



CSM GROUP
Stainless bonds

SUSTAINABILITY REPORT 2025

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LETTER TO STAKEHOLDERS

To our Stakeholders,

we are pleased to present the new edition of the CSM GROUP Sustainability Report, prepared with the aim of reporting the Group's environmental, social and governance information.

The Report covers CSM TUBE spa and CSM MACHINERY srl, highlighting, where relevant, the operational specificities of each company. Through this reporting we intend to progressively consolidate a Group-wide approach to the collection, analysis and communication of ESG information, so as to improve over time our understanding of the impacts connected with our activities.

The context in which we operate continues to be marked by rapid change and complex challenges, including the energy transition, regulatory developments, the transformation of markets and growing attention to social and environmental issues along production chains. For this reason, we consider it essential to progressively integrate sustainability matters into corporate decision-making, consistently with the characteristics of our sector and our operating model.

For CSM GROUP, sustainability is an area of work spanning several dimensions: industrial continuity and soundness, product quality, management of environmental aspects, attention to health and safety, skills development and the relationship with the supply chain. From this perspective, the Group intends to continue its work on innovation, process efficiency, monitoring of consumption and emissions, responsible resource management, supplier oversight and the development of its people.

In 2025 the Group pursued initiatives aimed at improving the monitoring of environmental impacts, strengthening management systems, raising internal awareness of ESG issues and consolidating dialogue with customers, suppliers, employees and local communities. In parallel, it promoted innovation by encouraging the adoption of solutions, processes and technologies capable of generating shared value and increasing operational efficiency.



This path is set within a medium to long-term perspective, in which corporate responsibility is regarded as a relevant element in supporting business continuity, risk management and the quality of stakeholder relations. We are aware that improvement requires progressive objectives, reliable data, structured internal processes and increasingly accurate reporting.

For this reason we continue to work on quality, safety, innovation, training and stakeholder engagement, with the aim of increasing over time the Group's ability to monitor its impacts, assess the results of the actions undertaken and communicate the available information clearly.

We wish to thank all the people who, with professionalism, expertise and dedication, contribute every day to the activities of CSM GROUP. Their contribution, together with the trust of our stakeholders, is an essential element in continuing this path with rigour and a sense of responsibility.

For us, sustainability is a process of progressive improvement, which requires continuity, transparency and the ability to measure over time the results achieved and the areas for improvement.



Elisabetta Trolese
Chair of CSM HOLDING spa

Marco Trolese
Chief Executive Officer, CSM HOLDING spa

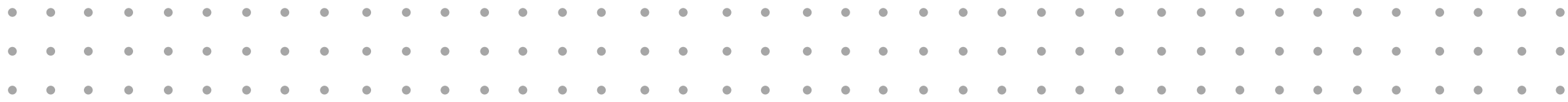
ESG PROFILE

Table 1. Summary of the main ESG initiatives, broken down by Group company, highlighting the most significant actions in the areas of Governance, Social and Environment.

ESG Area	ESG actions and initiatives	Entity	ESG Area	ESG actions and initiatives	Entity
GOVERNANCE	Membership of the Sustainability Group of Confindustria Veneto Est	 CSM GROUP	SOCIAL	Sharing of H&S indicators through digital boards with a dedicated system for employee reports and improvement proposals.	 CSM TUBE
	In-house development of software to monitor production, quality, environmental, health and safety data.			Vending machine for PPE and TAG anti-collision devices.	
	Assessment of strategic suppliers through a vendor rating system.			Training on gender equality and inclusive communication.	
	Adoption of advanced cybersecurity measures and staff training.			Lean Manufacturing training to strengthen production skills and organisational improvement.	 CSM MACHINERY
ENVIRONMENT	Self-generation of energy through photovoltaic systems.	 CSM TUBE		Zero work-related injuries in 2025.	 CSM GROUP
	Purchase of a share of renewable electricity covered by Guar-antees of Origin.			Great Place to Work project to assess the working climate and identify areas for improvement, with a suggestion box.	
	Purchase of recycled steel supported by supplier certificates.			Solidarity hour bank to donate leave to colleagues in difficult personal circumstances.	
	Recovery and reuse of wooden crates and pallets with customers and suppliers: 88.0% of pallets recovered in 2025.	Presence of a company coach with the aim of improving the working climate.			
	Washing and reuse of oil-contaminated cloths through a spe-cialised supplier, to reduce hazardous waste.	Additional welfare credit granted on the birth or adoption of a child.			
	Use of reusable plastic containers for transporting mechanical com-ponents with one supplier.	TreCuori welfare platform with notional credit for employees and agency workers and extra support for dependent children.			
				Dedicated activities and projects supporting the local community.	



GUIDE TO READING THE REPORT



This Sustainability Report, hereinafter also the “Report” or “Document”, forms part of the reporting path and progressive integration of sustainability undertaken by **CSM GROUP** (hereinafter also the “Group”, “Company” or “Organisation”) and is a tool intended to describe, according to the scope and criteria set out in the Methodological note, the commitment, actions and results achieved by the Group in the environmental, social and governance (ESG) sphere.

CSM GROUP is a group composed of CSM TUBE spa (“CSM TUBE”) and **CSM MACHINERY srl** (“CSM MACHINERY”), both wholly controlled by CSM HOLDING spa, sole shareholder holding 100% of the share capital. This Document provides a consolidated representation of the main initiatives, impacts and ESG performance of the companies included in the reporting scope.

The publication of the Report is a key step in consolidating the Group’s approach to sustainability and corporate social responsibility, expressing the intention to progressively integrate ESG principles into corporate strategies, operating processes and business decisions. Through this Document, CSM GROUP intends to report on its commitment



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and the actions taken to contribute to long-term value creation for stakeholders and to address, in relation to its own activities, the main environmental and social challenges of the current economic and industrial context.

The aim of the Report is to provide an organic and consolidated view of the **Group’s ESG impacts and performance**, setting out the policies adopted, the actions taken, the results achieved and the improvement objectives defined for the future. The Document mainly presents information at consolidated level; where necessary, specific aspects relating to individual companies are separately attributed to the relevant corporate entity.

The Report is structured in sections dedicated to the main ESG topics, within which the material topics for the Group are reported in relation to the policies adopted, the initiatives implemented and the reference indicators. The Document is completed by a **final section devoted to the qualitative and quantitative objectives** that CSM GROUP intends to pursue in the coming years, together with an annex on the analysis of CSM TUBE’s contribution to the United Nations Sustainable Development Goals (**SDGs**), carried out using the SDGs Action Manager tool.



METHODOLOGICAL NOTE

This Document is the second Sustainability Report of CSM GROUP and has been prepared with the aim of reporting the environmental, social and governance information considered material for the Group, according to the scope, reporting period, standards and methodologies described in the Document.

CSM GROUP is a group composed of CSM TUBE spa and CSM MACHINERY srl, with local units in Italy and abroad. For the purposes of this sustainability reporting, the consolidation scope includes the following entities:

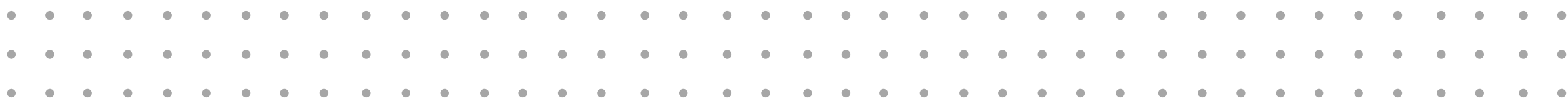
- CSM TUBE spa, registered office at Via del Lavoro 60, Cimavilla di Codogné (TV), and a local unit at Via Cadore Mare 23 and 25, Cimetta di Codogné (TV), housing some offices;
- CSM MACHINERY srl, with registered and operating office at Via Cadore Mare 25, Località Cimetta di Codogné (TV).

The scope of this Group reporting does not include the production plants located in Brazil and the United States, nor the sales branch in Germany. This exclusion should be borne in mind when reading the data and indicators presented in the Document.

For economic and financial information, reference should be made to the Group consolidated financial statements and to the financial statements of CSM TUBE spa and CSM MACHINERY srl. This Document has been prepared *with reference* to the Global Reporting Initiative Standards (GRI Universal Standards 2021).

The materiality analysis carried out for this reporting also incorporated the “Outside-In” perspective (**Financial Materiality**), assessing how ESG topics may generate risks and opportunities capable of affecting the Group’s ability to create value in the short, medium and long term, according to the methodological approach set out in this Document.

The GRI Content Index at the end of the Document makes it possible to identify the indicators reported and the related reference paragraphs. The Report has been prepared taking into account the reporting principles set out in GRI 1: Foundation 2021: accuracy, balance, clarity, comparability, completeness, sustainability context, timeliness and verifiability.



This Document has been prepared and published on a voluntary basis, as the Group does not currently fall within the scope of Directive (EU) 2022/2464 (Corporate Sustainability Reporting Directive - CSRD). Reporting is prepared annually in order to provide stakeholders with transparent disclosure on the ESG topics material to the Group.

The Document has not been subject to assurance by an independent third party. It should also be noted that no restatements have been made with respect to the previous edition published on the company website. The reporting period runs from 1 January 2025 to 31 December 2025 and coincides with that of the Financial Statements.

The Document was drafted with the involvement of an internal multidisciplinary working group, composed of company representatives from different areas and functions. The purpose of this involvement was to collect and consolidate information from the company functions responsible for the topics reported.

To support the accuracy of the information reported, the use of estimates has been limited where possible. Where estimates were necessary, these are indicated within the Document and defined on the basis of the calculation methodologies stated. Where available, data are presented on a comparative basis with reference to 2023, 2024 and 2025.

Accidents have been calculated in accordance with the guidelines set out in GRI 403-9, using 1,000,000 as the multiplier. Environmental parameters relating to energy consumption have been calculated using the conversion factors published by DEFRA UK. Market-based and location-based emissions have been calculated using data published by Terna and by the European Residual Mixes AIB Report. The conversion factors used for fuels correspond to the DEFRA UK GHG Conversion Factors. Fuel consumption has been converted into kWh using conversion factors based on the relevant Gross Calorific Value, Gross CV, and subsequently expressed in GJ.

For any requests for clarification or further information regarding this Sustainability Report and the ESG strategy of CSM GROUP, please contact the following e-mail address: esg@csmtube.

Expansion of the CSM TUBE do Brasil production plant



CSM GROUP

MISSION AND VALUES

Like stainless steel, our corporate bonds withstand the challenges of time, creating lasting connections with our internal and external stakeholders.

Trust and integrity define us as experienced professionals with established leadership.

These are the ideals, values and aspirations that guide CSM GROUP in its daily decisions

What we believe in:

1. PASSION AND SECTOR KNOWLEDGE:

engineering knowledge has been in our DNA from the very beginning and is reflected in our commitment to meeting customer needs with targeted solutions.

2. AWARENESS AND SAFETY:

towards people in terms of career satisfaction, workplace wellbeing and safety.

3. SOUNDNESS AND TECHNOLOGY:

in over 40 years we have refined our technical skills and achieved significant financial results.

4. FORESIGHT AND RESPONSIVENESS:

continuous investment in innovation has enabled us to anticipate market needs.

5. GLOBAL PRESENCE AND COMPLEMENTARITY:

the seven companies that make up the Group cover the entire production chain, from the processing of stainless steel tubes to the manufacture of smart machinery for producing heating elements and stainless steel tubes.



GROUP PROFILE

CSM GROUP is an industrial manufacturing group characterised by operational synergies and a shared strategic vision. The Group is composed of CSM TUBE spa, active in the production of stainless steel tubes, and CSM MACHINERY srl, specialised in the manufacture of machinery for producing heating elements and plants for producing stainless steel tubes.

CSM TUBE

CSM TUBE is a company specialising in the **production of stainless steel tubes**. Its activities fall under ATECO code 24.20, relating to the manufacture of steel tubes, pipes, hollow profiles and related fittings, excluding cast steel.

Founded in 1983, CSM TUBE has pursued a path of growth and consolidation that has progressively expanded its production capacity, product range and presence on international markets. From an initial capacity of around 2.5 million metres per year, the company now reaches a production capacity of around 70 million metres per year, with a range covering 60 different diameters, from 5 to 32 mm, and thicknesses from 0.3 to 2 mm.

Over the course of its development, CSM TUBE has built a diversified range of solutions, which

includes high-quality stainless steel tubes, also heat-treated, produced in coils or bars, together with high-nickel products and customised solutions tailored to customers' specific application requirements.

The company currently operates from a production site of around 12,000 m² in Cimavilla (TV), dedicated to the production of stainless steel tubes in bars and coils. The production process is based on TIG welding in a protected atmosphere or laser welding and includes, depending on the characteristics required, further processing and inspection stages. The entire process is supported by quality verification systems, including 100% Eddy Current Testing, in accordance with EN ISO 10893-1 and EN ISO 10893-2.

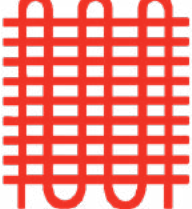
Over time, CSM TUBE has strengthened its competitive position thanks to product quality, service reliability, the ability to respond to market demands and a constant commitment to technological innovation. Alongside its manufacturing presence in Italy, the company also has plants in Brazil and the United States.

CSM TUBE products are used in a range of **industrial sectors**, including electric heating elements, heat exchangers, food & beverage, heating equipment, automotive, solar collectors, air conditioning and energy.

Fields of application



Heating elements
Tubes for tubular heating elements



Heat exchangers
Tubes for heat exchanger makers



Food and beverage
Tubes for the food & beverage sector



Tube processing
Tubes for customised processing



Boilers
Tubes for water heaters and electric boilers



Automotive
Tubes for the automotive sector



Solar
Tubes for the renewable energy sector



Air conditioning
Tubes for air conditioning and cooling



Energy
Tubes for the energy sector

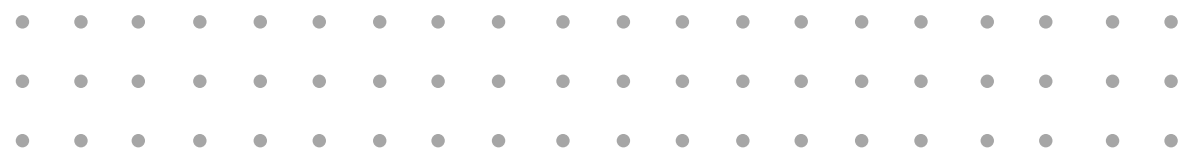
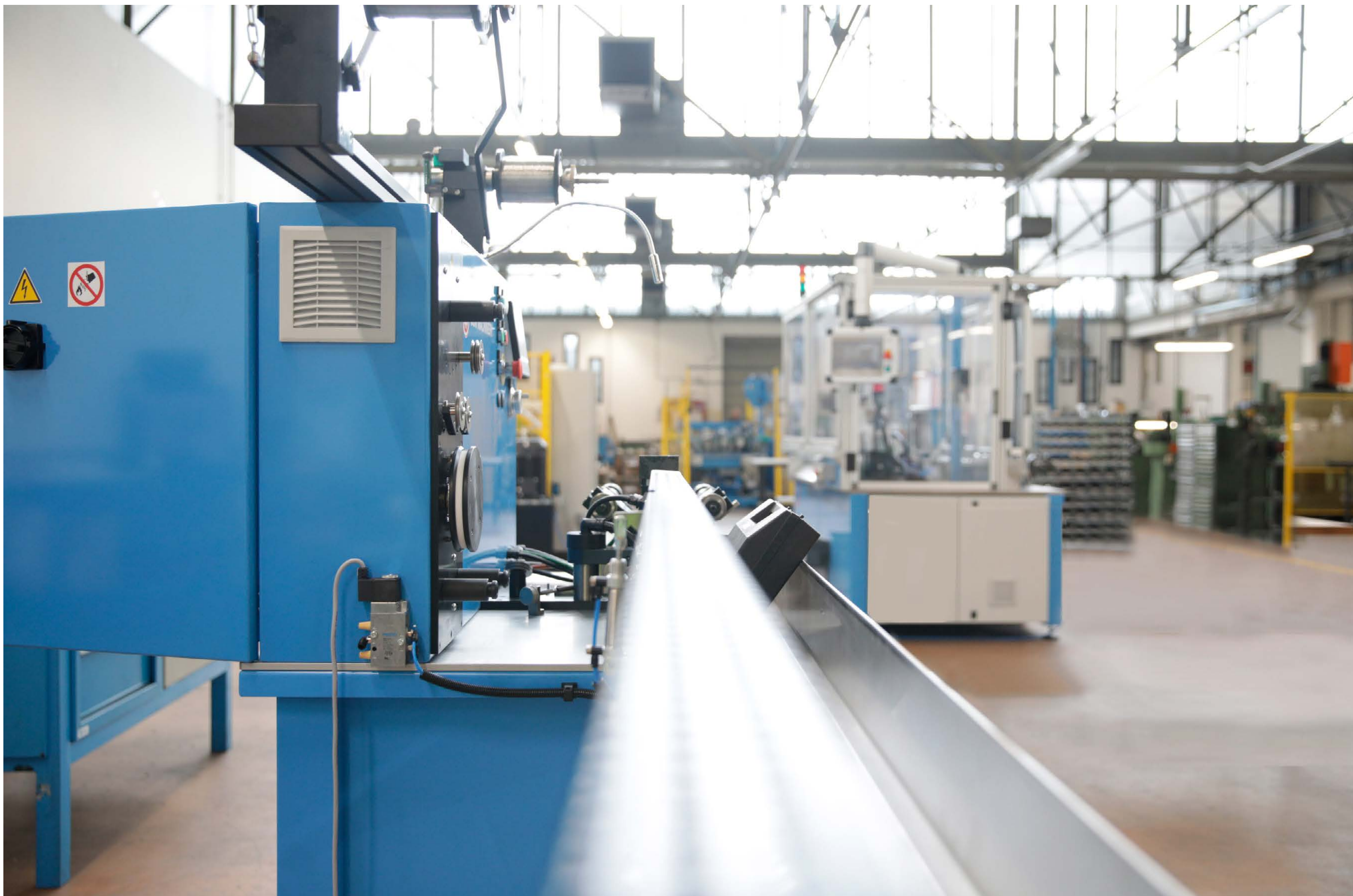


CSM MACHINERY

CSM MACHINERY operates in the **design and construction of machinery** for the production of heating elements and stainless steel tubes. Its activities fall under ATECO code 28.2, relating to the design and construction of machines, semi-finished products and mechanical and electronic accessories.

With over forty years of experience, the company has developed solid technological know-how, progressively extending its offering from plants for producing stainless steel tubes to specialised solutions for producing heating elements. Today CSM MACHINERY offers technologically advanced machinery for forming, welding, cutting to length, straightening and end-sizing stainless steel tubes.

The company's approach is geared towards innovation, reliability and production efficiency, with solutions designed to guarantee high quality standards, operational flexibility and consistent performance.





DOUBLE MATERIALITY ANALYSIS

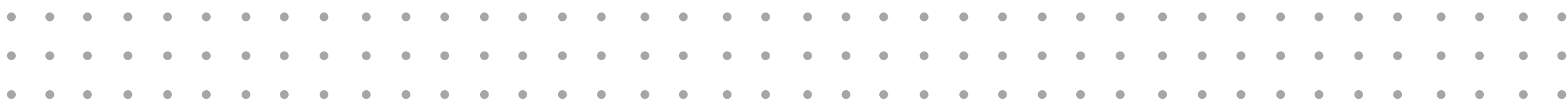
CSM GROUP has embarked on a path aimed at strengthening the integration of sustainability into its corporate strategy, also in view of the evolving European regulatory framework introduced by Directive (EU) 2022/2464 (*Corporate Sustainability Reporting Directive – CSRD*). In this context, the Group has progressively oriented its reporting approach towards the double materiality principle, which requires consideration of both the impacts generated by the company on the environment, people and society, and the ESG risks and opportunities capable of influencing its economic and financial performance over time.

Consistently with this approach, CSM GROUP has adopted an integrated sustainability model, based on the connection between economic, environmental, social and governance dimensions, with the aim of supporting long-term value creation and strengthening the resilience of its business model.

Along this path, the Group carried out a **Double Materiality Analysis** as the central tool for identifying the ESG topics material for reporting purposes. In a first phase, the analysis was developed from the perspective of **impact materiality**, in line with *GRI 3: Material Topics 2021*, in order to identify the significant actual and potential impacts generated by the Organisation on people, the environment and society across its activities and value chain. The results were considered valid for both CSM TUBE and CSM MACHINERY, as they relate to material topics common to the two Group companies.

Subsequently, CSM GROUP also undertook, on a voluntary basis, an assessment of **financial materiality**, in line with EFRAG guidance and the *European Sustainability Reporting Standards* (ESRS), with the aim of analysing the main ESG risks and opportunities capable of influencing the Group's economic and financial performance in the short, medium and long term.

The process was developed through a participatory approach, involving internal and external stakeholders representing the main perspectives relevant to the Group. In particular,



the collection of contributions through an ESG questionnaire captured stakeholders' expectations, perceptions and priorities, strengthening the robustness of the analysis process and the quality of the results obtained.

The Double Materiality Analysis is therefore a fundamental element of CSM GROUP's sustainability path and forms the basis for the contents of this Report.

The double materiality analysis carried out in 2024 was reviewed and confirmed for the 2025 financial year, as no significant changes emerged in the operating context, the business model or the profile of impacts, risks and opportunities such as to alter its outcomes.

UNDERSTANDING THE ORGANISATION'S CONTEXT

Understanding the context in which the Group operates was a fundamental preliminary stage of the materiality analysis process. This activity covered both the external and the internal context, with reference to the impacts generated by CSM TUBE and CSM MACHINERY.

The analysis was carried out by consulting the main international sustainability standards and sector literature, with the aim of identifying the actual and potential impacts connected with the Group's activities. The results were subsequently integrated with the analysis of the internal context, considering business activities, business relationships, the sustainability strategy and the main stakeholder categories.

ASSESSING THE MATERIALITY OF IMPACTS AND STAKEHOLDER ENGAGEMENT

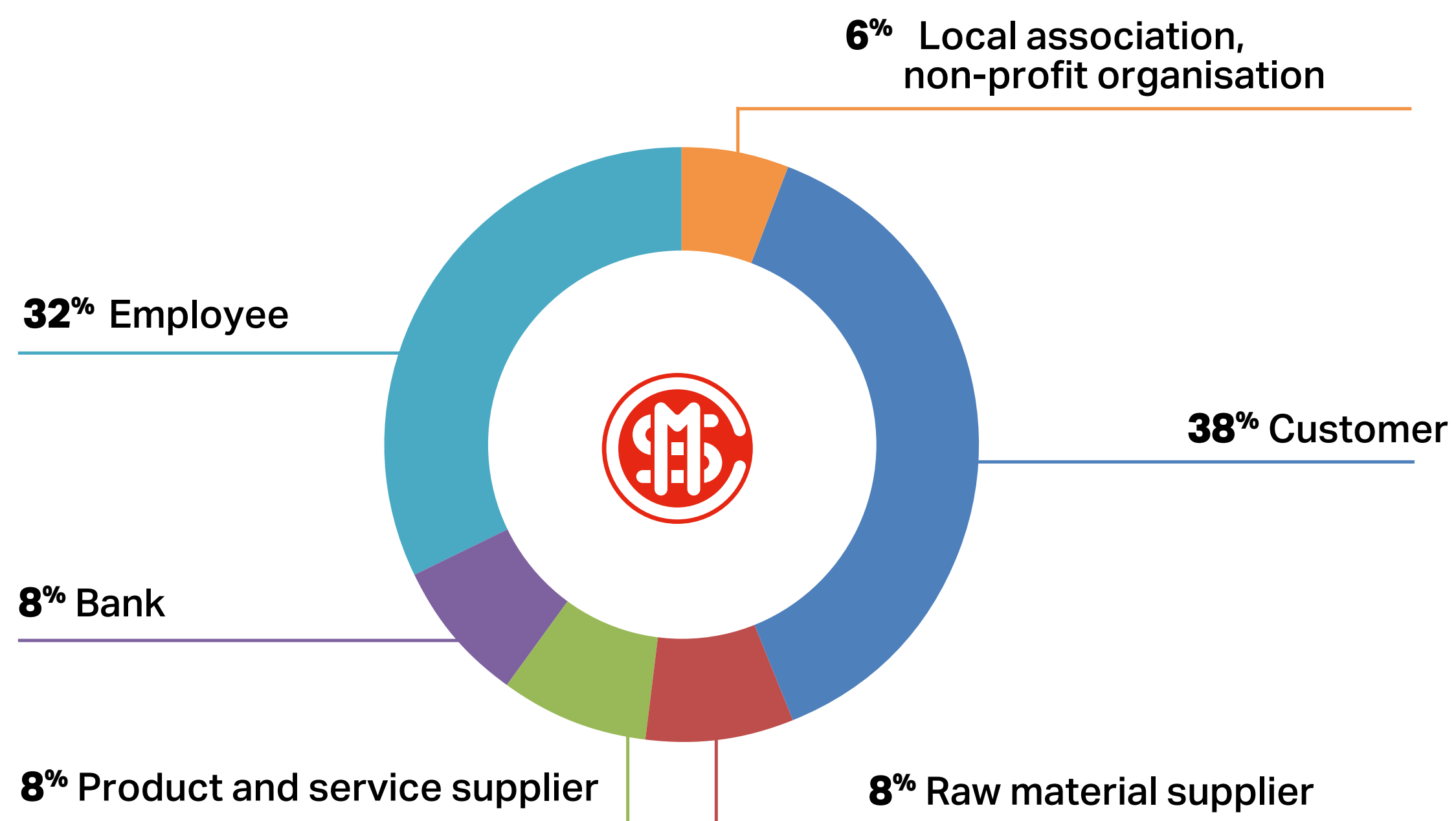
A subsequent stage of the process concerned the assessment of the materiality of impacts, carried out through the identification and involvement of the Group's main stakeholders. Stakeholders are the individuals or groups that can influence, or be influenced by, the activities, decisions and results of the Organisation.

The main **stakeholder categories** identified by the Group include: **customers, raw material suppliers, products and services suppliers, shareholders, banks, insurers, local associations and non-profit organisations, as well as employees.**

Internal and external stakeholders were involved through an ESG survey administered to the categories considered most relevant. Through this tool, respondents were asked to assess the significance of the impacts associated with the Group's activities for each material topic, using a scale from 1 to 5.

The results collected made it possible to define the priority level of sustainability topics and to support the materiality analysis process. The percentage breakdown of the stakeholder categories that took part in the ESG survey is shown in the chart below.

Figure 1. Percentage breakdown of the stakeholder categories that took part in the ESG questionnaire.



IDENTIFICATION OF IMPACTS, RISKS AND OPPORTUNITIES

CSM GROUP carried out the financial materiality analysis in order to identify the risks and opportunities potentially capable of influencing the Group's business model and economic and financial performance.

The analysis was developed by applying the criterion of financial relevance, through an objective assessment based on quantitative scales. In particular, for each risk and opportunity the following were considered:

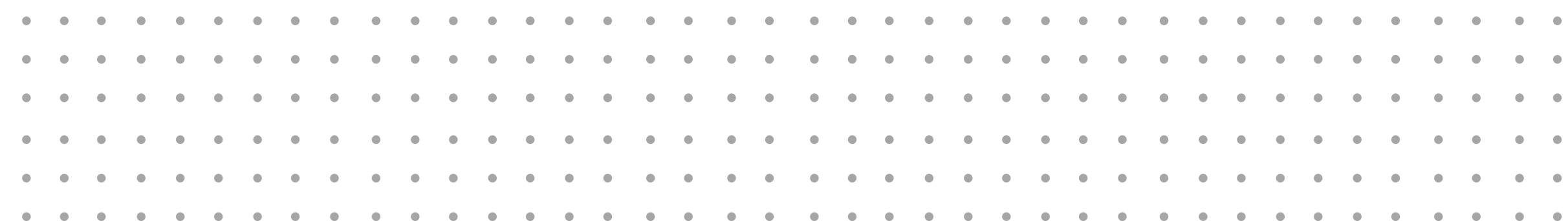
- Magnitude, assessed on five levels according to severity and financial exposure;
- Likelihood of occurrence, also expressed on five levels.

The combination of these parameters determined a level of materiality across five classes: low, moderate, medium, high and very high. The resulting score made it possible to define the financial materiality of the material topics analysed.

The list of IROs (Impacts, Risks and Opportunities) emerging from the process was shared with the Group's top and senior management, who confirmed its strategic relevance. The analysis was carried out in accordance with the ISO 31000 guidelines and considered residual risk, that is the risk remaining after the application of the management systems and mitigation measures adopted by the Group.

The assessment was conducted by the Sustainability Team with the involvement of the manager responsible for accounting and subsequently submitted to the Board of Directors for approval.

The following table sets out the IROs emerging from the Double Materiality Analysis. The assessment scope covers all areas relevant to sustainability, including the effects generated by the Organisation on people and the environment both through directly controlled activities and along the entire value chain, upstream and downstream





Material topics and related impacts, risks and opportunities (IRO).
+: positive impact, -: negative impact; **A:** current impact, **P:** potential impact; **BT:** short-term time horizon, **MT:** medium-term time horizon, **LT:** long-term time horizon.

ESG Area	Material topic	I/R/O	Description	Boundary			IRO relevance
				up-stream	own operations	down-stream	
ENVIRONMENT	 Chemical substances and waste production	Impact	+/A Adoption of structured methods for managing, segregating, storing and disposing of hazardous and non-hazardous waste from production activities, to prevent spills, contamination and potential adverse effects on the environment, health and safety.		●	●	LOW     
		Opportunity	BT Reducing production waste and improving its traceability can increase process efficiency, lower disposal costs and strengthen the Group's reputation with customers and stakeholders attentive to environmental performance.		●		MODERATE     
	 Circular economy	Impact	+/A Development of circular economy initiatives through the procurement of steel with recycled content, the optimisation of packaging and the introduction of solutions for the recovery, reuse or recycling of materials along the production cycle	●	●	●	MODERATE     
		Opportunity	BT Optimising the use of packaging and valorising waste as a resource can reduce purchasing and disposal costs, foster supply chain collaboration and generate innovation in production and logistics processes.	●	●	●	MODERATE     
	 Water resource management	Impact	+/P Implementation of technical and management solutions to reduce water withdrawals and consumption at the plants, including monitoring and water reuse or recirculation measures where applicable.		●	●	LOW     
		Risk	LT Despite limited water use in production processes, rising supply costs, local water scarcity and stricter permitting or environmental requirements could generate higher operating costs and management constraints for the Group's plants.		●		LOW     
	 Energy and greenhouse gas emissions	Impact	+/A Energy efficiency measures and progressive use of renewable energy, through the purchase of renewable power and self-generation from photovoltaic systems, with positive effects in reducing energy consumption and associated indirect emissions.	●	●		MEDIUM     
		Risk	MT Volatility in energy prices and any increase in consumption may lead to higher operating costs, affecting margins, commercial competitiveness and the Group's ability to plan industrial investments.	●	●	●	MEDIUM     
		Risk	MT Exposure to stricter climate regulations, carbon pricing mechanisms, customer emissions requirements and investor expectations may entail higher compliance costs, the need to invest in lower-emission technologies and possible effects on access to financing.	●	●	●	LOW     



ESG Area	Material topic	I/R/O	Description	Boundary			IRO relevance
				up-stream	own operations	down-stream	
SOCIAL	 Occupational health and safety	Impact	+/A Application of prevention and protection measures to reduce the risk of accidents and occupational diseases linked to the use of machines, equipment and plants; continuous monitoring of the health and safety system and training to promote safe behaviour and a culture of prevention.		●		HIGH 
		Opportunity	MT Extending the health and safety best practices already adopted at some Group sites to other operating units can strengthen risk control, reduce accidents and production downtime and improve operational continuity and the working climate.		●		LOW 
	 Human capital development	Impact	+/A Development and professional growth of people through training, skills updating, engagement and development paths, contributing to employability and to the Group's ability to achieve its industrial objectives.		●		MEDIUM 
		Opportunity	MT Investment in technical, managerial and cross-functional training can improve productivity, quality, operational efficiency and innovation capacity, reducing turnover and strengthening talent attraction and retention in a competitive manufacturing context.		●		MODERATE 
	 Working conditions and environment	Impact	+/A Promotion of fair and inclusive working conditions that respect personal dignity, through policies and practices geared towards equal opportunities, non-discrimination, collaboration, corporate welfare and organisational wellbeing.		●		MEDIUM 
		Risk	MT Difficulty in attracting and retaining qualified staff, including where shift work and specific production needs apply, may affect motivation, productivity, operational continuity and quality of work, generating recruitment and training costs, loss of key skills and higher turnover.		●		LOW 
		Opportunity	BT Strengthening welfare initiatives, incentive schemes, internal listening and improvement of the working climate can support motivation, retention and productivity, contributing in the short term to workforce stability and operational efficiency.		●		MEDIUM 
	 Relations with local communities and the territory	Impact	+/A Development of structured relations with schools, associations, local bodies and non-profit organisations, contributing to the creation of social value, the growth of local skills and the strengthening of the bond between the Group and the communities in which it operates.		●	●	MODERATE 
		Opportunity	MT Developing and maintaining solid relations with schools, local communities, local bodies and non-profit organisations can significantly improve the company's reputation. These activities can facilitate access to new market opportunities and create beneficial synergies that translate into immediate economic benefits and greater attractiveness to the local workforce.		●	●	LOW 

 CSM GROUP		CONTENTS	GOVERNANCE	SOCIAL	ENVIRONMENT	SUSTAINABILITY REPORT 2025			15
ESG Area	Material topic	I/R/O	Description	Boundary			IRO relevance		
				up-stream	own operations	down-stream			
Governance	 Legal and regulatory context management	Impact	-/P Shortcomings in monitoring and applying the sector regulatory framework could adversely affect customers, end users and other stakeholders, particularly where products or machinery do not meet applicable safety, quality or marking requirements.		●	●	MEDIUM 		
		Risk	BT Placing on the market products or machinery that do not comply with technical, safety or documentation requirements may lead to disputes, recalls, penalties, adaptation costs, liability towards customers and users and reputational damage, affecting the continuity of commercial relations.		●	●	LOW 		
		Opportunity	MT The ability to operate in highly regulated sectors, guaranteeing product quality, traceability, safety and regulatory compliance, can be a lever of competitive differentiation and facilitate access to markets or customers with demanding technical requirements.		●	●	MODERATE 		
	 Supply chain	Impact	+/P Integration of ESG criteria, alongside quality, reliability and commercial terms, into supplier qualification, assessment and monitoring processes, in order to promote responsible practices along the value chain and prevent indirect adverse environmental and social impacts.	●	●		MEDIUM 		
		Risk	LT Dependence on single suppliers or on geographical areas exposed to geopolitical tensions, price volatility or logistical difficulties may cause supply interruptions, cost increases, negotiating imbalances and production delays, with impacts on the Group's operational continuity and competitiveness.	●	●		LOW 		
		Opportunity	LT Developing strategic partnerships with qualified suppliers can increase production flexibility, access to specialist skills and innovation capacity, allowing the Group to focus on design, quality, customisation and continuous process improvement.	●	●		MEDIUM 		
	 Innovation management	Impact	+/A Promotion of a culture of innovation geared towards improving processes, products and services, in order to respond to changing customer needs and contribute to the development of more efficient and safer industrial solutions.		●	●	HIGH 		
		Risk	MT Investment in innovative solutions not aligned with market needs or unable to generate competitive advantage may result in a lack of economic return, loss of market share and reduced credibility with customers and commercial partners.		●	●	LOW 		
	 Business ethics and integrity	Impact	+/A Adoption of principles, procedures and conduct based on diligence, transparency, fairness, integrity, impartiality and the prevention of corruption in business activities and in relations with customers, suppliers, employees and other stakeholders.	●	●	●	MEDIUM 		
		Risk	BT Business practices not compliant with principles of ethics, integrity and transparency may generate penalties, litigation, loss of trust from customers, investors and employees, reputational damage and a weakening of the Group's operational and commercial stability.	●	●	●	LOW 		
	 Data management and cybersecurity	Impact	-/P Inadequate management of cybersecurity and data protection could lead to breaches of the confidentiality, integrity or availability of company information and of customer, supplier and employee data, with adverse effects on privacy rights and stakeholder trust.		●	●	MEDIUM 		
		Risk	BT Vulnerabilities in digital systems, cyber attacks or IT/OT system malfunctions may interrupt production and logistics processes, generating recovery costs, supply chain delays, productivity losses, possible penalties and reputational damage.		●	●	MEDIUM 		

MATERIALITY MATRIX

The output returned by the materiality analysis process was processed and formalised within a two-dimensional graph called the **Materiality Matrix**, where the X-axis shows the results of the financial materiality analysis and the Y-axis the results of the impact materiality analysis.

LEGEND



GOVERNANCE

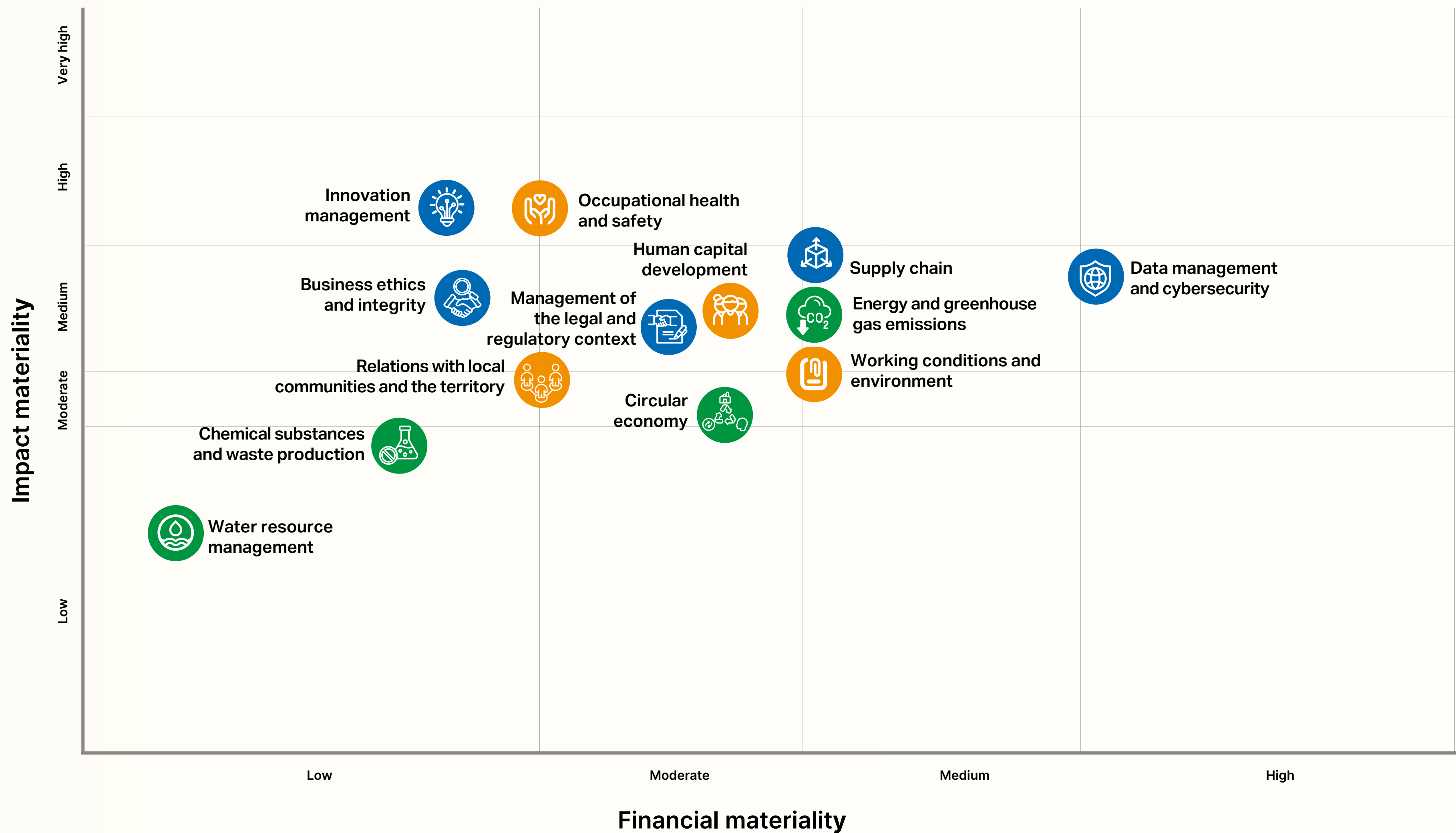


SOCIAL



ENVIRONMENT

Figure 2. Double materiality matrix.



GOVERNANCE



INNOVATION MANAGEMENT



SUPPLY CHAIN



BUSINESS ETHICS AND INTEGRITY

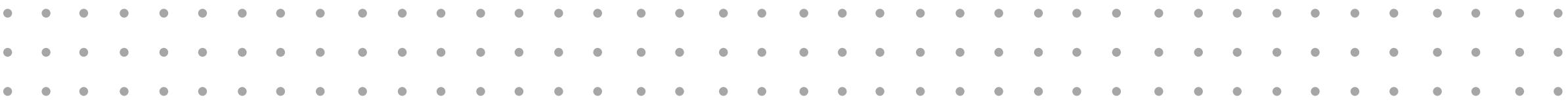


DATA MANAGEMENT AND CYBERSECURITY



LEGAL AND REGULATORY CONTEXT
MANAGEMENT





The following sections describe the organisational structure of CSM TUBE and CSM MACHINERY, with particular reference to the corporate governance arrangements of the two companies of the Group.

CSM GROUP bases its industrial relations on constructive dialogue with corporate figures and, where present, with workers’ representatives, promoting social dialogue, employee involvement and a positive organisational climate. The Group has internal channels and procedures to collect, assess and manage any requests, reports or concerns relating to the conduct of the Organisation and its actual or potential impacts on stakeholders.

For reporting purposes, “critical concerns” means concerns relating to actual or potential negative impacts on stakeholders, including those collected through complaint or reporting channels. During the reporting period, no critical concerns were communicated to the highest governance body.

The following table summarises the main practices adopted by the two Group companies in the area of corporate governance and certifications.

Table 3. Main practices adopted by CSM TUBE and CSM MACHINERY in the area of corporate governance and certifications.

PRACTICE DESCRIPTION	 CSM TUBE	 CSM MACHINERY
Board of Directors		
Independent Auditor		
Statutory Auditors		
Supervisory Body pursuant to Legislative Decree 231/01		
Code of Ethics		
Supplier Code of Conduct		
ISO 9001 Certification		
ISO 14001 Certification		
ISO 45001 Certification		
UNI/PdR 125:2022 – Gender Equality		

CSM TUBE SPA CORPORATE GOVERNANCE

CSM TUBE is a joint-stock company registered with the Treviso Company Register. The company is under the control of the sole shareholder, CSM HOLDING spa, which holds 100% of the company shares. The corporate governance structure of CSM TUBE provides for the presence of the Board of Directors and the Board of Statutory Auditors, bodies appointed by the Shareholders’ Meeting.

The structure of the corporate bodies as at 31 December 2025 comprises:

- The Board of Directors, which carries out all the operations necessary to achieve the corporate purpose and manages the company with the diligence required by the nature of the assignment;
- The Independent Auditor, responsible for the statutory audit of the financial statements;
- The Board of Statutory Auditors, responsible for ensuring compliance with the law, the Articles of Association and the principles of correct Administration;
- The Supervisory Body, established pursuant to Legislative Decree 231/01, responsible for overseeing the effectiveness, efficiency, maintenance and updating of the Organisation, management and control model pursuant to Legislative Decree 231/01.

All members of the **Board of Directors** of CSM TUBE, appointed by the Ordinary Shareholders’ Meeting, hold other offices only within the Group Companies, with the exception of the Chief Executive Officer of CSM TUBE who also holds the role of Board Member within the Centro Inox industry trade association.

The directors remain in office, except in the event of revocation and resignation, for a period of three financial years. The mandate is renewed at the Ordinary Shareholders’ Meeting convened for the approval of the financial statements (the Board of Directors expires with the approval of the 2026 financial statements).

In addition to the powers attributed to it by law and the Articles of Association, the Board has exclusive competence in relation to the most important decisions from an economic and strategic point of view. The directors are entitled to the remuneration established by the Shareholders’ Meeting.

The members of the Board of Directors are divided by gender and age group in the following table.



Table 4. Board of Directors of CSM TUBE spa as at 31 December 2025.

Member	Role	Gender	Age range	Executive/ Non-executive
Trolese Marco	Chairman	Male	30-50	Executive
Trolese Elisabetta	Managing Director	Female	30-50	Executive
Carpanini Pierluigi	Managing Director	Male	> 50	Executive

In the Board of Directors of CSM TUBE there are no independent members and the Chair is not a senior manager of the Organisation.

The **Board of Statutory Auditors** performs supervisory functions over compliance with the law and the Articles of Association, as well as over respect for the principles of correct administration and the adequacy of the organisational, administrative and accounting structure of the Company.

The body is composed of five members: a Chairman, two standing Auditors and two alternate Auditors. The composition of the Board reflects an adequate gender representation, with a female presence equal to 60% of the members. All members possess the requirements of integrity, professionalism and independence provided for by current legislation. The members of the Board of Statutory Auditors will remain in office until the date of the Shareholders’ Meeting convened for the approval of the financial statements closed at 31 December 2026.

CSM MACHINERY SRL CORPORATE GOVERNANCE

CSM MACHINERY is a limited liability company registered with the Treviso Company Register. The company is under the control of the sole shareholder CSM HOLDING spa, which holds 100% of the company shares.

The structure of the corporate bodies as at 31 December 2025 comprises:

- The Board of Directors, which carries out all the operations necessary to achieve the corporate purpose and manages the company with the diligence required by the nature of the assignment;
- The Independent Auditor, responsible for the statutory audit of the financial statements;

The members of the **Board of Directors** of CSM MACHINERY hold other offices only within the Group Companies and are appointed by the Ordinary Shareholders’ Meeting. The directors remain in office, except in the event of revocation and resignation, for an indefinite period.

In addition to the powers attributed to it by law and the Articles of Association, the Board of Directors has exclusive competence in relation to the most important decisions from an economic and strategic point of view. The directors are entitled to the remuneration established by the Shareholders’ Meeting.

The members of the Board of Directors are divided by gender and age group in the following table.

Table 5. Board of Directors of CSM MACHINERY srl as at 31 December 2025.

Member	Role	Gender	Age range	Executive/ Non-executive
Trolese Elisabetta	Chairwoman	Female	30-50	Executive
Trolese Marco	Managing Director	Male	30-50	Executive

In the Board of Directors of CSM MACHINERY there are no independent members and the Chair is not a senior manager of the Organisation.

SUSTAINABILITY GOVERNANCE

The Board of Directors plays a central role in defining the company's strategies in the area of environmental management, including aspects related to climate change, as well as social issues.

The annual Sustainability Report is prepared through a process that involves various internal company functions, including the shareholders, the Board, the HR area, HSE, the purchasing office, *finance*, *operations*, quality, the R&D office and the commercial area.

These functions make up the **ESG Team of CSM GROUP**, responsible for overseeing the implementation of sustainability initiatives and the monitoring of their performance. The process includes the collection and analysis of data relating to company activities, business relationships and internal initiatives, as well as the involvement of stakeholders, in order to ensure a broad and inclusive view of the impacts generated by the Group.





INNOVATION MANAGEMENT

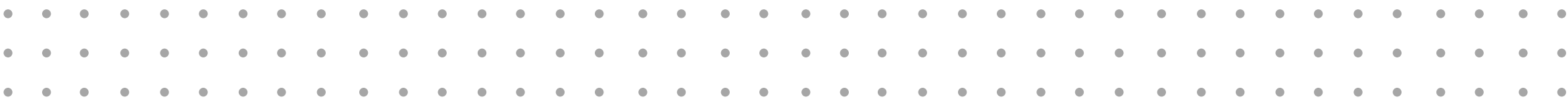
Innovation is one of the central elements of the CSM GROUP development model and results in a **customer-oriented approach**, continuous research and progressive improvement of the solutions offered. Research and development activities are strategic levers through which the Group strengthens its ability to respond to market developments and to support its resilience and competitiveness over time.

The investments made in recent years have helped to support CSM GROUP in addressing the new challenges of the industrial context, encouraging the adoption of technologically advanced solutions consistent with the requirements expressed by stakeholders.

Constant dialogue with customers and partners is, in this area, a relevant factor in identifying opportunities for improvement and developing responses increasingly targeted to the needs of the market.

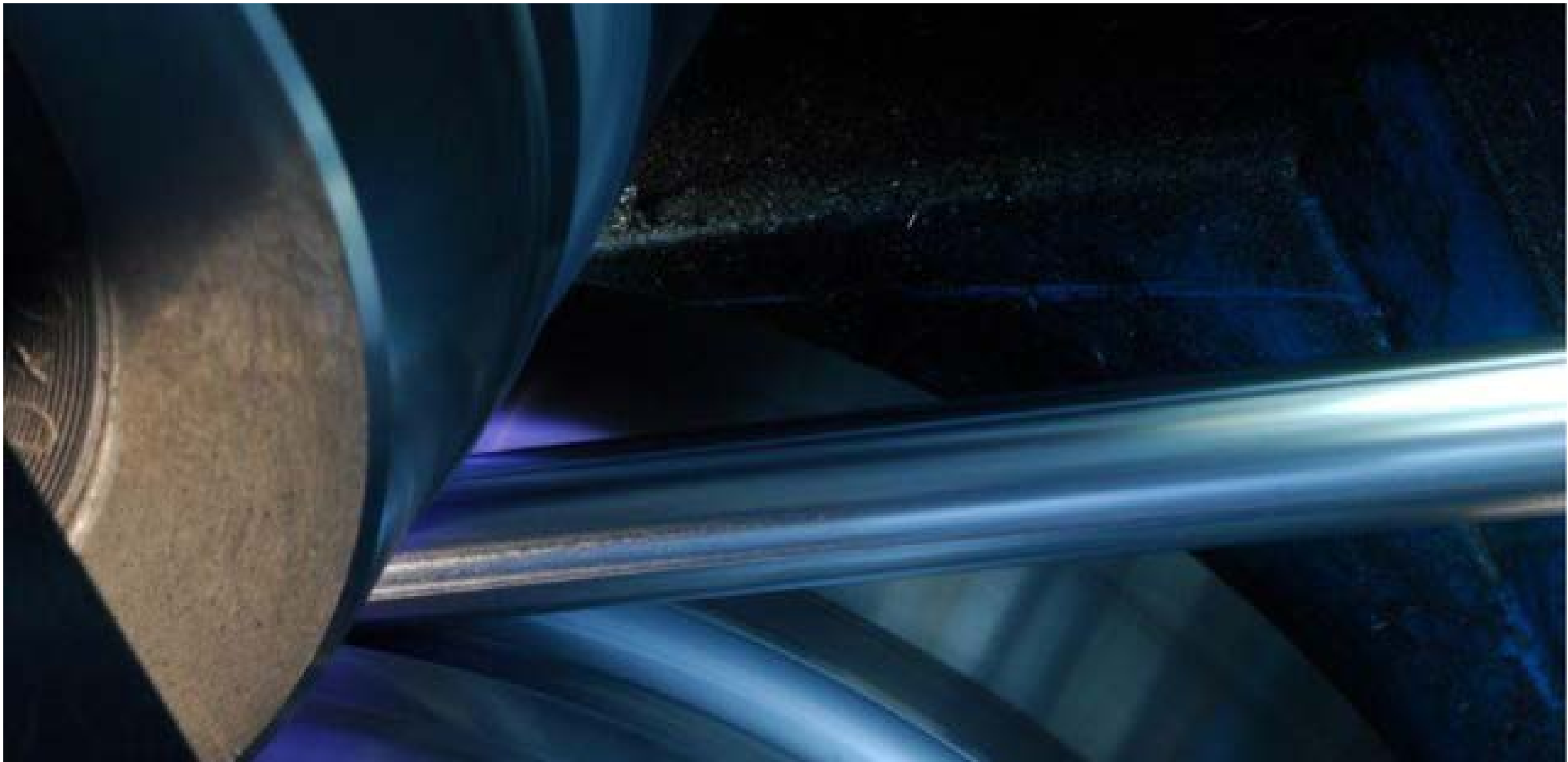
The collaboration between CSM MACHINERY and CSM TUBE constitutes a distinctive element of the Group's innovation path. CSM MACHINERY develops and refines its own machinery, while the synergy with CSM TUBE makes it possible to test them in real operating conditions, enhancing a process of continuous improvement based on application experience and direct feedback from the industrial use of the solutions.

“ **The collaboration between CSM MACHINERY and CSM TUBE constitutes a distinctive element of the Group's innovation path. progressively ESG principles into corporate strategies, operating processes and business decisions.** ”



The technical and design skills of CSM MACHINERY, integrated with the data and feedback deriving from the use of the systems by CSM TUBE, feed a constant flow of information useful to optimise the performance, reliability and quality of the solutions developed. This exchange helps to oversee the different stages of the innovation process, from design to experimentation, through to the completion of the final product.

The collaboration between the two companies of the Group is, therefore, an integrated model of innovation, in which research, prototyping and field validation reinforce each other. This approach allows CSM GROUP to develop solutions consistent with the qualitative requirements of the market and oriented to the creation of value for customers and stakeholders in the medium to long term.





CSM TUBE

In recent years, research and development activities have helped to expand the range of products supplied, both through new types of tubes and through the extension of production to new diameters. The activities also covered the possibility of welding tubes with a diameter-to-thickness ratio of less than 8 and the development of solutions aimed at welding new alloys.

In 2024 CSM TUBE developed, in collaboration with the University of Padua, **a new production line designed through advanced simulation tools** based on Digital Twin technology. This approach has enabled us to virtually test different plant configurations and optimise process parameters before industrial construction.

During the year a second production line was launched, co-designed with the University of Padua and CSM MACHINERY, equipped with laser welding technology and designed to increase productivity, operational efficiency and process continuity. The performance of the system will be monitored through specific operational indicators.

At the same time, a feasibility study was launched for the automation of testing and packaging of coiled tube, with the aim of improving product traceability, supporting operators in added-value activities and reducing the physical commitment associated with manual operations. The completion of the project is expected by 2026, compatibly with the results of technical evaluations and subsequent implementation phases.

In 2025, a project aimed at the automation of the adjustment of the forming heads was launched, with the aim of achieving a line by 2026 capable of managing these activities in an automated manner. The initiative aims to increase operational efficiency, product quality and process safety while at the same time improving production stability. The results and benefits achieved will be monitored and reported on the basis of the results of development and validation activities.

In continuity with this path of innovation, the research and development activities carried out in 2025 and planned for 2026 are oriented to the enhancement of the technologies already developed and tested, with the aim of expanding production applications to new market sectors, new



dimensional combinations and new alloys, strengthening competitiveness and responsiveness to customer needs.

Among the main development priorities for 2026 is the integration of solutions based on artificial intelligence within standard machines. These tools will be designed to support operators through dedicated dashboards, supporting the optimisation of tooling set-ups, maintaining production process stability, reducing operational errors and cutting scrap, according to a gradual, measurable approach oriented to continuous improvement.



CSM GROUP

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SUSTAINABILITY REPORT 2025

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CSM MACHINERY

In recent years, CSM MACHINERY has pursued a path of innovation and standardisation of its offering, developing a range of machines characterised by a modular architecture and standardised optionals. This approach allows customers to configure solutions in a flexible and personalised way, adapting them to the specific production and operational requirements, while guaranteeing high levels of reliability, efficiency and simplicity of integration.

During 2025 CSM MACHINERY launched significant upgrades on existing machinery, choosing to adopt a **standard PLC** that has made it possible to standardise human-machine interfaces. **This choice has improved the functionality of the systems and the operational efficiency of operators.** In addition, all machines are remotely interconnected, ensuring a more timely, flexible and responsive service.



At the same time, the company has developed customised plant solutions in response to specific needs expressed by customers, designing machinery able to adapt to their production processes and operational requirements. These interventions have helped to support the innovation and production flexibility of customers, promoting, where applicable, the expansion of production capacities and access to new market segments.

In the coming years CSM MACHINERY intends to continue its path of innovation through targeted investments in the digitalisation of machinery and the integration of advanced automation solutions. These initiatives are aimed at increasing operational efficiency, improving machine performance and expanding the possibilities for customising the solutions offered to customers.

CSM GROUP DIGITALISATION PROJECT

Since 2021, CSM GROUP has started **a process of digitalisation of production processes**, initially developed at CSM TUBE and aimed at improving the traceability of information, the monitoring of operational performance and the progressive dematerialisation of process records. The project, fully operational since 2023, provides for the integration of company machinery with MES and ERP systems and dedicated platforms for the collection and analysis of production data, supporting the control of process parameters, quality, productivity and waste.

During 2025 and looking ahead to 2026, the Group further strengthened its digital transformation path through interventions aimed at improving the integration of data in the processes of material acceptance, warehouse management and shipments, favouring an increasingly efficient and coordinated management of business information flows.

In parallel, an internal development project of the Power BI platform was launched, aimed at creating dashboards dedicated to the main company processes, including production, quality, environment and health and safety. The initiative aims to make updated information and indicators available to support operational decisions, while also favouring consultation from mobile devices and the sharing of data between the different sites of the Group, including international ones.



CSM GROUP



SUPPLY CHAIN

CSM GROUP considers the management of the supply chain an important element for operational continuity, product quality and the control of supply risks. In this context, the Group promotes stable relations with its suppliers, based on dialogue, transparency and compliance with the contractual and conduct requirements defined at the company level.

The Group has adopted a Supplier Code of Conduct, published on the company website, which defines principles and requirements regarding corporate ethics, human rights, environmental protection and fairness in business relations. The Code is referred to in the purchase orders and is the reference for the start and maintenance of relations with suppliers, in accordance with the procedures applicable to the different categories of supply and to the different contractual relationships. The Code also requires suppliers to promote these principles also with regard to sub-contractors and third parties operating on their behalf, it being understood that the level of verification by the Group may vary according to the type of supplier, the relevance of the supply and the risk profile. The supply chain has different characteristics between the Group companies. For CSM TUBE it consists mainly of suppliers of steel strips and coils, fixed assets and spare parts, packaging, transport and other services.



For CSM MACHINERY it consists mainly of third-party processing providers, steel fabrication, electronic and mechanical materials and additional services.

In the course of 2025, CSM TUBE continued its monitoring and diversification activities, also in the light of the evolution of the European regulatory framework. In particular, with reference to the **Carbon Border Adjustment Mechanism (CBAM)**, which has provided for a transitional phase from 2023 to 2025

and the start of the definitive regime from 2026, the Group has requested inclusion in the importers' register and revised its supply structure, replacing a Japanese supplier and providing for the zeroing of such supplies in 2026. Based on the current supply chain configuration and the internal analyses available, this regulatory change has not had significant strategic impacts on the business of CSM TUBE.

CSM TUBE also monitors the European safeguard measures applicable to certain imports of steel products, including tariff quotas and the possible application of out-of-quota duties. In 2025 the European Commission introduced changes to the steel safeguard mechanism. Based on the supply volumes, the commodity categories concerned and the internally assessed economic exposure, these measures did not entail significant strategic impacts for CSM TUBE.



Supply chain management also led to new industrial collaborations. In 2025, following the entry of a new European operator in the production of super-austenitic steels, CSM TUBE started sampling and preliminary tests aimed at the technical and commercial evaluation of a possible collaboration. At the same time, steel traders and stockists were introduced and evaluated for the supply of limited quantities, in support of internal development needs and greater flexibility in purchases.

For CSM MACHINERY, in 2025 a new qualified supplier was introduced for the on-board electrical equipment and UL-certified control panels, needed for the export of a machine to the United States. With reference to CBAM, at the reporting date, the company did not register, as any steel imports were lower than the quantitative threshold relevant for the applicable requirements.

Strategic suppliers are evaluated through a **system of vendor rating**, based mainly on the quality and punctuality of deliveries.

This tool allows the Group to monitor the operational performance of the supply chain and identify any areas for improvement. In perspective, the Group intends to strengthen the qualitative mapping of suppliers, gradually including further information such as the possession of system and industry certifications, including IATF, ISO 9001 and ISO 14001, and evaluating the integration of ESG criteria for the evaluation of suppliers.

GEOGRAPHICAL DISTRIBUTION OF THE SUPPLY CHAIN

With reference to the share of expenditure allocated to suppliers located near the Group’s operating sites, CSM GROUP conducted an analysis of the supply activities related to CSM TUBE and CSM MACHINERY.

For the purposes of the analysis, the Cimavilla di Codogné plant, in the province of Treviso, has been identified as the reference site. For “local area” the Company has adopted an operational definition based on a radius of 300 km from that location.

The analysis took into account the main suppliers of CSM TUBE and CSM MACHINERY, selected on the basis of the expenditure incurred for purchases in the financial years 2023, 2024 and 2025. In particular, suppliers were included which, altogether, represent at least 90% of total supply expenditure in the periods analysed. Excluded, on the other hand, were suppliers with annual costs of less than 30,000 euros and expenses relating to *utilities*, rents and staff, including temporary employment agencies, as well as intragroup expenses. For the determination of the location of the suppliers, the place where CSM TUBE and CSM MACHINERY make the purchase was considered, without including additional levels of the supply chain.

The following table shows the percentage distribution of the analysed expenditure towards suppliers located in four geographical areas: Non-EU, EU, Italy and within 300 km from the Cimavilla di Codogné (TV) site.

The data presented describes the geographical distribution of supply expenditure according to the criteria indicated above and does not constitute, in itself, an assessment of the environmental, social or economic impact of the purchases made.

Table 6. Percentage of expenditure for suppliers, divided by geographical area, in the three-year period 2023-2025.			
year			
2023	2024	2025	
2.5%	1.9%	0.7%	Non-EU
97.5%	98.1%	99.3%	European Union (EU)
of which			
74.3%	64.0%	73.5%	Italy
of which			
66.3%	55.3%	64.8%	within 300 km from CSM TUBE headquarters (TV)



The Company also collects information on the certifications declared or documented by suppliers, with reference to the areas of Quality, Health and Safety and Environment.

In the last three years, the survey has covered suppliers accounting for at least 90% of total annual expenditure towards the supply chain, according to the analysis criteria previously defined. The objective of the activity was to map the presence of certifications among the suppliers included in the analysis scope, without this implying an overall assessment of their ESG or environmental performance. The information was collected on the basis of the documentation provided by suppliers or publicly available sources such as their websites. Where it has not been possible to directly verify the validity, scope or period of coverage of the certifications, such information has been considered as declared statements and not as independently verified evidence.

In the table below, the results are expressed as a percentage of purchases for which certifications are available in the areas of Quality, Environment and Health and Safety, according to the scope and the sources described above.

Table 7. Percentage of expenditure for suppliers that have certifications.

TYPE OF CERTIFICATION	% spend 2023	% spend 2024	% spend 2025	Δ% 2025 VS 2024
Quality Management System - ISO 9001	86.1%	87.6%	93.7%	+6.1%
Environmental Management System - ISO 14001	74.5%	81.0%	82.9%	+1.9%
Health and Safety Management System - ISO 45001	71.2%	78.3%	79.2%	+0.9%

It should be noted that, where applicable, CSM GROUP collects from its suppliers the declarations relating to compliance with the REACH and RoHS regulations, the presence of *conflict minerals*, as well as declarations of preferential origin and “*Made in*”.



BUSINESS ETHICS AND INTEGRITY

CSM GROUP recognises ethics and integrity as principles underlying its corporate management and its approach to the responsible conduct of activities. This commitment is formalised in the **Code of Ethics** of CSM TUBE and the **Code of Ethics** of CSM MACHINERY, documents approved by the respective Boards of Directors and published on the respective company websites.

The Code of Ethics defines the general principles of conduct with which the Group companies intend to carry out their activities and relationships with their stakeholders. The document recalls, in particular, the principles of integrity, honesty, prevention of conflicts of interest, respect for the dignity of the person, protection of human rights, transparency of operations, accounting fairness, protection of health, safety and the environment, as well as responsible business management.

In line with its principles and values, CSM GROUP promotes an inclusive working environment, respectful of the dignity and rights of each person, committing to prevent and counter any form of discrimination, harassment or behaviour detrimental to individual integrity. The Group also reiterates its rejection of all forms of forced, compulsory or child labour and strives to ensure equal opportunities, enhance diversity and promote the professional growth of people through training paths and skills development.

In the reporting period, on the basis of the information collected through the reporting channels and active corporate oversight, no confirmed cases of discrimination emerged relating to factors such as ethnicity, gender, religion, political opinions, nationality, social origin or other personal characteristics, either among employees and other workers or towards external stakeholders.

CSM TUBE has adopted, since 2018, an Organisation, Management and Control Model pursuant to Legislative Decree 231/01, which includes specific measures on health and safety at work and defines general rules of conduct aimed at preventing offences. In this context, the Supervisory Body, established pursuant to the same legislation, is responsible for monitoring the application of the Model and compliance with the procedures provided.

In the course of 2025, CSM GROUP completed a process of review and updating of the Organisation, Management and Control Model pursuant to Legislative Decree 231/2001, extending its scope of application to further categories of predicate offences with respect to those already covered, including those relating to health and safety at work. As part of the same updating process, the Code of Ethics and the Whistleblowing Procedure were also revised.

The Group adopted a **Whistleblowing Procedure** applicable to both companies. For CSM TUBE, the procedure is implemented in accordance with current legislation, while for CSM MACHINERY it was introduced on a voluntary basis as an additional safeguard in support of the culture of integrity and corporate transparency. The system allows employees, collaborators and other parties operating in the corporate context to report, even anonymously, alleged regulatory violations, unlawful conduct or situations not compliant with corporate principles.

The management of the reports is entrusted to the Supervisory Body for CSM TUBE and to an independent external party for CSM MACHINERY, in order to guarantee its impartiality, confidentiality and correct evaluation. CSM GROUP promotes the dissemination and knowledge of the Code of Ethics and the



systems, there have been no corruption episodes or significant violations of applicable laws and regulations. Moreover, there are no legal actions initiated or pending against the Group for anti-competitive conduct, restrictive practices of competition or violations of antitrust legislation.

Whistleblowing Procedure through specific communication activities and by providing the relevant documentation inside and outside the company. In 2025 no reports were received through the Whistleblowing channel. CSM GROUP operates in line with the principles of integrity, fairness and transparency, adopting organisational safeguards and rules of conduct to prevent corruption, undue favours and collusive practices. Through the Code of Ethics, the Organisation, Management and Control Model pursuant to Legislative Decree 231/2001 and the other compliance instruments adopted, the Group promotes a corporate culture oriented to legality and responsibility, prohibiting any conduct aimed at obtaining undue benefits, direct or indirect, for itself or third parties.

In 2025, with reference to the reporting scope and on the basis of the information available through corporate control and monitoring



DATA MANAGEMENT AND CYBERSECURITY



CSM GROUP considers the protection of personal data and the security of information as relevant aspects for operational continuity, the protection of corporate information and the maintenance of the trust of stakeholders. Therefore, the Group has adopted an approach oriented to the prevention and management of risks related to privacy and cybersecurity, through organisational, technological and training measures aimed at reducing the risk of data breaches and cyber threats.

On the technological level, CSM GROUP introduced redundant firewall-based perimeter protection systems, endpoint protection solutions with XDR technologies and enhanced authentication systems through dedicated passwords and multi-factor authentication protocols (MFA). These measures are accompanied by periodic analysis and verification of the business IT systems, carried out through *penetration testing* and *vulnerability assessment*, with the aim of identifying any vulnerabilities and contributing to the improvement of the overall security level. The Group also adopted a multi-level backup policy.

Given the role of the human factor in the prevention of cybersecurity risks, the Group promotes training initiatives aimed at staff using IT tools, with the aim of increasing awareness of data protection and fostering responsible behaviour in the use of digital technologies. To integrate these activities, ***phishing simulation campaigns*** are periodically implemented, aimed at testing the level of user attention and increasing internal cybersecurity skills.

In the course of 2025, the Group strengthened its cybersecurity safeguards through the implementation of an immutable backup system, aimed at increasing the resilience of the information systems and ensuring the availability and restoration of data in the event of cyber attacks, including those related to ransomware phenomena.

In the same period, the Group promoted awareness-raising and training initiatives in cybersecurity, carrying out **in-person training sessions** that involved about 30% of employees equipped with digital tools and access. In continuity with this path, among the objectives identified for 2026 is the development of a cybersecurity awareness platform, designed to support workers' awareness through specific training paths and phishing attack simulations.

With reference to the protection of personal data, **CSM GROUP has adopted organisational and internal procedures aimed at supporting the management of the compliance obligations provided for in the applicable privacy legislation**, including Regulation (EU) 2016/679 ("GDPR"). At the time of recruitment, employees receive and sign an information notice prepared pursuant to Article 13 of the GDPR, containing information relating to the processing of personal data carried out in the context of the employment relationship.

At 31 December 2025, **on the basis of the information and internal evidence available at the reporting date**, there are no substantiated complaints concerning breaches of customer privacy, nor known incidents of leakage, theft or loss of personal data relating to customers.

In the course of 2026, CSM TUBE and CSM MACHINERY will be involved in a process of strengthening cybersecurity and digital risk management, in view of the expected classification of the companies as "important" entities under Directive (EU) 2022/2555 (NIS2) and its transposition legislation. The activities will include organisational, procedural and technological interventions aimed at consolidating the information security governance system, strengthening cyber risk management and monitoring processes and ensuring progressive alignment with regulatory requirements.



LEGAL AND REGULATORY CONTEXT MANAGEMENT



CSM GROUP continuously monitors the evolution of the regulatory and legislative framework applicable to its activities, with the aim of ensuring compliance with the relevant obligations and of updating, where necessary, internal processes and procedures. This activity is also carried out through dialogue with trade associations and professionals specialised in the areas relevant to the Group.

In particular, the Group engages with entities such as *Centro Inox*, the Italian Association for the Development of Stainless Steels, and with expert consultants on health and safety at work, regulatory compliance, machinery safety and environmental issues. These activities support the identification and evaluation of the requirements applicable to the Group companies and contribute to the management of their obligations.

With reference to quality, CSM TUBE and CSM MACHINERY adopt **ISO 9001 Certified Quality Management Systems**. Both companies have defined a **Quality Policy** that guides activities towards product compliance with the applicable regulatory and technical requirements and with the specifications required by customers, process improvement, waste management, the use of qualitative and production data and the development of processes based on the integration between technical skills, experience and technology.

In the course of 2025, both companies of the Group strengthened the activities of listening to and monitoring customer satisfaction through dedicated tools, including customer satisfaction questionnaires and indicators aimed at evaluating the qualitative performance of the products and services offered.

In the reporting period, with reference to the Group scope and on the basis of the information available through the company control systems, there have been no cases of non-compliance with regulations or voluntary codes regarding the labelling, marking or information provided on the products. Similarly, no incidents have been recorded that have resulted in recalls, sanctions, penalties or other measures resulting from violations of the applicable requirements.

The management of legal and regulatory aspects is developed taking into account the operational and regulatory specificities of the different sectors in which the Group companies operate, within a shared approach oriented to regulatory compliance, risk prevention and continuous improvement of business processes. The main distinguishing features of the management systems adopted by the two companies are described below.

CSM TUBE

Different regulatory references and technical standards apply to the products manufactured by CSM TUBE, depending on their respective scope and specific product families. In particular, the offer can be traced back to two main macro-categories: generic tubes and pressure tubes.

Pressure tubes are manufactured, where applicable, in accordance with Directive 2014/68/EU on pressure equipment, with specific reference to Annex I, Section 4.3, as well as to EN 10217-7:2014, which governs the technical conditions of supply. These products also comply with the **AD 2000 Merkblatt HP0 and W0** standards for the purposes of ensuring the safety requirements applicable to the industry.

Some CSM TUBE products also comply with the ASTM A249 and ASME SA249 specifications, relating to austenitic welded steel tubes intended, among others, for condensers, heat exchangers and boiler vessels. These standards define technical and performance characteristics relevant for applications requiring resistance to corrosion, oxidising agents and mechanical stress, according to the conditions and limits provided by the applicable standards. These compliances are particularly important in markets such as the American, Canadian and South American ones.

CSM TUBE attaches a central role to the certification and verification of the conformity of its products, as tools to support quality control and the requirements applicable to the health and safety of end users. In addition to the above standards, the Company operates in compliance with



the provisions provided for by the REACH and RoHS Regulations, the Ministerial Decree of 21 March 1973 and Regulation (EC) No 1935/2004, with particular reference to tubes intended for the food & beverage sector, where applicable.

The adoption of these standards and regulatory references contributes to the management of the technical, qualitative and safety requirements of products, especially in sectors where such aspects take on particular relevance, such as *automotive* and *food & beverage*.

In the reporting period, CSM TUBE did not record cases of non-compliance with regulations or voluntary codes relating to the health and safety impacts of products and services such as to entail sanctions, penalties, recalls or other measures by the competent authorities.

With reference to the regulatory context of the steel sector, as described in the supply chain section, Regulation (EU) 2023/956 of the European Parliament and of the Council of 10 May 2023, known as the **Carbon Border Adjustment Mechanism (CBAM)**, introduces a framework for the management of embedded emissions in specific categories of goods imported into the European Union.

In the course of 2025, the path aimed at obtaining the IATF Certification was started, with the aim of further strengthening the Quality Management System and promoting continuous improvement of business processes. As part of this path, the application of the FMEA (Failure Mode and Effects Analysis) methodology according to the AIAG standards was introduced, as a tool for the preventive identification, evaluation and management of potential risks associated with production processes.

In the same period, a structured system of qualification and monitoring of suppliers in the Quality area was implemented, based on the VDA methodology. To support this system,



In the course of 2025, the path aimed at obtaining the IATF Certification was started, with the aim of further strengthening the Quality Management System and promoting the continuous improvement of business processes.



CSM MACHINERY

With reference to regulatory compliance, CSM MACHINERY has started a project

aimed at the adaptation of some product lines to the safety standards required by the North American market.

As regards product safety, the activities of CSM MACHINERY are subject to the Machinery Directive 2006/42/EC, which defines the essential health and safety requirements for the design, construction and placing on the market of machinery within the European Union.

In the reporting period, CSM MACHINERY did not record cases of non-compliance with regulations or voluntary codes relating to the health and safety impacts of products and services such as to entail sanctions, penalties, recalls or other measures by the competent authorities.

In recent years, CSM MACHINERY has also invested in improving the traceability of components, introducing the individual marking of each piece. This intervention has supported the component identification activities, the spare parts service and the assembly activities, contributing to a more precise management of the information relating to the product life cycle.



SOCIAL



OCCUPATIONAL HEALTH AND SAFETY



HUMAN CAPITAL DEVELOPMENT



WORKING CONDITIONS AND ENVIRONMENT



RELATIONS WITH LOCAL COMMUNITIES AND THE TERRITORY



People represent a central element for CSM GROUP and contribute, through skills, professionalism and behaviours consistent with corporate principles, to the solidity of the Organisation and its development path over time. The Group promotes a working environment oriented to mutual respect, participation and the enhancement of skills, with the aim of favouring the involvement of people in corporate life.

Decisions relating to personnel management are oriented to criteria of merit, professional competence and consistency with organisational needs, with the aim of promoting conditions of equity in the various phases of the employment relationship, from selection and recruitment to training, from remuneration to the management and enhancement of resources. The Group adopts an approach aimed at favouring equal opportunities and preventing forms of discrimination linked to gender, age, nationality, religion, ethnicity, political orientation or sexual orientation. CSM GROUP enhances the contribution of employees and other workers, assigning roles and responsibilities according to the skills possessed and promoting professional growth paths.

In line with the principles enshrined in the Conventions of the International Labour Organization (ILO) and with the Group’s commitment to respect for fundamental human rights, both a **Code of Ethics specific to CSM TUBE** and a **Code of Ethics specific to CSM MACHINERY** have been adopted, aimed at defining the principles of expected conduct and the internal references regarding fairness, respect for the person and responsibility in employment relationships.

CSM GROUP is committed to guaranteeing timely and transparent communication to its employees regarding any organisational or operational changes that may have effects on working conditions. Such communications are carried out in compliance with the applicable legislation, collective bargaining agreements and internal procedures, with the aim of favouring the involvement of people, the correctness of decision-making processes and responsible management of change. The following table provides an overview of the main information relating to company personnel in the three-year period 2023-2025, with reference to CSM TUBE, CSM MACHINERY and the aggregated Group data (CSM GROUP). At the end of the reporting year, at 31 December 2025, CSM GROUP had a workforce of 173 employees, of which 94.8% employed with a permanent contract.

At Group level, in 2025, 24 new employees were hired, with a job growth rate of +4.8%. The exit turnover rate was instead equal to 9.2%.

Table 8. Overview of company personnel in CSM TUBE, CSM MACHINERY and CSM GROUP in the three-year period 2023-2025.

	2023			2024			2025		
	CSM TUBE	CSM MACHINERY	TOTAL CSM GROUP	CSM TUBE	CSM MACHINERY	TOTAL CSM GROUP	CSM TUBE	CSM MACHINERY	TOTAL CSM GROUP
	 CSM TUBE	 CSM MACHINERY	 CSM GROUP	 CSM TUBE	 CSM MACHINERY	 CSM GROUP	 CSM TUBE	 CSM MACHINERY	 CSM TUBE
Total employees	115	37	152	126	39	165	135	38	173
Permanent	110	36	146	114	39	153	126	38	164
Fixed-term	5	1	6	12	0	12	9	0	9
Part-time	5	0	5	5	0	5	6	0	6
Newhires	16	5	21	21	3	24	21	3	24
Average age	40	40	40	41	41	41	41	42	41
Men	94	29	123	101	30	131	107	29	136
Women	21	8	29	25	9	34	28	9	37
Average training hours	11.3	23.6	14.1	12.5	17.6	13.8	12.2	11.6	12.0
Turnover*	12.2%	5.4%	10.5%	7.9%	2.6%	6.7%	8.9%	10.5%	9.2%
Job growth rate**	+1.8%	+8.8%	+3.4%	+9.6%	+5.4%	+8.6%	+7.1%	-2.6%	+4.8%

* (total employees leaving at 31 December / total no. of employees at 31 December) *100 ** % change: (total employees at 31 December - employees on the workforce 12 months earlier) / employees on the workforce 12 months earlier

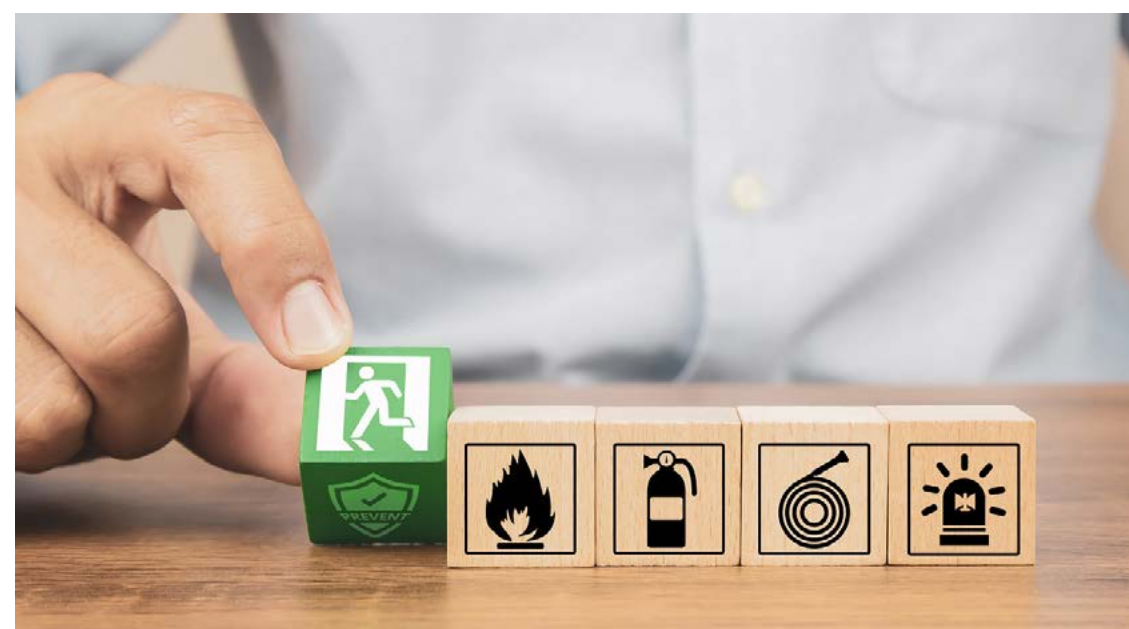


OCCUPATIONAL HEALTH AND SAFETY

CSM GROUP considers health and safety in workplaces a fundamental right of people and an essential element of corporate sustainability. In line with this commitment, the Group has defined specific health and safety guidelines and has adopted internal procedures to oversee the main risks associated with business activities. These include the monitoring of injuries and near misses, as well as the definition of training activities aimed at promoting responsible and aware behaviour. The Company is committed to spreading and consolidating a culture of health and safety at work, promoting awareness of risks through adequate resources, training and instruction.

CSM TUBE, in particular, recognises that the attainment of high safety standards depends on the contribution of the entire Organisation and, in this perspective, adopts a continuous improvement approach in line with the requirements of **UNI EN ISO 45001:2018** certification. The achievement of the ISO 45001 certification testifies to the Company's commitment to these issues and confirms the structured application of the provisions provided for by the organisation, management and control model pursuant to **Legislative Decree 231/01**, whose extension has been progressively expanded to cover all the offences provided for by the Decree.

CSM GROUP manages health and safety aspects with the aim of identifying the risks present in the Company and defining the necessary improvement actions in order to reduce them and, where possible, eliminate them. Specific health protocols are also active that regulate the **periodic health surveillance** of employees exposed to specific risks, with the aim of ensuring their fitness for the job carried out.



With reference to CSM TUBE, there were no occupational diseases during 2025.

CSM TUBE and CSM MACHINERY draw up the Interference Risk Assessment Document (DUVRI), aimed at identifying and evaluating the risks arising from interferences connected with the activities entrusted under contract to external companies, as well as defining the measures necessary to eliminate or reduce them to the minimum. An emergency plan is also adopted, which provides for specific operational procedures to be activated according to the different emergency situations that may occur during working activities.

Health and safety aspects are also examined through regular meetings with workers. These are accompanied by internal audits, conducted with the involvement of the RSPP and ASPP, as well as external audits conducted by specialised consultants. The **awareness-raising activities** involve the entire corporate population and, in the case of CSM TUBE, particular attention has been paid to supervisors, strengthening the ability to report situations of danger and near misses. This work of oversight and prevention has contributed to reaching the **goal of zero injuries in 2025**. In this context of continuous improvement, the periodic QSA awareness sessions will continue to focus on the topic of *near misses*, in order to further consolidate the culture of prevention.

The health and safety risk analysis is periodically reviewed and the outcome of this activity is represented by the Risk Assessment Document (DVR), drawn up by the employer in collaboration with the RSPP (Head of the Prevention and Protection Service), the occupational health physician and the Workers' Safety Representative (RLS). In relation to the specific risks connected with the tasks performed and the requirements of the occupational health physician, CSM GROUP also provides workers with the necessary **personal protective equipment (PPE)**.





Among the improvement objectives for 2026, CSM TUBE plans to integrate into the DVR the assessment of the risk linked to abuse and harassment in the workplace, confirming an approach to safety in an increasingly broad and inclusive sense.

At both CSM TUBE and CSM MACHINERY sites an **automated external defibrillator (AED)** is available. Although at present this is not a provision required by law, the Group has chosen to adopt such a safeguard to ensure prompt intervention in the event of cardiac arrest and to further strengthen the protection of the health of its people.

Training in health and safety at

work is planned annually and provided in accordance with the regulatory requirements and the specific tasks performed by individual workers. In addition to compulsory training courses, targeted instruction and specific training courses are also planned, based on roles and operational activities. In particular, in CSM TUBE, health and safety training is carried out internally from the first day of work, so as to ensure that new recruits are immediately fully aware of the risks and of the correct operating procedures. Also in 2025, the company provided specific training on mechanical risks and on departmental risks aimed at all shift leaders, even in the absence of a specific regulatory obligation, confirming the attention placed on strengthening internal competences in the field of prevention.

At both sites there are **digital notice boards** placed in the production areas, through which performance indicators relating to health and safety are shared with company staff. CSM TUBE also provides employees with an **internal system for reporting health and safety improvement suggestions**. On an annual basis,

the Company Management grants a financial award to workers who stand out for proactivity and for the contribution provided through proposals for improvement in health and safety. Among the objectives for 2026 is also a project aimed at the use of visual pictograms, in order to make health and safety information even more immediate, accessible and effective.

Among the main initiatives implemented by CSM TUBE to further strengthen the management of these aspects are the installation of a vending **machine** for personal protective equipment (**PPE**), the increase in the number of employees assigned to emergency teams beyond the legal obligations, and the maintenance of **anti-collision devices (TAGs)**, with the extension of their use not only to forklift trucks but also to company personnel and external operators. In 2025, the PPE dispensing devices were further integrated with the addition of first-aid materials and category III PPE, thus extending the level of oversight and the availability of the necessary equipment.

In the course of 2025, CSM TUBE also completed the overhaul of the internal and external signage and drafted an internal traffic regulation, with the aim of further strengthening the safety of the work spaces and the company routes. In a perspective of further development of the prevention system, the objectives for 2026 also include the evaluation of the adoption of integrated health and safety management software, aimed at supporting more structured monitoring, process management and the dissemination of relevant information.

In order to prevent ergonomic and manual-handling risks, it is also foreseen that each operator, at their own workstation, receives precise information on the quantities of material to be handled, moved and lifted, so as to reduce exposure to risks connected with operational activities.

In the following tables, the data relating to injuries of employees and non-employees of CSM GROUP in the three-year period 2023-2025 are reported. The indicators have been calculated in accordance with the GRI 403-9 guidelines, using the value 1,000,000 as the multiplication coefficient. In 2025, no injuries were recorded among either employees or non-employees.

Table 9. Injury indices among CSM GROUP employees in the three-year period 2023-2025.

DESCRIPTION	2023	2024	2025
Number of recordable occupational injuries	4	2	0
Number of injuries with serious consequences* (excluding deaths)	0	0	0
Number of deaths resulting from occupational injuries	0	0	0
Number of hours worked	266,215	290,531	308,665.25
Rate of recordable occupational injuries **	15.03	6.88	0.00
Rate of occupational injuries with serious consequences (excluding deaths)	0.00	0.00	0.00
Rate of deaths resulting from occupational injuries	0.00	0.00	0.00

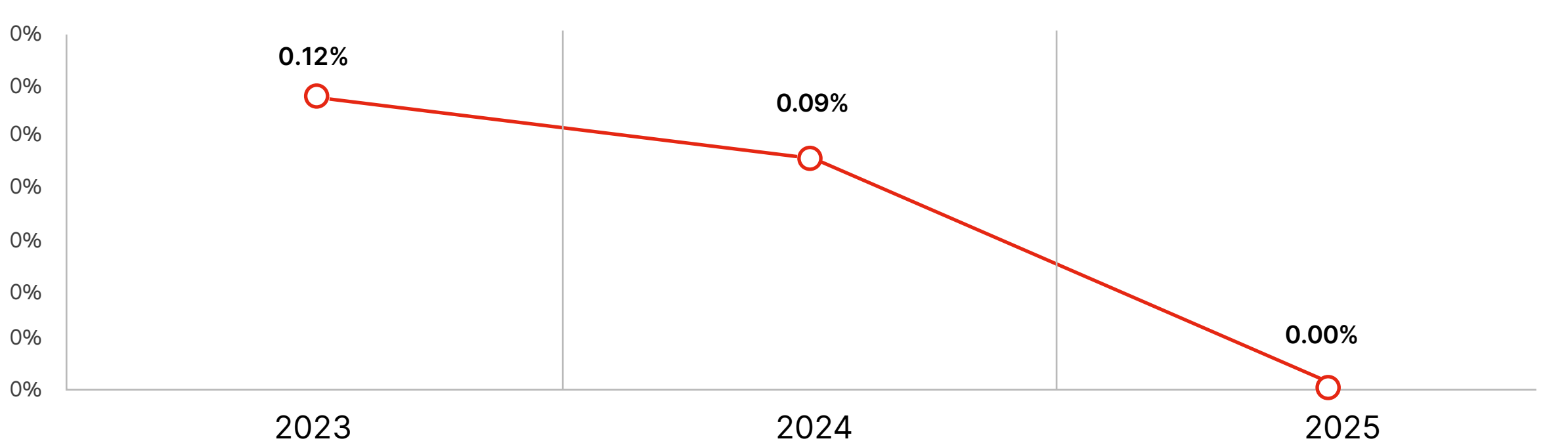
Table 10. Injury indices among CSM GROUP non-employees in the three-year period 2023-2025.

DESCRIPTION	2023	2024	2025
Number of recordable occupational injuries	1	0	0
Number of injuries with serious consequences* (excluding deaths)	0	0	0
Number of deaths resulting from occupational injuries	0	0	0
Number of hours worked	10,245	13,405	12,981
Rate of recordable occupational injuries **	97.61	0.00	0.00
Rate of occupational injuries with serious consequences (excluding deaths)	0.00	0.00	0.00
Rate of deaths resulting from occupational injuries	0.00	0.00	0.00

* Serious consequences = an occupational injury leading to death or to an injury from which the worker cannot recover, does not recover, or from which it is not realistic to expect a full recovery to the state of health prior to the accident within 6 months. ** (no. of occupational injuries / no. of hours worked) x 1,000,000

The following graph shows the trend of the index relating to hours lost due to injury compared with the hours worked among CSM GROUP employees.

Figure 3. Ratio between hours lost due to injuries and hours worked among CSM GROUP employees.



The absenteeism index is a useful indicator for monitoring organisational well-being and the working conditions of staff. CSM GROUP periodically detects and analyses data relating to absences, in order to identify any critical issues and support the adoption of measures to promote the health, safety and well-being of its people. Monitoring this indicator also allows the effectiveness of company initiatives in the management of human resources and the improvement of the working environment to be assessed. In the three-year reference period, the absenteeism index showed a progressively decreasing trend in both companies of the Group, confirming a reduction in absences compared with previous years.

Table 11. Employee absenteeism indices of CSM GROUP in the three-year period 2023-2025.

Indicator description	2023	2024	2025	Δ% 2025 VS 2024
Absenteeism index* CSM TUBE	3.60%	3.16%	2.73%	-13.6%
Absenteeism index* CSM MACHINERY	2.06%	1.37%	1.11%	-18.9%

* (hours of absence due to illness / hours worked) *100



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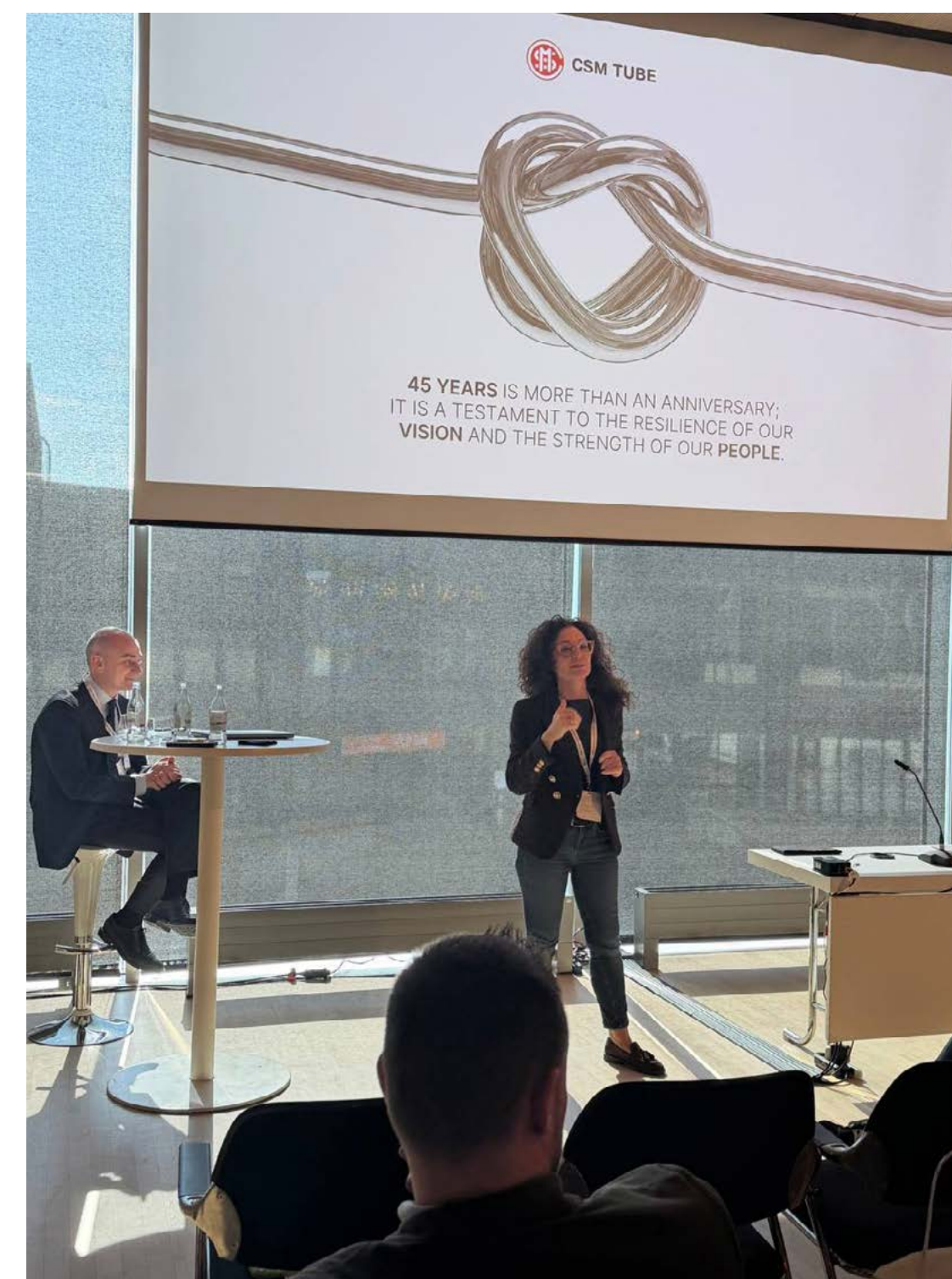
HUMAN CAPITAL DEVELOPMENT

In CSM GROUP, the management of people constitutes a relevant area for the pursuit of business objectives and for organisational continuity over the long term. The approach adopted by the Group is oriented towards attracting, developing and enhancing internal skills, through initiatives dedicated to integration, training, dialogue with the HR function and monitoring of the working climate.

In this perspective, the Group has launched the **project *Great Place to Work***, aimed at gathering evaluation elements on the quality of the working environment and identifying possible areas of organisational improvement. Within the framework of the initiative, specific training paths were implemented, oriented towards improving the working climate and the dissemination of shared organisational and relational practices. In support of the internal dialogue, a **suggestion box** was also introduced, through which employees can share proposals, observations and ideas, even anonymously. Overall, 118 employees took part in the satisfaction survey administered within the *Great Place to Work* project, equal to 68% of the people involved.

Following the survey carried out under the Great Place to Work project, some areas for improvement were identified. In the course of 2026 the company intends to evaluate and develop dedicated initiatives, consistent with the priorities that emerged and with the available resources. In particular, in 2026 the Group plans to structure a process for the management of the suggestions collected through the suggestion box. The process will include logging each suggestion and, where it is not anonymous, responding to the person who made it when the suggestion is not anonymous, and an internal evaluation of the ideas considered most relevant or applicable.

From the earliest stages of the employment relationship, CSM GROUP devotes attention to the integration of new employees. At the time of hiring, each employee receives a presentation of the main corporate tools and safeguards, including the Code of Ethics, the Organisation, Management and Control Model and the Whistleblowing reporting system, with the aim of favouring transparency, awareness and knowledge of the organisational context. At the same time, the Company Regulation and the main internal procedures are made available, including information relating to the health and safety organisation,



contacts to be activated in case of emergency and the management of privacy.

The onboarding process is accompanied by **moments of dialogue between the HR function and the worker**. A first individual interview is carried out about thirty days after recruitment, aimed at evaluating the level of integration in the company context and gathering any useful elements for improving the integration experience. A further interview is scheduled after six months, in order to deepen the integration path and analyse the progress of the collaboration also in terms of performance. In the event of termination of the employment relationship, the HR function carries out an exit interview aimed at understanding the reasons behind the decision and at identifying possible areas of improvement of the

working environment and of the people management processes.

100% of CSM GROUP employees are engaged in compliance with the National Collective Labour Agreement (**CCNL**) **for the Metalworking Industry**, which governs the main aspects of the employment relationship, including pay and terms and conditions of employment, working hours, holidays, leave, social protection and parental leave. The application of the collective agreement guarantees a uniform framework of reference, consistent with the legislation in force and with the provisions laid down for the industry sector concerned.

The following tables report the data relating to CSM GROUP employees at the end of the reporting period (31 December), with a comparison against the 2023, 2024 and 2025 financial years. The information is presented according to a breakdown by gender, age group, professional category, type of employment and type of contract.

At 31 December 2025, the workforce of CSM GROUP is composed mainly of workers belonging to the age group between 30 and 50, who represent 63.0% of the total workforce. Employees over 50 years of age make up 21.4% of the total, while those under 30 account for 15.6%.

With regard to professional classification, blue-collar workers represent the most significant component of the workforce (64.2%), followed by white-collar employees (28.9%). The Group also confirms an occupational structure characterised by high stability, with 94.8% of employees engaged on a permanent contract.

In 2025 the female presence stood at 21.4% of the total workforce. In the same period, the Group recorded 24 new hires and 16 terminations with a net increase of eight employees.



Table 12. Employees by professional category and age group.

Professional category	2023				2024				2025			
	<30	30-50	>50	Total	<30	30-50	>50	Total	<30	30-50	>50	Total
Executives	0.0%	3.1%	10.3%	3.9%	0.0%	2.8%	8.8%	3.6%	0.0%	1.8%	13.5%	4.0%
Managers	0.0%	1.0%	3.4%	1.3%	0.0%	1.9%	2.9%	1.8%	0.0%	2.8%	2.7%	2.3%
White-collar	25.9%	30.2%	20.7%	27.6%	16.0%	32.1%	23.5%	27.9%	29.6%	31.2%	21.6%	28.9%
Blue-collar	66.7%	65.6%	65.5%	65.8%	64.0%	63.2%	64.7%	63.6%	66.7%	64.2%	62.2%	64.2%
Apprentices	7.4%	0.0%	0.0%	1.3%	20.0%	0.0%	0.0%	3.0%	3.7%	0.0%	0.0%	0.6%
TOTAL	17.8%	63.2%	19.1%	100%	15.2%	64.2%	20.6%	100%	15.6%	63.0%	21.4%	100%

Table 13. Employees by gender and age group.

Age range	2023						2024						2025					
	Men	%	Women	%	Total	%	Men	%	Women	%	Total	%	Men	%	Women	%	Total	%
<30	17	13.8%	10	34.5%	27	17.8%	15	11.5%	10	29.4%	25	15.2%	17	12.5%	10	27.0%	27	15.6%
30-50	78	63.4%	18	62.1%	96	63.2%	84	64.1%	22	64.7%	106	64.2%	85	62.5%	24	64.9%	109	63.0%
>50	28	22.8%	1	3.4%	29	19.1%	32	24.4%	2	5.9%	34	20.6%	34	25.0%	3	8.1%	37	21.4%
TOTAL	123	80.9%	29	19.1%	152	100%	131	79.4%	34	20.6%	165	100%	136	78.6%	37	21.4%	173	100%

Table 14. Employees by gender and professional category.

Professional category	2023			2024			2025		
	Men	Women	Total	Men	Women	Total	Men	Women	Total
Executives	4.9%	0.0%	3.9%	4.6%	0.0%	3.6%	4.4%	2.7%	4.0%
Managers	1.6%	0.0%	1.3%	2.3%	0.0%	1.8%	2.9%	0.0%	2.3%
White-collar	15.4%	79.3%	27.6%	15.3%	76.5%	27.9%	16.2%	75.7%	28.9%
Blue-collar	78.0%	13.8%	65.8%	77.1%	11.8%	63.6%	76.5%	18.9%	64.2%
Apprentices	0.0%	6.9%	1.3%	0.8%	11.8%	3.0%	0.0%	2.7%	0.6%
TOTAL	80.9%	19.1%	100%	79.4%	20.6%	100%	78.6%	21.4%	100%



Table 15. Employees by gender and type of employment.

Type of employment	2023						2024						2025					
	Men	%	Women	%	Total	%	Men	%	Women	%	Total	%	Men	%	Women	%	Total	%
Full-time	122	99.2%	25	86.2%	147	96.7%	130	99.2%	30	88.2%	160	97.0%	135	99.3%	32	86.5%	167	96.5%
Part-time	1	0.8%	4	13.8%	5	3.3%	1	0.8%	4	11.8%	5	3.0%	1	0.7%	5	13.5%	6	3.5%
TOTAL	123	80.9%	29	19.1%	152	100%	131	79.4%	34	20.6%	165	100%	136	78.6%	37	21.4%	173	100%

Table 16. Employees by gender and type of contract.

Type of contract	2023						2024						2025					
	Men	%	Women	%	Total	%	Men	%	Women	%	Total	%	Men	%	Women	%	Total	%
Permanent	119	96.7%	27	93.1%	146	96.1%	122	93.1%	31	91.2%	153	92.7%	129	94.9%	35	94.6%	164	94.8%
Fixed-term	4	3.3%	2	6.9%	6	3.9%	9	6.9%	3	8.8%	12	7.3%	7	5.1%	2	5.4%	9	5.2%
TOTAL	123	80.9%	29	19.1%	152	100%	131	79.4%	34	20.6%	165	100%	136	78.6%	37	21.4%	173	100%

Table 17. Number of hires and terminations by gender and age group.

Age range	2023						2024						2025					
	Hires			Terminations			Hires			Terminations			Hires			Terminations		
	Men	Women	Total	Men	Women	Total	Men	Women	Total	Men	Women	Total	Men	Women	Total	Men	Women	Total
<30	8	3	11	3	2	5	4	6	10	3	2	5	4	1	5	1	1	2
30-50	4	4	8	6	3	9	9	2	11	4	1	5	13	4	17	9	2	11
>50	2	0	2	2	0	2	3	0	3	1	0	1	1	1	2	3	0	3
TOTAL	14	7	21	11	5	16	16	8	24	8	3	11	18	6	24	13	3	16

Table 18. Percentage of hires and terminations by gender and age group.

Age range	2023						2024						2025					
	Hires			Terminations			Hires			Terminations			Hires			Terminations		
	Men	Women	Total	Men	Women	Total	Men	Women	Total	Men	Women	Total	Men	Women	Total	Men	Women	Total
<30	47.1%	30.0%	40.7%	17.6%	20.0%	18.5%	26.7%	60.0%	40.0%	20.0%	20.0%	20.0%	23.5%	10.0%	18.5%	5.9%	10.0%	7.4%
30-50	5.1%	22.2%	8.3%	7.7%	16.7%	9.4%	10.7%	9.1%	10.4%	4.8%	4.5%	4.7%	15.3%	16.7%	15.6%	10.6%	8.3%	10.1%
>50	7.1%	0.0%	6.9%	7.1%	0.0%	6.9%	9.4%	0.0%	8.8%	3.1%	0.0%	2.9%	2.9%	33.3%	5.4%	8.8%	0.0%	8.1%
TOTAL	11.4%	24.1%	13.8%	8.9%	17.2%	10.5%	12.2%	23.5%	14.5%	6.1%	8.8%	6.7%	13.2%	16.2%	13.9%	9.6%	8.1%	9.2%



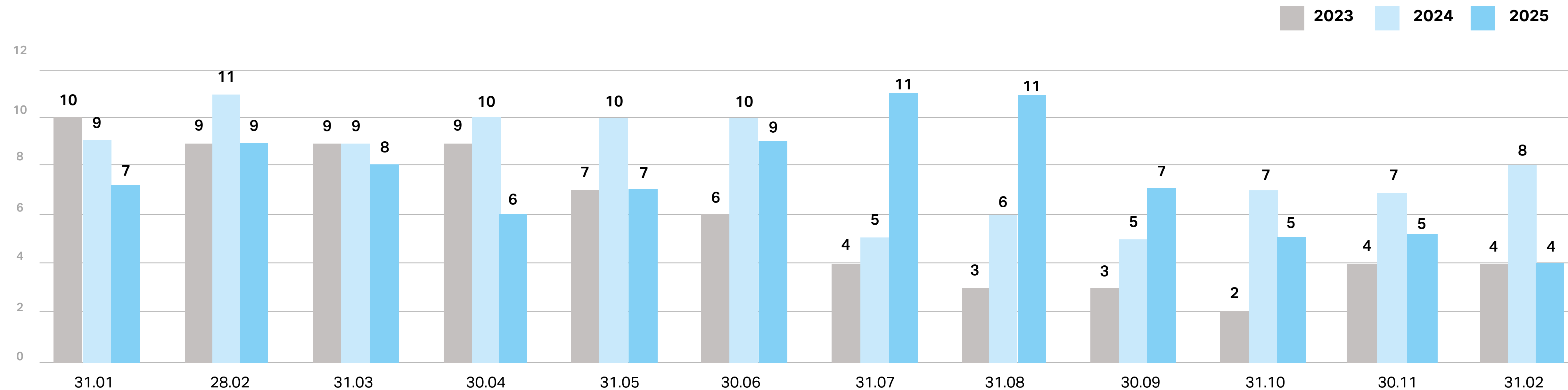


TEMPORARY AGENCY WORKERS

Employment agencies represent an important support for CSM GROUP in managing the needs of organisational flexibility, acting as intermediaries, identifying and selecting the profiles suitable for business needs. In 2025, CSM TUBE made use exclusively of agency workers in the production area, in order to ensure targeted and effective support for operational needs. CSM MACHINERY, by contrast, did not employ agency workers during the year.

The following graph shows the number of agency workers employed by CSM TUBE in the three-year period 2023-2025. In 2025, the average number of agency workers employed was 7.4.

Figure 4. Number of agency workers in CSM TUBE in the three-year period 2023-2025.



TRAINING

CSM GROUP manages training activities through the company management software, which allows the registration and traceability of the courses provided. In the course of 2025, the Group carried out training courses on health and safety, basic operational skills, sustainability and other cross-cutting issues, aimed at specific categories of staff according to the training needs identified. In 2025, on the occasion of the annual spring meetings with the Italian employees of the Group, a brief information session was held on the Great Place to Work project, aimed at presenting the initiative for analysis of the working climate. A training session dedicated to UNI/PdR 125 on gender equality was also held during the annual CSM TUBE meeting. In 2025, English, Portuguese and Spanish language courses were provided for CSM TUBE and CSM MACHINERY staff. Some employees of the two companies also took part in the Week of Sustainability, as well as events, congresses and training meetings on environmental, social and artificial intelligence issues. As part of the IATF certification, training activities were carried out for the business areas involved and the production area. The company figures involved in the UNI/PdR 125 path took part in specific training sessions, including those dedicated to inclusive communication and personnel selection. The technical training carried out with Centro Inox on product topics continued. In 2025, for CSM TUBE, training was carried out on the Organisation, Management and Control Model (Legislative Decree 231/01) for all office staff. At Group level, training on Incoterms was also provided. In 2025 CSM MACHINERY continued the training path connected to the Lean Manufacturing project, with the aim of expanding internal skills on production processes and organisational improvement tools. On the basis of the data reported by CSM GROUP, on average 12.0 hours of training per employee were provided and 95.2% of employees took part in at least one training activity. The non-compulsory training hours, i.e. those not related to the health and safety requirements provided by Legislative Decree 81/2008, represented 71.6% of the total training hours provided.

Table 19. Average training hours per employee in CSM GROUP, by gender and category.

Professional category	2023			2024			2025		
	Men	Women	Total	Men	Women	Total	Men	Women	Total
Executives	31.9	-	31.9	28.4	-	28.4	20.5	23.0	20.8
Managers	20.3	-	20.3	10.7	-	10.7	13.4	-	13.4
White-collar	20.3	22.9	21.8	32.1	14.4	21.9	22.0	23.5	22.8
Blue-collar	9.8	9.5	9.8	9.8	8.2	9.7	6.5	9.9	6.7
Apprentices	-	12.3	12.3	57.0	6.6	15.0	-	6.0	6.0
TOTAL	12.5	20.4	14.1	14.2	12.5	13.8	9.8	20.2	12.0



Table 20. Other training indicators for CSM GROUP.

Description of indicators (KPI)	2023	2024	2025
Compulsory training hours in relation to total training hours	39.6%	45.0%	28.4%
Non-compulsory training hours in relation to total training hours	60.4%	55.0%	71.6%
Total training hours in relation to hours worked	0.82%	0.88%	0.70%
Employees who received training	92.3%	93.8%	95.2%



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WORKING CONDITIONS AND ENVIRONMENT

CSM GROUP promotes initiatives aimed at improving the organisational climate, internal dialogue and the well-being of people, considering the quality of working conditions a significant factor both for the satisfaction of employees and for the achievement of the business objectives. The activities undertaken are, in particular, instruments of listening, participation and involvement of staff, with attention to the people employed in the production area.



In December 2025 **CSM TUBE** obtained certification of its management system to the **UNI/PdR 125:2022 Reference Practice for gender equality**, with a **score of 76**. This recognition attests to the adoption of a structured approach aimed at promoting gender equality, equal opportunities and inclusion in business processes, through specific policies, procedures and monitoring tools.

In support of the path undertaken, the Group has set up a **Policy** and a dedicated Committee and defined a strategic plan based on the analysis and monitoring of specific KPIs, with the aim of overseeing over time the areas relevant to gender equality and identifying any improvement actions.

Among the initiatives undertaken is a **periodic programme of direct dialogue with staff**, conducted with the support of a company coach, aimed at encouraging listening and sharing. The path is

oriented to collecting observations and ideas for improvement and to supporting an organisational culture based on mutual respect. On the occasion of achieving significant goals, such as obtaining certifications relating to Management Systems, CSM GROUP involves staff by sharing the results obtained and collecting any suggestions for improvement.

With reference to listening and reporting channels, the Group has also implemented a **suggestion box**, in order to facilitate the collection of reports, observations and improvement proposals.

The Group has also introduced support measures aimed at people in situations of particular need. In particular, a **solidarity hour bank** was established, formalised through a trade union agreement, which allows employees to donate hours of leave to colleagues in delicate personal situations. The initiative also includes a contribution from the Company, which doubles the hours donated.

With reference to trade union dialogue, at CSM TUBE three unitary workplace union representatives (RSU) operate, who play a role in linking the workers and the Management and contribute to the discussion of issues relating to staff rights and industrial relations.

CSM GROUP adopts measures aimed at fostering the balance between professional and private life, compatibly with the role held and organisational needs. In particular, the Group allows employees to adjust their entry and exit times where this is compatible with the activity carried out. Smart Working agreements have also been formalised with some employees, based on specific personal needs, allowing part of their activities to be carried out remotely.

The Group provides welfare and social protection instruments established by the National Collective Labour Agreement and offers employees the possibility of joining supplementary pension schemes through the **Cometa and Solidarietà Veneto funds**, to which the Company contributes in accordance with the regulations in force.

CSM GROUP has also activated the **corporate welfare platform TreCuori**, through which employees and agency workers can access a notional credit to be allocated to specific welfare services, selected according to their individual needs.



**Welfare
Aziendale**



of their individual needs. For workers with dependent children, an additional financial contribution is provided for each child.

At 31 December 2025, all Group employees had used, in whole or in part, the available welfare credit. The 2025 welfare plan, structured across the various sources made available by the Company (national collective labour agreement, welfare for dependent children, performance-related welfare and the option to convert the 2025 Performance Bonus), was used by 99.3% in CSM TUBE and 99.9% in CSM MACHINERY.

Reward systems also constitute an instrument through which the Group recognises the contribution of its people, according to criteria defined in the applicable company agreements and processes. In 2025, in CSM TUBE, the **Performance Bonus** (PdR), already provided for blue-collar workers, was extended also to white-collar employees on the basis of a second-level trade union agreement and shared objectives. For middle managers and executives, the reward was defined on the basis of individual performance and the achievement of specific objectives.

In 2025, CSM MACHINERY also introduced a Performance Bonus system for blue-collar workers and white-collar employees, through a second-level territorial agreement signed with the support of Confindustria Veneto Est. The process of defining and finalising the bonus involves the HR office and the relevant function manager. This process is carried out through individual meetings, during which the results achieved in the previous year are assessed, the objectives for the following year are defined, any promotions are communicated and feedback is collected from the worker.

The well-being of people is also supported through specific healthcare measures. CSM TUBE and CSM MACHINERY provide their employees with supplementary healthcare coverage through the **Metasalute fund**, established for the metalworking sector. Workers can also benefit from a 10% discount on certain healthcare services at an affiliated medical centre. During the summer period, the Group provides mineral salts to support staff on days



The well-being of people is also supported through specific measures in the healthcare field. CSM TUBE and CSM MACHINERY provide their employees with supplementary healthcare coverage through the Metasalute fund, established for the metalworking sector.



characterised by higher temperatures, and has installed free drinking-water dispensers, accessible using the reusable bottles distributed to employees.

Finally, CSM GROUP has launched an internal project aimed at nurturing attention towards people at the main moments of their personal life, such as birthdays, weddings, births or family bereavements. These initiatives aim to foster the sense of belonging and the relational dimension within the corporate community.

To complete this approach, the Group organises annually a company event dedicated to employee involvement, during which the results achieved, future objectives and the main planned investments are shared.





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RELATIONS WITH LOCAL COMMUNITIES AND THE TERRITORY

CSM GROUP recognises that the creation of economic value should be accompanied by attention to the social and environmental impacts of its activities in the local areas in which it operates. The Group promotes and supports initiatives aimed at local communities, with particular reference to the enhancement of culture, social inclusion, education and actions related to the management of environmental aspects. In the following paragraphs, some of the main projects and actions undertaken by the Group to connect with the territory and generate value for the community are illustrated.



RIFLESSI D'ESTATE

In 2025 CSM GROUP supported **“Riflessi d'Estate”**, the programme of events promoted in the Municipality of Codognè during the summer. The initiative included musical moments and cultural

evenings open to the public, with the aim of contributing to the cultural life of the local area and to the participation of the local community.



VELO CLUB SAN VENDEMIANO CYCLING CLUB

CSM GROUP confirms its support for the Velo Club San Vendemiano, organiser of the City of San Vendemiano Trophy – Gran Premio Industria e Commercio, an international Under-23 cycling event which in 2025 took place on 13 April on the roads of the Marca Trevigiana. On the occasion of the 18th edition of the event, which saw the participation of 162 athletes and 29 teams, the Company sponsored the **Green Jersey – Memorial Giorgio Trolese**, an award given to the winner of the Grand Prix

of the Mountain, dedicated to the founder of CSM GROUP. The prize was awarded to the Austrian cyclist Marco Schrettl of Team Tirol KTM. Support for the initiative forms part of the Company's relationship with the territory and with a local sporting event of international importance, enhancing the memory of the founder and the link with local cycling.

SPONSORSHIP OF THE SARMEDE FOOTBALL TEAM

CSM GROUP maintains a historical link with the territory of Sarmede, where the Company's first production of tubes originated. In this context the support for the local football team is part of a sponsorship that aims to enhance the relationship with the community and to recognise the symbolic role of the place in the manufacturing origins of the Group. Through this initiative, CSM GROUP confirms its desire to contribute to local community and sporting life, promoting opportunities for participation and closeness to the territory.

SANVE SPORT 20.26

CSM TUBE has confirmed its support for the activities of SANVE SPORT 20.26, an Amateur Sports Association based in San Vendemiano (TV), recognised by C.O.N.I. and affiliated to F.I.S.G. – the Italian Ice Sports Federation.

The association promotes the practice of ice sports through dedicated activities and courses, including introductory skating, figure skating and ice hockey. In particular, SANVE SPORT 20.26 offers programmes aimed also at children from four years of age, with the aim of encouraging their introduction to the discipline in an organised sporting context. The support of CSM TUBE is part of the company's initiatives in favour of the local territory and amateur sport.

MAGIE D'INVERNO

Since 2023, CSM TUBE has supported the “Magie d’Inverno” initiative, organised in the community of San Vendemiano during the Christmas period. The event includes various open activities



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to the public, including an ice skating rink of 1,100 square metres, intended for recreational activities such as free skating and ice hockey.

In 2025 CSM TUBE renewed its support for the initiative, confirming the company's contribution to a local event that offers opportunities for meeting, entertainment and community aggregation. The skating rink, equipped with a professional ice resurfacing machine for surface maintenance, is one of the main attractions of the event.

Through this contribution, CSM TUBE intends to support initiatives of the local area that promote the participation of the local community and the enjoyment of shared recreational moments.

FREE MAMMOGRAM AND ULTRASOUND INITIATIVE

CSM GROUP considers people's well-being an important part of its corporate culture and supports initiatives aimed at prevention and health. In this area, the Company has joined a project implemented in collaboration with the Municipality of Codognè, WelfareCare Società Benefit and some manufacturing companies of the local area, contributing to the free offer of mammograms and ultrasounds to 50 women belonging to



age groups not included in the prevention programmes of the National Health System. The initiative is a contribution to the promotion of prevention and awareness on the issue of female health in the local area.

LILT TREVISO AND LILT CONEGLIANO

CSM GROUP supports some initiatives promoted by the Italian League Against Cancer (LILT), the Provincial Association of Treviso, a non-profit organisation, committed to promoting oncological prevention and supporting people involved in cancer care pathways.

LILT activities focus in particular on three areas:

- primary prevention, by promoting healthy lifestyles;
- secondary prevention, by raising awareness of the importance of early diagnosis;
- support for patients and their families throughout treatment and rehabilitation.

In the territory of Treviso, LILT also operates through its local delegations. Among these, the Delegation LILT of Conegliano promotes initiatives aimed at promoting information, proximity and support to people facing cancer and their family members.

In 2025 CSM TUBE participated in the Pigma Run in Conegliano, a solidarity initiative for LILT and Giocare in Corsia. The event involved



almost 100 participants, among collaborators, friends and members of the community, in an event attended by more than 500 people. The company has supported the participation of employees through the supply of the shirts and the contribution towards race registration fees.

AED DEFIBRILLATOR

CSM TUBE and CSM MACHINERY have installed at their sites a semi-automatic external defibrillator (AED). The device was installed on a voluntary basis, with the aim of supporting the capacity to provide first aid in case of cardiac emergency in the workplace. In line with this commitment, companies have also chosen to make the devices available to the local community, in accordance with the operational arrangements provided by the relevant local project and the competent authorities. The initiative is part of a path aimed at encouraging greater access to AEDs in the area where the Group operates, contributing together with the other stakeholders involved to improve the conditions for rapid intervention in case of need.



MINIBUS FOR THE DISABLED

In 2025 CSM GROUP supported the project for the provision of a **bus equipped for persons with disabilities** in the local area of Oderzo, promoted by Progetti del Cuore Srl Società Benefit in collaboration with the association La Fonte ODV. The initiative aims to facilitate the mobility of vulnerable people living in the areas of Oderzo, Fontanelle, Mansuè and Codognè, promoting access to medical care and participation in social activities.

SUPPORT FOR LOCAL SCHOOLS

At the end of 2024, CSM MACHINERY gave a new lathe to the Istituto Tecnico Galileo Galilei di Conegliano, in memory of Giorgio Trolese, founder of the company. The donation allowed the school to integrate an up-to-date tool into the technical laboratory for practical exercises of students, replacing equipment previously used.

The initiative is part of the collaborative relationship between the CSM GROUP and some local schools, with the aim of bringing students closer to the mechanical sector and sharing business experiences useful for school and professional orientation.

During 2025, through CSM TUBE and CSM MACHINERY, the Group held three meetings with local schools dedicated to careers guidance, training and sharing business experience. On the occasion of one of these meetings the inauguration ceremony of the lathe donated in 2024 was also held. During the meetings, with reference to business activities, the themes of gender equality and sustainability were also addressed.

The Group plans to continue these activities in 2026, in line with the shared programming with the institutions involved. Among the initiatives under study is the establishment of a scholarship named after Giorgio Trolese, aimed at students interested in the mechanical sector.

MEMBERSHIP OF ASSOCIATIONS

CSM TUBE and CSM MACHINERY recognise the value of shared representation and constructive dialogue within their sector and, for this reason, are active members of several trade associations. Through this participation, the two companies contribute to the development of the sector, taking part in working groups, joint projects and strategic initiatives aimed at promoting competitiveness, innovation and sustainability. Membership of trade associations also represents an important opportunity for regulatory updating, professional training and dialogue with institutions, reinforcing the role of enterprises as informed actors within the relevant economic and social context.

CENTRO INOX - ITALIAN ASSOCIATION FOR THE DEVELOPMENT OF STAINLESS STEELS

CSM TUBE adheres to Centro Inox, a non-profit association engaged in the study and development of the applications of stainless steels in Italy. The association brings together the main Italian producers of the sector, active in the manufacture of sheets, strips, bars, tubes and profiles, and provides its members with technical skills and specialist information acquired over a consolidated experience. In particular, Centro Inox provides advice and technical data on the physical-mechanical characteristics of stainless steels, their corrosion resistance, as well as processing and application technologies. Moreover, the association makes available statistical data and market analyses relating to the different steel products and their fields of application, while promoting training activities through dedicated courses and specialised webinars. As confirmation of CSM TUBE's active involvement within the sector's associative system, the Company's Chief Executive Officer holds the role of Board Member of Centro Inox, and the administrative manager of CSM GROUP has been appointed auditor of the association.



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UCIMU

CSM MACHINERY adheres to UCIMU, the leading trade association for Italian manufacturers of production technologies, which brings together over 200 companies and represents more than 70% of the national production of the sector. Joining UCIMU allows the company to be part of an authoritative and consolidated network, committed to promoting technological Made in Italy on international markets, representing the interests of the sector at national and European institutions and offering specialist support on strategic issues such as research and development, marketing, training and internationalisation. The association also stands out for its commitment to the diffusion of industrial culture and the enhancement of technical skills, also through educational initiatives and collaborations with the academic and school world.

CONFINDUSTRIA VENETO EST

Confindustria Veneto Est is the association that represents the member companies of eastern Veneto, protects their interests and supports them in relations with public institutions. The Association promotes initiatives aimed at fostering the sustainable, industrial, economic and social development of the entrepreneurial fabric of the

territory. Through joining Confindustria Veneto Est, CSM TUBE and CSM MACHINERY can count on a strategic network that promotes collaboration, growth and the sharing of knowledge and good practices among local enterprises. Moreover, the Association also provides support in the field of industrial relations, including support in collective bargaining and in negotiating second-level trade union agreements. In 2025 the Group's Chair spoke at a meeting organised by Confindustria Veneto Est, sharing the company experience regarding the production presence in the United States.

CONFINDUSTRIA VENETO EST SUSTAINABILITY GROUP

CSM TUBE adheres to the Sustainability Group promoted by Confindustria Veneto Est, an initiative that brings together companies of the local area interested in dialogue on the issues of corporate sustainability. Born a few years ago with the involvement of a dozen companies, the network has gradually expanded and represents a context of dialogue between enterprises on experiences, approaches and practices in the ESG field.

The activities of the group are developed through periodic meetings and thematic working groups, aimed at promoting the sharing of skills,

the exchange of experience and the sharing of good practices between participating companies. The programme also includes reciprocal visits to the manufacturing sites of the participating companies, which represent opportunities for deepening and direct learning. During these meetings, the host company presents its approach to sustainability, illustrating the initiatives implemented, the relevant fields of application, the results achieved and the main challenges faced in the



improvement path.

In 2025, the central theme of the discussion and in-depth activities was decarbonisation, with particular attention to strategies and actions aimed at reducing emissions and improving environmental performance.

In 2025, CSM TUBE participated in the fourth edition of the Week of Sustainability, an initiative promoted by Confindustria Veneto Est and held from 25 to 28 March in Mogliano Veneto.

The edition, dedicated to the theme of "Resilience", explored the role of sustainability as a strategic lever to strengthen the ability of enterprises to face the challenges of the economic, environmental and social context and to increase their competitiveness in the long term.

As part of the event, two members of CSM TUBE's ESG Team took part, sharing the company's experience and describing the work undertaken on the themes of sustainability, with particular reference to the initiatives and measures adopted in the ESG field.

ENVIRONMENT



ENERGY AND GREENHOUSE GAS EMISSIONS



CIRCULAR ECONOMY



TOXIC SUBSTANCE EMISSIONS AND WASTE GENERATION



WATER RESOURCE MANAGEMENT



The following table shows an overview of the environmental impacts of CSM TUBE and CSM MACHINERY and at Group level (CSM GROUP) for the year 2025. In particular, it reports the main information on water and energy consumption, waste production and CO2 emissions, with the aim of providing an overall representation of the environmental impacts generated by the individual entities and the Group as a whole.

Table 21. Overview of environmental impacts in CSM TUBE, CSM MACHINERY and CSM GROUP in 2025.

DESCRIPTION OF ENVIRONMENTAL IMPACTS	 CSM TUBE	 CSM MACHINERY	 CSM GROUP
Waste generated (t)	903.5	21.0	924.5
Water withdrawal (m3)	2,211.0	543.0	2,754.0
Energy consumed within the Organisation (GJ)	19,125.6	1,626.3	20,751.9
Scope 1 and Scope 2 GHG emissions, market-based (tCO2e)	1,405.4	123.7	1,529.1

CSM GROUP recognises the management of environmental aspects as an integral part of its sustainability path and of the corporate governance system. The Group’s approach is aimed at identifying, monitoring and, where possible, reducing the environmental impacts related to production and operational processes. The environmental impacts generated by CSM TUBE and CSM MACHINERY have different characteristics, owing to the different nature of their respective business models and production processes. For this reason, in this section particular attention is paid to the environmental aspects most relevant to CSM TUBE, while maintaining aggregate reporting at Group level and, where available and significant, a breakdown by single entity. CSM TUBE, active in the production of steel tubes, presents the Group’s main areas of environmental impact, with particular reference to the production of industrial waste, energy consumption and CO₂ emissions. These impacts are mainly attributable to production processes characterised by higher energy intensity, including the cutting and heat treatment of tubes.

CSM MACHINERY, by contrast, operates through production processes that, based on the scope and the data reported in this report, are associated with lower levels of energy consumption and emissions than CSM TUBE. This differentiation confirms the opportunity to adopt environmental actions calibrated on the specificities of the individual business units, within a common Group approach aimed at monitoring and progressively improving the management of relevant environmental aspects. The main environmental indicators, including energy consumption, emissions and waste, are reported in the dedicated sections of this Report. **CSM TUBE has been ISO 14001** certified since 2013. The certification covers the company’s environmental management system and operates in accordance with the **Integrated Environmental Policy**, internal procedures and applicable environmental legislation. As part of its environmental management system, CSM TUBE promotes improvement initiatives aimed at strengthening the management and control of significant environmental aspects. In recent years, the company has also consolidated its environmental governance through the formalisation of an **Environment Organisation Chart**, aimed at defining roles and responsibilities in the management of environmental issues. CSM GROUP recognises, finally, the importance of environmental culture within the Organisation and develops training activities aimed at staff, with the aim of increasing knowledge of environmental procedures, applicable obligations and responsible operational behaviour. In this area, in 2025 the environmental representative took part in training and updating activities on issues relevant to environmental management, including RENTRI, the LCA methodology and an event dedicated to the circular economy. In addition, for each new employee assigned to the production area, documentation and specific training are provided on the correct separation, collection and management of waste. During 2026, the Group will monitor the evolution of the EUDR Regulation and assess its potential indirect impacts on its supply chain. Although, at present, CSM TUBE and CSM MACHINERY are not directly subject to the obligations under the Regulation, the companies intend to start a dialogue with potentially affected suppliers, progressively requesting information from suppliers of wooden packaging and corrugated cardboard. During the reporting period, CSM GROUP was not involved in any civil or criminal proceedings in environmental matters, nor was it the recipient of measures to revoke environmental authorisations or to shut down plants falling within the reporting scope.



ENERGY AND GREENHOUSE GAS EMISSIONS



CSM GROUP has initiated an improvement in the energy management of its production processes, through plant energy-efficiency measures, the introduction of technologies with lower energy consumption than the solutions previously used and the adoption of consumption-monitoring systems.

The Group has also invested in the production of energy from renewable sources through the installation of photovoltaic systems at some production sites, which contribute to covering a share of the internal energy requirements.

These measures aim to reduce the energy intensity of operational activities and to contain the greenhouse gas emissions associated with energy consumption. The results achieved are reported through quantitative indicators of energy consumption, self-produced energy from renewable sources and CO₂e emissions.

ENERGY

In the Group's scope, energy consumption is mainly attributable to production activities and to the air conditioning of working environments, with different impacts across the various companies and operating sites.

For CSM MACHINERY, electricity purchased from the grid is mainly used for manufacturing processes and for cooling the offices in summer, while the winter heating of the rooms is powered by LPG.

For CSM TUBE, energy needs are distributed across two sites: an operating site, which represents the main consumption centre, and a site dedicated to administrative and commercial activities, characterised by more contained consumption. In view of the energy intensity associated with the production of steel tubes, CSM TUBE has initiated interventions aimed at improving energy efficiency and increasing self-production from renewable sources.

In this context, the last two years have seen the installation of a second photovoltaic system with a power of 605.1 kWp, which is added to the existing plant of 16.5 kWp. On the basis of the technical estimates available, the two plants will be able to generate a total of about 650 MWh of electricity per year from solar sources, on an installed surface of 2,750 m². The self-produced energy is intended to reduce electricity withdrawals from the grid and, consequently, the indirect emissions associated with electricity consumption, within the limits of the actual self-consumption. The environmental benefit will be monitored through production, self-consumption and grid-withdrawal data.

A share of the electricity purchased by CSM TUBE is covered by renewable certifications.

With the aim of further improving the energy efficiency of business processes, CSM TUBE has planned, for the two-year period 2025-2026, a series of interventions aimed at enhancing the performance of the plants.



These include the precise mapping and monitoring of consumption through a dedicated system, with the aim of having more granular data on consumption and identifying further opportunities for efficiency.

Electrical energy, whether self-produced or drawn from the grid, is used mainly for lighting work environments, powering machines and production plants, operating the electronic devices serving the offices, and running the heating, air-conditioning and air-treatment systems in the logistics and laboratory areas.

As regards plant infrastructure, the transformer substation contains two transformers that do not involve the use of mixtures containing PCBs. Natural gas is used for heating work areas, in particular offices and the start-up phase of the production department, as well as for the production of domestic hot water.

Among the efficiency measures already implemented is the progressive replacement of fluorescent light fittings with LED fittings in the production area.

This measure is aimed at reducing electricity consumption for lighting and improving the quality of lighting in work environments.

With a view to optimising the plants, CSM TUBE has also installed 11 air heaters for the heating of the profile production department, powered by the recovery of the hot cooling air of the chiller. In 2022 a new chiller was installed, with higher energy performance than the previous system: according to the technical specifications available, the coefficient of performance (COP) is 25-30% higher than the plant it replaced, under the same reference operating conditions. The heat generated by the new plant

is recovered by heat exchangers and reused within the plant; the use of air heaters also helps to contain the recourse to methane for heating and to improve the distribution of heat in work environments.

In 2025, the total energy consumption of CSM GROUP stood at 20,751.6 GJ, stable compared with 2024. Electricity is confirmed as the main source of the Group's energy requirements, representing about 90% of total consumption. Over the last year, a significant increase (+42.1%) in electricity purchased from certified renewable sources and a greater share (+11.2%) of self-produced and self-consumed energy were recorded. At the same time, the purchase of electricity from the traditional mix decreased by 11.6%. LPG, used exclusively for heating the working environment of CSM MACHINERY, represents 4.7% of total energy consumption. Over the last year, LPG consumption decreased by 6.7%, mainly owing to more favourable climatic conditions and, in particular, to the trend of temperatures over the reference period.

Also in 2025, CSM TUBE is confirmed as the company making the greatest contribution to the Group's total energy consumption.



In the last year, a significant increase (+42.1%) in electricity purchased from certified renewable sources and a greater share (+11.2%) of self-produced and self-consumed energy were recorded. At the same time, the purchase of electricity from the traditional mix decreased by 11.6%.



The increase in self-produced and self-consumed electricity is linked to the entry into operation of the new photovoltaic system, which has helped to reduce the recourse to electricity purchased from the grid. To this is added the choice, initiated in October 2024, to also source electricity certified from renewable sources through Guarantees of Origin (GO).

During 2025, interventions aimed at improving energy efficiency also continued, including the implementation of a heat-recovery system connected to

chiller 7 and installation of a new high-efficiency chiller, intended to replace less-performing installations.

Such actions have generated several benefits, including the reduction of natural gas consumption compared to 2024 (-23.7%), the decrease in fluorinated gases (F-gas) and the possibility of doubling the white certificates obtained. In particular, the reduction of natural gas consumption was favoured by the installation of air heaters with a heat-recovery system in the cutting department, completed at the end of 2024, which contributed to improving heating efficiency.

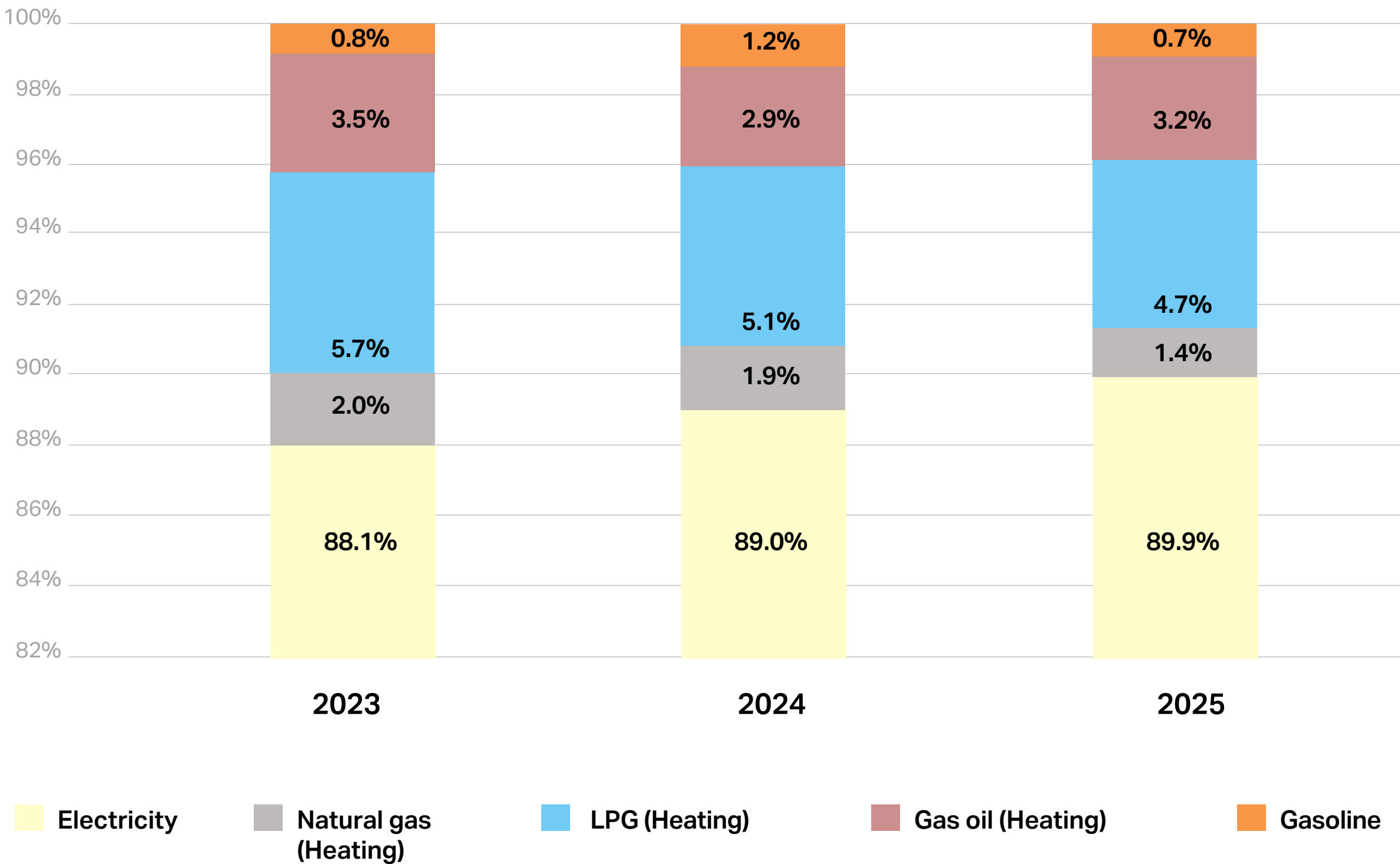
The table and the graph below illustrate the overall energy consumption trend of CSM GROUP in the three years 2023-2025. The data highlight, in particular, the significant increase in self-produced and self-consumed electricity within the Organisation.

Table 22. Energy consumption in GJ within the Organisation in the three-year period 2023-2025.

FUELS	Unit	2023	2024	2025	Δ% 2025 vs 2024
Natural gas*	GJ	395.37	391.89	299.18	-23.7%
Gas oil* OF WHICH:		684.52	589.49	669.53	+13.6%
For vehicles	GJ	684.52	589.49	669.53	+13.6%
For heating		-	-	-	-
Gasoline* OF WHICH:		158.22	247.83	140.34	-43.4%
For vehicles	GJ	158.22	247.83	140.34	-43.4%
For heating		-	-	-	-
LPG* OF WHICH:		1,126.97	1,049.34	979.55	-6.7%
For vehicles	GJ	-	-	-	-
For heating		1,126.97	1,049.34	979.55	-6.7%
TOTAL CONSUMPTION OF FUELS FROM NON-RENEWABLE ENERGY SOURCES	GJ	2,365.07	2,278.55	2,088.60	-8.3%
TOTAL CONSUMPTION OF FUELS FROM RENEWABLE ENERGY SOURCES	GJ	-	-		-
ELECTRICITY	Unit	2023	2024	2025	Δ% 2025 vs 2024
Self-produced electricity sold	GJ	23.71	787.73	850.92	+8.0%
Total electricity consumed OF WHICH:	GJ	17,426.83	18,370.47	18,663.00	+1.6%
From traditional mix		17,379.76	12,942.27	11,436.47	-11.6%
100% certified from renewable sources	GJ	0.00	3,858.70	5,481.35	+42.1%
Self-produced self-consumed		47.07	1,569.50	1,745.19	+11.2%
TOTAL INTERNAL ENERGY CONSUMPTION OF WHICH:		19,791.90	20,649.02	20,751.60	+0.5%
Renewable	GJ	47.07	5,428.20	7,226.54	+33.1%
Non-renewable		19,744.83	15,220.82	13,525.06	-11.1%

*Source of conversion factors used for fuels: Defra UK GHG conversion factors. The fuels were converted into kWh using the conversion factors based on their Gross CV and subsequently transformed into GJ.

Figure 5. Percentage breakdown of internal energy consumption.



Below are the energy intensity indices of CSM GROUP and CSM TUBE for the three-year period 2023-2025. The total energy consumed has been related to various production and management parameters: turnover, hours worked, metres and tonnes of product.

For CSM TUBE, compared to 2024, in 2025 a reduction of 5.2% is observed in the energy index per tonne of product, while an increase of 8.1% is recorded in the energy intensity calculated in relation to the metres of product. It is important to emphasise that such variations are influenced by the mix

of production and the type of tube produced: for example, the production of an as-welded tube requires on average one-fifth of the energy needed for an annealed tube, thus significantly affecting the indicators.

With regard to CSM GROUP indices, in 2025 the energy intensity index in relation to hours worked decreased by 5.0% compared to 2024, while the one in relation to turnover recorded an increase of 2.6%.

The Group continues to pay attention to efficient energy management, in the awareness that a significant share of consumption is attributable to the annealing furnaces.

Table 23. Energy intensity index on tonnes and metres of product in CSM TUBE and energy intensity index on hours worked and turnover in CSM GROUP.

Indicator description	Unit	2023	2024	2025	Δ% 2025 vs 2024
Ratio between total energy consumed internally and tonnes of product  CSM TUBE	GJ/t	2.35	2.32	2.20	-5.2%
Ratio between total energy consumed internally and metres of product  CSM TUBE	(GJ / m) x 1,000	0.41	0.39	0.42	+8.1%
Ratio between total energy consumed internally and hours worked  CSM GROUP	(GJ / h) x 1,000	71.59	67.94	64.52	-5.0%
Ratio between total energy consumed internally and turnover  CSM GROUP	GJ /Mln €	277.65	303.79	311.81	+2.6%



GREENHOUSE GAS EMISSIONS

The greenhouse gas emissions (GHG) generated by the Group’s activities are mainly derived from energy consumption associated with production processes, the heating of working environments and the use of electricity purchased from the grid. The monitoring of emissions is a key tool for understanding the climate impacts of its activities and for guiding energy efficiency initiatives and the progressive reduction of its carbon footprint. CSM GROUP, as an industrial reality, recognises the importance of monitoring greenhouse gas emissions within its sustainability path. The Group carries out interventions aimed at the containment of CO₂ emissions, including **the supply of a share of electricity from certified renewable sources, the self-production of electricity** through photovoltaic systems and energy efficiency initiatives. In the reporting period, CSM GROUP calculated the Scope 1 and Scope 2 emissions generated by the business activities included in the reporting scope. The monitoring allows the Group to assess the performance of its direct and indirect emissions from purchased energy and to identify the main areas of improvement. Scope 3 emissions are not included in this calculation. The Group’s greenhouse gas emissions are subdivided into direct emissions (Scope 1), generated by fuel consumption, heating systems and company vehicles, and indirect emissions (Scope 2), associated with electricity purchased and consumed. In 2025 no fluorinated refrigerant gas losses were recorded by the chillers subject to the F-Gas Regulation present in the Company. Scope 2 emissions were calculated according to the market-based and location-based approaches, in order to represent both the effect of the supply of certified renewable energy and the reference national energy mix. From the analysis of the data relating to the three-year period 2023-2025 it emerges that, in 2025, direct Scope 1 emissions recorded a reduction of 6.7% compared to 2024, mainly attributable to the lower use of fossil fuels. Scope 2 indirect emissions are also decreasing compared to the previous year, with a fall of 22.1% according to the market-based method and of 17.8% according to the location-based method. The reduction observed with the market-based approach is also attributable to the purchase of an increasing share of electricity from certified renewable sources.

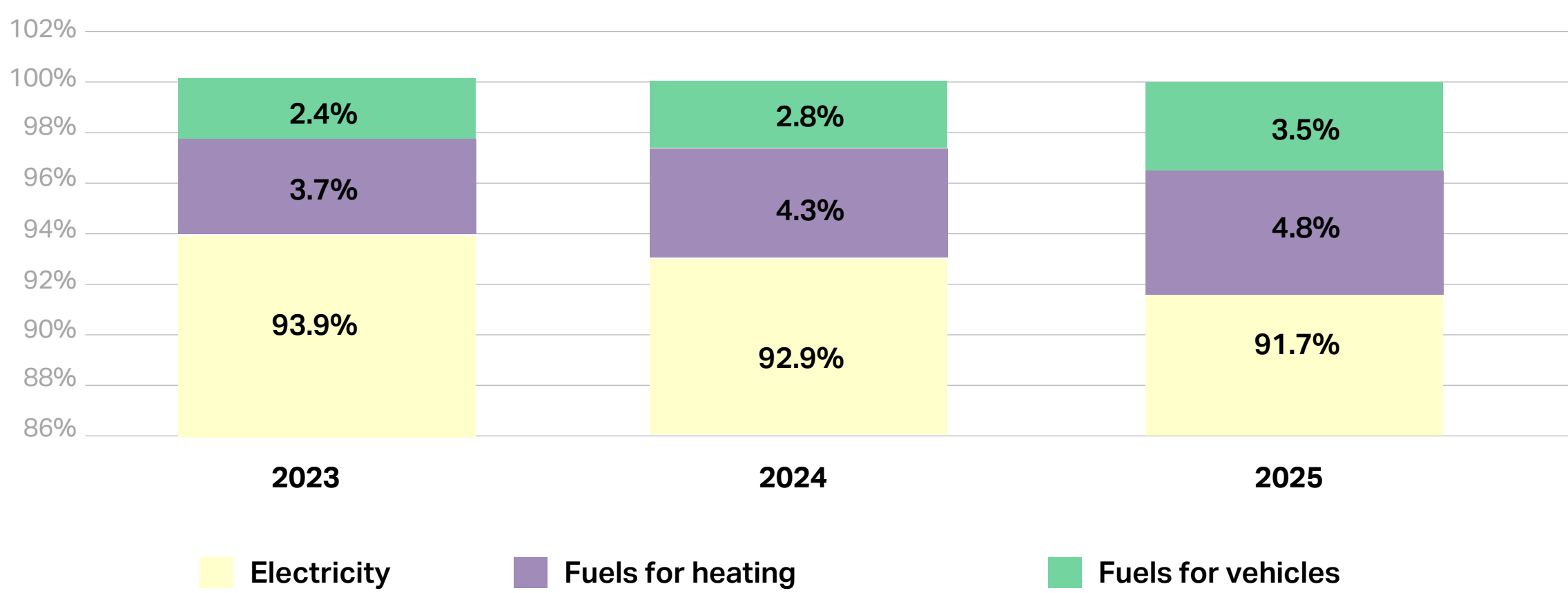
Table 24. Emissions of CO₂ (Scope 1 and 2) in the three-year period 2023-2025.

EMISSIONS	Unit	2023	2024	2025	Δ% 2025 vs 2024
Estimated Scope 2 location-based*	tCO ₂ e	1,520.73	1,470.09	1,208.68	-17.8%
Estimated Scope 2 market-based*	tCO ₂ e	2,206.99	1,799.59	1,401.60	-22.1%
Estimated Scope 1*	tCO ₂ e	142.27	136.74	127.54	-6.7%
TOTAL Scope 1 and Scope 2 location-based	tCO ₂ e	1,663.00	1,606.83	1,336.22	-16.8%
TOTAL Scope 1 and Scope 2 market-based	tCO ₂ e	2,349.26	1,936.33	1,529.14	-21.0%

* The sources of the coefficients for calculating Scope 2 location-based and market-based are respectively Terna and the AIB European Residual Mixes report. The coefficients required for calculating Scope 1 derive from the Defra UK GHG conversion factors. For the calculation of fuel emissions, the Gross CV (Calorific Value) was used or, in its absence, the Net CV.

The chart below shows the percentage distribution of the Group’s Scope 1 and Scope 2 emissions.

Figure 6. Composition of Scope 1 and Scope 2 market-based.



As already highlighted, among the initiatives undertaken by CSM TUBE to contribute to the reduction of impacts associated with greenhouse gas emissions are the purchase of a share of electricity from certified renewable sources and the installation of a new photovoltaic system of 605.1 kWp, which is added to the existing plant of 16.5 kWp.

The following table presents some emission intensity indicators relating to CSM GROUP and CSM TUBE for the three-year period 2023-2025. In particular, the values of CO₂Scope 1 and Scope 2 emissions are reported, related to turnover and hours worked for the Group, as well as to the tonnes of product for CSM TUBE.

Table 25. Emission intensity index on tonnes of product in CSM TUBE and emission intensity index on hours worked and turnover in CSM GROUP.

Indicator description	Entity	Unit	2023	2024	2025	Δ% 2025 vs 2024
location-based Methodology						
Emission intensity location-based on tonnes of product	 CSM TUBE	tCO ₂ e/t	0.20	0.18	0.14	-22.2%
Emission intensity location-based on turnover	 CSM GROUP	tCO ₂ e /Mln €	23.33	23.64	20.08	-15.1%
Emission intensity location-based on hours worked	 CSM GROUP	(tCO ₂ e/hours) *1000	6.02	5.29	4.15	-21.4%
market-based Methodology						
Emission intensity market-based on tonnes of product	 CSM TUBE	tCO ₂ e/t	0.29	0.22	0.16	-26.7%
Emission intensity market-based on turnover	 CSM GROUP	tCO ₂ e /Mln €	32.96	28.49	22.98	-19.3%
Emission intensity market-based on hours worked	 CSM GROUP	(tCO ₂ e/hours) *1000	8.50	6.37	4.75	-25.4%

CIRCULAR ECONOMY

The circular economy is a productive approach that aims to use resources more efficiently, extend the useful life of products and promote, where technically and economically possible, the recovery and reuse of materials. Its actual application, however, depends on the design of products, the management of production processes and the conditions of the supply chain.

Stainless steel has some technical characteristics relevant to circularity, including the possibility of being recycled several times while maintaining its qualitative and performance properties. In addition, depending on the type of material and the supply chain, stainless steel products may contain shares of recycled material coming from processing waste or from manufactured products that have reached the end of their life.

In the case of CSM TUBE, the content of recycled material present in the purchased raw materials is monitored through a specific activity to collect information from suppliers. In 2025, CSM TUBE initiated an activity to monitor its supply chain with the aim of acquiring information on the percentage of recycled material present in the purchased products. As part of this activity, the main steel suppliers communicated to CSM TUBE variable shares of recycled content in the materials supplied.

The information collected is a first source of insight to improve the traceability of the materials purchased and to evaluate, on a documented basis, the contribution of recycled content in the company's production processes. Such data must be read in relation to the scope of the materials analysed, the reference period, the share of purchases covered by the suppliers involved and the nature of the evidence provided.

The following table shows the main materials purchased by CSM TUBE and used in production processes and packaging activities in the three-year period 2023-2025, providing an overview of the relative consumption trends and, where available, the content of recycled material. Materials are classified as renewable and non-renewable*.

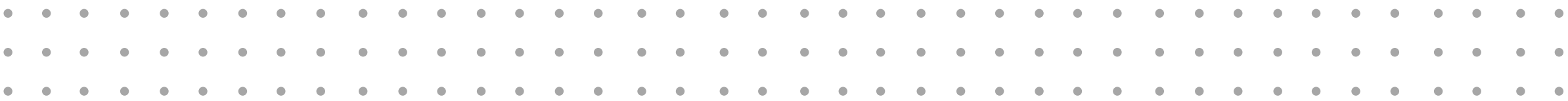


Table 26. Percentage calculated according to the weight of the materials used for the production and packaging of the products in CSM TUBE.

Material purchased	2023	2024	2025	Material type*
Tube steel	89.49%	88.82%	87.22%	Non-renewable
Ink	0.00%	0.00%	0.00%	Non-renewable
Solvent	0.01%	0.01%	0.00%	Non-renewable
Carton packaging	0.78%	0.75%	0.94%	Renewable
Wooden packaging	9.58%	10.32%	11.71%	Renewable
Nylon roll	0.11%	0.08%	0.10%	Non-renewable
PET material	0.04%	0.02%	0.03%	Non-renewable

*For the type of renewable or non-renewable material refer to GRI 301 (Materials 2016) and to what is specified in the report of the Organisation for Economic Cooperation and Development (OECD), Resource Productivity in the G8 and the OECD – A report in the Framework of the Kobe 3R Action Plan (<http://www.oecd.org/env/waste/47944428.pdf>)

The average value of the recycled steel content is 79.4%, calculated on the basis of formal documentation and statements received from suppliers. The data therefore represents a conservative estimate documented on the materials for which evidence is available from the supply chain. For the purposes of this analysis, no further quantities of ferrous scrap used in steel production processes have been included if not specifically indicated or quantified in the documentation received. The following table shows, with reference to the reporting years 2023, 2024 and 2025, the percentage incidence of recycled steel on the total materials purchased in CSM TUBE.

Table 27. Percentage by weight of recycled steel on the total weight of materials purchased by CSM TUBE.

Description	2023	2024	2025	Δ% 2025 vs 2024
Percentage of recycled steel on total materials purchased	26.8%	80.9%	64.8%	-16.1%



As part of the **initiatives dedicated to the re-use of packaging**, CSM TUBE has launched a project, in collaboration with four customers and two suppliers, aimed at the recovery and subsequent re-use of wooden packaging used for the transport of products. The project covers the wooden cases and pallets used for some shipments to the customers involved. On subsequent deliveries, this packaging can be returned to CSM TUBE. Once back at the company, it is subjected to a check of its state of conservation and integrity; only packaging deemed suitable is reused for subsequent shipments. In 2025, according to the available internal monitoring, 88.0% of the wooden pallets falling within the scope of the project were recovered.

At the end of 2025 an agreement was also signed to extend the reuse of pallets to a further strategic supplier of steel strips, expanding the number of parties involved in packaging recovery activities.

In support of the monitoring activities, CSM TUBE has introduced a register dedicated to the control of reused pallets and packaging. The register aims to improve the traceability of flows, to quantify the number of packaging items actually reused at the end of the year and to have more accurate data on the progress of the initiative.

In parallel, CSM TUBE has launched internal activities of analysis and optimisation of transport packaging, with the aim of evaluating possible reductions in the quantity of wood used in the shipments of steel tubes.

In 2025, CSM MACHINERY launched a collaboration with an external supplier specialising in the washing and re-use of oil-contaminated cloths. The initiative is aimed at reducing the quantity of hazardous waste generated, while ensuring compliance with the regulatory requirements applicable to the management of such materials.

Among the other activities developed during the year is a pilot project involving the use of reusable plastic crates for the transport of mechanical components between CSM MACHINERY and a supplier. The project aims to replace, for the movements included in the pilot scope, part of the previously used single-use packaging.



CHEMICAL SUBSTANCES AND WASTE PRODUCTION



Waste management is an important area for CSM GROUP. The Group manages this issue through the separation, handling, temporary storage and recovery or disposal of the materials generated by its activities, according to the applicable internal procedures and through authorised third parties. In 2025, 97.7% of the total waste produced by the Group is attributable to the activities of CSM TUBE. Among the main types of waste generated by CSM GROUP are steel scraps, wooden packaging, aqueous liquid waste, paper and cardboard packaging, plastic packaging, sandpaper, end-of-life equipment and processing sludge. The prevailing share of the waste produced consists of the scrap resulting from the production of the tubes, subsequently sent for recovery. The increase in non-hazardous waste, consisting mainly of steel, is also attributable to the new research and development tests and pilot projects carried out during the year, which resulted in an increase in the scrap generated during the testing and experimentation phases. In 2025, the increase in hazardous waste is mainly due to the installation of a new laser profiling machine and to weld-bead removal activities, which involve the generation of sludge and of non-woven fabric soaked with sludge. All the waste generated by the Organisation is managed through authorised third-party operators. Municipal-type waste, deriving in particular from office activities and from the areas dedicated to breaks and refreshment, is collected in special containers for the separate collection made available by the municipal administration. The substances classified as hazardous are kept in covered areas equipped with containment basins, while the bales of paper and plastic are stored inside specific containers, in order to limit their exposure to atmospheric agents and possible washout. The external areas are kept in conditions of order and cleanliness through periodic interventions tracked by means of check-lists. Periodically, field audits are carried out, awareness-raising activities are promoted within the QSA meetings and timely information is shared through the digital notice boards.

With reference to the most significant environmental aspects, in CSM TUBE the management of the emulsions deriving from the condensation of the compressors takes place through a double-chamber collection basin, consisting of an underground cistern located outside the plant. The system is equipped with a leak and spill detection device that, in the event of an anomaly, activates a warning by means of a light beacon, contributing to the operational control of the spill risk. Waste oils arise mainly from the maintenance or decommissioning of the hydraulic power units serving the production lines. In the last two years an internal process of collection and filtration of the waste oil has been initiated, which allows the recovery and reuse of the filtered oil for topping up the power units, contributing to containing the need for new oil and the quantities of oil sent for disposal.



Following the installation of the new laser line, an analysis of the post-process extracted fumes was carried out. Since the suction system requires the periodic replacement of the filters, CSM TUBE has launched, in collaboration with an external partner, an initiative aimed at the regeneration and reuse of the spent filters, with the aim of promoting the recovery of materials and containing the production of waste associated with the replacement of the filters.

In 2025, 42.3% of the hazardous waste produced by CSM GROUP was sent for recovery. Overall, the total waste generated increased by 11.8% compared to the previous year. This increase is attributable, as mentioned above, both to the increase in hazardous waste connected to the new machining and scarfing activities, and to the increase in non-hazardous steel waste deriving from research and development tests and pilot projects.

The following table shows the detail of the classification of the waste generated by the Company in the three-year period 2023-2025.



Table 28. Waste produced by CSM GROUP by type and final destination in the three-year period 2023-2025.

WASTE CATEGORIES	Unit	2023	2024	2025	Δ% 2025 VS 2024
TOTAL NON-HAZARDOUS WASTE	t	943.10	849.20	944.68	+11.2%
of which sent for recovery	t	903.60	804.80	905.71	+12.5%
of which sent for disposal	t	39.50	44.40	38.97	-12.2%
TOTAL HAZARDOUS WASTE	t	3.28	2.20	6.91	+214.1%
of which sent for recovery	t	2.08	1.27	2.92	+129.9%
of which sent for disposal	t	1.20	0.93	3.99	+329.0%
TOTAL WASTE	t	946.38	851.40	951.59	+11.8%

The analysis of the key performance indicators (KPI) relating to the waste management of CSM GROUP, shown in the table below, highlights that the percentage of waste sent for internal recovery remained substantially stable in the three-year period 2023-2025, standing at an average of 95.3%. In 2025, hazardous waste represented only 0.7% of the total waste generated, confirming the limited incidence of critical materials in business processes. A further monitored KPI is the total quantity of waste generated by CSM TUBE per tonne of product. In the course of the last year, this indicator recorded an increase of 10% compared to 2024.

In 2025, CSM TUBE recorded an increase of 13.0% in the waste produced overall compared to 2024. The indicator relating to waste generated in relation to tonnes of product manufactured also shows an increase, equal to 10.0% compared to the previous year.

In order to monitor waste production and to identify possible interventions to improve the efficiency of the production process, in recent years the Company has started a project dedicated to the analysis of the main causes of waste. In this context, a process engineering specialist has been appointed, tasked with overseeing the monitoring and analysis of the main sources of waste in the production phases managed by the Company.

The activity provided for the collection and systematic analysis of the available data, considering variables such as production lines, shifts, operators, raw materials and equipment used. In parallel, targeted process controls were introduced, with the aim of improving the oversight of the production phases and reducing errors potentially responsible for the generation of non-compliant products.

With reference to the **management of chemical substances**, in the CSM TUBE production process their use is mainly attributable to inks and solvents used for marking. For CSM MACHINERY, in addition to the substances contained in detergents, solvents and lubricating oils, residues resulting from the washing of machinery are also considered, which can generate liquid waste of an oily nature.

The Group operates in compliance with the applicable legislation on the matter and, where relevant with respect to the products and components concerned, declares compliance with the RoHS Directive. As a downstream user of

Table 29. KPI on waste generated in the three-year period 2023-2025.

Boundary	KPI	2023	2024	2025	Δ% 2025 VS 2024
 CSM GROUP	Waste destined for recovery on total waste generated	95.70%	94.68%	95.49%	+0.8%
 CSM GROUP	Percentage of hazardous waste on total waste generated	0.35%	0.26%	0.73%	+0.5%
 CSM TUBE	Tonnes of waste generated in relation to tonnes of product	0.12	0.10	0.11	+10.0%

chemical substances, CSM TUBE does not produce or market chemical substances or preparations which, under normal and reasonable conditions of use, involve the intentional release of substances. For this reason, on the basis of the information currently available, no registration, preregistration or authorisation activities are required for the products supplied.

On the basis of the information collected along the supply chain, the products sold do not contain SVHC substances (*Substances of Very High Concern*) in a concentration greater than 0.1%.

CSM TUBE also produces certain types of stainless steel tubes suitable for contact with food and compliant, where applicable, with Regulation (EC) No 1935/2004 and the Ministerial Decree of 21 March 1973 and subsequent amendments and updates.

WATER RESOURCE MANAGEMENT

CSM GROUP considers the management of the water resource a relevant area of its environmental management. The Group monitors water withdrawals, water uses and the impacts directly connected to its activities, with the aim of enhancing the control of consumption and identifying possible efficiency interventions.

In CSM MACHINERY, water is supplied by third parties and is used for the toilets, the washing of the machines, the cleaning of small-size components and testing on machinery. Consumption may vary according to the number of “profile” tests carried out. To improve the management of the water used in testing, the company has introduced a chiller unit that allows the recirculation of the water used in such activities.

In CSM TUBE, water is supplied by third parties from the municipal mains and is used both to support the production processes and for general services. The main uses include the replenishment of the water of the cooling system, the production of demineralised water by means of reverse osmosis, the testing of the coils, the supply of the fire-fighting network and the replenishment of the heating circuits of the premises.

At the production site there is also a recirculation tank dedicated to the cooling of the production lines, which makes it possible to optimise the use of the water resource. The Company also intends to install water meters in the processes and points of the plant that are most significant for the purposes of the water balance.

Water discharges include domestic waste water conveyed into the sewerage network, rainwater discharged into the storm-water drainage network, water resulting from the testing of the coils and waste water produced by the reverse osmosis system. The water resulting from the testing of the coils and the waste water of the reverse osmosis system constitute an authorised industrial discharge and are subject to annual monitoring.

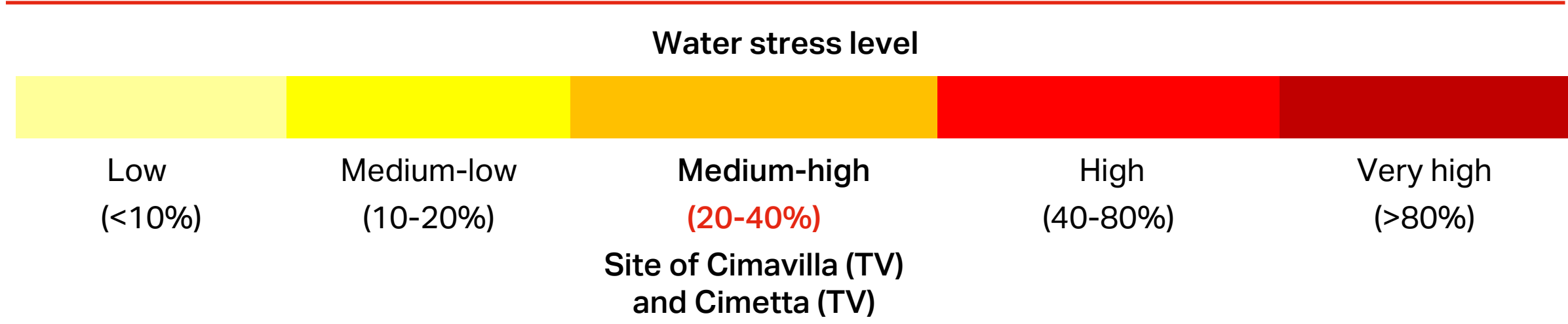
In the course of 2026, the installation of a water meter dedicated to the monitoring of the water consumption associated with the demineralisation plant is planned, the water of which is used in testing activities and in profiling processes.

In the same period, the installation of timed taps in the toilets is also planned, with the aim of promoting a more efficient and controlled use of the water resource.

The following table shows the water withdrawals of CSM GROUP, expressed in megalitres, relating to the three-year period 2023-2025.

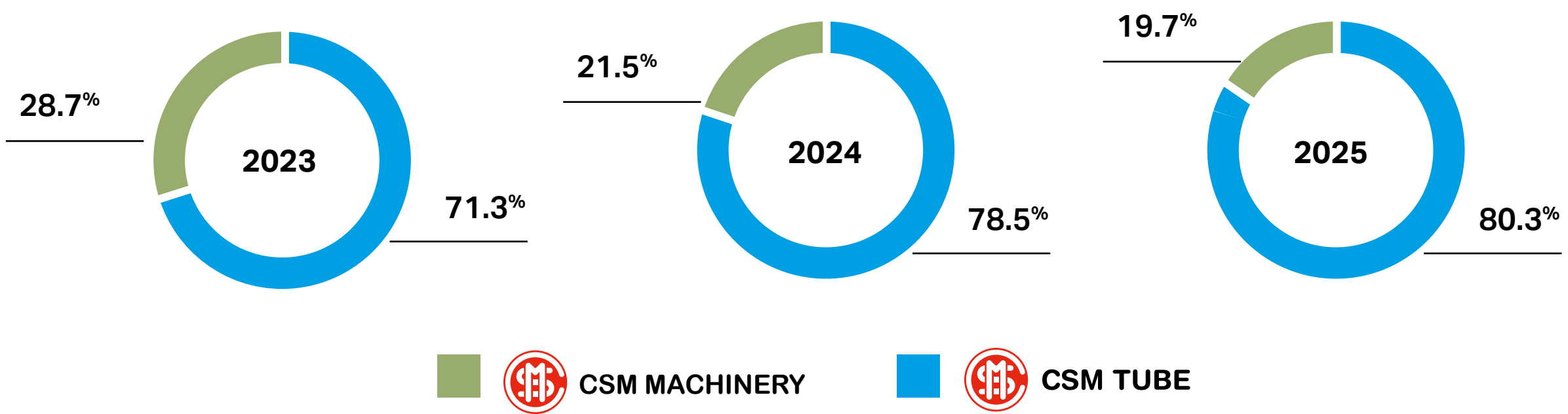
Origin and quality of the water withdrawn	2023		2024		2025		Δ% 2025 VS 2024	
	From all	Water-stress areas	From all	Water-stress areas	From all	Water-stress areas	From all	Water-stress areas
THIRD-PARTY WATER	2.84	-	2.88	-	2.75	-	-4.5%	-
Drinking water (≤1,000 mg/L of total dissolved solid particles)	2.84	-	2.88	-	2.75	-	-4.5%	-
Other water (>1,000 mg/L of total dissolved solid particles)	-	-	-	-	-	-	-	-
TOTAL WATER WITHDRAWAL	2.84	-	2.88	-	2.75	-	-4.5%	-

In order to assess its exposure to risks connected to the water resource in sensitive areas or areas subject to water stress, CSM GROUP used the *Aqueduct Water Risk Atlas* of the World Resources Institute. The analysis carried out showed that the geographical area in which the plants of Cimavilla (TV) and Cimetta (TV) are located has a medium-high water stress level (20-40%) and falls within the hydrographic basin of the river Tagliamento. For reporting purposes, the Group has chosen to consider as water stress areas exclusively those classified with a stress level of “High” and “Very high”. Although not classified by the Group as a water stress area according to the threshold adopted, the area in which the plants of CSM TUBE are based presents a medium-high level according to the WRI; for this reason the Group will continue to monitor withdrawals and to evaluate efficiency interventions.



The following graphs show the contribution to the water withdrawal of CSM TUBE and CSM MACHINERY in the years 2023, 2024 and 2025. The Cimavilla plant (headquarters of CSM TUBE) is responsible for the most significant share of the total water withdrawal of the Group.

Figure 7. Percentage contribution of CSM TUBE and CSM MACHINERY to the total water withdrawal of the Group in the three-year period 2023-2025.



The following table shows the index relating to the ratio between the water withdrawals of the Organisation and the number of employees, with reference to CSM TUBE, CSM MACHINERY and the aggregated Group data. The analysis of the data shows a reduction of this indicator both at a consolidated level and with reference to the individual companies.

Table 31. Total water withdrawal in relation to the number of employees in 2023-2025.

INDICATOR DESCRIPTION	ENTITY	Unit	2023	2024	2025	Δ% 2025 vs 2024
Ratio between total water withdrawal and number of employees	CSM TUBE	(ML/no. employees) x 1,000	0.014	0.013	0.012	-7.7%
	CSM MACHINERY	(ML/no. employees) x 1,000	0.045	0.043	0.039	-9.3%
Ratio between total water withdrawal and number of employees	CSM GROUP	(ML/no. employees) x 1,000	0.011	0.010	0.009	-10.0%

OBJECTIVES FOR SUSTAINABLE DEVELOPMENT

Below are the ESG objectives that CSM GROUP intends to pursue, in synergy with the Sustainable Development Goals, as an integral part of its operational strategies. The objectives are divided according to their timeframe of implementation: short, medium and long term. For each objective, the relevant indicators and targets of reference are indicated, together with the progress of the objectives defined in previous years. In particular, of the 18 objectives referred to 2025, 17 were achieved. In 2025 a further 15 new objectives were defined for subsequent years.

Relevant SDGs	Reference to	Material topic	Objective description	Indicators (KPI)	Target	Implementation period (time span)
	 CSM GROUP	Business ethics and integrity	Update the Code of Ethics	-	Achieved	2025
			Adopt an external whistleblowing platform.	-	Achieved	2025
			Establish an internal ESG working group within CSM MACHINERY to coordinate, monitor and promote corporate sustainability initiatives.	-	New objective 2025	2026
	 CSM GROUP	Data management and cybersecurity	Develop and implement an awareness platform aimed at workers to strengthen the cybersecurity culture and increase awareness of the main IT risks, through dedicated training paths and periodic phishing simulations.	-	Achieved	2025
			Offer training paths on the use of artificial intelligence as a tool to support and optimise professional activities.	% of employees trained	Achieved: 50% of digitalised workers trained	2025
			Complete a Risk Assessment in the field of cybersecurity and prepare an Incident Response Plan in line with the requirements of the NIS2 legislation.	-	New objective 2025	2026
			Implement an annual cybersecurity awareness programme, structured in four phishing simulation campaigns and targeted training activities, aimed at increasing the resilience of the organisation with respect to IT risks.	100% of digitalised employees reached	New objective 2025	2026
	 CSM TUBE	Legal and regulatory context management	Strengthen the Quality Management System through the adoption of the IATF 16949 standard, in order to optimise internal management and control processes along the production chain of tubes intended for the automotive sector.	-	Achieved: audit completed in November 2025	2025

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Relevant SDGs	Reference to	Material topic	Objective description	Indicators (KPI)	Target	Implementation period (time span)
	 CSM TUBE	Working conditions and environment	Adoption of UNI PdR 125:2022 practices	-	Achieved: UNI PdR 125:2022 with score of 76	2025
			Administering an employee satisfaction survey based on the Great Place to Work methodology, aimed at evaluating the working climate and organisational wellbeing and implementing an improvement action.	-	Achieved: 70.2% of participants	2025
	 CSM GROUP	Working conditions and environment	To promote a positive, inclusive and collaborative work environment, oriented to the well-being of people and to the enhancement of skills.	Exit turnover rate < 8.6%	Partially achieved: 9.2% New objective 2025	2025 2026
			Institution of an additional welfare credit to be recognised on the birth or adoption of a child.	-	New objective 2025	2026
			Starting a project led by the company coach to improve collaboration and communication between managers and production operators, with the aim of improving the working climate.	-	New objective 2025	2026
	 CSM GROUP	Human capital development	Boost internal skills through mentoring paths between new hires and line leaders, integrated with a system for assessing the performance of new recruits.	-	Achieved	2025
			Great Place to Work: training courses aimed at improving the working environment and company best practices.	Percentage of trained employees	≥ 90% Achieved: 100% of employees trained	2025
			Boost personnel skills through specific training paths in the field of GDPR, Power BI and Artificial Intelligence.	-	New objective 2025	2026
			Average training hours per employee	> 12 hours	New objective 2025	2026
	 CSM TUBE	Human capital development	Gender equality: training initiatives to promote a fair and inclusive corporate culture.	Percentage of trained employees	≥ 50% Achieved: 100% of employees trained	2025

Relevant SDGs	Reference to	Material topic	Objective description	Indicators (KPI)	Target	Implementation period (time span)
	 CSM GROUP	Local community and territory	Establish two scholarships named after Giorgio Trolese in favour of the deserving students of the Galileo Institute of Conegliano.	-	New objective 2025	2026
			Contribute to the requalification of the outdoor spaces of the kindergarten of the Scuola San Pio X of Vittorio Veneto through the creation of an equipped green area, intended for recreational and educational outdoor activities, with the aim of promoting the well-being and development of children.	-	New objective 2025	2026
	 CSM TUBE	Occupational health and safety	Zero injuries recorded among employees and non-employees.	Zero injuries	Achieved	2025
					New objective 2025	2026
	 CSM GROUP	Occupational health and safety	Reach and maintain performance indicators on health and safety at work in line with the targets defined by the PdR adopted by the company.	-	New objective 2025	2026
	 CSM MACHINERY	Circular economy	Launch of a circular economy pilot project, aimed at introducing reusable plastic crates for the transport of mechanical components between CSM MACHINERY and a supplier, with the aim of reusing the packaging for transport and reducing the environmental impact.	-	Achieved	2025
			Implement a collaboration with a specialised external supplier for the washing and sanitising of oil-contaminated cloths, ensuring their return to the Company for reuse.	-	Achieved	2025
			Strengthen the monitoring of environmental performance through the implementation of a dedicated Power BI system for the detection and analysis of data relating to the reuse of materials, pallets and energy consumption.	-	New objective 2025	2026
	 CSM MACHINERY	Transversal	Purchase of corrugated cardboard certified FSC® for the transport of products/materials.	100% of corrugated cardboard purchased FSC® certified	New objective 2025	2026

Relevant SDGs	Reference to	Material topic	Objective description	Indicators (KPI)	Target	Implementation period (time span)
 	 CSM TUBE	Energy and greenhouse gas emissions	Expansion of the photovoltaic installation.	-	Achieved	2025
			Expand the capacity of energy production from renewable sources through the installation of a new photovoltaic system on company-owned land, contributing to the reduction of energy drawn from the grid and the emissions associated with energy consumption.	-	New objective 2025	2028
			Installation of a new chiller with better energy efficiency, replacing the existing plants.	-	Achieved	2025
			Install a new high-efficiency chiller to replace obsolete equipment, in order to improve the energy performance of the plants and reduce the associated consumption, while ensuring the correct disposal of the replaced units.	-	New objective 2025	2027
			Strengthen the monitoring of energy consumption through the implementation of a power management system, aimed at improving the control of energy performance and supporting the identification of efficiency measures.	-	New objective 2025	2026
			Purchase of electricity certified from renewable sources.	Percentage of renewable electricity on total ≥ 30.0%	Achieved: 30.0%	2025
			Achieve a reduction in CO ₂ emissions (Scope 1 and Scope 2 market-based).	% reduction in CO ₂ emissions from the baseline (year 2022, value equal to 2,552.6 t CO ₂ eq)	-20.0% Achieved: -44.9%	2025
					-25.0%	2027

GRI CONTENT INDEX

Statement of use	CSM GROUP has prepared a report with reference to the GRI Standards for the period from 1 January 2025 to 31 December 2025
GRI 1 used	GRI 1: Foundation 2021
Relevant GRI industry standards	To date, there are no relevant industry standards for the sector

GRI STANDARD	DISCLOSURE	LOCATION (PAGE NUMBER)
GRI 2: General Disclosures 2021	2-1 Organisational details	6, 18-19
	2-2 Entities included in the organisation’s sustainability reporting	5-6
	2-3 Reporting period, frequency and contact point	6
	2-4 Restatements of information	6
	2-5 External assurance	6
	2-6 Activities, value chain and other business relationships	9-10, 24-26
	2-7 Employees	32, 36-38
	2-8 Workers who are not employees	39
	2-9 Governance structure and composition	18-19
	2-10 Nomination and selection of the highest governance body	18-19
	2-11 Chair of the highest governance body	18-19
	2-12 Role of the highest governance body in overseeing the management of impacts	20
	2-13 Delegation of responsibility for managing impacts	20
	2-14 Role of the highest governance body in sustainability reporting	20
	2-15 Conflicts of interest	26
	2-16 Communication of critical concerns	18
	2-17 Collective knowledge of the highest governance body	Currently, CSM GROUP has not formalised specific initiatives aimed at increasing the collective knowledge of the highest governance body in the field of sustainable development
	2-18 Evaluation of the performance of the highest governance body	Currently, CSM GROUP has not implemented formal procedures to assess the performance of its highest governance body regarding oversight of the management of ESG impacts.
	2-19 Remuneration policies	Information not available. There are no formal procedures governing such parameters
	2-20 Process to determine remuneration	There is currently no official document defining the procedure for determining remuneration. However, the reference Metalworking CCNL is applied
	2-21 Annual total compensation ratio	Requirement omitted. As CSM TUBE Spa and CSM MACHINERY Srl are private companies, it is not considered appropriate to share this information owing to confidentiality constraints
	2-22 Statement on sustainable development strategy	3
	2-23 Policy commitments	24, 26-27, 29, 41, 48
	2-24 Embedding policy commitments	24, 26-27
	2-25 Processes to remediate negative impacts (a, b)	27
	2-26 Mechanisms for seeking advice and raising concerns	27
	2-27 Compliance with laws and regulations	26-30
	2-28 Membership associations	45-46
	2-29 Approach to stakeholder engagement	11-12
	2-30 Collective bargaining agreements	36
GRI 3: Material Topics 2021	3-1 Process to determine material topics	11-12
	3-2 List of material topics	13-15
	3-3 Management of material topics	21-61

GRI STANDARD	DISCLOSURE	LOCATION (PAGE NUMBER)
GRI 204: Procurement Practices 2016	204-1 Proportion of spending on local suppliers	25
GRI 205: Anti-corruption 2016	205-3 Confirmed incidents of corruption and actions taken	27
GRI 206: Anti-competitive Behaviour 2016	206-1 Legal actions for anti-competitive behaviour, anti-trust and monopoly practices	27
GRI 301: Materials 2016	301-1 Materials used by weight or volume	55-56
	301-2 Recycled input materials used	55-56
GRI 302: Energy 2016	302-1 Energy consumption within the organisation	49-52
	302-3 Energy intensity	49-52
	302-4 Reduction of energy consumption	49-52
GRI 303: Water and Effluents 2018	303-1 Interactions with water as a shared resource	60-61
	303-2 Management of water discharge-related impacts	60-61
	303-3 Water withdrawal	60-61
GRI 305: Emissions 2016	305-1 Direct (Scope 1) GHG emissions	53-54
	305-2 Energy indirect (Scope 2) GHG emissions	53-54
	305-4 GHG emissions intensity	53-54
	305-5 Reduction of GHG emissions	53-54
GRI 306: Waste 2020	306-1 Waste generation and significant waste-related impacts	57-59
	306-2 Management of significant waste-related impacts	57-59
	306-3 Waste generated	57-59
	306-4 Waste diverted from disposal	57-59
	306-5 Waste directed to disposal	57-59
GRI 401: Employment 2016	401-1 New employee hires and employee turnover	36-38
	401-2 Benefits provided to full-time employees that are not provided to temporary or part-time employees	In both CSM TUBE Spa and CSM MACHINERY Srl, the benefits granted to employees on a full-time contract are also recognised for staff on part-time or fixed-term contracts, ensuring fairness and uniform access to welfare opportunities

GRI STANDARD	DISCLOSURE	LOCATION (PAGE NUMBER)
GRI 403: Occupational Health and Safety 2018	403-1 Occupational health and safety management system	33-35
	403-2 Hazard identification, risk assessment and incident investigation	33-35
	403-3 Occupational health services	33-35
	403-5 Worker training on occupational health and safety	33-35
	403-6 Promotion of worker health	33-35
	403-7 Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	33-35
	403-8 Workers covered by an occupational health and safety management system	33-35
	403-9 Work-related injuries	33-35
GRI 404: Training and Education 2016	404-1 Average hours of training per year per employee (a)	40
GRI 405: Diversity and Equal Opportunity 2016	405-1 Diversity of governance bodies and employees	18-19, 37
GRI 406: Non-discrimination 2016	406-1 Incidents of discrimination and corrective actions taken	26
GRI 413: Local Communities 2016	413-2 Operations with significant actual and potential negative impacts on local communities	There are no actual or potential negative impacts from CSM GROUP's operations on the local community.
GRI 416: Customer Health and Safety 2016	416-1 Assessment of the health and safety impacts of product and service categories	29-30
	416-2 Incidents of non-compliance concerning the health and safety impacts of products and services	30
GRI 418: Customer Privacy 2016	418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data	28



ANNEX



CSM TUBE

SDG ACTION MANAGER



ANALYSIS OF THE SDGS USING THE SDG ACTION MANAGER

CSM TUBE SPA

INTRODUCTION

Transparency in business behaviour is a useful element to clearly represent the activities, commitments and, where measured, the results achieved by the company.

The UN **Sustainable Development Goals (SDGs)**, as defined within the Agenda 2030 approved in 2015 by the 193 UN Member States, represent an international framework to identify **17 priority areas of sustainable development**.

In its field of activity, the private sector can contribute to these objectives through the analysis of the risks and impacts connected with its activities and through the adoption of improvement actions consistent with its operating model, the market context and available resources.

SDGs can also be used by companies, investors and other stakeholders as a reference to read and organise relevant environmental, social and economic issues.

In 2023, CSM TUBE used the SDGs Action Manager tool to carry out an internal evaluation of its impacts and analyse the level of alignment of business activities with respect to the United Nations SDGs. The activity, which involved the company team, made it possible to identify some areas of attention and opportunities for improvement. In 2024, the analysis was updated taking into account the initiatives carried out during the year and their contribution to the areas of improvement previously identified, in order to monitor the evolution of the path undertaken.

SUSTAINABLE DEVELOPMENT GOALS

Datagraphic is focused on sustainability in line with the UN SDGs.



PROCESS STEPS

The path of self-assessment and preliminary measurement in relation to the SDGs was carried out using the **SDG Action Manager**, an international tool supporting the analysis of business impacts. The process comprised the following phases:

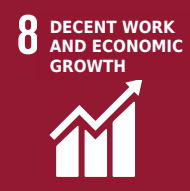
- In-depth study of the SDGs, in order to promote a shared understanding of the objectives and their fields of application;
- Identification of the SDGs potentially relevant to the business, through a prioritisation of impact areas;
- Completion of the *Base Form*, aimed at obtaining an initial snapshot of corporate performance in relation to some key areas, including human rights, working practices, environmental management and governance;
- Detailed analysis of the selected SDGs, to assess the possible contribution of the company with respect to the objectives considered most relevant.

The results of the path represent a preliminary internal evaluation based on the information available at the time of the analysis and do not, in themselves, constitute a certification, an attestation of conformity or a guarantee of positive impact on the SDGs.

IDENTIFICATION OF PRIORITY SDGS

The CSM TUBE Team carried out an internal evaluation to identify the most relevant SDGs in relation to the company’s business activities and operating context. The evaluation considered the relationship between each SDG and the main areas of CSM TUBE activity, with the aim of defining a priority order useful to guide initiatives and reporting activities.

Below are the SDGs considered most relevant to CSM TUBE, presented in priority order on the basis of the methodology adopted.

SDGs in order of importance for CSM TUBE	
	Business Sustainability
	Good Health and Well-being
	Decent Work and Economic Growth
	Affordable and Clean Energy
	Quality Education
	Peace, Justice and Strong Institutions
	Responsible Consumption and Production
	Gender Equality
	Climate Action
	Life on Land

MEASUREMENT OF THE CONTRIBUTION TO EACH SDG

At the end of the SDGs prioritisation phase, the Company used the SDG Action Manager as a self-assessment tool to analyse the degree of alignment of its practices and initiatives with respect to the SDGs identified as relevant to the business. On the basis of the answers entered in the tool, a score from 0 to 100 was generated for each SDG considered. The results obtained were used as a basis for identifying areas of oversight, areas for improvement and possible action priorities in relation to the selected SDGs.

SDGs	CSM TUBE score 2023	CSM TUBE score 2024/2025	Benchmark (Italy)	Benchmark sector*
	63.8%	75.5%	26.7%	29.8%
	19.6%	21.0%	16.3%	19.3%
	34.5%	40.8%	19.6%	22.3%
	27.2%	31.7%	19.1%	19.2%
	29.3%	35.5%	11.8%	12.7%
	20.6%	23.9%	17.6%	16.5%
	20.7%	37.4%	16.8%	17.9%
	39.8%	52.4%	21.3%	22.2%
	13.2%	13.9%	10.2%	10.3%
	39.7%	43.1%	13.8%	14.6%
	10.8%	17.5%	12.3%	12.0%

ANALYSIS OF RESULTS

The following table presents a summary of the scores associated with the SDGs identified by CSM TUBE as priorities for its business. For each SDG the following are shown: the score recorded for the year 2023, the estimate of the expected score following the improvement actions defined by the Company, and the available benchmark values relating to the Italian national context and the sector of belonging, identified as “manufactured metal products”. The forward-looking data represent a forecast based on the planned actions and do not constitute a guarantee of results. The scores should be read taking into account the methodology used, the scope of analysis, the benchmark sources and the actual implementation of the planned initiatives.

*Manufactured metal products



CSM GROUP
Stainless bonds
