metal strapping. Wood consumption also fell (-8%), as did the use of technical materials in the production cycle (-4%). Overall, **75%** of the materials used consists of **renewable materials**<sup>8</sup> (such as wood and metal strapping), whilst the remaining 25%<sup>9</sup> consists of non-renewable materials (plastic derivatives, oils and other technical materials).

## Recycled materials

In 2025, Padana Tubi continued to collect and analyse information on the recycled content of the steel it purchased, drawing in part on data from EPD studies and information provided by steelworks. This has enabled a more accurate assessment of the percentage of recycled material contained in the steel purchased, for both the stainless steel and carbon steel divisions. In fact, several suppliers have provided up-to-date and accurate data, enabling the company to gain a more comprehensive overview than in previous years. The results show **a recycled content of 83% for stainless steel, 29% for carbon steel and 39% for galvanised steel.**

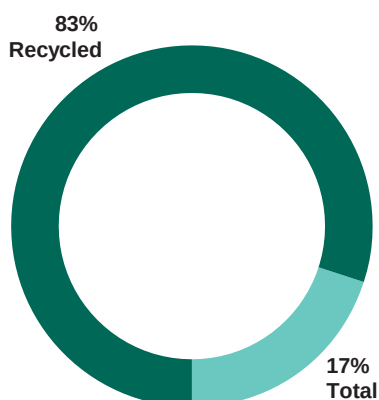
<sup>7</sup> From 2023 onwards, the company has committed to providing even greater detail than in previous reports regarding the quantities of materials used, particularly with regard to packaging materials.

<sup>8</sup> Renewable materials are materials derived from abundant resources that are rapidly replenished through ecological cycles or agricultural processes.

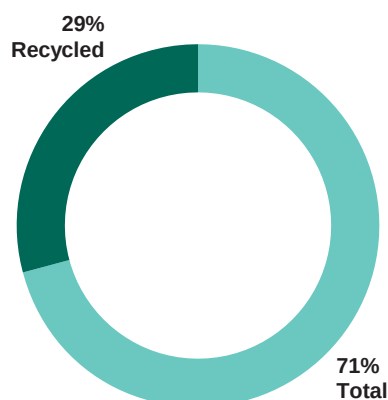
<sup>9</sup> Raw materials (steel coils) should be excluded from the calculation.



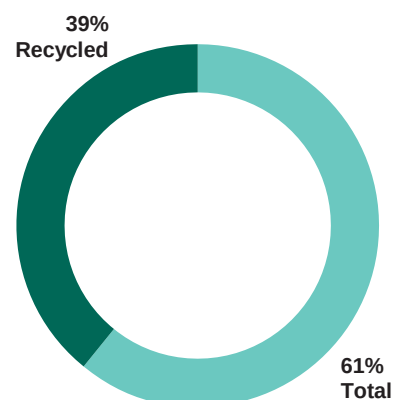
## STAINLESS STEEL



## CARBON STEEL



## GALVANISED STEEL



## Waste and treatment methods

### SDGs 12,13

Waste management encompasses all activities from the generation of waste through to its final treatment, which may involve recovery, disposal or reuse.

In this context, Padana Tubi focuses on the proper management of the various types of waste – solid, liquid and gaseous – with the aim of minimising their impact on the environment and reducing the emissions associated with its processes.

41,975  
TONNES OF WASTE  
PRODUCED (+3% COMPARED  
TO 2024)

98%  
NON-HAZARDOUS WASTE

99%  
PERCENTAGE OF WASTE SENT  
FOR RECOVERY

**In 2025, the total amount of waste generated was 41,975 tonnes**, of which<sup>10</sup> 2% was hazardous waste (870 tonnes) and 98% was non-hazardous waste (41,106 tonnes).<sup>11</sup>

Compared with 2024, there was a slight overall increase in waste generated, amounting to +3 per cent, attributable in part to the maintenance and structural expansion works carried out during the year, in particular the completion of Warehouse P and the preparatory works for the expansion of the storage area at Plant B, in Via Roncaglio.

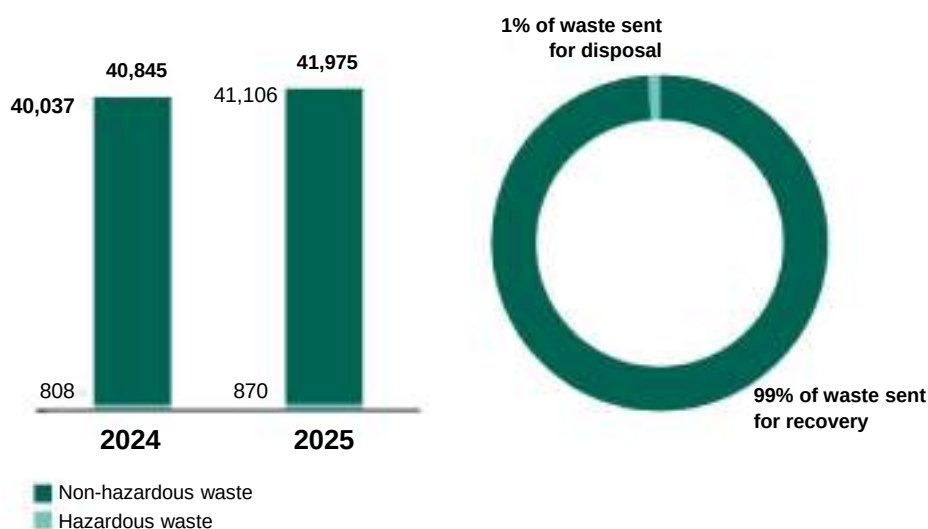
**In 2025, 99% of the waste produced was sent for recovery**, in line with the figure for the previous year. In particular:

- 71% of hazardous waste was sent for recovery (preparation for reuse and recycling), whilst the remaining 29% was disposed of;
- non-hazardous waste was almost entirely recovered, at a rate of 99.6%.

<sup>10</sup> Waste classification is based on the EWC system, the code used to classify both hazardous and non-hazardous waste in the European Waste List (EWL).

<sup>11</sup> Non-hazardous waste includes: sludge produced by on-site effluent treatment; ferrous metal filings and shavings; processing sludge; waste not otherwise specified; metal packaging; packaging made of mixed materials; iron and steel; cables; components removed from end-of-life equipment; plastics; filings and shavings of non-ferrous materials; iron and steel; dust and particulates of ferrous materials; tool bodies and spent grinding materials.

## HAZARDOUS AND NON-HAZARDOUS WASTE (T)



The classification of waste by treatment method also includes metal scrap generated during manufacturing processes at Padana Tubi's various plants. As this waste consists of steel, the main method is material recovery, in line with the widespread recycling of this material at national level.

## Use of water resources

### SDGs 6,12

**Water is a vital resource for production activities and is monitored with a view to optimising its use.**

**At Padana Tubi, water is used primarily for industrial purposes and is sourced from wells on the factory premises or from the mains water supply. Where technically feasible, production facilities are designed as closed-loop systems, reducing the need for new resources to only that required to replenish losses due to evaporation or actual consumption.**

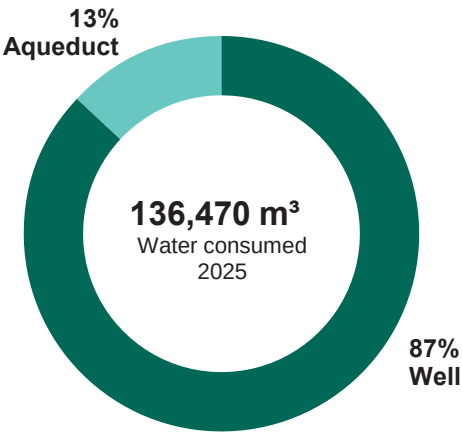
**136,470**  
CUBIC METRES OF WATER  
ABSTRACTED  
(-29% COMPARED TO 2024)

**87%**  
WELL WITHDRAWALS

**In 2025, the total volume of water abstracted was 136,470 cubic metres, of which 87% came from wells and 13% from the water mains.** Compared with 2024, there has been an overall decrease in water abstraction of 29%, both from wells (-31%, equivalent to 118,287 cubic metres) and from the water supply network (-13%). Unlike in previous reporting years, when wastewater discharge estimates were based on the volumes abstracted, from 2025 onwards – thanks to the installation of meters on both wells and discharge points – it has been possible to record consumption accurately rather than relying on estimates; this is the reason for the reduction in water abstraction.

100% of wastewater discharges for the year 2025 were channelled into the sewerage network.

WATER ABSTRACTION BY SOURCE OF ORIGIN 2025



# Energy and emissions in business operations

SDGs 3, 12, 13

The role that businesses play in relation to climate change is also linked to the way they use energy and monitor the emissions generated by their activities.

In this context, monitoring energy consumption and having access to emissions data are key factors in guiding business decisions.

In the steel industry, the production and processing of steel involve high energy consumption. For this reason, a focus on energy efficiency plays a significant role from both an environmental and an economic perspective.

|                                                                        |                                                                                   |                                                                           |                                                               |                                         |
|------------------------------------------------------------------------|-----------------------------------------------------------------------------------|---------------------------------------------------------------------------|---------------------------------------------------------------|-----------------------------------------|
| 298,471 GJ<br>ENERGY CONSUMED<br>IN 2025<br>(-11% COMPARED<br>TO 2024) | 100% OF ENERGY<br>PURCHASED<br>FROM THE GRID<br>100% FROM<br>RENEWABLE<br>SOURCES | RENEWABLE<br>ENERGY SOURCES<br>ACCOUNT FOR<br>66% OF TOTAL<br>CONSUMPTION | ENERGY INTENSITY<br>INDEX DOWN BY<br>8% COMPARED<br>WITH 2024 | ACHIEVEMENT<br>UNI EN<br>ISO 50001:2018 |
|------------------------------------------------------------------------|-----------------------------------------------------------------------------------|---------------------------------------------------------------------------|---------------------------------------------------------------|-----------------------------------------|

Energy and environmental considerations are now a key factor in Padana Tubi's investment decisions. During 2025, the company obtained **UNI CEI EN ISO 50001:2018** certification, with the aim of establishing a structured system for monitoring and improving energy performance.

Incorporating these aspects into business operations makes it possible to analyse consumption, identify areas for optimisation and keep operating costs down.

In a context characterised by significant fluctuations in energy prices, monitoring consumption is a key factor both for internal efficiency and for the more careful use of energy resources.

## Energy carriers

Padana Tubi uses different energy sources depending on its operational requirements. **Electricity** is the main source of energy consumption **(65 per cent of the total)** and is used in production processes, auxiliary services and general operations. Next come **natural gas (31%)**, used mainly for heating, and **fuels (diesel and petrol)**, used for transport and internal handling **(4%)**.

The bulk of energy consumption is accounted for by production processes, including conveyor belt loading, shearing and end welding, forming, welding, sizing, tube inspection and packaging. In addition to these are the auxiliary services (compressed air, extraction, emulsion water systems) and the general services (lighting and heating of the premises, using boilers and natural gas).

In 2025, meters were installed at various points along the production line to monitor the specific energy consumption of the generator used for welding the tubes. The aim is to collect data to determine how much energy is used to produce one metre or one kilo of tube, with a view to optimising energy efficiency throughout the production process.

## Energy consumption

**The relamping work continued** with the replacement of the old neon lights with new LED kits. The timers on the equipment serving the lines (compressors and towers), which were installed in previous years, remain active.

Over the course of the year, a number of welding generators were replaced with new-generation models, which consume less power than the previous triode-based technology. The replacement programme will continue over the next three years to cover further generators.

**During the reporting period, total energy consumption (electricity, natural gas, diesel and petrol) amounted to 298,471 GJ, down by 11% compared with 2024 (335,145 GJ).**

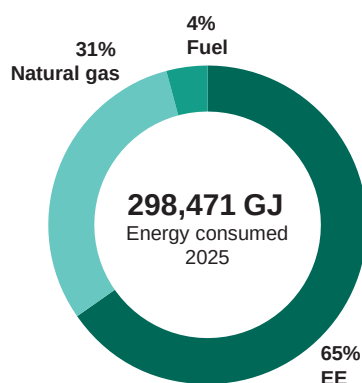
**As regards electricity, the amount drawn from the grid** remained broadly stable **compared with the previous year**. There has been an **increase in the amount of energy self-generated by photovoltaic systems**, amounting to **11,830 GJ in 2025** (11,237 GJ in 2024).

The proportion of photovoltaic energy consumed on-site **amounted to 72%** of the total generated (75% in 2024). **The electricity purchased by Padana Tubi comes entirely from certified renewable energy sources**, underlining the company's commitment to a more responsible approach to energy management.

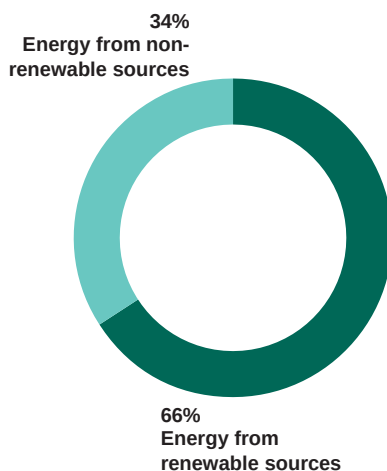
With regard to other energy sources, there has been a reduction in the consumption of natural gas (-25%) and diesel (-4%), whilst petrol consumption has risen, mainly due to internal use by the company's vehicle fleet.

**Overall, in 2025, renewable energy sources accounted for 66 per cent of the organisation's total energy consumption.**

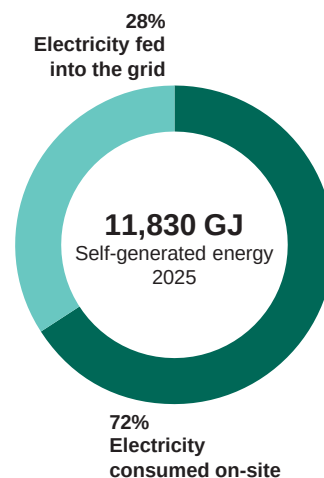
## ENERGY CONSUMED IN THE ORGANISATION IN 2025 (%)



## ENERGY CARRIERS BY RENEWABLE AND NON-RENEWABLE SOURCE 2025 (%)



## SELF-PRODUCTION OF PHOTOVOLTAIC ENERGY 2025 (%)



## Energy intensity

To assess its energy efficiency, Padana Tubi has calculated the energy intensity indicator, defined as energy consumption per tonne of processed steel.

**In 2025, Padana Tubi's energy intensity stood at 0.397 GJ/t, reflecting a positive overall performance: compared with the previous year, there was an 8% reduction.**

This improvement reflects the effectiveness of the company's long-standing policies on efficiency and energy saving.

## Greenhouse gas emissions

SDGs 3, 7, 12, 13

**Greenhouse gas emissions generated by the company's operations are closely linked to energy consumption and production processes. For this reason, the availability of structured emissions data is a key factor in understanding the contribution made by different activities and in supporting any improvement measures. Padana Tubi uses electricity purchased with Guarantees of Origin (GO), certifying that it comes from renewable sources.**

Throughout 2025, as in previous years, Padana Tubi continued to account for and monitor its greenhouse gas (GHG) emissions.

For the fifth consecutive year, the organisation's carbon footprint is undergoing certification in accordance with the UNI EN ISO 14064-1:2019 standard.



The calculation exercise enables the quantification of greenhouse gas (GHG) emissions associated with the company's activities in 2025 and allows these to be compared with the results from previous years, thereby supporting the monitoring of emissions performance over time and facilitating the development of an integrated medium- to long-term strategy.

Data for direct emissions (Scope 1), indirect emissions from energy consumption (Scope 2) and other indirect emissions from upstream and downstream activities (Scope 3), as identified in the study<sup>12</sup> for 2025 are set out below.

GHG emissions are divided into the following categories:

### **Scope 1 – Direct emissions generated by the company's operations**

- Combustion from fixed/stationary sources (consumption of natural gas used for heating or in the production process);
- Combustion from mobile sources (fuel consumption of the fleet of company vehicles used to transport employees and goods in and out of plants);
- Refrigerant gas leaks.

### **Scope 2 – Indirect emissions from imported energy**

Electricity purchased from the grid.

### **Scope 3 – Other indirect emissions from the organisation's downstream and upstream activities**

- Inbound logistics (transport of raw materials, round trips of semi-finished products);
- Outbound logistics (transport of finished products to customers, transport of company waste to treatment sites);
- Employee business travel;
- Employee commuting;
- Purchased goods and services;
- Purchase of capital goods;
- Disposal of liquid and solid waste;
- Upstream part of the fuel used in company vehicles;
- *Upstream part of electricity (production of fuels for electricity generation, transmission and distribution losses).*

To enable a comparison of the effects of different greenhouse gases, the Global Warming Potential (GWP) index is used, which allows emissions to be expressed in CO<sub>2</sub>equivalents.

<sup>12</sup> Emissions classified here as Scope 1, 2 and 3 in line with the GHG Protocol, are indicated in the Padana Tubi CFO study divided into Categories 1,2,3,4,5 in accordance with UNI ISO 14064:2019.

In 2025, Padana Tubi's organisational carbon footprint, calculated using the ISO 14064-1 methodology and a location-based approach, stands at **1,838,389 tCO<sub>2</sub>eq**, representing a **2% reduction in emissions compared with 2024 and a 9% reduction compared with 2023**. This result is mainly due to a reduction in production compared with 2024, and to improved reporting of emissions arising from the transport of incoming and outgoing goods. Specifically, compared with 2024, these last two categories have led to a reduction in emissions of 46 per cent for inbound logistics transport (purchases of raw and auxiliary materials) and -71 per cent for outbound logistics transport (shipments of finished products). This was mainly due to an improvement in the methodology used to report emissions: in 2025, a detailed study was carried out to calculate the distances travelled by land transport within the country, accurately measuring the distance covered in transporting the finished product.

#### TOTAL CFO (TCO<sub>2</sub>EQ)



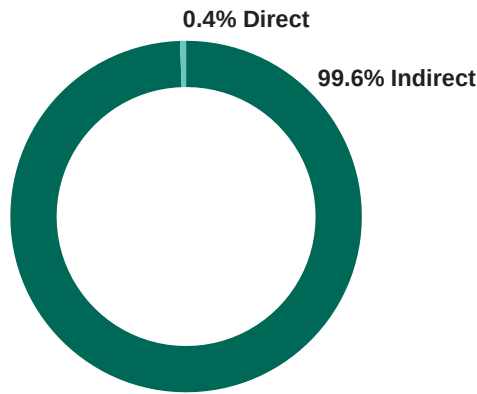
The table in the 'Reporting Package' section shows the breakdown of emissions by category and source, covering the company's value chain; this includes direct emissions and indirect emissions deemed material on the basis of a specific materiality assessment.

**For 2025 too, the carbon footprint of Padana Tubi & Profilati Acciaio S.p.A. is largely determined by indirect emissions (99.6% of total emissions generated), whilst direct emissions account for 0.4% of the total carbon footprint.**

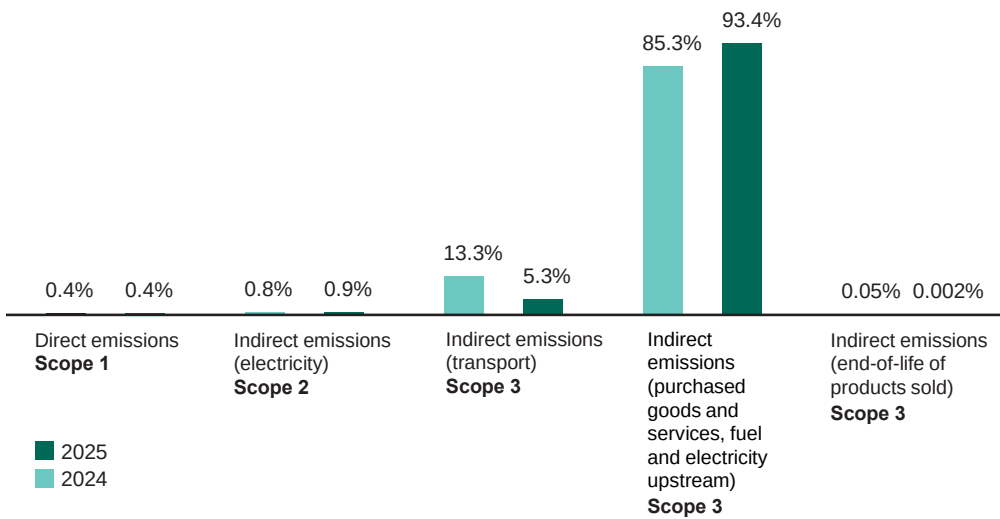
In particular, Category 4, which includes indirect emissions resulting from the products and services used by the Organisation, is the most significant category in the inventory and accounts for approximately 1,717,212 tonnes CO<sub>2</sub>eq, whilst Category 3 (emissions related to transport processes) generates 97,829 tonnes of CO<sub>2</sub>eq. Next come the categories relating to imported electricity (category 2), direct emissions (category 1) and indirect emissions associated with the use of the products sold (category 5), which generate, respectively, 15,969 tonnes of CO<sub>2</sub>eq, 7,350 tonnes of CO<sub>2</sub>eq and 29 tonnes of CO<sub>2</sub>eq respectively.

Specifically, the sub-category relating to purchased goods and services (category 4.2) accounts for the majority of total emissions, with 1,705,326 tonnes of CO<sub>2</sub>eq, representing 92.76% of the total.

% EMISSIONS BY TYPE 2025



INVENTORY – TYPE OF EMISSION AND PERCENTAGE OF TOTAL EMISSIONS 2024–2025



Emissions monitoring provides Padana Tubi with useful information for assessing the performance of its operations over time and supporting any improvement measures.

# Methodological note

GRI 2-1 | GRI 2-2 | GRI 2-3 | GRI 2-4

## The Report

This is the **fifth Sustainability Report of Padana Tubi & Profilati Acciaio S.p.A.** (hereinafter also “Padana Tubi” or “the company”).

The information in the report was collected and processed to provide an understanding of the Company’s activities, performance, results and impact.

The **reporting scope** of the qualitative and quantitative data and information presented here refers to the performance of Padana Tubi in the 2025 reporting year.

To enable readers to compare data over time and evaluate Padana Tubi's performance, the report sets out qualitative and quantitative data for 2024 for comparison purposes.

The Sustainability Report is prepared annually. Data have been calculated precisely based on the general accounting records and other information systems used; where estimates were necessary for indicator determination, the methodology employed is explained.

The Sustainability Report has been drawn up on a voluntary basis and does not constitute sustainability reporting in accordance with the “Corporate Sustainability Reporting Directive”; the Company does not, in fact, fall within the scope of Directive 2022/2464, which imposes a sustainability reporting obligation on organisations and companies that exceed certain quantitative thresholds.



## References

The Sustainability Report has been prepared in accordance with the guidelines issued by the *Global Reporting Initiative* (GRI), an independent international organisation recognised by the UN, the key reference for sustainability reporting activities at the global level. Specifically, a set of indicators was selected from those contained in the **"GRI Sustainability Reporting Standards" updated to 2021**, as indicated in the GRI Content Index of this document.

The general principles applied in preparing the Sustainability Report are those set out in the GRI Standards, namely: materiality, inclusiveness, sustainability context, completeness, balance between positive and negative aspects, comparability, accuracy, timeliness, reliability, clarity.

The **selected performance indicators** correspond to those set out in the reporting standards adopted, which represent the specific areas of sustainability analysed and are consistent with the activities of Padana Tubi and the impacts it produces.

The indicators reported are 'general', concerning the legal and organisational profile of the company; 'economic', concerning economic results and the added value generated and distributed; 'environmental', concerning environmental aspects and, in particular, those relating to materials, energy, emissions and waste; and 'social', concerning aspects relating to health and safety at work, training, equal opportunities and relations with the local community.

The indicators were selected on the basis of a materiality analysis of key issues for the organisation and its sector of operation, as described in the section "Double Materiality analysis".

**The Double Materiality Analysis**, carried out on a voluntary basis and in advance of the regulatory obligations introduced by the **Directive European Corporate Sustainability Reporting Directive**, as part of Padana Tubi's sustainability programme, involved the company's senior management and executive team.

The Sustainability Report is published on the company's official website [www.padanatubi.it](http://www.padanatubi.it).

For more information, please contact [sustainability@padanatubi.it](mailto:sustainability@padanatubi.it).

# Appendix: Impacts, risks and opportunities

The table below provides a comprehensive overview of the relevant IROs associated with the sustainability issues identified as material; specifically, it summarises Padana Tubi's specific characteristics in relation to each sustainability issue identified as relevant; the issues are presented below, accompanied by a description of the **impacts** (characterised as positive or negative, actual or future) and the part of the **value chain** in which they arise (upstream or *upstream*, downstream or *downstream*, within its *own operations*), as well as the risks and opportunities that have in turn been identified as relevant.

| TOPICAL ESRS                 | SUB-TOPIC                       | IMPACTS<br>INSIDE-OUT PERSPECTIVE                                                                                                                                                                                                                                        | TYPE               | VALUE CHAIN           | RISKS/OPPORTUNITIES<br>OUTSIDE-IN PERSPECTIVE                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|------------------------------|---------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------|-----------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| ESRS E1<br>Climate<br>change | Adaptation to<br>climate change |                                                                                                                                                                                                                                                                          |                    |                       | <p><b>Improved market positioning</b> thanks to reduced competition from small companies that are not sufficiently structured to comply with the requirements imposed by the CBAM system, and thanks to an improvement in the scores of environmental assessments such as the EPD. (Opportunity)</p> <p><b>Risk of non-compliance with the CBAM regulations.</b> (Transition risk)</p>                                                                                                                |
|                              | Climate change<br>mitigation    | <b>GHG emissions</b> resulting from production activities (Scopes 1 and 2) and along the value chain (Scope 3)                                                                                                                                                           | Negative<br>Actual | Entire value<br>chain | <p><b>Physical damage caused by extreme weather events</b> linked to climate change and the associated management and/or repair costs. (Physical risk)</p>                                                                                                                                                                                                                                                                                                                                            |
|                              | Energy                          | <b>High electricity consumption</b> , which is necessary for the company's operations                                                                                                                                                                                    | Negative<br>Actual | Own<br>Operations     | <p><b>Negative financial effects on expenditure incurred for energy procurement</b> caused by rising energy prices on the market and overall volatility. (Risk)</p>                                                                                                                                                                                                                                                                                                                                   |
|                              |                                 | Increase in the <b>supply of electricity from renewable sources and consequent reduction in emissions generated (Scope 2)</b> through the purchase of electricity on the market accompanied by guarantees of origin (GO) certifying that it comes from renewable sources | Positive<br>Actual | Own<br>Operations     | <p><b>Reputational benefit and positive ESG assessment</b> resulting from the reduction in Scope 2 emissions following the issuance of GO certificates by the GSE. (Opportunity)</p> <p>Long-term <b>reduction in energy costs</b> thanks to energy efficiency measures. (Opportunity)</p> <p><b>Competitive advantage in the market</b> and a reduced risk of losing customers due to the company's failure to meet their expectations regarding the fight against climate change. (Opportunity)</p> |

| TOPICAL ESRS                | SUB-TOPIC                                            | IMPACTS<br>INSIDE-OUT PERSPECTIVE                                                                                                                                                    | TYPE                   | VALUE CHAIN    | RISKS/OPPORTUNITIES<br>OUTSIDE-IN PERSPECTIVE                                                                                                                                                                                                                                                    |
|-----------------------------|------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------|----------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| ESRS E2<br>Pollution        | Water and soil pollution                             | <b>Water pollution</b> caused by contamination with metals and pollutants                                                                                                            | <i>Negative Actual</i> | Upstream       | <b>Risk of non-compliance with regulations</b> and exposure to penalties as a result of water and/or soil contamination caused by accidental chemical spills. (Risk)                                                                                                                             |
|                             | Air pollution                                        |                                                                                                                                                                                      |                        |                | <b>Risk of non-compliance with regulations</b> and exposure to penalties for exceeding the limit values for substances emitted into the atmosphere. (Risk)                                                                                                                                       |
|                             | Substances of concern                                |                                                                                                                                                                                      |                        |                | <b>Increased costs</b> arising from the management of workplace health and safety accidents related to employees' handling of hazardous substances. (Risk)<br><br><b>Reputational risk</b> associated with the occurrence of accidents caused by employees handling hazardous substances. (Risk) |
| ESRS E3<br>Circular Economy | Inflows of resources, including the use of resources | <b>Contributing to the creation of a circular economy</b> through the use of steel in the production process, which incorporates a high percentage of recycled raw materials (scrap) | <i>Positive Actual</i> | Own Operations |                                                                                                                                                                                                                                                                                                  |
|                             |                                                      | Reuse of production residues and <b>minimisation of waste</b> due to the recyclability of steel as a raw material                                                                    | <i>Positive Actual</i> | Own Operations |                                                                                                                                                                                                                                                                                                  |
|                             | Waste                                                | <b>Optimising the management of waste</b> generated in-house and fostering an environmental culture                                                                                  | <i>Positive Actual</i> | Own Operations | <b>Reduction in waste disposal costs</b> thanks to the optimisation of the waste management process. (Opportunity)                                                                                                                                                                               |
|                             |                                                      | <b>Generation of hazardous and non-hazardous waste</b> resulting from the company's business activities                                                                              | <i>Negative Actual</i> | Own Operations | <b>Risk of non-compliance with regulations</b> and exposure to penalties for failing to classify and sort waste correctly or at all. (Risk)                                                                                                                                                      |

| TOPICAL ESRS                | SUB-TOPIC                                     | IMPACTS<br>INSIDE-OUT PERSPECTIVE                                                                                                                                                             | TYPE                       | VALUE CHAIN       | RISKS/OPPORTUNITIES<br>OUTSIDE-IN PERSPECTIVE                                                                                                                                                                                     |
|-----------------------------|-----------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------|-------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| ESRS S1<br>Own<br>workforce | Working<br>conditions                         | <b>The occurrence of accidents at work</b> , which is inherent in the nature of the business, with a consequent impact on workers' health and wellbeing                                       | <i>Negative<br/>Actual</i> | Own<br>Operations | <b>Increase in operating costs</b> linked to the occurrence of accidents. <i>(Risk)</i>                                                                                                                                           |
|                             |                                               | <b>Reduction in the number of serious accidents/incidents</b> involving staff (reduction in the severity rate) thanks to a high standard of maintenance and monitoring of plant and equipment | <i>Positive<br/>Actual</i> | Own<br>Operations | <b>Reputational risk</b> associated with the occurrence of accidents. <i>(Risk)</i>                                                                                                                                               |
|                             |                                               | <b>Promoting a corporate culture of health and safety</b> and promoting prevention                                                                                                            |                            |                   | <b>Reduction in costs</b> associated with the occurrence and management of serious workplace accidents, thanks to a high level of maintenance and monitoring of plant and equipment. <i>(Opportunity)</i>                         |
|                             |                                               | <b>Operators' exposure to noise</b>                                                                                                                                                           | <i>Positive<br/>Actual</i> | Own<br>Operations | <b>Reputational benefit</b> linked to a reduction in the number of serious accidents occurring in the workplace, thanks to a high standard of maintenance and monitoring of plant and equipment. <i>(Opportunity)</i>             |
|                             |                                               |                                                                                                                                                                                               | <i>Negative<br/>Actual</i> | Own<br>Operations | <b>Reduction in costs</b> associated with the occurrence and management of workplace accidents, thanks to the promotion of a corporate culture focused on health and safety and the promotion of prevention. <i>(Opportunity)</i> |
|                             |                                               |                                                                                                                                                                                               |                            |                   | <b>More resources need to be allocated</b> to remain up to date and comply with the standards set by European environmental and safety regulations. <i>(Risk)</i>                                                                 |
|                             |                                               |                                                                                                                                                                                               |                            |                   | Adopting stricter regulatory requirements as <b>an opportunity to improve business performance</b> . <i>(Opportunity)</i>                                                                                                         |
|                             |                                               |                                                                                                                                                                                               |                            |                   | <b>Increased costs incurred by the company in managing occupational diseases</b> linked to operators' exposure to noise. <i>(Risk)</i>                                                                                            |
|                             | Equality of treatment and opportunity for all | <b>Promoting the personal and professional development of employees</b>                                                                                                                       |                            |                   |                                                                                                                                                                                                                                   |



| TOPICAL ESRS                               | SUB-TOPIC                                                      | IMPACTS<br>INSIDE-OUT PERSPECTIVE                                                                                                                             | TYPE                   | VALUE CHAIN        | RISKS/OPPORTUNITIES<br>OUTSIDE-IN PERSPECTIVE                                                                                                                                                                                                                                                                                             |
|--------------------------------------------|----------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------|--------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>ESRS E3<br/>Affected communities</b>    | Economic, social and cultural rights of communities            | <b>Socio-economic and employment development of the region and the local community</b>                                                                        | <i>Positive Actual</i> | Downstream         | <b>Reputational benefits and greater legitimacy for the company in the local area</b> thanks to staff being mainly drawn from the local area and community. <i>(Opportunity)</i>                                                                                                                                                          |
|                                            |                                                                | <b>Support for the local community and international causes</b> through charitable donations to voluntary organisations, sports clubs and parishes            | <i>Positive Actual</i> | Downstream         | <b>Opportunities to enhance reputation through activities supporting the local community</b> and international causes, via charitable donations to voluntary organisations, sports clubs and parishes. <i>(Opportunity)</i>                                                                                                               |
|                                            |                                                                | <b>Promoting the local artistic and architectural heritage</b> through the funding of restoration projects                                                    |                        | Downstream         | <b>Opportunities to enhance reputation through the promotion of the local artistic and architectural heritage</b> by funding restoration projects. <i>(Opportunity)</i>                                                                                                                                                                   |
|                                            |                                                                | <b>Impact on the quality of life of the local community</b> due to increased traffic, noise and pollution in the vicinity of the company's plants             | <i>Positive Actual</i> | Downstream         |                                                                                                                                                                                                                                                                                                                                           |
|                                            |                                                                |                                                                                                                                                               | <i>Negative Actual</i> |                    | <b>Reputational risk</b> arising from the company's extensive physical presence in the area (industrial development) and with consequences for the quality of life of the local community (increased traffic/noise/pollution). <i>(Risk)</i>                                                                                              |
| <b>ESRS S4<br/>Consumers and end users</b> | Impacts relating to information for consumers and/or end-users | Ensuring a <b>high standard of information for end customers</b> through the implementation of a traceability system                                          | <i>Positive Actual</i> | Entire value chain |                                                                                                                                                                                                                                                                                                                                           |
| <b>ESRS G1<br/>Business Conduct</b>        | Corporate culture                                              | <b>Legal compliance; adherence to applicable requirements and regulations</b>                                                                                 | <i>Positive Actual</i> | Own Operations     | <b>Improved reputation</b> among key stakeholders through the conduct of business in accordance with the principles of ethics and transparency. <i>(Opportunity)</i>                                                                                                                                                                      |
|                                            |                                                                | <b>Running the business in accordance with the principles of ethics and transparency</b> , in full compliance with the company's Code of Ethics and Model 231 | <i>Positive Actual</i> | Own Operations     | <b>Potential reduction in the costs of legal disputes</b> and penalties for administrative offences and breaches of current legislation. <i>(Opportunity)</i><br><br><b>Consolidation and growth of market opportunities</b> , as the company is able to meet its customers' demands for ethical business practices. <i>(Opportunity)</i> |

| TOPICAL ESRS | SUB-TOPIC                         | IMPACTS<br>INSIDE-OUT PERSPECTIVE                                                                                                       | TYPE                             | VALUE CHAIN    | RISKS/OPPORTUNITIES<br>OUTSIDE-IN PERSPECTIVE                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
|--------------|-----------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------|----------------------------------|----------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|              | Protection of whistleblowers      | <b>Protection of mechanisms for reporting wrongdoing</b><br>(a whistleblowing system to ensure that stakeholders can report wrongdoing) | <i>Positive</i><br><i>Actual</i> | Own Operations | <p><b>Legal and reputational exposures</b> associated with the disclosure of sensitive data.<br/>(Risk)</p> <p><b>Mitigation of any reputational damage</b> and any losses in terms of litigation costs, penalties and potential business disruption.<br/>(Opportunity)</p> <p><b>Supporting the creation of an open culture</b>, encouraging employees to report issues, and improving trust and productivity. (Opportunity)</p> <p><b>Lower costs</b> associated with managing and resolving cyber-attacks. (Opportunity)</p> <p><b>Lower risks of operational disruption</b> resulting from cyber-attacks suffered</p> <p><b>Reduced exposure of end-customer dissatisfaction</b> due to delays caused by operational disruptions resulting from cyber-attacks. (Opportunity)</p> |
|              | Political engagement and lobbying |                                                                                                                                         |                                  |                | <p><b>Opportunities to enhance reputation and improve market positioning</b> resulting from increased engagement and active participation in industry associations.<br/>(Opportunity)</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |

| TOPICAL ESRS | SUB-TOPIC                                                     | IMPACTS<br>INSIDE-OUT PERSPECTIVE | TYPE | VALUE CHAIN | RISKS/OPPORTUNITIES<br>OUTSIDE-IN PERSPECTIVE                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
|--------------|---------------------------------------------------------------|-----------------------------------|------|-------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|              | Management of supplier relations, including payment practices |                                   |      |             | <p><b>An increase in costs due to the introduction of tariffs</b> and anti-dumping measures. (Risk)</p> <p><b>A reduction in the range of suppliers and difficulties in sourcing raw materials</b> due to political, financial and market instability at a global level and the introduction of tariffs and anti-dumping measures. (Physical risk)</p> <p><b>Ability to attract key suppliers on favourable terms</b> thanks to the company's distinctive features (financial strength and long-standing market presence); competitive advantage. (Opportunity)</p> <p><b>Ability to attract new customers</b> as safeguard quotas are also envisaged on imports of non-EU tubes. (Opportunity)</p> <p>Higher costs for the payment of CO2 levies on imports from countries with greenhouse gas emissions (currently unbudgeted costs, effective from 01/01/2026 unless extended or subject to regulatory changes).<sup>13</sup> (Risk)</p> |

<sup>13</sup> The financial burden has been deferred until 2027, although it is based on imports for the year 2026.

# Reporting package

## GRI 201-1 ECONOMIC VALUE GENERATED AND DISTRIBUTED

| DETERMINATION AND<br>DISTRIBUTION OF ADDED VALUE | 2024               | %VAL         | 2025               | %VAL         |
|--------------------------------------------------|--------------------|--------------|--------------------|--------------|
| <b>Economic value generated</b>                  | <b>966,571,571</b> | <b>100%</b>  | <b>893,293,815</b> | <b>100%</b>  |
| <b>Economic value distributed</b>                | <b>874,712,443</b> | <b>90.5%</b> | <b>806,285,370</b> | <b>90.3%</b> |
| Suppliers                                        | 817,987,233        | 84.6%        | 748,169,531        | 83.8%        |
| Human resources                                  | 44,498,756         | 4.6%         | 44,423,268         | 5.0%         |
| Banks and other lenders                          | n.a.               | n.a.         | n.a.               | n.a.         |
| Public authorities                               | 11,858,171         | 1.2%         | 13,267,882         | 1.5%         |
| Local community                                  | 368,283            | 0.04%        | 424,688            | 0.05%        |
| <b>Economic value retained</b>                   | <b>91,859,129</b>  | <b>9.5%</b>  | <b>87,008,445</b>  | <b>9.7%</b>  |

## GRI 204-1 PROPORTION OF SPENDING ON LOCAL SUPPLIERS

|                                       | 2024               |             | 2025                  |             |
|---------------------------------------|--------------------|-------------|-----------------------|-------------|
| PROCUREMENT EXPENDITURE               | €                  | %           | €                     | %           |
| <b>Total expenditure on suppliers</b> | <b>892,216,841</b> | <b>100%</b> | <b>760,466,945.16</b> | <b>100%</b> |
| Budget spent on local suppliers       | 539,943,876        | 61%         | 486,462,095.96        | 64%         |

## GRI 302 – ENERGY

| ENERGY CONSUMPTION                                        | 2024           | 2025           |
|-----------------------------------------------------------|----------------|----------------|
| <b>Total energy consumed within the organisation (GJ)</b> | <b>335,145</b> | <b>298,471</b> |
| Natural gas (for heating)                                 | 123,208        | 92,093         |
| Electricity (GJ)                                          | 200,947        | 195,819        |
| Of which:                                                 |                |                |
| Electricity purchased (from renewable energy sources)     | 192,518        | 183,988        |
| Self-generated electricity from solar panels              | 11,237         | 11,830         |
| Self-consumed photovoltaic electricity                    | 8,429          | 8,552          |
| Photovoltaic electricity transferred to the grid          | 2,808          | 3,278          |
| Fuel consumption from non-renewable sources (GJ)          | 10,991         | 10,560         |
| Of which                                                  |                |                |
| Diesel (for corporate fleet)                              | 10,952         | 10,505         |
| Petrol (for corporate fleet)                              | 39             | 55             |

| ENERGY INTENSITY RATIO (GJ/T)               | 2024         | 2025         |
|---------------------------------------------|--------------|--------------|
| Natural gas                                 | 0.159        | 0.122        |
| Electricity                                 | 0.260        | 0.261        |
| Fuel                                        | 0.0142       | 0.0141       |
| <b>Energy intensity of the organisation</b> | <b>0.433</b> | <b>0.397</b> |

## GRI 303 – WATER

| WATER WITHDRAWAL                                | 2024           | 2025           |
|-------------------------------------------------|----------------|----------------|
| <b>Total water abstraction (m³)</b>             | <b>192,250</b> | <b>136,470</b> |
| Of which groundwater (well)                     | 171,420        | 118,287        |
| Of which third-party water resources (aqueduct) | 20,830         | 18,183         |

## GRI 305 – EMISSIONS

| SCOPE 1 GHG EMISSIONS – TONNES CO <sub>2</sub> EQ GHG EMISSIONS                                                        | 2024         | 2025         |
|------------------------------------------------------------------------------------------------------------------------|--------------|--------------|
| Direct emissions from combustion in fixed/stationary sources (related to the consumption of natural gas) <sup>14</sup> | 7,065        | 6,586        |
| Direct emissions due to combustion from mobile sources <sup>15</sup>                                                   | 763          | 751          |
| Fugitive direct emissions <sup>16</sup>                                                                                | 26           | 12           |
| <b>Total Scope 1</b>                                                                                                   | <b>7,853</b> | <b>7,350</b> |

| SCOPE 2 GHG EMISSIONS – TONNES CO <sub>2</sub> EQ GHG EMISSIONS | 2024          | 2025          |
|-----------------------------------------------------------------|---------------|---------------|
| Electricity purchased <sup>17</sup> (location based)            | 15,764        | 15,969        |
| <b>Total Scope 2</b>                                            | <b>15,764</b> | <b>15,969</b> |

14 Emission Factor Sources considered for natural gas: CO<sub>2</sub>, CH<sub>4</sub> and N<sub>2</sub>O: DEFRA 2025.

15 Emission Factor Sources considered for diesel fuel: CO<sub>2</sub>, CH<sub>4</sub> and N<sub>2</sub>O: DEFRA 2025.  
Emission Factor Sources considered for petrol: CO<sub>2</sub>, CH<sub>4</sub> and N<sub>2</sub>O: DEFRA 2025.

16 Emission Factor Sources considered for refrigerant gases: R407C: DEFRA 2025.

17 Emission Factor Sources considered for imported electricity: CO<sub>2</sub>, CH<sub>4</sub> and N<sub>2</sub>O: Ecoinvent 3.12.



| SCOPE 3 – TCO <sub>2</sub> EQ <sup>18</sup> GHG EMISSIONS                            | 2024             | 2025             |
|--------------------------------------------------------------------------------------|------------------|------------------|
| Inbound logistics for goods (raw materials)<br>Upstream transport and distribution   | 100,625          | 54,630           |
| Outbound logistics for carbon steel tubes<br>Transport and downstream distribution   | 147,015          | 42,313           |
| Employee commuting                                                                   | 1,592            | 879              |
| Corporate travel                                                                     | 10               | 7                |
| Upstream phase of fuels used for the corporate fleet                                 | 189              | 179              |
| Purchased goods and services                                                         | 1,569,407        | 1,705,326        |
| Purchase of capital goods                                                            | 18,059           | 4,523            |
| Disposal of liquid and solid waste                                                   | 298              | 556              |
| Upstream part of electricity and fuels used from stationary sources (location-based) | 8,054            | 6,629            |
| Products sold                                                                        | 960              | 29               |
| <b>Total Scope 3</b>                                                                 | <b>1,846,210</b> | <b>1,815,070</b> |
|                                                                                      |                  |                  |
| GHG EMISSIONS: SCOPE 1 + SCOPE 2 + SCOPE 3 – TCO <sub>2</sub> E                      | 2024             | 2025             |
| <b>Total GHG emissions (location-based)</b>                                          | <b>1,869,827</b> | <b>1,838,389</b> |

## GRI 306 – WASTE

| WASTE DIVERTED FROM DISPOSAL (KG)            | 2024              | 2025              |
|----------------------------------------------|-------------------|-------------------|
|                                              |                   |                   |
| <b>HAZARDOUS WASTE</b>                       |                   |                   |
| Preparation for reuse (R13)                  | 578,220           | 607,360           |
| Recycling (R4)                               | 20,980            | 14,420            |
| <b>Total hazardous waste</b>                 | <b>599,200</b>    | <b>621,780</b>    |
|                                              |                   |                   |
| <b>NON-HAZARDOUS WASTE</b>                   |                   |                   |
| Preparation for reuse (R13)                  | 25,201,985        | 21,417,415        |
| Recycling (R4) or reuse (R13)                | 14,508,806        | 19,282,586        |
| Other recovery options                       | 304,520           | 259,680           |
| <b>Total non-hazardous waste</b>             | <b>40,015,311</b> | <b>41,105,611</b> |
| <b>Total waste not intended for disposal</b> | <b>40,614,511</b> | <b>41,581,461</b> |

18 Sources of Emissions:

- Categories 3.1, 3.2, 3.3, 3.5 and 3.6: DEFRA 2025;
- Category 4.1: Ecoinvent 3.12, DEFRA 2025;
- Category 4.2: EPA (Environmental Protection Agency);
- Category 4.3: Ecoinvent 3.12;
- Category 4.6: DEFRA 2025 for natural gas and Ecoinvent 3.12 for electricity;
- Category 5.3: Ecoinvent 3.12.

## 9. REPORTING PACKAGE

| WASTE FOR DISPOSAL (KG)                            | 2024              | 2025              |
|----------------------------------------------------|-------------------|-------------------|
| <b>HAZARDOUS WASTE</b>                             |                   |                   |
| Other disposal operations (D01/D9/D15)             | 208,946           | 247,920           |
| <b>Total hazardous waste</b>                       | <b>208,946</b>    | <b>247,920</b>    |
| <b>NON-HAZARDOUS WASTE</b>                         |                   |                   |
| Other disposal operations (D01/D9/D15)             | 21,340            | 145,930           |
| <b>Total hazardous waste</b>                       | <b>21,340</b>     | <b>145,930</b>    |
| <b>Total waste directed to disposal</b>            | <b>230,286</b>    | <b>393,580</b>    |
| <b>WASTE PRODUCED (EER CODE)<sup>19</sup> (KG)</b> |                   |                   |
| Hazardous waste                                    | 808,146           | 869,700           |
| Non-hazardous waste                                | 40,036,651        | 41,105,611        |
| <b>Total waste generated</b>                       | <b>40,844,797</b> | <b>41,975,311</b> |

## GRI 2-7 EMPLOYEES

| EMPLOYEES BY GENDER | 2024       | 2025       |
|---------------------|------------|------------|
| Women               | 51         | 54         |
| Men                 | 697        | 749        |
| <b>Total</b>        | <b>748</b> | <b>803</b> |

| EMPLOYEES BY TYPE OF CONTRACT AND GENDER | 2024      |            |            | 2025      |            |            |
|------------------------------------------|-----------|------------|------------|-----------|------------|------------|
|                                          | WOMEN     | MEN        | TOTAL      | WOMEN     | MEN        | TOTAL      |
| Permanent                                | 49        | 652        | 701        | 51        | 682        | 733        |
| Temporary                                | 2         | 45         | 47         | 3         | 67         | 70         |
| <b>Total</b>                             | <b>51</b> | <b>697</b> | <b>748</b> | <b>54</b> | <b>749</b> | <b>803</b> |

| BREAKDOWN OF EMPLOYEES BY TYPE OF EMPLOYMENT AND GENDER | 2024      |            |            | 2025      |            |            |
|---------------------------------------------------------|-----------|------------|------------|-----------|------------|------------|
|                                                         | WOMEN     | MEN        | TOTAL      | WOMEN     | MEN        | TOTAL      |
| Full-time                                               | 45        | 695        | 740        | 48        | 746        | 794        |
| Part-time                                               | 6         | 2          | 8          | 6         | 3          | 9          |
| <b>Total</b>                                            | <b>51</b> | <b>697</b> | <b>748</b> | <b>54</b> | <b>749</b> | <b>803</b> |

<sup>19</sup> Waste marked with an '\*' symbol is classified as hazardous waste

## GRI 405-1 – DIVERSITY OF GOVERNING BODIES AND EMPLOYEES

| GOVERNANCE BODIES<br>BY GENDER | 2024     |          |             |           | 2025     |          |             |           |
|--------------------------------|----------|----------|-------------|-----------|----------|----------|-------------|-----------|
|                                | WOMEN    | MEN      | OTHER       | TOTAL     | WOMEN    | MEN      | OTHER       | TOTAL     |
| Board of Directors             | 3        | 3        | n.a.        | 6         | 3        | 3        | n.a.        | 6         |
| Board of Statutory Auditors    | 1        | 4        | n.a.        | 5         | 1        | 4        | n.a.        | 5         |
| Special Powers of Attorney     | 3        | 2        | n.a.        | 5         | 3        | 2        | n.a.        | 5         |
| <b>Total</b>                   | <b>7</b> | <b>9</b> | <b>n.a.</b> | <b>16</b> | <b>7</b> | <b>9</b> | <b>n.a.</b> | <b>16</b> |

| GOVERNANCE BODIES BY<br>AGE GROUP | 2024        |                |           |           | 2025      |                |           |           |
|-----------------------------------|-------------|----------------|-----------|-----------|-----------|----------------|-----------|-----------|
|                                   | <30 YEARS   | 30-50<br>YEARS | >50 YEARS | TOTAL     | <30 YEARS | 30-50<br>YEARS | >50 YEARS | TOTAL     |
| Board of Directors                | n.a.        | 1              | 5         | 6         | 0         | 1              | 5         | 6         |
| Board of Statutory Auditors       | n.a.        | 4              | 1         | 5         | 0         | 2              | 3         | 5         |
| Special Powers of Attorney        | n.a.        | 5              | n.a.      | 5         | 0         | 4              | 1         | 5         |
| <b>Total</b>                      | <b>n.a.</b> | <b>10</b>      | <b>6</b>  | <b>16</b> | <b>0</b>  | <b>7</b>       | <b>9</b>  | <b>16</b> |

| EMPLOYEES BY PROFESSIONAL<br>FIGURE AND GENDER | 2024      |            |            | 2025      |            |            |
|------------------------------------------------|-----------|------------|------------|-----------|------------|------------|
|                                                | WOMEN     | MEN        | TOTAL      | WOMEN     | MEN        | TOTAL      |
| Senior managers                                | 0         | 0          | 0          | 2         | 4          | 6          |
| Clerical staff                                 | 45        | 36         | 81         | 46        | 33         | 79         |
| Blue-collar workers                            | 6         | 661        | 667        | 6         | 712        | 718        |
| <b>Total</b>                                   | <b>51</b> | <b>697</b> | <b>748</b> | <b>54</b> | <b>749</b> | <b>803</b> |
| Percentage                                     | 7%        | 93%        | 100%       | 7%        | 93%        | 100%       |

| EMPLOYEES BY PROFESSIONAL<br>FIGURE AND AGE GROUP | 2024       |                |            |            | 2025       |                |            |            |
|---------------------------------------------------|------------|----------------|------------|------------|------------|----------------|------------|------------|
|                                                   | <30 YEARS  | 30-50<br>YEARS | >50 YEARS  | TOTAL      | <30 YEARS  | 30-50<br>YEARS | >50 YEARS  | TOTAL      |
| Senior managers                                   | 0          | 0              | 0          | 0          | 0          | 4              | 2          | 6          |
| Clerical staff                                    | 12         | 55             | 14         | 81         | 13         | 50             | 16         | 79         |
| Blue-collar workers                               | 99         | 383            | 185        | 667        | 122        | 397            | 199        | 718        |
| <b>Total</b>                                      | <b>111</b> | <b>438</b>     | <b>199</b> | <b>748</b> | <b>135</b> | <b>451</b>     | <b>217</b> | <b>803</b> |
| Percentage                                        | 15%        | 59%            | 27%        | 100%       | 17%        | 56%            | 27%        | 100%       |

## 9. REPORTING PACKAGE

| PROTECTED JOB CATEGORIES<br>BROKEN DOWN BY CATEGORY<br>AND GENDER | 2024     |           |           | 2025     |           |           |
|-------------------------------------------------------------------|----------|-----------|-----------|----------|-----------|-----------|
|                                                                   | WOMEN    | MEN       | TOTAL     | WOMEN    | MEN       | TOTAL     |
| Senior managers                                                   | 0        | 0         | 0         | 0        | 0         | 0         |
| Clerical staff                                                    | 1        | 0         | 1         | 1        | 0         | 1         |
| Blue-collar workers                                               | 0        | 31        | 31        | 0        | 34        | 34        |
| <b>Total</b>                                                      | <b>1</b> | <b>31</b> | <b>32</b> | <b>1</b> | <b>34</b> | <b>35</b> |
| Percentage                                                        | 3%       | 97%       | 100%      | 3%       | 97%       | 100%      |

## GRI 401 – TURNOVER AND BENEFITS

|                                                           | 2024      |             | 2025       |             |
|-----------------------------------------------------------|-----------|-------------|------------|-------------|
|                                                           | NO.       | %           | NO.        | %           |
| <b>HIRES</b>                                              |           |             |            |             |
| <b>Total New Hires<br/>(Incoming staff turnover rate)</b> | <b>73</b> | <b>100%</b> | <b>123</b> | <b>100%</b> |
| Men                                                       | 71        | 97%         | 119        | 97%         |
| Women                                                     | 2         | 3%          | 4          | 3%          |
| <30 years                                                 | 37        | 51%         | 64         | 52%         |
| 30-50 years                                               | 34        | 46%         | 47         | 38.2%       |
| >50 years                                                 | 2         | 3%          | 12         | 10%         |

|                                                            | 2024      |             | 2025      |             |
|------------------------------------------------------------|-----------|-------------|-----------|-------------|
|                                                            | NO.       | %           | NO.       | %           |
| <b>TERMINATIONS</b>                                        |           |             |           |             |
| <b>Total Departures<br/>(Outgoing staff turnover rate)</b> | <b>66</b> | <b>100%</b> | <b>65</b> | <b>100%</b> |
| Men                                                        | 64        | 97%         | 64        | 98%         |
| Women                                                      | 2         | 3%          | 1         | 2%          |
| <30 years                                                  | 32        | 48%         | 23        | 35%         |
| 30-50 years                                                | 24        | 36%         | 27        | 42%         |
| >50 years                                                  | 10        | 15%         | 15        | 23%         |

| REASON FOR TERMINATION                    | 2024     |           |           | 2025     |           |           |
|-------------------------------------------|----------|-----------|-----------|----------|-----------|-----------|
|                                           | WOMEN    | MEN       | TOTAL     | WOMEN    | MEN       | TOTAL     |
| Employees who left voluntarily            | 2        | 29        | 31        | 1        | 36        | 37        |
| Retirement                                | n.a.     | 7         | 7         | n.a.     | 10        | 10        |
| Other (e.g., end of fixed-term contracts) | n.a.     | 28        | 28        | 0        | 18        | 18        |
| <b>Total</b>                              | <b>2</b> | <b>64</b> | <b>66</b> | <b>1</b> | <b>64</b> | <b>65</b> |

## GRI 403-9 – WORK-RELATED INJURIES

| EMPLOYEE INJURIES            | 2024               | 2025 |
|------------------------------|--------------------|------|
| Severity Index <sup>20</sup> | 1.16 <sup>21</sup> | 1.75 |

## GRI 404-1 – AVERAGE HOURS OF TRAINING PER YEAR PER EMPLOYEE

| AVERAGE HOURS OF TRAINING | 2024       |             |             | 2025        |             |           |
|---------------------------|------------|-------------|-------------|-------------|-------------|-----------|
|                           | WOMEN      | MEN         | TOTAL       | WOMEN       | MEN         | TOTAL     |
| Senior managers           | n.a.       | n.a.        | n.a.        | 4.8         | 17.0        | 12.9      |
| Clerical staff            | 4.4        | 5.4         | 4.8         | 21.2        | 7.8         | 15.6      |
| Blue-collar workers       | n.a.       | 11.8        | 11.6        | n.a.        | 11.6        | 11.5      |
| <b>Total</b>              | <b>3.9</b> | <b>11.4</b> | <b>10.9</b> | <b>18.2</b> | <b>11.5</b> | <b>12</b> |

20 The severity index is calculated by Padana Tubi using its own methodology, as the ratio between injury days recorded during the year and hours worked during the same period.

21 This indicator was revised during the preparation of the 2024 Sustainability Report, following a data request and due to the reopening of a case that occurred in 2024.

# GRI content index and correlation table



| GRI SUSTAINABILITY REPORTING STANDARD 2021 |                                                                                              | REFERENCES/ PARAGRAPH                                                                                | COMMENTS                                                                         |
|--------------------------------------------|----------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------|
| GENERAL DISCLOSURE AND GOVERNANCE          |                                                                                              |                                                                                                      |                                                                                  |
| ORGANISATION PROFILE                       |                                                                                              |                                                                                                      |                                                                                  |
| 2-1                                        | Organisational details                                                                       | Methodological note                                                                                  |                                                                                  |
| 2-2                                        | Entities included in the organisation's sustainability reporting                             | Methodological note                                                                                  |                                                                                  |
| 2-3                                        | Reporting period, frequency and contact point                                                | Methodological note                                                                                  |                                                                                  |
| 2-5                                        | External assurance                                                                           |                                                                                                      | Padana Tubi's 2025 Sustainability Report does not contemplate external assurance |
| 2-6                                        | Activities, value chain and other business relationships                                     | Padana Tubi: an industrial history that looks beyond borders; Suppliers and supply chain management  |                                                                                  |
| 2-7                                        | Employees                                                                                    | People in the company's development – Workforce and staff structure                                  |                                                                                  |
| 2-8                                        | Workers who are not employees                                                                |                                                                                                      |                                                                                  |
| 2-9                                        | Governance structure and composition                                                         | The governance of Padana Tubi                                                                        |                                                                                  |
| 2-10                                       | Nomination and selection of the highest governing body                                       |                                                                                                      |                                                                                  |
| 2-11                                       | Chair of the highest governing body                                                          |                                                                                                      |                                                                                  |
| STRATEGY                                   |                                                                                              |                                                                                                      |                                                                                  |
| 2-22                                       | Statement on sustainable development strategy                                                | Letter to Stakeholders                                                                               |                                                                                  |
| ETHICS AND INTEGRITY                       |                                                                                              |                                                                                                      |                                                                                  |
| 2-26                                       | Mechanisms for submitting suggestions and making reports                                     | Ethics and integrity in business management; Quality and control throughout the production processes |                                                                                  |
| 2-27                                       | Compliance with laws and regulations                                                         | Ethics and integrity in business management                                                          |                                                                                  |
| 418-1                                      | Substantiated complaints concerning breaches of customer privacy and losses of customer data | Suppliers and supply chain management – Privacy and data management section                          | No cases of privacy breaches and cyber attacks were recorded during 2025         |
| STAKEHOLDER ENGAGEMENT                     |                                                                                              |                                                                                                      |                                                                                  |
| 2-28                                       | Membership of associations                                                                   | Padana Tubi's ESG strategy – section: The role of stakeholders in Padana Tubi's decision-making      |                                                                                  |
| 2-29                                       | Approach to stakeholder engagement                                                           |                                                                                                      |                                                                                  |
|                                            |                                                                                              | Padana Tubi's ESG strategy – section. The role of stakeholders in Padana Tubi's decision-making      |                                                                                  |
| 2-30                                       | Collective bargaining agreements                                                             | People in the company's development – Workforce and staff structure                                  |                                                                                  |

## 9. GRI CONTENT INDEX AND CORRELATION TABLE

| GRI SUSTAINABILITY REPORTING STANDARD 2021 |                                                                                               | REFERENCES/ PARAGRAPH                                                                            | COMMENTS                                                                         |
|--------------------------------------------|-----------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------|
| GENERAL DISCLOSURE AND GOVERNANCE          |                                                                                               |                                                                                                  |                                                                                  |
| MATERIAL TOPICS                            |                                                                                               |                                                                                                  |                                                                                  |
| 3-1                                        | Process to determine material topics                                                          | Padana Tubi's ESG strategy – section:<br>The dual materiality analysis                           |                                                                                  |
| 3-2                                        | List of material topics                                                                       |                                                                                                  |                                                                                  |
| 3-3                                        | Management of material topics                                                                 |                                                                                                  |                                                                                  |
| ECONOMIC TOPICS                            |                                                                                               |                                                                                                  |                                                                                  |
| ECONOMIC PERFORMANCE                       |                                                                                               |                                                                                                  |                                                                                  |
| 201-1                                      | Direct economic value generated and distributed                                               | Direct economic value generated and distributed                                                  |                                                                                  |
| 204-1                                      | Proportion of spending on local suppliers                                                     | Suppliers and supply chain management – section: Structure of the supply chain                   |                                                                                  |
| 416-2                                      | Incidents of non-compliance concerning the health and safety impacts of products and services | Quality and control throughout the production processes                                          | No incidents of non-compliance occurred during the reporting period under review |
| ENVIRONMENTAL TOPICS                       |                                                                                               |                                                                                                  |                                                                                  |
| MATERIALS                                  |                                                                                               |                                                                                                  |                                                                                  |
| 301-1                                      | Materials used by weight or volume                                                            | Steel and its life cycle – Section:<br>Materials used in production processes/Recycled materials |                                                                                  |
| 301-2                                      | Recycled input materials used                                                                 |                                                                                                  |                                                                                  |
| ENERGY                                     |                                                                                               |                                                                                                  |                                                                                  |
| 302-1                                      | Energy consumption within the organisation                                                    | Energy and emissions in business operations                                                      |                                                                                  |
| 302-3                                      | Energy intensity                                                                              |                                                                                                  |                                                                                  |
| WATER                                      |                                                                                               |                                                                                                  |                                                                                  |
| 303-3                                      | Water withdrawal by source                                                                    | Use of water resources                                                                           |                                                                                  |
| 303-4                                      | Water discharge                                                                               |                                                                                                  |                                                                                  |
| 303-5                                      | Water consumption                                                                             |                                                                                                  |                                                                                  |
| EMISSIONS                                  |                                                                                               |                                                                                                  |                                                                                  |
| 305-1                                      | Direct (Scope 1) GHG emissions                                                                | Energy and emissions in business operations                                                      |                                                                                  |
| 305-2                                      | Indirect (Scope 2) GHG emissions                                                              |                                                                                                  |                                                                                  |
| 305-3                                      | Other indirect (Scope 3) GHG emissions                                                        |                                                                                                  |                                                                                  |
| WASTE                                      |                                                                                               |                                                                                                  |                                                                                  |
| 306-3                                      | Waste generated                                                                               | Waste and treatment methods                                                                      |                                                                                  |
| 306-4                                      | Waste diverted from disposal                                                                  |                                                                                                  |                                                                                  |
| 306-5                                      | Waste for disposal                                                                            |                                                                                                  |                                                                                  |

| GRI SUSTAINABILITY REPORTING STANDARD 2021   |                                                                                                   | REFERENCES/ PARAGRAPH                                               | COMMENTS                                                                                          |
|----------------------------------------------|---------------------------------------------------------------------------------------------------|---------------------------------------------------------------------|---------------------------------------------------------------------------------------------------|
| <b>GENERAL DISCLOSURE AND GOVERNANCE</b>     |                                                                                                   |                                                                     |                                                                                                   |
| <b>ENVIRONMENTAL ASSESSMENT OF SUPPLIERS</b> |                                                                                                   |                                                                     |                                                                                                   |
| <b>308-1</b>                                 | New suppliers who have been assessed using environmental criteria                                 | Suppliers and supply chain management                               |                                                                                                   |
| <b>SOCIAL TOPICS</b>                         |                                                                                                   |                                                                     |                                                                                                   |
| <b>EMPLOYMENT</b>                            |                                                                                                   |                                                                     |                                                                                                   |
| <b>401-1</b>                                 | New employee hires and employee turnover                                                          | People in the company's development – Workforce and staff structure |                                                                                                   |
| <b>404-2</b>                                 | Benefits provided for full-time employees, but not for part-time or fixed-term contract employees | People in the company's development – Workforce and staff structure |                                                                                                   |
| <b>OCCUPATIONAL HEALTH AND SAFETY</b>        |                                                                                                   |                                                                     |                                                                                                   |
| <b>403-1</b>                                 | Occupational health and safety management system                                                  |                                                                     |                                                                                                   |
| <b>403-3</b>                                 | Occupational health services                                                                      |                                                                     |                                                                                                   |
| <b>403-5</b>                                 | Worker training on occupational health and safety                                                 |                                                                     |                                                                                                   |
| <b>403-6</b>                                 | Promotion of worker health                                                                        |                                                                     |                                                                                                   |
| <b>403-8</b>                                 | Workers covered by an occupational health and safety management system                            |                                                                     |                                                                                                   |
| <b>403-9</b>                                 | Work-related injuries                                                                             | Health and safety: a daily priority                                 |                                                                                                   |
| <b>403-10</b>                                | Work-related ill health                                                                           |                                                                     |                                                                                                   |
| <b>416-2</b>                                 | Incidents of non-compliance concerning the health and safety impacts of products and services     |                                                                     | No incidents of non-compliance with relevant regulations were reported in the period under review |
| <b>EDUCATION AND TRAINING</b>                |                                                                                                   |                                                                     |                                                                                                   |
| <b>404-1</b>                                 | Average hours of training per year per employee                                                   | People in the company's development – Workforce and staff structure |                                                                                                   |
| <b>DIVERSITY AND EQUAL OPPORTUNITIES</b>     |                                                                                                   |                                                                     |                                                                                                   |
| <b>405-1</b>                                 | Diversity of governance bodies and employees                                                      | The governance of Padana Tubi                                       |                                                                                                   |
| <b>NON-DISCRIMINATION</b>                    |                                                                                                   |                                                                     |                                                                                                   |
| <b>406-1</b>                                 | Incidents of discrimination and corrective actions taken                                          | Ethics and integrity in business management                         | No incidents of discrimination occurred in the company during the period under review             |
| <b>SOCIAL EVALUATION OF SUPPLIERS</b>        |                                                                                                   |                                                                     |                                                                                                   |
| <b>414-1</b>                                 | New suppliers that were screened using social criteria                                            | Suppliers and supply chain management                               |                                                                                                   |





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