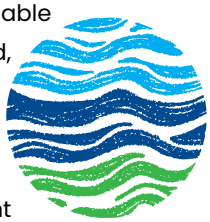
SUSTAINABILITY REPORT 2024 NON-FINANCIAL STATEMENT

Group

[CTA Group] AND THE DEVELOPMENT OF ITS ENVIRONMENTAL, ETHICAL AND MORAL COMMITMENT.

THE CTA Group IS ONE OF THE FEW COMPANIES TO HAVE CREATED A SPECIFIC LOGO FOR ITS SUSTAINABILITY REPORT.

The natural elements that are easily identifiable in the logo, namely water, air and earth, are like the points of the compass that together define the coordinates of life, both concrete and symbolic. Although the current situation may give rise to concerns about our future, we are called upon to recognise the opportunities for positive change; the resources available on Planet Earth, such as air, drinking water and soil, are not unlimited, but it is the symbolic force that will prevail, provided it manages to survive even in the background. To meet this challenge, we need new ideas and a radically new way of thinking and doing things; we need to evaluate and implement natural resource management that is adaptive, collaborative and takes into account short, medium and long term consequences.



"Towards an ecology of the mind', dreamed Gregory Bateson in his seminal work. The mind is the most important environment to protect: reducing harmful emissions is fine, but emancipating minds, leaving them free to plan, to imagine wondrous encounters, is indispensable. And we are doing all we can to make that happen.

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OPENING LETTER

Following the acquisition of the Raccortubi Group in 2023, the 2024 fiscal year marked the first full year for the CTA Group in its new structure. We began to test the market responsiveness of our newly configured corporate and organizational setup.

Even in 2024, sudden international political uncertainties continued to arise, creating new complexities and impacts on our market — both on demand and supply. Logistical challenges, regulatory changes, and production tensions created unfavorable conditions for operators and, consequently, for market demand.

In this context, the CTA Group nonetheless achieved significant economic results and acquired new clients.

Moreover, we consistently and coherently continued our commitment to sustainability, which once again this year led to tangible achievements:

- We began introducing innovative products into our range (net-zero emission pipes);
- We reached the goal of eliminating Scope 2 emissions for the parent company CTA S.p.A.;
- We increased our training efforts, involving a greater number of Group employees. The training activities were also aimed at harmonizing practices and skills across the Group's resources, integrating ESG topics into the learning content;
- We consolidated and brought to completion several investment projects launched in previous years, including the photovoltaic plant in Grugliasco — whose full economic benefits will be reflected in the 2025 fiscal year — and the redevelopment of the sports facility in Settimo Torinese, inaugurated in May 2024 and open since then to our staff and the local community;
- We progressively developed expertise and awareness in measuring the organizational carbon footprint, an activity we have internalized and now manage directly;
- We integrated sustainability indicators into our managerial objectives, to better motivate the entire team on these issues;
- We received excellent ratings and feedback on our sustainability efforts, both from clients and from qualified entities such as Open-Es and Synesgy.

Our strategy aims for an integrated approach to sustainability within daily business processes. The Group is committed to harmonizing processes, skills, and systems across its various components, with ESG topics set to accompany this transformation — also to enhance the effectiveness of our corporate actions.

Historically, the CTA Group has stood out in the market for its ability to serve clients with quality, expertise, and punctuality. In recent years, we have complemented these strengths with a strong commitment to sustainability, and we intend to continue on this path.

We hope that reading this document will allow all stakeholders to appreciate the distinctive features of our company's actions.

CEO

Marco Pollastrini

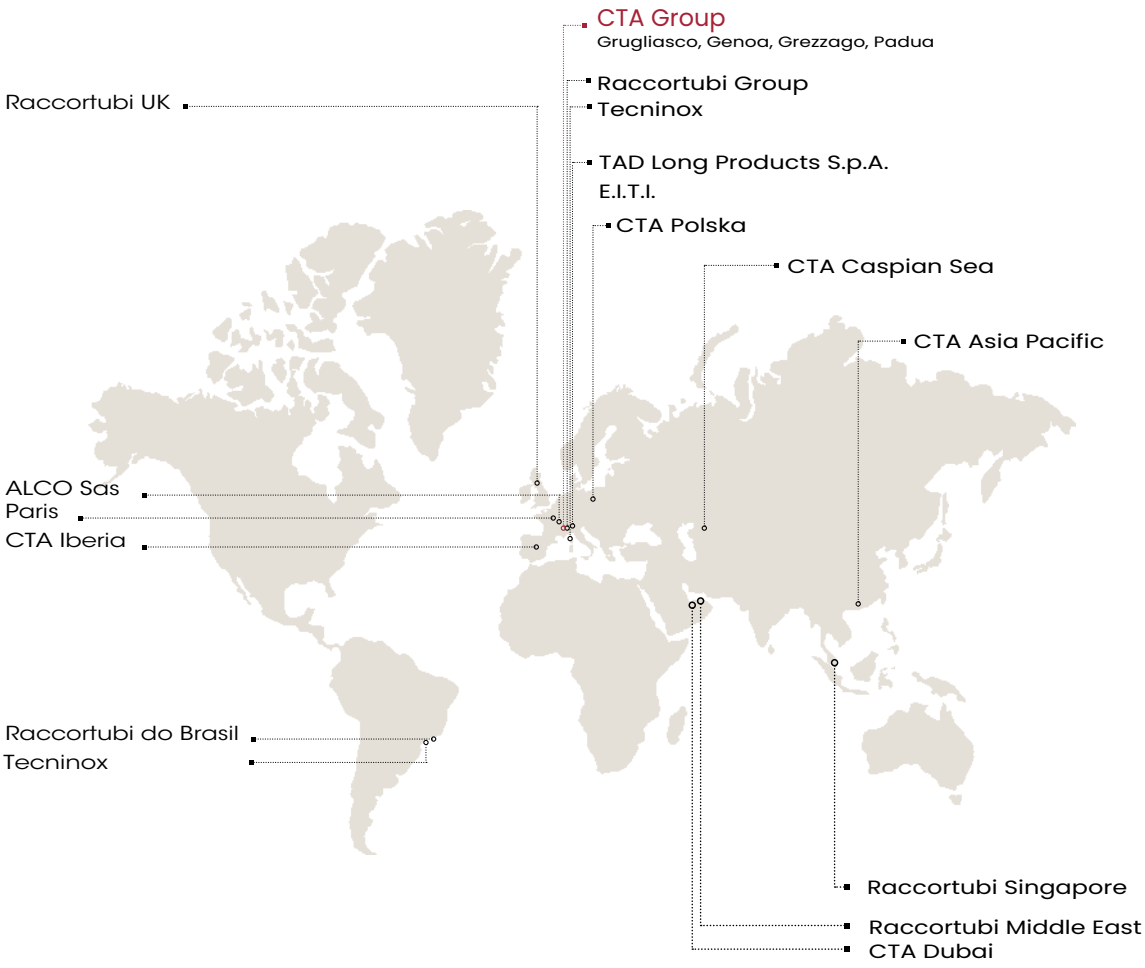
1 PROFILE AND IDENTITY

1.1 The Group

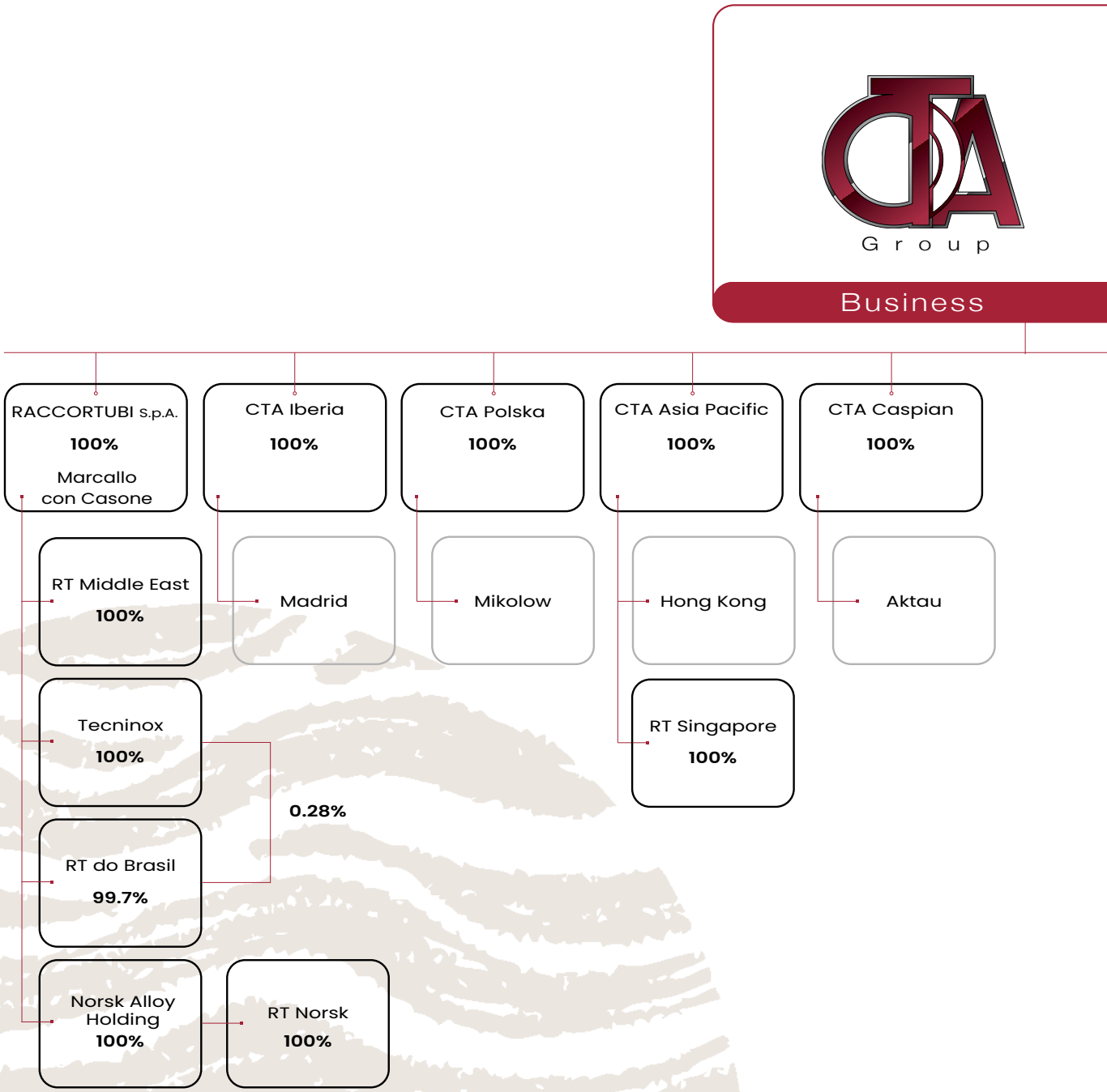
The CTA Group is an international **leader** in the distribution of **steel** pipes, rods, fittings, flanges and valves and in the **management of industrial projects** mainly for the chemical, petrochemical, refining, gas processing, nuclear and renewable energy markets, with total revenues exceeding **205 million euros** in 2024.

Revenues in million euros by geographical area	**2024**	**2023**	**2022**
Italy	79,8	104,0	89,0
Europe	60,1	70,0	74,0
Extra-EU	65,4	91,0	38,0
Total	205,3	265,0	201,0

The acquisition of the **Raccortubi Group**, completed in **July 2023** to further reinforce a partnership started as early as 2020, allowed the company to **consolidate** its market positioning and further diversify its business, giving rise to a leading Group in its markets, with a relevant **international presence** especially in the Middle East, Asia, Africa, South America and Europe.



NO. OF EMPLOYEES BY GEOGRAPHICAL AREA - 2024		
ITALY	**REST OF EU**	**EXTRA-EU**
245	25	46


Group
Business
RACCORTUBI S.p.A.
100%
Marcallo
con Casone
CTA Iberia
100%
CTA Polska
100%
CTA Asia Pacific
100%
CTA Caspian
100%
RT Middle East
100%
Madrid
Mikolow
Hong Kong
Aktau
Tecninox
100%
RT Singapore
100%
0.28%
RT do Brasil
99.7%
Norsk Alloy
Holding
100%
RT Norsk
100%

Grugliasco (Turin)

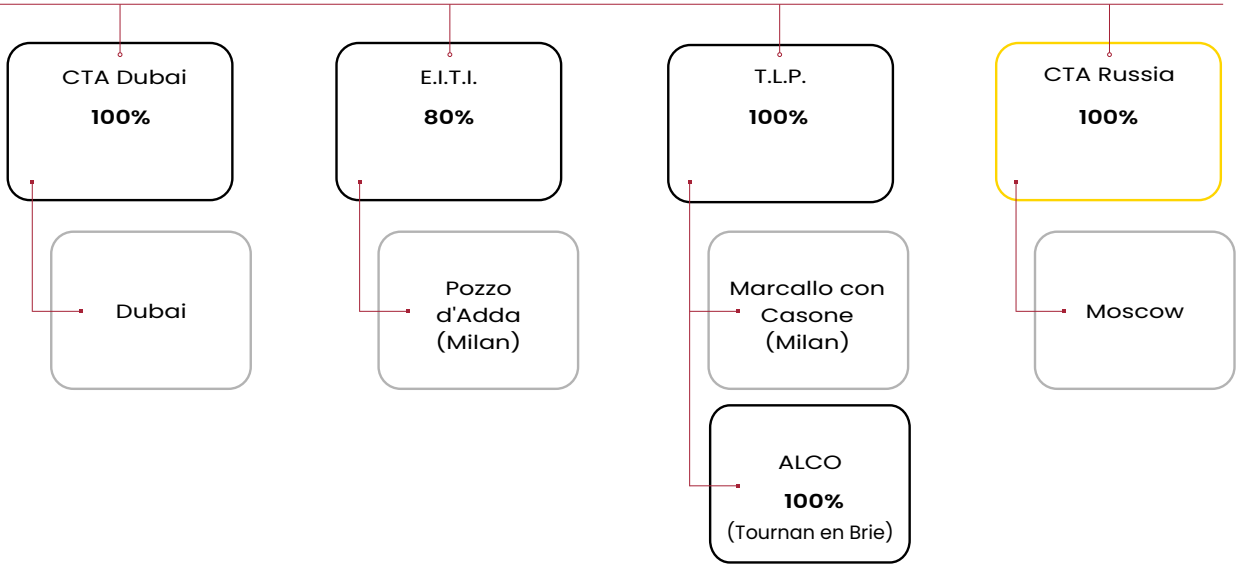
Grezzago (Milan)

Conselve (Padua)

Genoa

Paris

Tubi Acciaio



Dormant company

Commerciale Tubi Acciaio S.p.A. is the parent company of the Group, mainly engaged in **marketing** first and second-stage steel products (namely, pipes and related accessories) and in **project management** for the chemical, petrochemical, refining, gas processing, power generation and nuclear markets, with revenues of approximately **103 million euros** in 2024.
In Italy, CTA S.p.A. carries out its activities at the following sites:

- **Grugliasco** → the head office of the CTA Group, with 1,300 m^2 of offices and 40,000 m^2 of warehouse space, to which an additional warehouse was recently added that will be fully operational as from 2024.
- **Grezzago** → a 46,000 m^2 facility that combines a warehouse and sales offices in a single strategic structure, including areas for the activities of TLP and EITI.
- **Genoa** → an office dedicated to international projects, designed to facilitate the Group's entry into non-traditional geographical areas such as the Arab Emirates, Egypt and Libya.
- **Padua** → sales office.

Business growth in Italy has been accompanied over the years by significant **international expansion**, with the incorporation of foreign subsidiaries so as to operate directly in the main relevant markets:

- in **France** with the CTA France sales office, established in 2003;
- in **Hong Kong** with CTA Asia Pacific Ltd, operational since 2008;
- in **Spain** with CTA Iberia (created in 2010), the group's main interlocutor for the Central and South American region as well as for the local market;
- in **Kazakhstan** with CTA Caspian Sea, established in 2011 to serve all major local and international oil, gas, and engineering companies, as well as to establish business relations with major local producers;
- in **Poland** since February 2012 thanks to the cooperation with Polish wholesaler König Stahl and the subsequent establishment of CTA Polska in 2018;
- in the **Arab Emirates United** with CTA Dubai, set up in 2023 to consolidate our presence in the Gulf area, where our largest investments to date in the oil and gas sector are planned.

In addition to the establishment of foreign sales offices, CTA's expansion over time has also been pursued with the **acquisition of specialised companies** such as T.L.P, ALCO and E.I.T.I.

TAD Long Products (TLP) is an Italian company that is a leader in the distribution of seamless and welded pipes, fittings, and bars. Its presence in the market is significant in the chemical, petrochemical, hydraulic, and mechanical sectors, as well as in all the main application fields of stainless steel, thanks to its ongoing collaboration with CTA.

TLP's commercial offices were located in Caronno Pertusella (Varese) until the end of 2024, and subsequently, in the latter part of the year, moved to Marcallo con Casone (Milan). The warehouse — set up at the CTA site in Grezzago (Milan) — offers approximately 7,000 m^2 of space and a well-stocked inventory of over 2,000 tons, ensuring fast shipments and accurate responses to a portfolio of about 3,000 customers throughout the country.

ALCO is a French company — with a facility serving both as a warehouse and commercial office near Paris — active in the distribution of seamless stainless steel pipes and fittings. A range of its conventional products is intended for the naval, petrochemical, and cryogenic markets, to which is added a line of RCCM-qualified products for the nuclear industry. ALCO became part of the CTA Group in 2020, opening up to new business opportunities as a niche distributor of stainless and carbon steel in all segments of the energy market, including renewables, and strengthening its presence in a market of high value-added materials.

EITI is an inspection body established in 2015 from the merger between Qualytube S.r.l. and Sideco S.p.A. It offers the Oil & Gas market inspection services, testing, non-destructive testing, auditing, project management, and technical consulting for quality management and control.

Since 2023, as a 100% subsidiary of the CTA Group, the Raccortubi Group operates as a manufacturer, stockist, and supplier of piping products (pipes, fittings, and flanges) for critical applications destined for chemical, petrochemical, and nuclear plants, water treatment facilities, shipyards, fertilizer and desalination plants, as well as renewable energy and hydrogen production plants. The Group reached a turnover of 65 million Euros in 2024 (including Intercompany value). Raccortubi Group boasts an international profile thanks to the following subsidiaries:

- **Raccortubi UK**, in the United Kingdom, mainly focused on offshore applications for North Sea plants; in March 2024, the company changed its name to Raccortubi UK;
- **Raccortubi Middle East** in Dubai, serving customers in the Middle East;
- **Raccortubi Singapore**, serving customers in Southeast Asia;
- **Raccortubi do Brasil**, both serving as references for customers in South America.

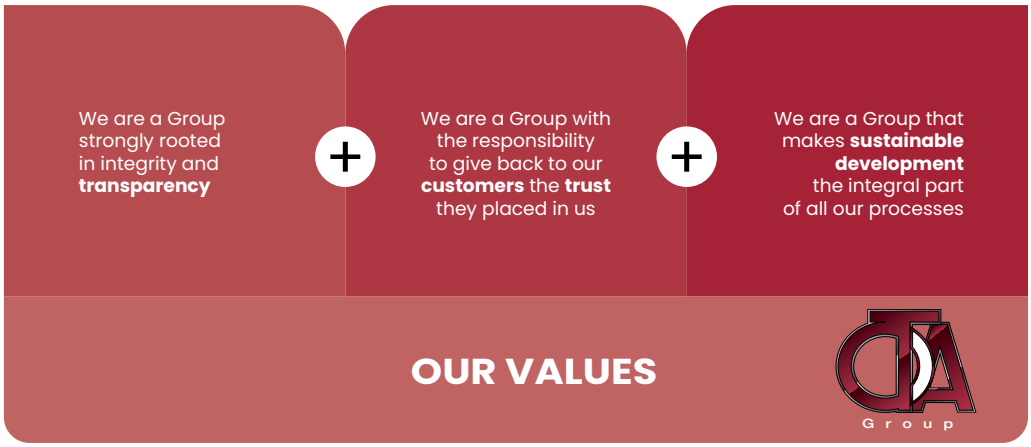
The foreign branches act both as commercial offices with small warehouses for product storage and in project acquisition; the Group's headquarters — located near Milan — manages and coordinates the entire national and international distribution network thanks to a large warehouse with more than 6,000 items intended for the direct supply of piping material in stainless steel and special alloys.

To ensure the highest quality and efficiency in the services offered, the Group's central warehouse is constantly replenished with in-house production of butt-weld fittings manufactured at the Italian production site of Tecninox, located in Piacenza

Adaptive planning enables synergistically integrated production serving all the Group's companies: since 1988, Tecninox has ensured an internal, flexible, and reliable production source, allowing for the inclusion of special orders based on specific customer requirements and sourcing raw materials from Raccortubi's stock according to already scheduled deliveries or orders for specific setups.

To date, the CTA Group has over 300 employees and 16 locations worldwide, making it one of the leading international suppliers in the aforementioned sectors, with intermediated volumes that allow for advantageous conditions in terms of costs, deliveries, and service from the world's most important manufacturers.

To ensure efficient management and high operational standards, the CTA Group constantly promotes uniform practices across all operational units: the company's service philosophy, customer-oriented organization, technical expertise, warehouse services, flexibility, and reliability are all widely shared values among the various locations, which over time have been established in the most important geographical areas for the business.



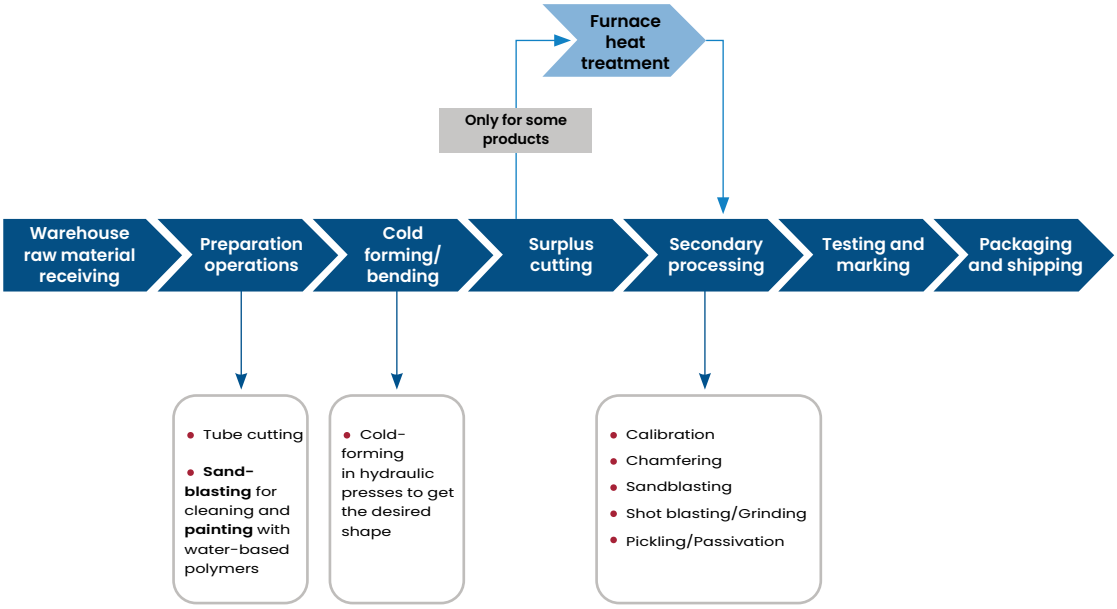
1.2 Business Model

The main activities carried out by the CTA Group are aimed at the markets of companies in the chemical, petrochemical, refining, gas processing, power generation from both renewable and non-renewable sources, nuclear, fertilizer and desalination plants, water treatment, and shipbuilding sectors:

- **Distribution of pipes, fittings, flanges, and valves in steel**
  The key phases for this type of activity are the procurement of finished products, storage in warehouses (including pipe cutting/beveling and product marking operations), logistics organization (handled by the quality control team), sales, and customer support.
  The products sold are mainly used by so-called "end users," i.e., entities involved, for example, in the distribution and processing of fossil fuels. In addition, there is also more traditional distribution activity aimed at smaller end customers or traders located in specific areas who require material for immediate delivery.

The main sites for these activities are the CTA warehouses in Grugliasco and Grezzago (where TLP also operates), the Raccortubi warehouse in Marcallo, several smaller warehouses belonging to Raccortubi's foreign branches, and the ALCO warehouse in Tournan en-Brie.
As for Raccortubi, part of the materials sold comes from the in-house production of butt-weld fittings manufactured at the Italian Tecninox plant.

Tecninox specializes in the cold production of butt-weld fittings (elbows, tees, reducers), sourcing raw materials from Raccortubi's stock according to already scheduled deliveries or orders for specific setups.
Specifically, the standard production cycle at Tecninox can be summarized — in simplified form — as follows.



- **Project management for industrial plants**
  Project management for industrial plants, carried out exclusively by CTA and its foreign commercial offices, is provided in support of so-called major end users (e.g., in the case of purchasing products used for maintenance), engineering companies to which these major end users entrust the design of projects, and companies responsible for the construction of the plants.

In addition to these two main activities, there are also the technical consulting services provided by EITI, which operates both at CTA locations and at customer sites. EITI offers technical consulting services such as inspections, testing, non-destructive examinations, and project management in the fields of Quality and Supply Chain.

Consolidated revenues are distributed among the various activities and geographical areas as shown in the following table:

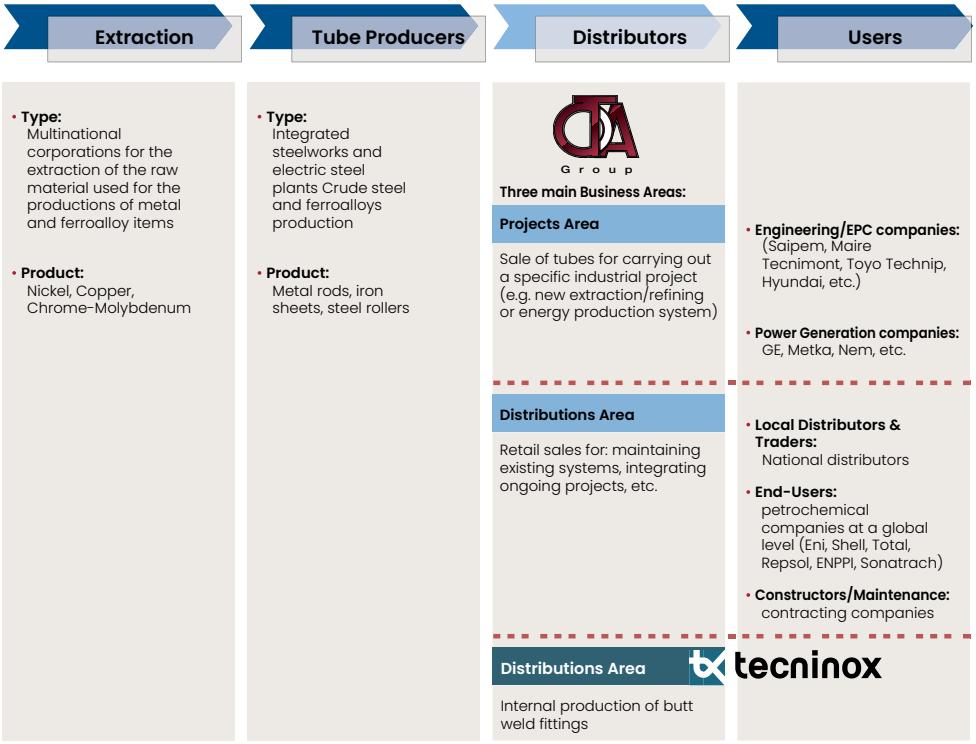
Distribution of revenues	Total %	Italy	EU (extra ITA)	EUROPE (extra EU)	Extra-EU
Projects	37%	8%	5%	1%	23%
Distribution	62%	43%	5%	5%	8%
Other revenues	1%	0%	0%	1%	0%
Total	**100%**	**51%**	**11%**	**7%**	**31%**

Also thanks to external growth, the Group has pursued a strategy of revenue diversification by country, customer, and sector — further enhanced by the acquisition of Raccortubi in 2023. In 2024, the CTA Group confirmed its international presence while maintaining a significant portion of its distribution activity focused on Italian customers, with careful attention to reducing business risk by geographical area and segment, thereby strengthening its ability to respond to and manage potential local crises.

The acquisitions of recent years — particularly that of the Raccortubi Group — led CTA to launch, starting in 2024, a project of systematization, integration, and consolidation, supervised by top management, aimed at strengthening the capabilities of each Business Unit and achieving maximum efficiency.
Considering the target markets and types of customers served, consolidated revenues are primarily linked to clients operating in the following key sectors: extraction or refining of fossil fuels, energy production (both fossil and renewable), and chemical plants. These sectors account for the majority of the Group's turnover.

Positioning in the value chain

The activities described above are predominantly positioned downstream in the value chain of their respective industries and operate on an international scale — between the manufacturers of pipes and related accessories (steel mills) and the end users (EPC contractors, petrochemical companies), with whom interactions are exclusively B2B.



The Group therefore does not position itself as a *"Market Maker"*; however, the success of its development strategy depends on its ability to anticipate and adapt to ongoing changes in its target markets.

Figure 1. Some examples of customers having a stable relationship with the Group.

Among the main strengths of the Group's business model are:

- its international presence, with locations strategically positioned in areas considered key for business development and for relationships with both producers and consumers of the products handled;
- technical expertise, negotiation capabilities, and market knowledge — particularly regarding aspects such as procurement lead times, most in-demand products, price trends, etc.;
- extensive stock availability and the ability to organize and optimize the distribution network;
- long-standing relationships with clients, thanks to the proven quality of the services offered;
- privileged partnerships with major global manufacturers — for example, Tenaris, with which the Group has maintained a partnership since 2002. This collaboration allows the Group to:
    - be its main distributor worldwide;
    - benefit from high product quality and reliability;
    - maintain a uniquely broad and deep product range in stock;
    - receive bonuses upon reaching certain purchasing thresholds.

1.3 Organisation and Control

The parent company of the CTA Group (CTA S.p.A.) is a joint-stock company whose capital is held by shareholders belonging to the family of the company's founder, Dante Pollastrini. The continuity of the ownership structure over time and the active involvement in the company's management are clear signs of the shareholders' long-term commitment to the development of corporate projects.

The company adopts a traditional corporate governance system: the management body is the Board of Directors, elected by the Shareholders' Meeting, renewed at the beginning of 2024 and serving a three-year term. It is currently composed of Dr. Marco Pollastrini (Chairman of the Board and CEO), Dr. Francesca Santini (CEO), and Dr. Roberto Romagnoli (Director).

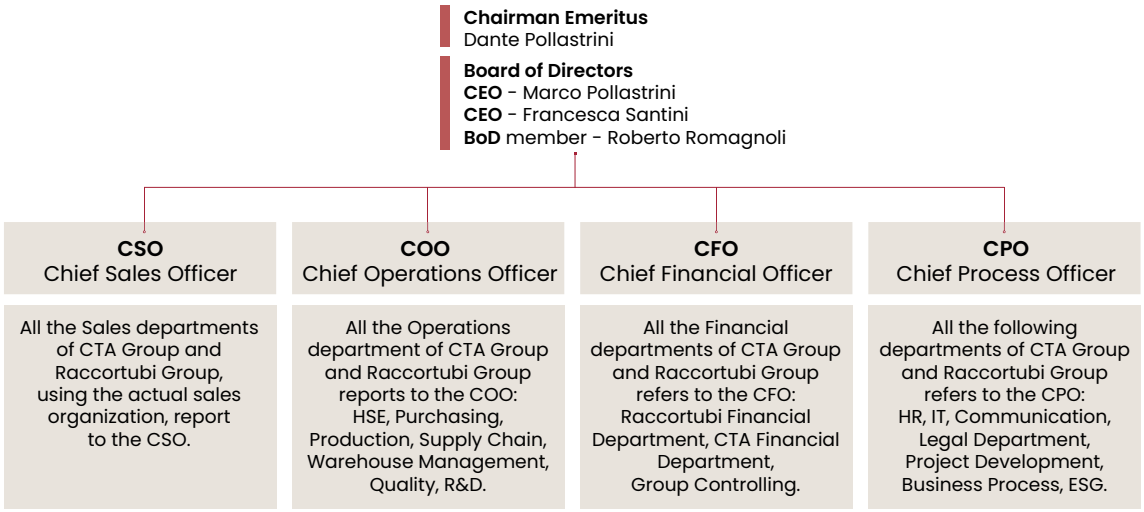
Name	Gender	Age Group	Role	Executive	Independent
Marco Pollastrini	M	>50	Chairman and CEO	Yes	No
Francesca Santini	F	>50	AD	Yes	No
Roberto Romagnoli	M	>50	Director	No	Yes

The Board of Directors is responsible for reviewing and approving the operational guidelines for the Company and its subsidiaries, evaluating organizational and corporate governance proposals, and making decisions on commercial and investment policies. It is also entrusted with decision-making authority for extraordinary transactions and the management of annual budgets.

The Board of Directors is therefore granted the broadest strategic powers to ensure the proper and efficient management of the Group in line with its corporate purpose. The Board of Statutory Auditors — currently composed of three members — is responsible for overseeing compliance with the law and the Company's bylaws, adherence to sound management principles, and, within its remit, the adequacy of the internal control system.

The statutory audit of the consolidated financial statements is entrusted to BDO Italia S.p.A.

The operational and strategic management of the company and its main subsidiaries is supervised by the executive members of the Board of Directors and supported by specific management roles with cross-functional responsibilities at Group level, with the aim of ensuring consistency in business practices and strengthening the business culture.



From the perspective of managing sustainability impacts, risks, and opportunities, the organizational structures — led by directors and managers — report to the Chief Operations Officer and the Chief Process Officer and are responsible for:

- the day-to-day management of operational activities (e.g., human resources offices, procurement and legal affairs, IT and Communication);
- the implementation and maintenance of environmental, safety, and quality management systems in compliance with ISO standards.

The main responsibilities are therefore defined within the functions assigned by law to the directors and, as shown in the simplified organizational chart above, to first-level managers (which include the directors themselves).

In this context, in September 2023 — according to the ESG Plan — an ESG Committee was established. It includes the managerial representatives of the most relevant ESG-related processes as well as the executive members of the Board of Directors, who are entrusted with strategic direction. In particular, the Board is responsible for:

- overseeing the periodic review phases required by the environmental, safety, and quality management systems;
- periodically reviewing the materiality analysis to identify and assess impacts, risks, and opportunities relevant to the Group in relation to its activities, business relationships, and operating context;
- reviewing and approving the ESG Plan, which outlines the Group's main sustainability objectives, responsible parties, specific targets, and allocated budgets;
- reviewing and approving the Sustainability Report, developed by dedicated corporate structures, also with the support of external consultants specialized in the field.

The periodic management reviews of the environmental, safety, and quality management systems (carried out at least once a year) and the ESG Committee meetings (held every four months) are key moments to ensure that the Group's governance, management, and control bodies receive adequate information on the progress of ESG-related matters.

These moments are also essential for informing the definition and evaluation of corporate sustainability objectives (e.g., in health and safety), including those assigned to certain first-line managers and linked to a variable component of their annual compensation.
Within the ESG Committee, the ESG Manager is responsible for overseeing the reporting of sustainability performance, reporting to the Committee, promoting improvements, or addressing critical issues. The Committee also includes the ESG Ambassador, a role established in 2023, tasked with presenting sustainability initiatives across the Group's companies and gathering feedback and suggestions to make activities more effective and tailored to local specificities.

2 SUSTAINABILITY STRATEGY

2.1 Our Approach

The CTA Group pays particular attention to environmental, social, and governance sustainability issues, following methodological and regulatory guidelines defined at the international level, in order to mitigate negative impacts, intensify positive impacts, and manage potential risks and opportunities.

The integrated management of sustainability issues enables the Group to effectively respond to the needs of multiple stakeholders — such as customers, financial operators, human resources, and local communities — ensuring sustainable development in the medium to long term.

For the CTA Group, sustainability topics have become especially relevant at the operational level, particularly with regard to the following aspects:

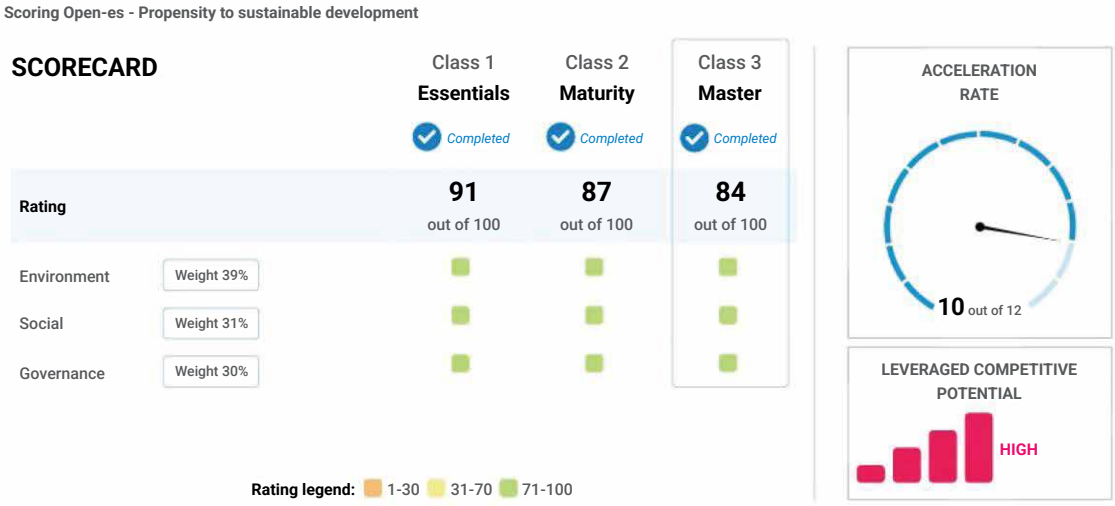
- the definition and maintenance of certified systems in accordance with ISO standards for the management of environmental, health and safety (as well as quality) aspects, in those companies/operational areas most exposed to related risks; these systems, through the establishment of specific roles, responsibilities, and procedures, make it possible to set up and maintain an organizational structure capable of ensuring control and continuous improvement of environmental and social performance;

CTA S.p.A.	**RACCORTUBI S.p.A. and UK**	**TECNINOX Srl**
ISO 14001	ISO 14001	ISO 14001
ISO 45001	ISO 45001	ISO 45001

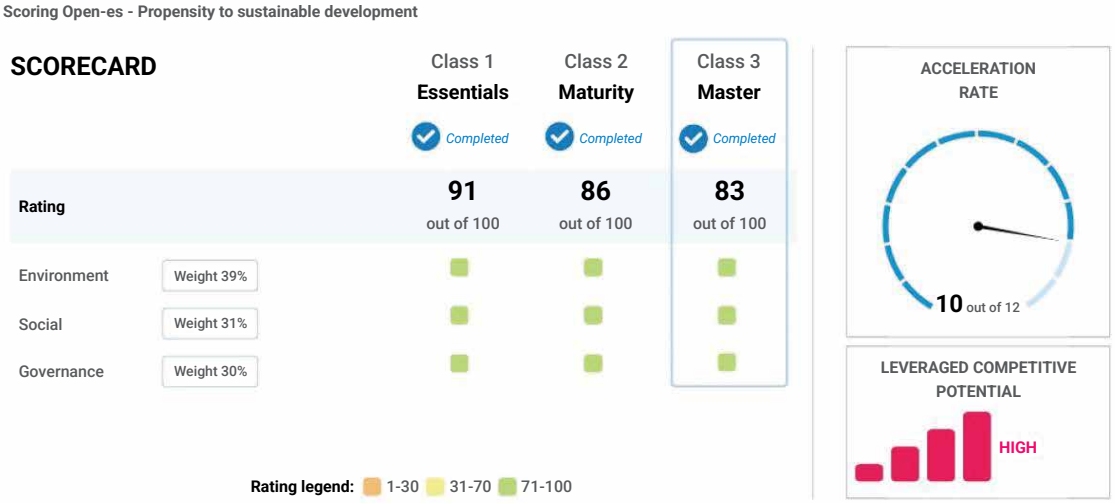
- the adoption of corporate governance tools aligned with best practices defined at national and international levels, including the establishment of specific safeguards such as the Code of Ethics and Conduct (in place at both CTA and Raccortubi), the Organization, Management, and Control Model (implemented at CTA S.p.A. and currently being defined for Raccortubi S.p.A.), and the Legality Rating (for CTA S.p.A.);
- the inclusion of zero-emission products in the product catalogue: to meet the needs of our most environmentally conscious clients and to differentiate our range, we have started evaluating certified zero-emission products to be offered alongside more traditional materials, most of which are already derived from the reuse of materials and scrap;
- the implementation of initiatives to improve environmental performance, such as the installation of photovoltaic systems at the Grugliasco and Grezzago sites and the measurement of the Organization's Carbon Footprint (certified for CTA according to ISO 14064);
- the development of human resources through specific training and development programs aimed at continuously strengthening skills and supporting professional growth;

- the implementation of support and development initiatives for local communities;
- the continuation of a project launched in 2022 for the preparation of the Sustainability Report and the ESG Plan, within which the ESG Committee was officially established — an operational committee currently chaired by the CEO and composed of managers with roles and expertise related to sustainability topics;
- participation in the main ESG Self-Assessment platforms, aimed at strengthening competitive positioning and collaboration with key clients with a view to improving ESG performance across the respective value chains; regarding this point, it is also important to mention the "ZEI-World" self-assessment undertaken by ALCO at the beginning of 2024. The following figure shows the results of the self-assessments carried out on the Open-es portal by the main companies of the CTA Group.

COMMERCIALE TUBI ACCIAIO SPA



RACCORTUBI SPA



Both companies achieved a score of 91/100 in 2024, higher than in previous years and above the industry average.

Attention to sustainability and the topics discussed above has long been shared by the Raccortubi Group, which has adopted a Code of Ethics and obtained certifications for its most exposed operational areas — namely Raccortubi S.p.A., Raccortubi UK, and Tecninox — in accordance with ISO standards for environmental management and health & safety.
As previously mentioned, in 2024 specific initiatives and resources were launched to further strengthen these practices and safeguards, with a view to integrating and standardizing procedures across the CTA Group, ensuring that sustainability topics are managed as part of ordinary business processes rather than as stand-alone projects.
Beyond the operational level, the careful assessment and management of sustainability impacts, risks, and opportunities is also reflected in the Group's strategic approach, considering the growing importance of ESG issues throughout the relevant value chain.
Upstream, for steel producers, the focus on reducing environmental impacts (related to energy consumption, emissions generation, and use of natural resources) and protecting workers' rights is increasingly seen as a competitive factor. However, attention to these aspects is not uniform globally, resulting in a significant price gap between European producers and those located in low-cost regions (typically developing countries), where regulatory frameworks for climate action are less stringent.
In this context, the effects of the recent introduction of the Carbon Border Adjustment Mechanism (CBAM) must be evaluated. CBAM is an environmental levy designed to ensure that the EU's efforts to reduce greenhouse gas emissions are not undermined by a simultaneous increase in emissions outside EU borders from imported goods produced in non-EU countries. Specifically, CBAM will impose an additional cost on the embedded emissions of products from certain industries (including steel), comparable to the cost borne by EU producers under the current EU Emissions Trading System (EU ETS).
Downstream, for many large clients operating in the Oil & Gas sector, the ecological transition is becoming increasingly critical, with a gradual shift toward renewable energy production and the replacement of fossil fuels to reduce greenhouse gas emissions and achieve climate neutrality targets set by the EU and major international organizations.
Regarding supply management, the Group has had to reorganize to remain competitive in procurement, especially for large international projects, facing competition from non-European suppliers who are often not subject to the same restrictions.
As for target markets, in recent years the Group has taken the first steps toward a strategic repositioning aimed at maintaining competitiveness in the medium to long term, diversifying its business, and gaining an edge in future markets. The goal is to operate not only as a distributor for the renewable energy and green chemistry sectors but also as a producer and decision-maker.

In terms of distribution, the acquisition of the Raccortubi Group plays a key role, ensuring better positioning in the aforementioned markets, alongside the activities of the French subsidiary ALCO, which serves the nuclear energy sector.

Regarding production and decision-making topics, the following research and development projects, supervised by the **R&D Department**, can be mentioned:

- The establishment — in partnership with **Valland**, a leading Italian manufacturer of special valves for the Oil & Gas sector — of **Vision 2H**, a company aimed at developing an electrolyzer for hydrogen production using **AEM (Anion Exchange Membrane)** technology. This emerging technology allows the use of less precious materials as electrodes for water electrolysis, offering advantages in terms of **cost-efficiency and sustainability** compared to current technologies (alkaline and PEM);

In the first months of 2024, Vision 2H was officially established

Strategy

We aim to become the pioneer in manufacturing large-scale, green AEM electrolyzers. Our offerings will include complete production modules, each with a capacity ranging from 1 MW to 10 MW. Our target clientele will encompass engineering firms, end users, and energy operators, many of whom are already part of the CTA Group's esteemed customer base

Despite a slowdown in activities due to the need to identify new suppliers, Vision2H continued to pursue its 2024 objectives, participating in the main international hydrogen trade fairs and setting a goal for 2025 to launch the first operational prototype (100 kW).

- Participation in the Italian Hydrogen Association
- Co-founding and participation in the "H2 Technology Consortium", a consortium of companies based in Houston
- Development of dedicated purchasing specifications and establishment of a dedicated stock of materials suitable for hydrogen transportation (blended with natural gas in varying proportions, up to 100% of the transported gas): pipes, fittings, and valves.

2.2 Double Materiality Analysis

The **materiality analysis** is a process that helps identify material topics — i.e., the most relevant sustainability issues based on the activities carried out and the business context — and, consequently:

- define the structure of sustainability reporting;
- set improvement actions for ESG performance;
- analyze financial risks and opportunities for the company

In **2023**, ahead of the requirements set by the **Corporate Sustainability Reporting Directive**, the **CTA Group** carried out its first **double materiality analysis**, as introduced by the **European Sustainability Reporting Standards (ESRS)**.
In assessing sustainability issues, the ESRS require consideration of two dimensions of relevance:

- A sustainability issue is **impact-relevant** when it concerns the company's significant impacts — positive or negative, actual or potential — on people or the environment over the short, medium, or long term.
  These impacts include those related to the company's own operations and its upstream and downstream value chain, including its products, services, and business relationships.
  Business relationships include those within the company's value chain, both upstream and downstream, and are not limited to direct contractual relationships.
- A sustainability issue is **financially relevant** if it has, or can reasonably be expected to have, significant financial effects on the company.
  This occurs when a sustainability issue generates risks or opportunities that have, or are reasonably expected to have, a material influence on the company's development.
  These risks and opportunities may arise from past or future events.
  Financial relevance is not limited to aspects under the company's control but also includes information on risks and opportunities attributable to business relationships outside the scope of consolidation used in financial reporting.

In **2024**, the CTA Group consolidated the preliminary analysis conducted in 2023, further integrating the materiality assessment from both perspectives (**inside-out and outside-in**).
The main phases of the analysis are summarized below.

PHASE 1: Identification of impacts, risks and opportunities

The first phase of the materiality analysis, aimed at identifying impacts, risks and opportunities, was conducted by taking into account the evolution of the organization's context. Specifically, this phase included:

- discussions with first-line management;

- analysis of internal documentation;
- assessment of material topics identified by key competitors;
- analysis of sustainability macro-trends and the Sustainable Development Goals (SDGs);
- analysis of potentially material topics suggested by the GRI Sector Standard 11;
- analysis of the sustainability expectations of key stakeholders.

With regard to the latter point, below is a list of the main stakeholder categories identified, along with their expectations and the ways in which they interact with the Group.

CATEGORY	STAKEHOLDERS	EXPECTATIONS	MANNER OF INTERACTION
Shareholders		• Value creation and distribution • Economic, social and environmental sustainability • Operational and strategic risk management	• Shareholders' Meetings • Communication of financial results • Sustainability disclosure
Customers		• Product quality, safety and competitiveness • Service continuity and accountability • Collaboration in the development of products and services • Commitment to ESG issues	• Audits • Direct contacts with competent structures • (logistics, sales, quality) • Website • Industry events
Human resources	• Employees and collaborators	• Financial solidity • Health and safety at work • Fairness, transparency and continuity of contractual arrangements • Skill enhancement • Opportunities for professional growth • Welfare protection and psychological and physical well-being	• Direct contacts with competent structures • Corporate information • Model 231 and Whistleblowing Platform
Financial community	• Banks • Insurance companies	• Value creation and distribution • Business continuity • Solid and transparent governance • Operational and strategic risk management • Economic, social and environmental sustainability	• Communication of financial results • Direct contacts with competent structures • Questionnaires on ESG topics • Sustainability disclosure
P.A. and institutions	• Local institutions (Municipalities, Provinces and Regions) • National and European institutions	• Financial solidity • Collaboration and dialogue • Transparent communications and accountability • Compliance with legislation and standards	• Communication of financial results • Sustainability disclosure
Certification and inspection bodies	• DNV • ARPA, INPS, INAIL, Labour Inspectorate	• Compliance with regulatory requirements • Compliance with certification specifications	• Audits • Direct contacts with competent structures

CATEGORY	STAKEHOLDERS	EXPECTATIONS	MANNER OF INTERACTION
Territories and communities	• Citizens • Local and national associations • Schools and Universities	• Value creation and distribution • Use of local resources • Transparent communications and accountability • Compliance with legislation and standards • Support for territorial initiatives • Economic, social and environmental sustainability	• Interventions to support local development • Sustainability disclosure • Collaborations with local authorities
Suppliers of goods and services	• Strategic product suppliers • Strategic service • providers • Suppliers of ancillary products/services	• Fairness, transparency and continuity of contractual arrangements • Value creation and distribution	• Audits • Direct contacts with competent structures (logistics, sales, quality control) • Website
Industrial relations	• Trade unions • Trade associations • Consortia	• Knowledge of economic trends and the needs of companies in the area • Dialogue and collaboration • Development of new growth opportunities	• Regular meetings with trade unions • Category events • Consortia and sector initiatives

Phase 1 has therefore led to the drafting of a list of impacts, risks, and opportunities to be submitted for the assessment phase.

PHASE 2: Assessment of impacts, risks and opportunities

The economic, environmental and social impacts, as well as the financial risks and opportunities that may arise from external events to the organization identified in Phase 1, were initially assessed by the management of the CTA Group using the method described in the following two paragraphs.

Impact Materiality

Impacts were classified as positive or negative, current or potential. For each impact, the relevant stakeholders and the position in the value chain where the impact occurs (upstream, core, downstream) were identified.

The assessment was carried out by multiplying the severity of each impact by its likelihood. Severity was considered as an average of scale (extent of the impact), scope (breadth of the impact), and irreversibility (the latter only in the case of negative impacts).

Financial Materiality

Financial risks and opportunities (RO) were classified by type (economic-financial, reputational, legal, operational) and assessed according to magnitude (extent of the risk or opportunity) and likelihood.

Following this initial analysis, some stakeholders of the Group — clients, suppliers, financiers and employees – were involved and asked to provide a simplified assessment (using a value range from 1 to 5) of the relevance of the impacts identified in Phase 1.

A total of 449 stakeholders were involved, with a response rate of 28% (126 responses).

5 Banks	5 Customers	108 Employees	9 Suppliers

PHASE 3: Processing of results

The results were processed by aggregating the financial materiality assessments and the impact materiality evaluations provided by the Group's management, as shown in the following table:

IMPACT	MACRO-THEME	IMPACT MATERIALITY	FINANCIAL MATERIALITY
Customer satisfaction requirements		**Critical**	**Critical**
Responsible business management		**Critical**	**Critical**
Training and growth of workers		**Significant**	**Critical**
Health and safety protection of workers		**Critical**	**Important**
Environmental impacts related to the supply chain		**Critical**	**Important**
Physical and psychological well-being of workers		**Critical**	**Important**
Guarantee of equal opportunities and diversity protection		**Critical**	**Important**
Fair remuneration of workers		**Critical**	**Important**
Economic value creation and distribution		**Critical**	**Important**
Local development and relationships with reference communities		**Significant**	**Important**
Ecological transition and mitigation of climate change		**Important**	**Important**
Reduction of indirect greenhouse gas emissions (Scope 3)		**Significant**	Informative
Generation of greenhouse gas emissions (Scope 1 & 2)		**Important**	Informative
Social impacts related to the supply chain		**Important**	Informative
Self-production and consumption of energy from renewable sources		**Important**	Informative
Energy consumption		**Important**	Minimal
Innovation in processes and products		Informative	Informative
Consumption of resources and raw materials		Informative	Informative
Waste generation		Informative	Minimal
Reduction in water availability & quality		Informative	Minimal

IMPACT	MACRO-THEME	IMPACT MATERIALITY	FINANCIAL MATERIALITY
Environmental pollution		Minimal	Minimal
Recycling and reuse of production waste and generated waste		Informative	Minimal

For simplified reading and better visualization on the double materiality matrix, multiple impacts have been grouped into macro-themes.

ISSUE	IMPACT	DESCRIPTION	
Customer satisfaction requirements	Customer satisfaction requirements	Business success is determined by customer trust and satisfaction: for this reason, the CTA Group is constantly committed to delivering valuable and high-quality products and services, closely monitoring satisfaction through dedicated management systems and ongoing communication.	Core Downstream
Responsible business management	Responsible business management	The adoption of responsible business management practices is particularly important for the CTA Group, given the complexity of its business processes and the international scope of its operations. To this end, specific policies and safeguards have been defined to promote compliance with principles of social responsibility.	Upstream Core Downstream
Well-being and protection of the Group's workers	Protection of workers' health and safety	The oversight of health and safety matters concerning workers is a key aspect in managing employee well-being. The CTA Group is committed to ensuring a work environment that complies with current regulations and pays close attention to the adoption of responsible practices.	Core
	Training and growth of workers	The enhancement of human capital is essential for improving the quality of the activities carried out. The CTA Group is committed to engaging employees and collaborators in the development of their skills and potential, regularly organizing training activities across all organizational levels.	Core
	Fair remuneration of workers	Fair remuneration for the work performed generates a strategically positive impact on the well-being of CTA Group employees, who are offered incentive plans aimed at achieving performance excellence.	Core
	Guarantee of equal opportunities and diversity protection	The definition of appropriate policies and procedures to ensure equal opportunities is essential to the CTA Group's operations, in order to maintain a healthy, motivating and inclusive work environment, and to support the full development of each employee.	Core
	Physical and psychological well-being of workers	The CTA Group considers employee well-being to be essential and aims to develop management and work organization practices that ensure a balance between professional activity and private life, promoting employee retention and loyalty through specific policies and procedures.	Core
Social and environmental responsibility of the supply chain	Environmental and social impacts related to the supply chain	The activities of goods and services suppliers are associated with significant environmental and social impacts, both actual and potential. CTA Group promotes the adoption of responsible policies to safeguard workers' health and safety and natural ecosystems, and aims to monitor the supply chain's commitment in this regard.	Upstream
Relationships with local communities and distribution of economic value	Creation and distribution of economic value	The creation of economic value and financial balance are essential conditions to ensure business operations: CTA Group aims to achieve satisfactory economic and financial performance in order to adequately compensate the risk taken by shareholders and generate added value to be distributed to all stakeholders.	Core Downstream

ISSUE	IMPACT	DESCRIPTION	
	Local development and relationships with relevant territorial communities	Fostering relationships and collaborations with the local reference area is a key priority for CTA Group, not only in terms of distributing the economic value generated, but also in terms of social and cultural development.	Downstream
Climate change mitigation	Ecological transition and climate change mitigation	CTA Group has been committed for years to investing in projects and initiatives aimed at ecological transition and climate change mitigation, such as the use of renewable energy, the measurement of its carbon footprint, and the purchase of low-emission materials.	Upstream Core Downstream
	Reduction of indirect greenhouse gas emissions (Scope 3)	Activities directly and indirectly related to CTA Group's business generate a significant impact in terms of greenhouse gas emissions, particularly with regard to logistics and procurement management. For this reason, CTA Group is committed to reducing these emissions as much as possible, for example by purchasing materials produced with a lower environmental impact.	Upstream Core Downstream
	Generation of greenhouse gas emissions (Scope 1 and 2)	As part of its efforts to reduce greenhouse gas emissions generated by its activities, CTA Group uses renewable energy sources and continuously monitors its emissions and energy consumption.	Core
Reduction of resource consumption and circular economy	Self-generation and consumption of energy from renewable sources	CTA Group is committed to self-producing part of its energy needs through photovoltaic systems installed at some of its facilities. In addition, it purchases part of the electricity it consumes with Guarantees of Origin.	Core
	Direct energy consumption	The performance of business activities has a negative impact in terms of energy consumption: CTA Group promotes consumption reduction and energy efficiency through constant monitoring of operations and support for improving supplier performance.	Core
	Consumption of resources and raw materials	The main type of activity carried out by the CTA Group does not involve significant consumption of resources and raw materials. For this reason, the topic is not considered relevant from either an impact or financial perspective.	Upstream Core
	Waste generation	The type of activity carried out by the CTA Group does not involve the production of large quantities of waste. For this reason, the topic is not considered relevant from either an impact or financial perspective.	Core Downstream
	Reduction in the availability and quality of water	The type of activity carried out by the CTA Group does not require the use of significant quantities of water that could lead to a reduction in its availability, nor does it involve any discharges or potential pollution that could compromise its quality. For this reason, the topic is not considered relevant from either an impact or financial perspective.	Core Downstream
	Recycling and reuse of production scraps and generated waste	The few waste materials produced by the CTA Group are mostly destined for recycling and reuse, as they consist primarily of steel scraps. However, due to its limited scale, the topic is not considered relevant from either an impact or financial perspective.	Core Downstream
Process and product innovation	Process and product innovation	While promoting innovation, the CTA Group's area of activity is not influenced by rapid changes or innovations, and therefore the topic is not considered relevant from either an impact or financial perspective.	Core Downstream
Environmental pollution	Environmental pollution	Given the type of activity carried out by the CTA Group, the risk that the few potentially polluting substances or activities could actually have a negative impact on the environment is considered minimal. Therefore, the topic is not considered relevant from either an impact or financial perspective.	Core Downstream

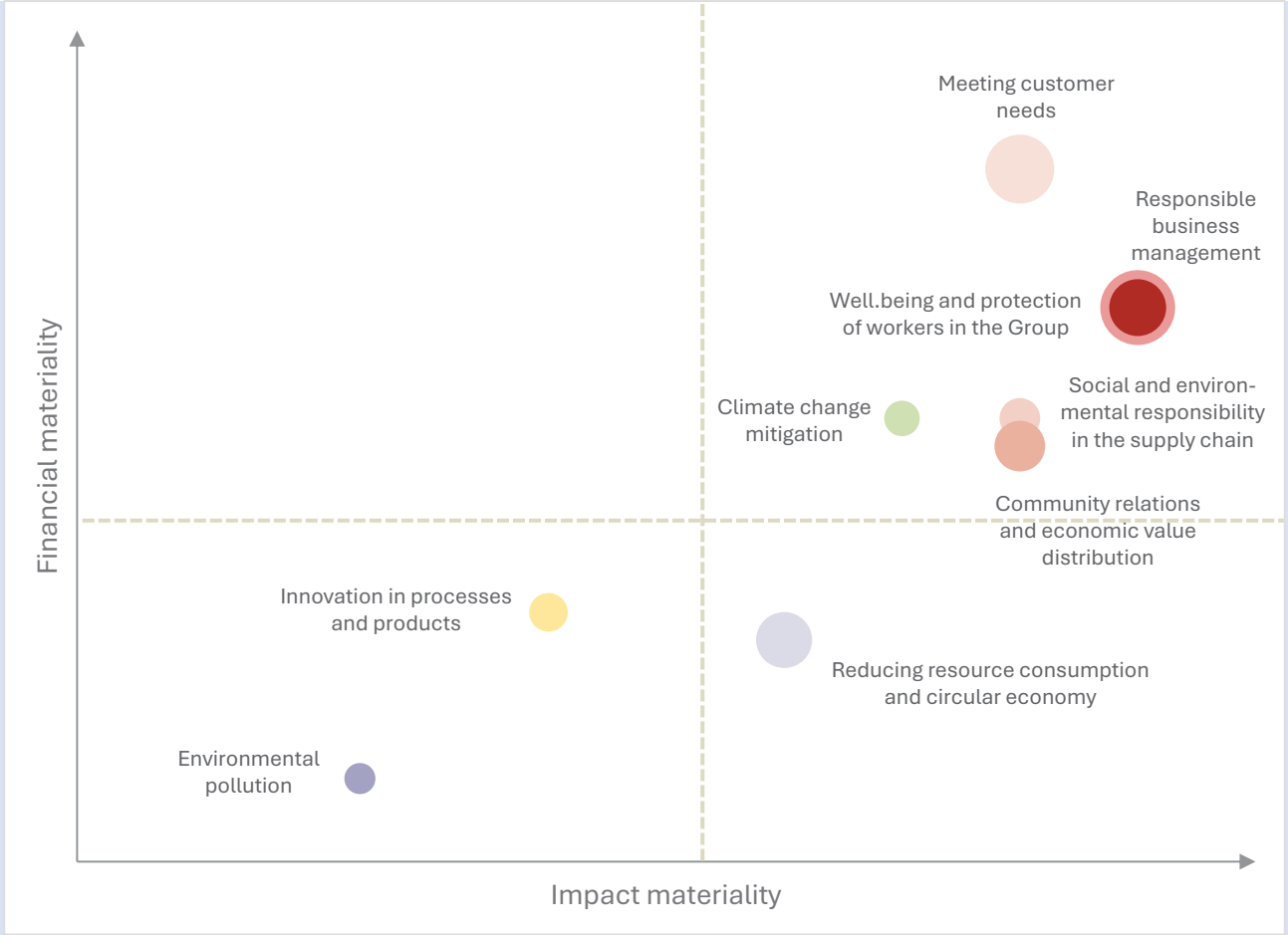
The assessment carried out is consistent with the Group's context: the business model is in fact focused on commercial activities and project management, which do not involve particularly significant direct environmental impacts. Instead, it requires careful management of the Group's workforce and business practices (including the monitoring of environmental and social impacts associated with the supply chain).
Nonetheless, a data collection and reporting activity has been developed, also covering impacts that are not particularly significant — such as water and material consumption or waste generation — in order to continuously monitor the Group's positioning across all sustainability dimensions and to systematize the completion of ESG questionnaires shared by stakeholders.

The Double Materiality Matrix

The results of the assessment are presented in the following double materiality matrix, which illustrates:

- in the top right quadrant, the topics that are material from both an impact and financial perspective;
- in the bottom right quadrant, the topics that are material from a financial perspective but not from an impact perspective;
- in the top left quadrant, the topics that are material from an impact perspective but not from a financial perspective;
- in the bottom left quadrant, the topics that are not material from either an impact or financial perspective.

The size of each point represents the level of importance attributed to the individual topic by stakeholders.



The material topics identified reflect the main challenges and developments faced by the CTA Group:

- The Group's main reference market (Oil & Gas) is undergoing an ecological transition aimed at promoting the adoption of technologies for low greenhouse gas emission energy production, their offsetting, and thus climate change mitigation;
- The complexity of business processes and the international scope of operations require the definition of specific safeguards and procedures to ensure responsible business management and compliance with principles of social and environmental responsibility;
- The nature of the Group's activities demands careful management of its workforce, particularly in areas such as training and development, protection of physical, psychological, and economic well-being.

Among these, "Climate Change Mitigation" translates into the analysis of impacts, risks, and opportunities that the current historical moment presents to an organization like the CTA Group:

- Exposure to the risk that potential regulatory and policy developments may further reduce business volumes related to fossil fuel extraction and refining. CTA addresses this risk through a structured diversification strategy along four axes:
  i. Geographic diversification, since regulations vary locally;
  ii. Segment diversification, balancing the activity portfolio between project-based and distribution content;

iii. Focus on maintenance of existing production sites rather than the activation of new ones;
iv. Entry into markets served by different technologies.

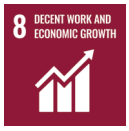
- The evolution of fiscal regulations, such as the Carbon Border Adjustment Mechanism (CBAM), represents a risk of reduced volumes of steel intermediated from outside the EU.
  The fiscal regulation will have gradual impacts and, in the long term, may lead to more significant differences than currently observed between the prices of EU-produced steel and imported steel.
  CTA Group will be ready to address this issue by implementing a careful diversification of supply sources and continuously monitoring Scope 3 carbon footprint to proactively build reliable impact scenarios.
- CTA Group's ability to mitigate its climate change impacts includes actions within its control, such as the use of energy from renewable sources and the purchase of low-carbon materials (e.g., O-Next pipes).
- Specialization in the new structural pipes business represents an opportunity to mitigate climate risk exposure, as it opens CTA Group to new markets: structural pipes are used in wind energy production plants and civil construction projects, rather than in fossil fuel extraction.
  In particular, green energy production incentive policies are expected to support the growth of this market, in which CTA Group intends to invest with interest.
- The promotion of hydrogen-based energy production is another opportunity for CTA Group: the establishment of the subsidiary Vision2H enables the Group to focus specifically on a rapidly growing market and to follow its evolution on multiple levels: strategic (participation in working groups and organizations), commercial (distribution of pipes for hydrogen synthesis), and operational (creation of Vision2H with a specialized partner).

2.3 The 2030 Agenda and the SDGs

The growing focus on the need to achieve sustainable development from an economic, social, and environmental perspective has been formalized at the international level through the definition of the **2030 Agenda for Sustainable Development**.
This Agenda was signed in September 2015 by 193 countries, including Italy, and aims to guide the world toward a more sustainable path through the definition of **17 Sustainable Development Goals (SDGs)** to be achieved by 2030.
The goals are broken down into **169 targets** and over **240 indicators**. Their ambitious nature requires a joint effort from all stakeholders in the global economy — not only governments and institutions, but also companies, which, through their business activities, have the potential to positively influence the territories in which they operate.

In recent years, **CTA Group has become increasingly aware of the need to ensure the economic, social, and environmental sustainability of its activities**, and to engage with the Sustainable Development Goals to identify the targets most relevant to its current business operations.

The main SDGs identified as reference points are listed below:

	Guarantee equal rights and equal opportunities for employment, without gender discrimination.		Ensure that everyone has access to affordable, reliable, sustainable and modern energy systems.
	Encourage lasting, inclusive and sustainable economic growth, full and productive employment, decent work for all.		Build resilient infrastructure, promote innovation and fair, responsible and sustainable industrialisation.
	Guarantee sustainable models of production and consumption.		Adopt urgent measures to combat climate change and its consequences.

3 ENVIRONMENTAL

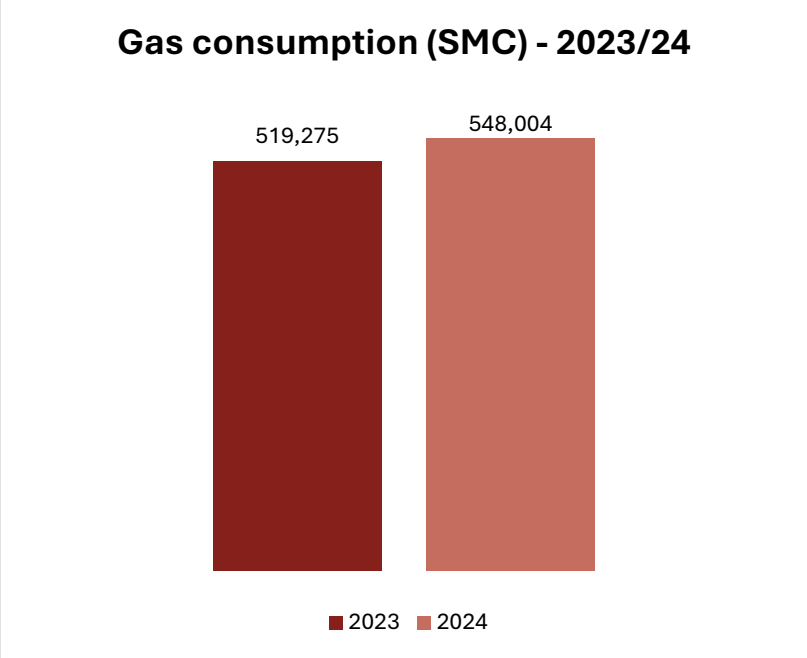
Operational activities are carried out with respect for the environment, with a commitment to reducing impacts and using natural resources sustainably. For this reason, the Group's main companies — CTA S.p.A., Raccortubi S.p.A., and Tecninox S.r.l. — have implemented Environmental Management Systems in accordance with ISO 14001 standards. These systems are governed by specific environmental policies, and their practices serve as a reference for process management across all other subsidiaries.

3.1 Energy Consumption

Proper management — and potential reduction — of energy consumption is a key issue for achieving a dual benefit: lowering operating costs and reducing direct greenhouse gas emissions (Scope 1 and 2).
With regard to the Group's activities, energy consumption is attributable to:

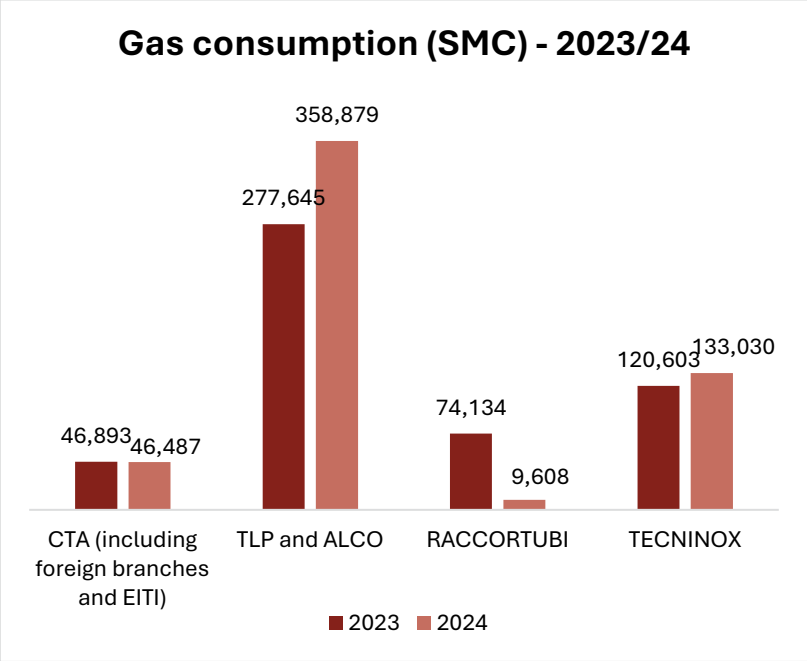
- the use of gas and electricity to ensure the operation of offices and warehouses (where only minor processing activities are carried out);
- the use of fossil fuels for the movement of the company's vehicle fleet;
- the use of gas and electricity for processing activities at Tecninox, such as cold forming/ bending and preliminary and secondary machining.

For these types of consumption, the following data were recorded in 2024:[i]

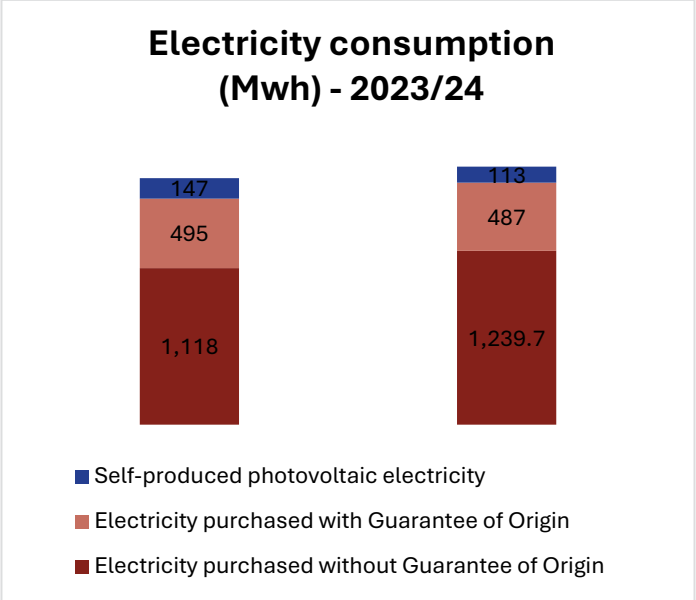


Compared to 2023, there has been a slight increase in methane gas consumption, mainly attributable, as shown in the chart below, to the activities of ALCO and the processing operations carried out at Tecninox, such as heat treatment in furnaces — performed for certain types of products.

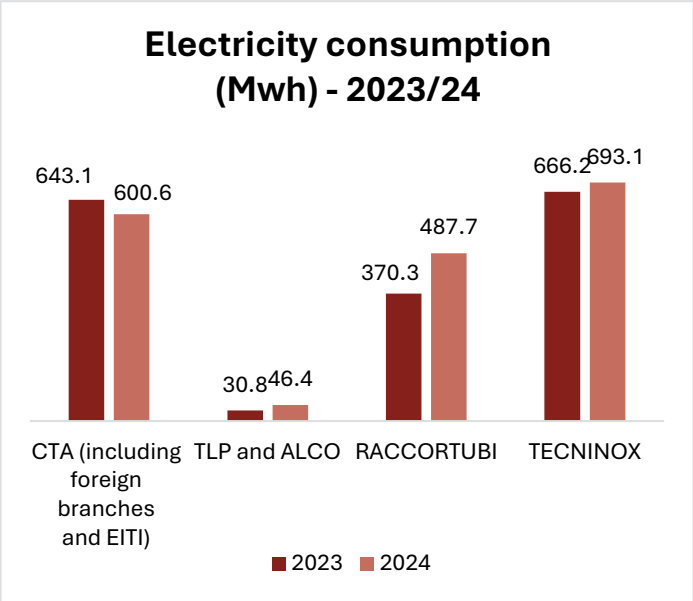
Data from the other companies show a reduction in consumption, particularly for Raccortubi. In fact, in 2024, the underfloor heating system at the Marcallo warehouse was turned off and replaced with a heat pump that provides heating without the use of methane gas.



With regard to electricity consumption data[ii], a slight increase is observed compared to 2023, mainly driven by greater electricity usage by Raccortubi. This increase is due to the change in heating method, which offsets the reduced use of methane gas.



As shown in the chart below, the main sources of consumption are attributable to the warehouses and offices of CTA and Raccortubi, as well as the Tecninox facility, which represent the largest entities in terms of size within the CTA Group.



Overall, energy consumption management is based on:

- Monitoring the efficiency of technical equipment and implementing corrective measures when necessary (e.g., replacing lighting fixtures with LED lamps, carried out in recent years at the Grugliasco and Sarmato sites);
- Rationalizing gas and electricity consumption at every operational site;
- Sourcing certified renewable energy with Guarantees of Origin for the electricity consumption of CTA S.p.A. and Raccortubi at the Marcallo site starting from March 2025 (both amounting to approximately 500 MWh per year, excluding self-consumption from photovoltaic systems);
- Installing photovoltaic systems at the Grezzago and Grugliasco sites to generate electricity and achieve both economic and environmental benefits, offering greater autonomy and stability against potential cost fluctuations:
    - The system currently in place at Grezzago has an annual production capacity of approximately 215,000 kWh, covering around 60% of the site's total consumption through full self-consumption, with seasonal surplus phases resulting in energy being fed back into the grid;
    - The system installed at Grugliasco (supported by an investment of approximately 2 million euros) was completed and became fully operational in spring 2025. It is expected to provide an annual production capacity of approximately 221,000 kWh, covering around 60% of the site's total consumption through full self-consumption.

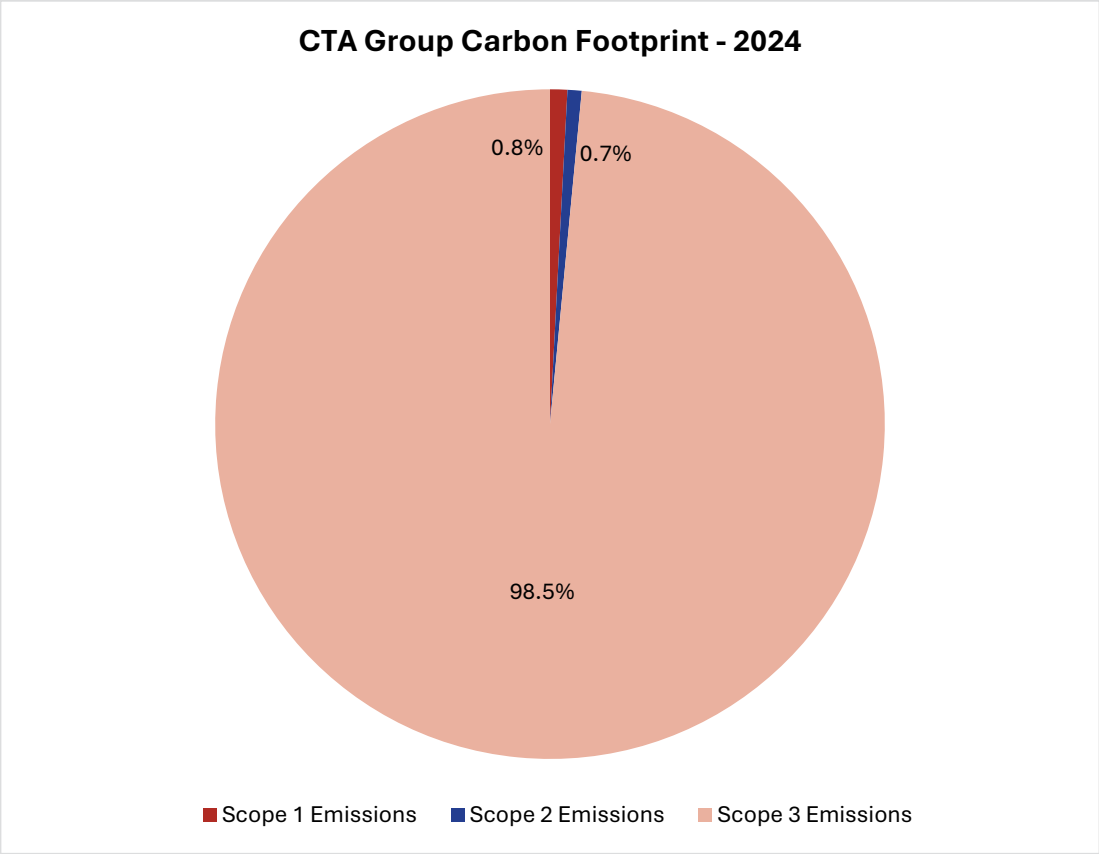
3.2 Greenhouse Gas Emissions

To make a concrete contribution to climate change mitigation, since 2022 the Group has initiated a process for accounting and monitoring greenhouse gas (GHG) emissions generated by CTA and TLP, in accordance with the standards of the GHG Protocol, obtaining certification under ISO 14064.

In light of the expanded scope of the Sustainability Report, starting in 2023 the operational sites of Raccortubi and Tecninox have also been included in the calculation, to ensure more detailed reporting and to assess potential changes in categories most relevant to the Group CFO.

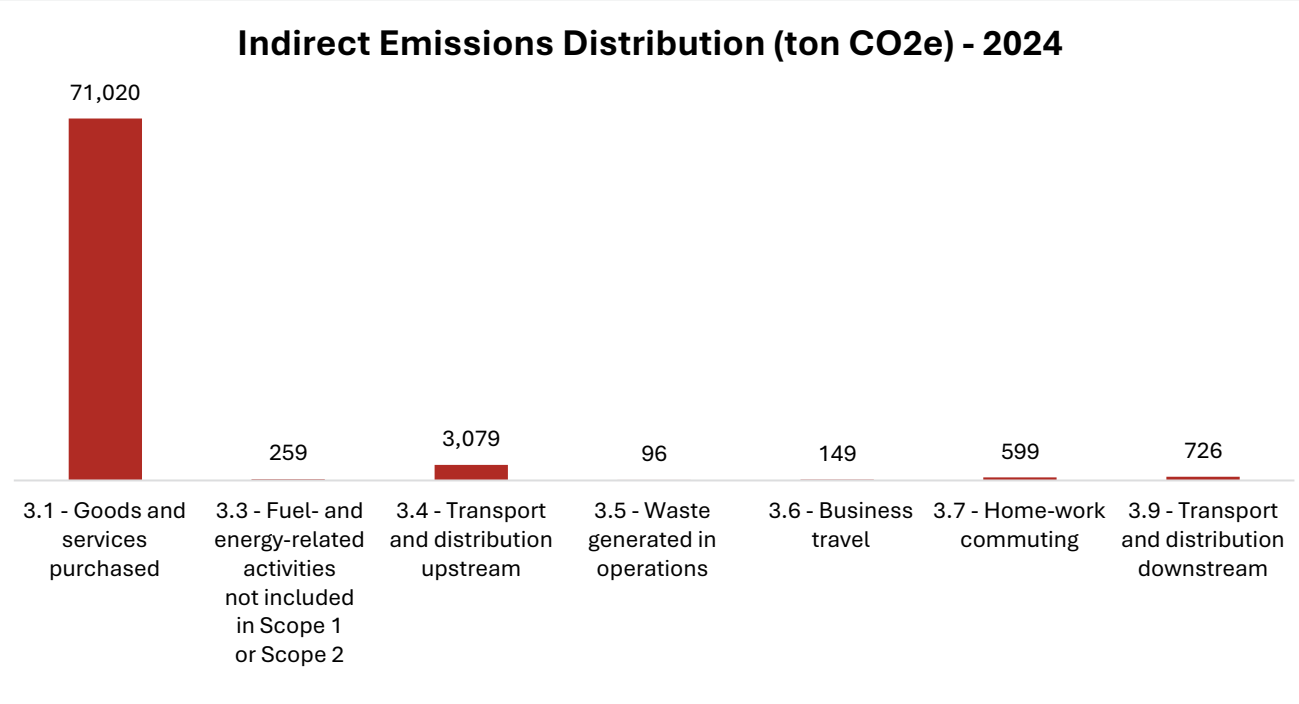
The total **Carbon Footprint emissions of the CTA Group**[iii] for the reporting year 2024 amount to **77,097 tonnes of CO_2e** based on the **market-based approach**, and **77,019 tonnes of CO_2e** based on the **location-based approach**.

The distribution of emissions, as shown in the chart below, highlights that the **largest contribution to the CTA Group's carbon footprint comes from Scope 3 activities (98.5%)**, which are not entirely under the direct control of the organization.



Specifically, as shown in the following chart, the most significant Scope 3 indirect emissions relate to:

- The production of purchased goods, which accounts for approximately 92% of total emissions, due to the fact that steel manufacturing processes are highly energy-intensive and therefore responsible for releasing substantial amounts of greenhouse gas emissions;
- Logistics (by land and sea), which accounts for approximately 4% of total emissions. In this area, there is already a consistent commitment — with specific targets assigned to senior management — to optimize goods transportation, also aiming to achieve economic benefits.



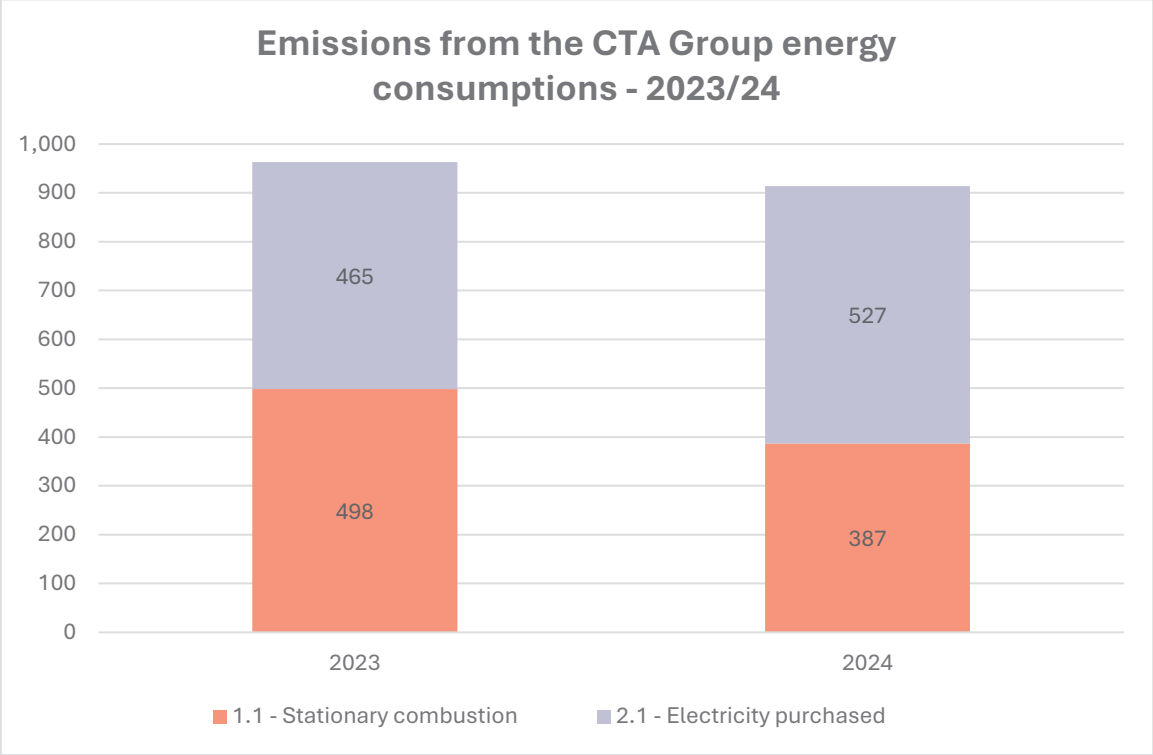
Despite the limited potential for intervention in terms of climate change mitigation highlighted by the CFO results, the CTA Group has committed in recent years to implementing various emission reduction initiatives — not only for Scope 1 and 2 emissions, which are directly under its control, but also more recently for Scope 3 emissions.

Specifically:

- the execution of energy efficiency measures — such as the revamping of the Grugliasco and Sarmato sites — and the promotion of best practices for rationalizing energy consumption;
- the installation of an electric-powered heating and cooling system in the Marcallo con Casone warehouse, replacing the methane boiler;
- the construction of photovoltaic systems for self-generation of electricity at the Grezzago and Grugliasco sites (with the new warehouse in Grugliasco already prepared for potential photovoltaic installation);

- the procurement of electricity from certified renewable sources with Guarantees of Origin to eliminate Scope 2 emissions for CTA S.p.A.;
- the appointment of a mobility manager to develop a Home-to-Work Travel Plan;
- the introduction of net-zero emission O-Next pipes in the product catalog.

The results of these initiatives can be observed in the comparison between 2023 and 2024 data on energy consumption at CTA Group sites:



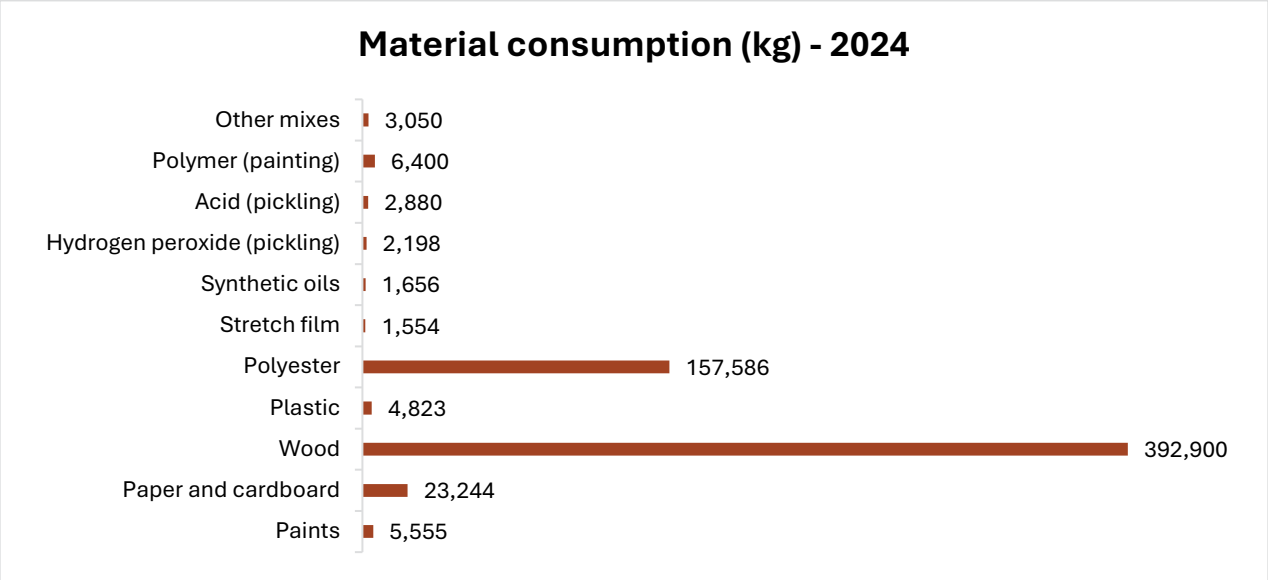
The chart indeed shows a general decrease in emissions associated with energy consumption across CTA Group sites. A slight increase in emissions linked to electricity consumption is observed, directly correlated with a reduction in emissions from methane combustion. This shift is due to the replacement of a methane-powered boiler with an electric-powered heating and cooling system in the Marcallo con Casone warehouse.

3.3 Use of Materials

The operational activities carried out by the CTA Group generate a limited direct impact in terms of material consumption. Nevertheless, this impact is monitored and mapped to assess the positioning of each operational area and to identify any significant trends.
This impact is mainly attributable to:

- **Warehouse management**, which primarily involves the consumption of wood, paper and cardboard, plastic, polyester, and paints for packaging and product marking;
- **Tecninox's production activities**, which mainly involve the use of hydrogen peroxide and acid for pickling, polymers for painting, oils, paper, and cardboard;
- **Office operations**, which primarily involve the consumption of paper and other stationery materials.

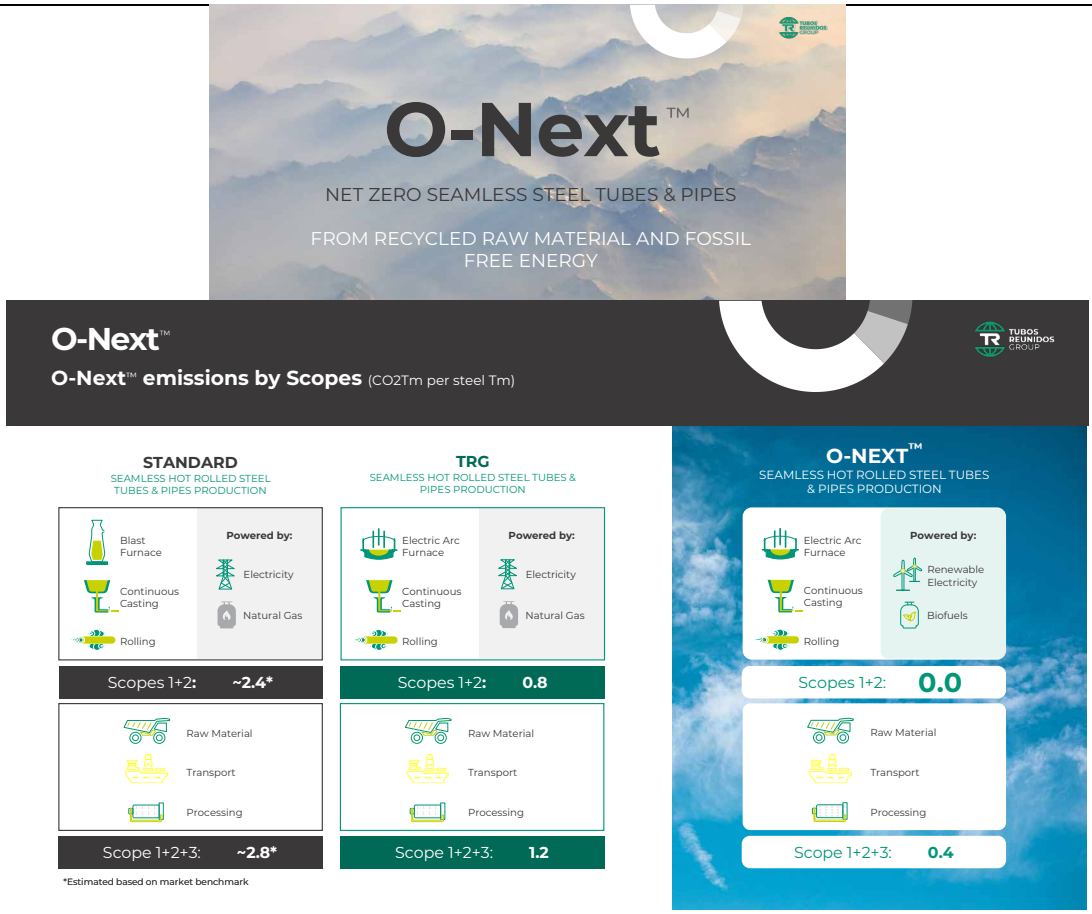
In this regard, the following material consumption figures were recorded in 2024.[iv]



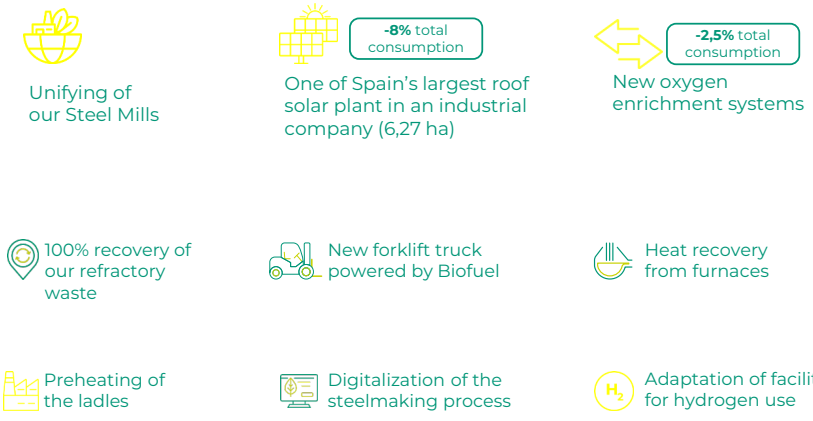
As shown in the chart above, the most significant material consumption in quantitative terms involves wood, polyester, plastic, paper, and cardboard. These are primarily linked to warehouse management activities such as the handling and packaging of pipes, fittings, flanges, and valves.

To improve material consumption management, the Group promotes — where technically feasible - the use of certified and recycled materials for packaging, as well as the adoption of best practices for recovering and reusing supplier packaging. Initiatives are also in place to reduce plastic usage - particularly in office environments — and to monitor the volume of recycled steel compared to the total annual volume handled.

Furthermore, in order to innovate the product range with a sustainable approach and to act, where possible, on indirect emissions, CTA Group has added net-zero emission O-Next™ steel pipes to its catalog.



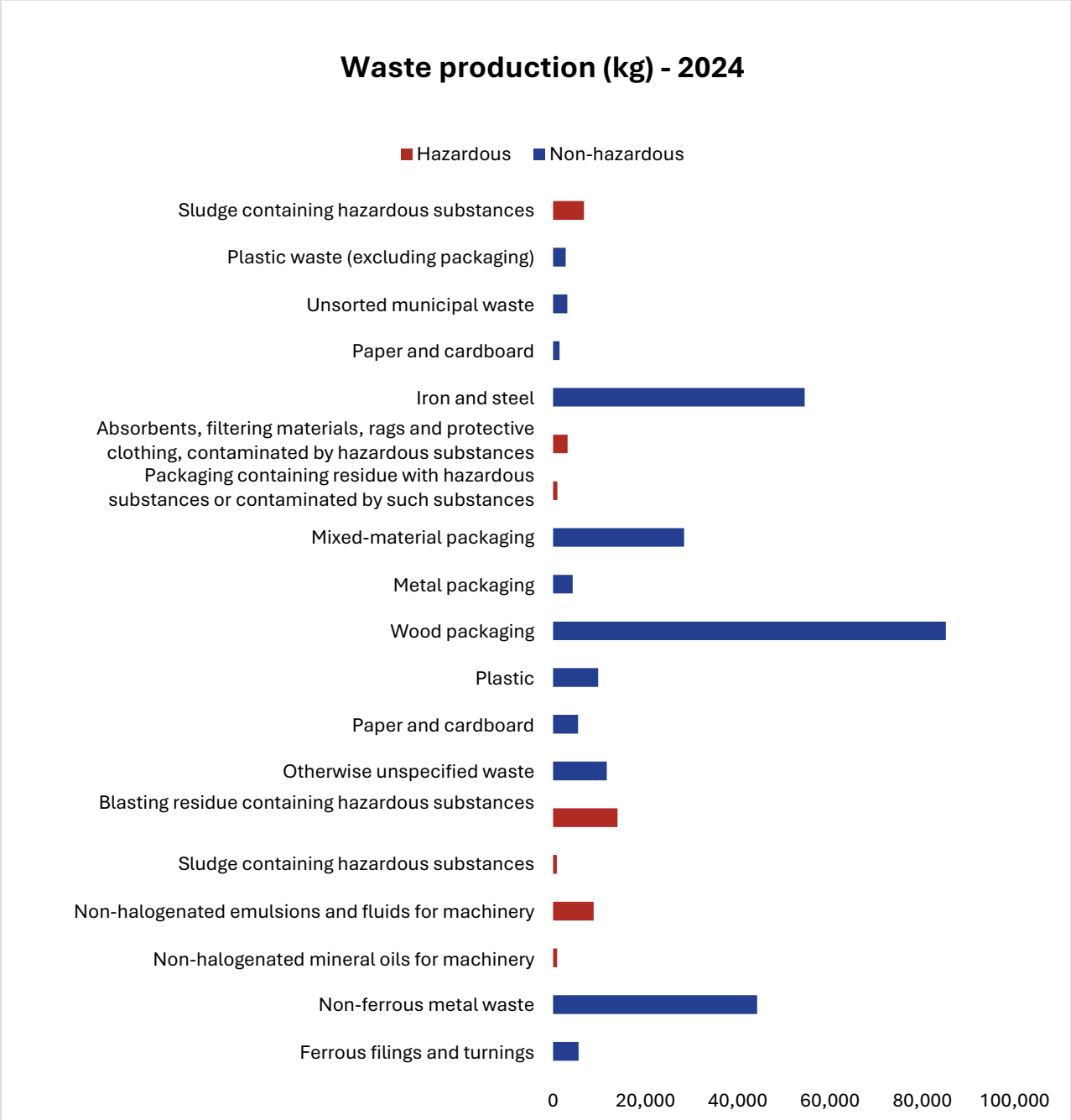
Several decarbonization initiatives to reach Net Zero



O-Next™ is the range of low-emission seamless steel tubes developed by the Tubos Reunidos Group. Thanks to the use of renewable energy, biofuels, and secondary raw materials — combined with innovative and efficient processes — the direct CO_2 emissions from the production of O Next™ tubes amount to 0.0 tonnes. The total emissions, including indirect activities, are 0.4 tonnes of CO_2, which is still lower than those of steel tubes produced using standard methods. The Environmental Product Declaration (EPD) will also be available in 2025.

3.4 Waste Management

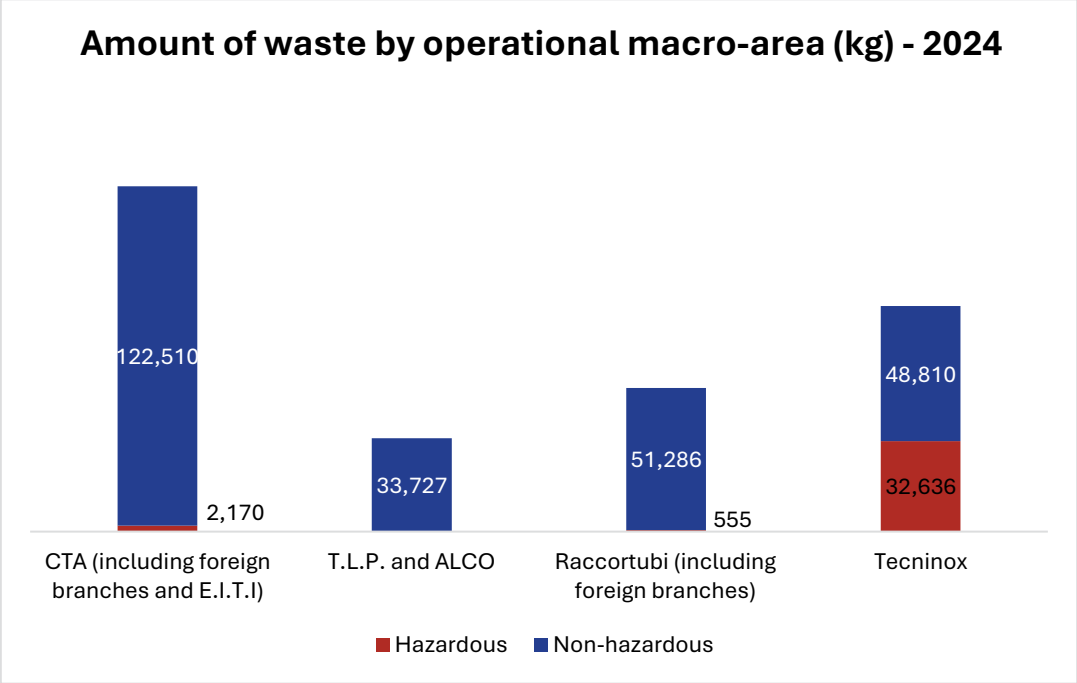
The management of waste generated during the CTA Group's activities follows, as far as possible, the principles of prevention, reduction, and recycling.
In this regard, specific measures have been implemented in the most exposed operational areas within the framework of ISO:14001-certified Environmental Management Systems. These systems enable continuous monitoring of the quantity of waste produced and the respective management methods, ensuring periodic verification of compliance with current regulatory requirements.
In 2024, the following data[v] were recorded regarding the composition and treatment of waste (the main categories are shown in the chart).



Shown in the chart, the most significant waste categories in quantitative terms are:

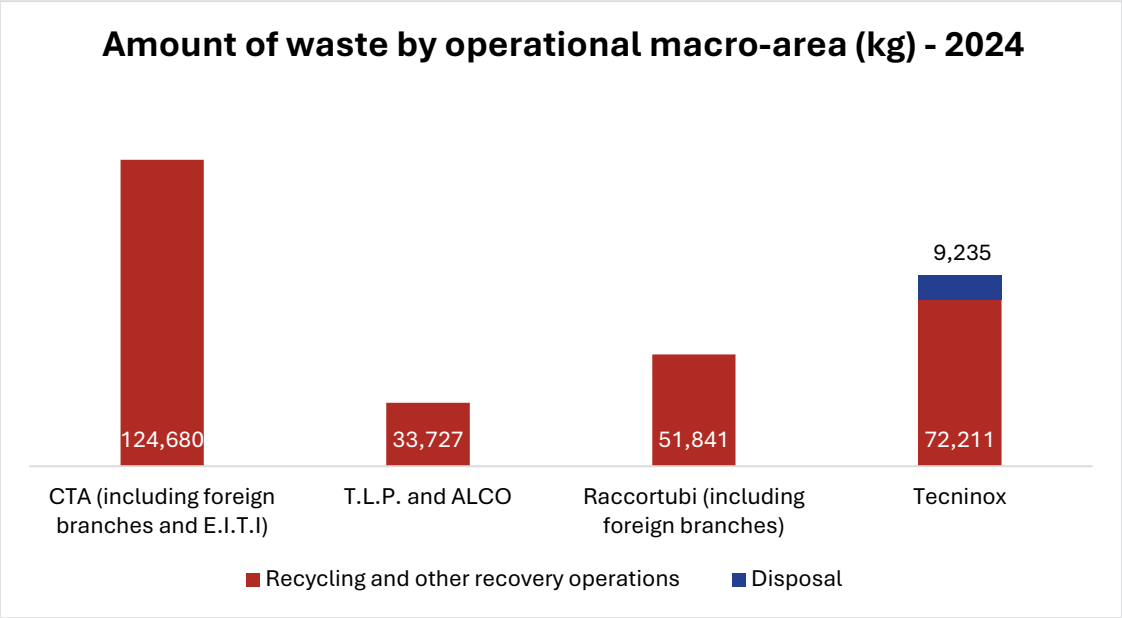
- **Wood packaging** (amounting to 85,110 kg), mainly originating from supplier packaging that can no longer be reused;
- **Iron and steel** (amounting to 54,520 kg), generated as production scraps or warehouse leftovers (e.g., non-compliant products);
- **Shavings, chips, and powders of non-ferrous materials** (amounting to 44,240 kg), resulting from processing activities carried out at Tecninox.

When grouping the companies into four main operational divisions, the 2024 data is distributed as follows.



Overall, the total amount of waste produced does not exceed **300 tonnes**. The majority of this waste (approximately **88%**) falls under the category of **non-hazardous waste**, a figure that aligns with the nature of the Group's activities. In fact, nearly all **hazardous waste** can be attributed almost exclusively to **Tecninox's production operations**, which play an auxiliary role within the Group's core business.

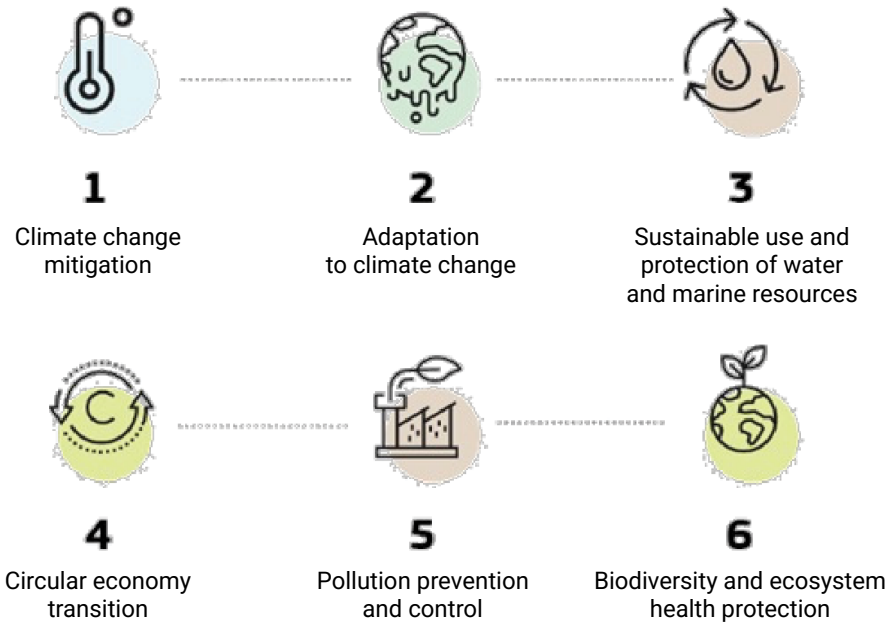
Given this qualitative composition, approximately **96%** of the waste generated by the Group is directed towards **reuse, recovery, or recycling operations**. Disposal processes are reserved almost entirely for the hazardous waste resulting from Tecninox's manufacturing activities.



With regard to waste management, the Group is committed to promoting best practices based on reduction principles — through both structural and operational efficiency in how activities are carried out — and recovery, by reintroducing certain types of waste (e.g., iron and steel) into production cycles, which can also generate economic benefits.

3.5 Environmental Taxonomy

The European Union Environmental Taxonomy, introduced by Regulation (EU) No. 2020/852, is one of the cornerstones of sustainable finance. This regulation provides the criteria for determining whether an economic activity can be considered environmentally sustainable — that is, whether the activity is aligned with one of the six environmental objectives of the EU illustrated in the figure below.



The objective of the Environmental Taxonomy is to guide and facilitate the financing of economic activities aligned with the goals of the European Green Deal.
According to EU guidelines, the strategy for alignment with the Taxonomy is a process that unfolds in two phases:

1. The company must identify eligible economic activities, i.e., those that correspond to the activities included in the list of "environmentally sustainable" economic activities, as defined in the delegated acts of the Taxonomy;
2. The company must narrow down the list to identify activities that meet the eligibility criteria and are aligned with the sustainability requirements and technical screening criteria established by the Taxonomy.

The CTA Group recognizes the importance of the EU Taxonomy as a classification and transparency tool to help companies achieve sustainable development goals.
For this reason, in 2023 a gradual alignment process with the Taxonomy was initiated, which continued in 2024, identifying economic activities that could be considered "eligible" and therefore potentially aligned with one or more environmental objectives.

To this end, a preliminary screening was completed to assess the correspondence between the activities classified in the Taxonomy and the economic activities carried out by each company within the Group. This analysis revealed a match with the activity “3.2 Manufacture of equipment for the production and use of hydrogen” — listed in the delegated acts related to climate change mitigation and adaptation objectives — which is consistent with the development goals of the startup Vision2H. On the other hand, the Group’s core business activities in distribution and project management are currently not among the activities considered eligible, i.e., those capable of making a substantial contribution to the European Union’s environmental objectives.

Based on this eligibility analysis, it will be possible — in the coming years — to assess the potential alignment of the listed eligible activity, potentially demonstrating its full compliance with the Taxonomy requirements.

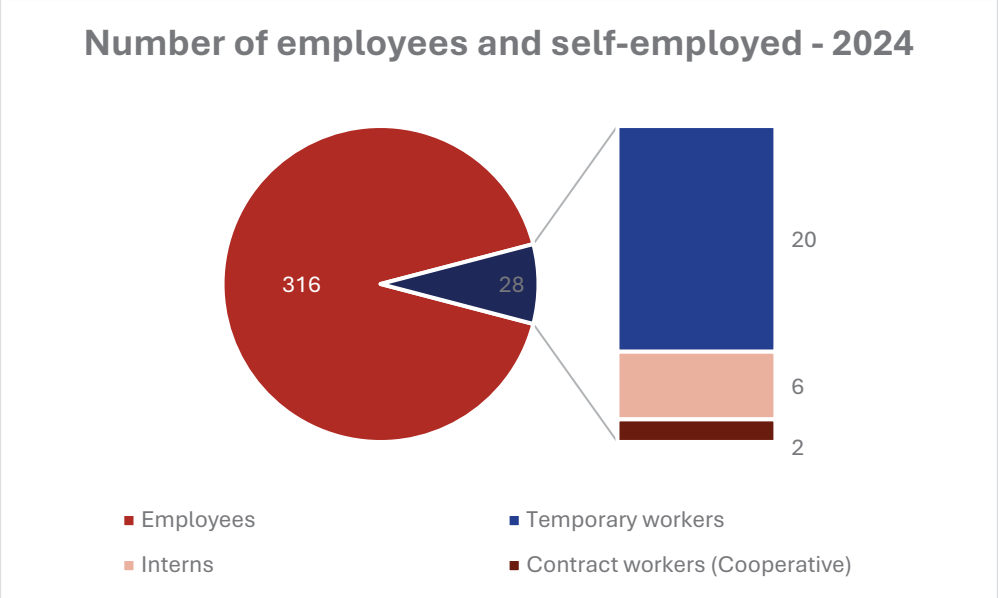
4 SOCIAL

4.1 People at CTA Group

CTA Group recognizes that human resources are a fundamental and essential component for the execution of its business and for achieving optimal management of the services offered. For this reason, it is continuously committed to protecting and enhancing human capital, with the aim of ensuring employee well-being and developing their skills in a positive and inclusive work environment.
In 2023, with the acquisition of the Raccortubi Group, CTA Group significantly expanded its workforce and embraced the challenge of integrating the skills and characteristics of the people working in the various companies, creating a cohesive team with a strong sense of belonging.

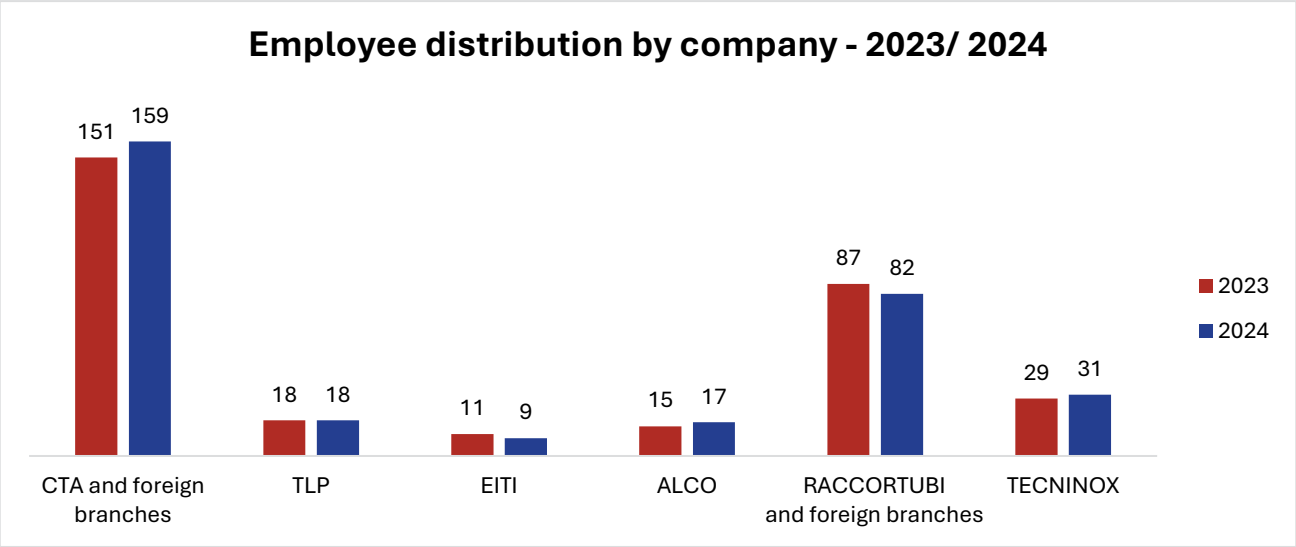
4.1.1 Human Resources

Compared to 2023, when the Group's activities were carried out by 311 employees, in 2024 the total workforce of CTA Group — as of 31/12/2024 — consists of 316 employees[1] and 28 non-employees, the majority of whom are temporary workers, as shown in the chart below.



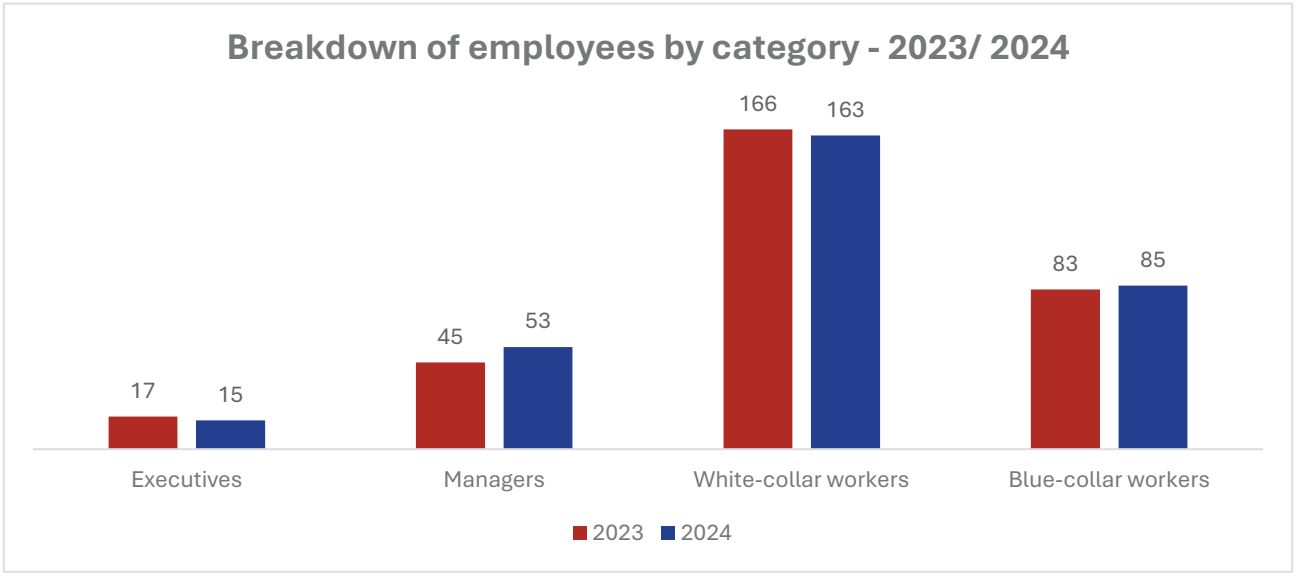
With respect to the various companies within the CTA Group, in 2024 the workforce is distributed as follows.

[1] In 2024, personnel data was calculated as the total number of Group employees as of 31/12/24.

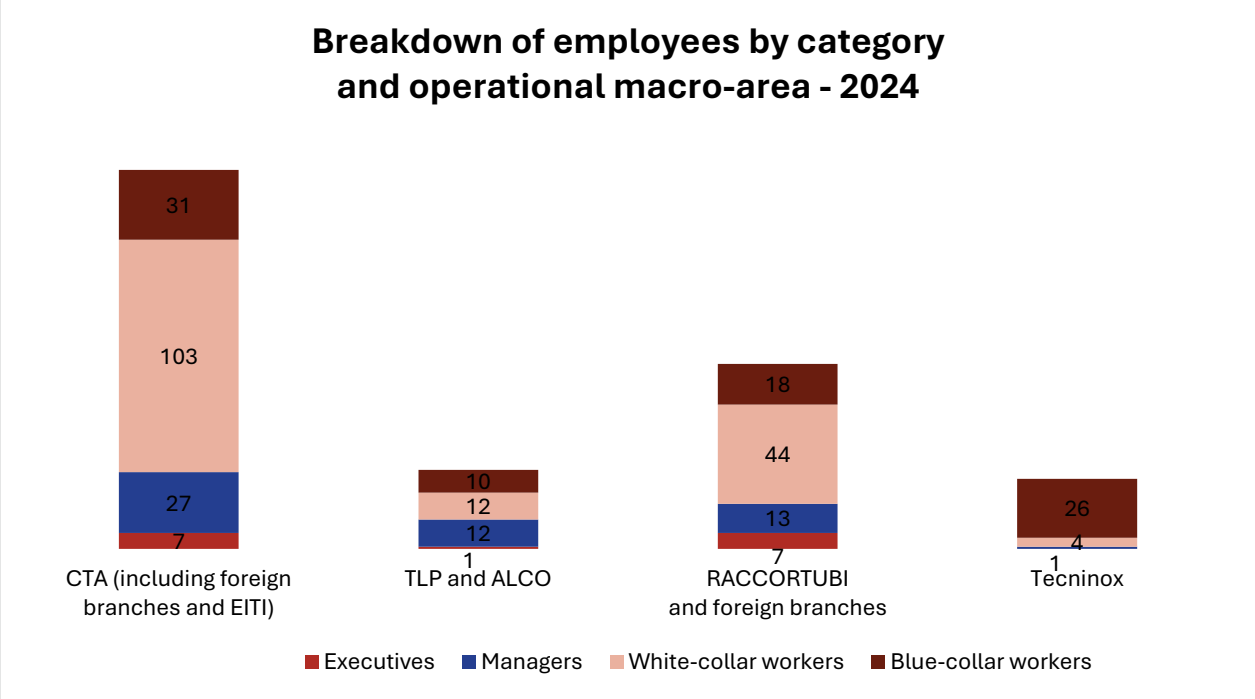


Within the Group, CTA Spa — including its foreign branches — is the company with the highest number of employees, followed by Raccortubi, the second largest in terms of size, and Tecninox. Next are TLP, EITI, and ALCO, which have a similar workforce size.
Of the Group's total employees, approximately 75% are classified as white-collar workers, middle managers, and executives, in line with the Group's distribution and design activities. Meanwhile, blue-collar workers represent around 25%, mainly concentrated in the production units of Tecninox (26 employees) and CTA Spa (31 employees).

Compared to 2023, the distribution of employees by professional classification has remained largely unchanged, with the only significant variation being a 2% increase in the number of middle managers, offset by a corresponding decrease in white-collar workers.

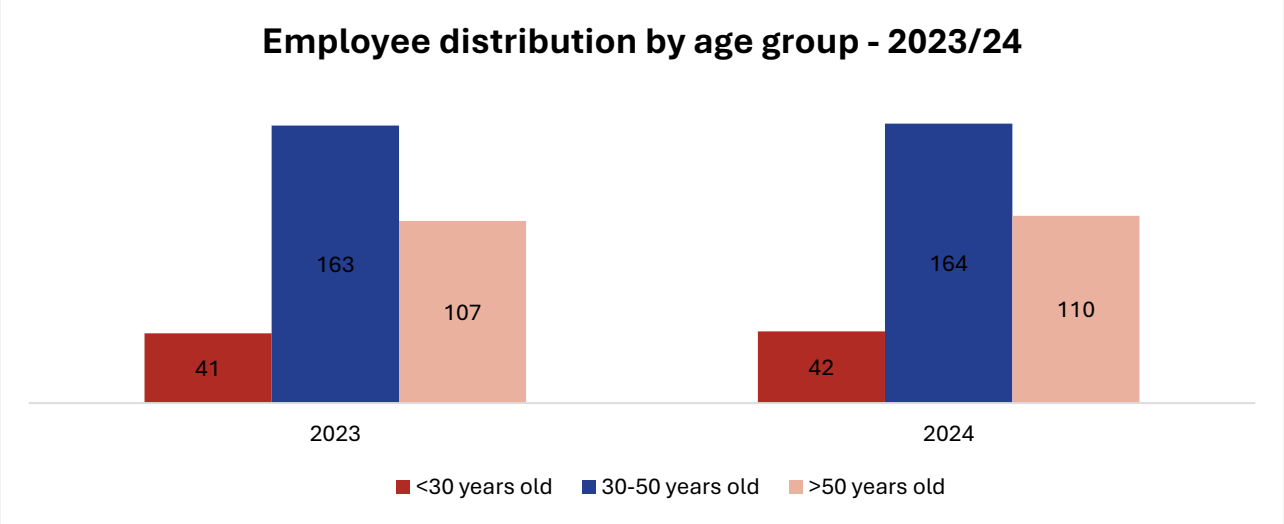


The chart below highlights the distribution of the number of employees and their classification based on the respective company.



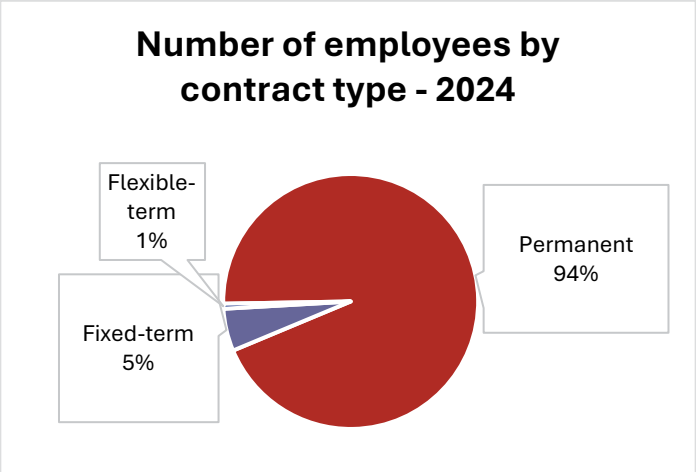
By convention, all senior managers of foreign branches are considered "executives," even where there is no exact correspondence with the classification used in Italy.

In terms of age group distribution, approximately half of the Group's employees fall within the "30–50 years" range, in line with 2023 data. The significant number of employees over the age of 50 reflects the Group's ability to value the experience of its human capital as an important asset for the success of its activities.



With regard to employment relations management, each company within the Group promotes the creation of stable and long-lasting relationships with its human resources. This commitment is demonstrated not only through the initiatives aimed at enhancing and supporting employee

well-being (described in the chapters | Development & Training and | Well-being & Inclusion), but also through the following indicators calculated at consolidated level.
In 2024, 94% of employees were hired on permanent contracts, and the turnover rate[2] was 8%, showing a slight increase compared to 2023.

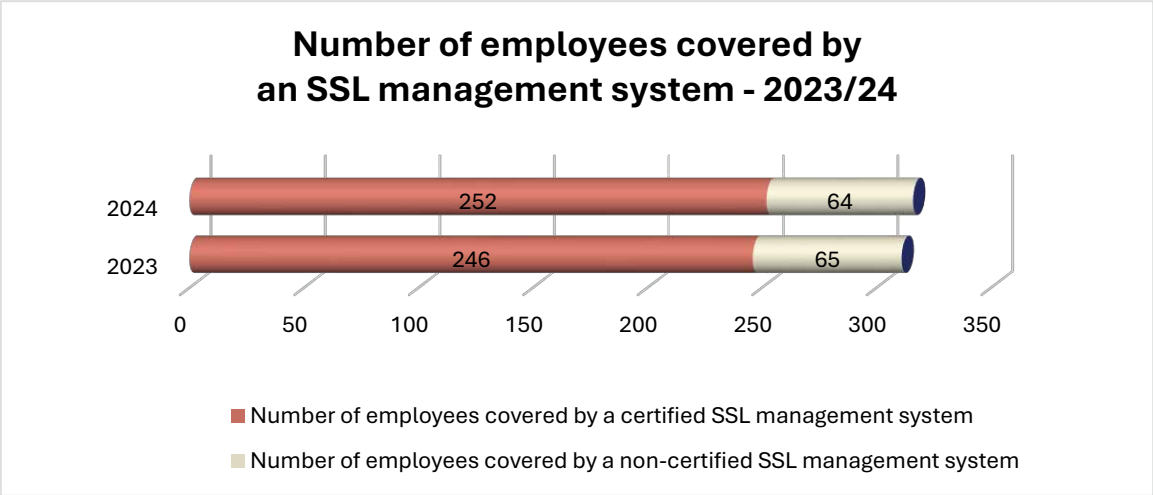


4.1.2 Health and Safety

CTA Group is committed to ensuring that all employees work in an environment characterized by optimal safety and health conditions, and to promoting a culture of safety and awareness of the risks associated with work activities. At every level of the organization, responsible behavior and compliance with the adopted workplace safety procedures are required.

Across all companies within the Group — for the 2023/24 biennium — Health and Safety Management Systems are in place to protect workers. In operational areas exposed to higher risks (such as the Tecninox production plant and the CTA and Raccortubi warehouses in Grugliasco, Grezzago, Marcallo, and Aberdeen), these systems are implemented in accordance with the international ISO 45001 standard, recognized as best practice in the field. In operational areas with lower risk exposure, the systems are implemented in compliance with legislative requirements, while still using ISO practices as a reference.

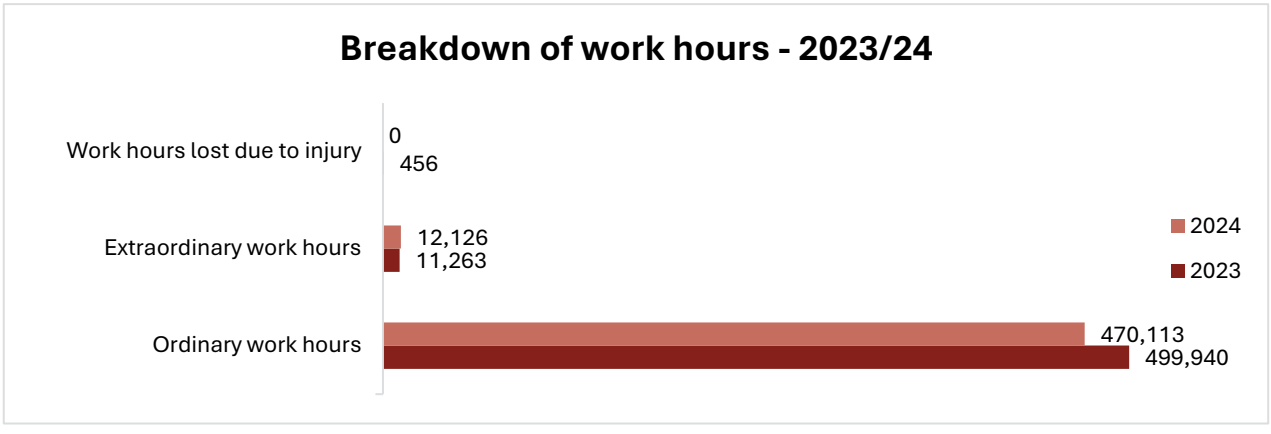
[2] (Number of employees who left the company during the reference year / total number of employees)



These management systems allow, through the definition of specific roles, responsibilities, and procedures, to:

- prepare and keep risk assessment documents up to date;
- improve risk monitoring capabilities in order to eliminate them or, where this is not possible, minimize them based on the knowledge acquired through technological progress;
- regulate the maintenance of environments, equipment, and facilities;
- verify legislative compliance and reduce the risk of administrative and criminal penalties;
- plan prevention activities, as well as information and training for managers and all personnel;
- achieve greater efficiency by reducing accidents and downtime during production.

During the 2023–2024 biennium, there was a significant decrease in workplace accidents: from four cases in 2023 to zero in 2024. Moreover, none of the reported accidents resulted in serious consequences or fatalities, and no cases of occupational illness were recorded during the same period. The chart below shows the details of hours worked in 2023 and 2024 at Group level.



In 2023, the Group's injury rate – calculated as (number of injuries / total hours worked) × 1,000,000 – was 7.8%, while in 2024 it dropped to zero, consistent with the elimination of workplace accidents.
In this context of continuous improvement, the Group's main objective for 2024 — zero injuries — was achieved, thanks to the harmonization of practices across the various companies (especially the newly acquired Raccortubi Group) in terms of monitoring, assessing, and managing health and safety risks for workers.
The goal for 2025 and the following years is to maintain the result of zero injuries across the entire Group, reinforcing the intention to make workplace safety a long-term priority.

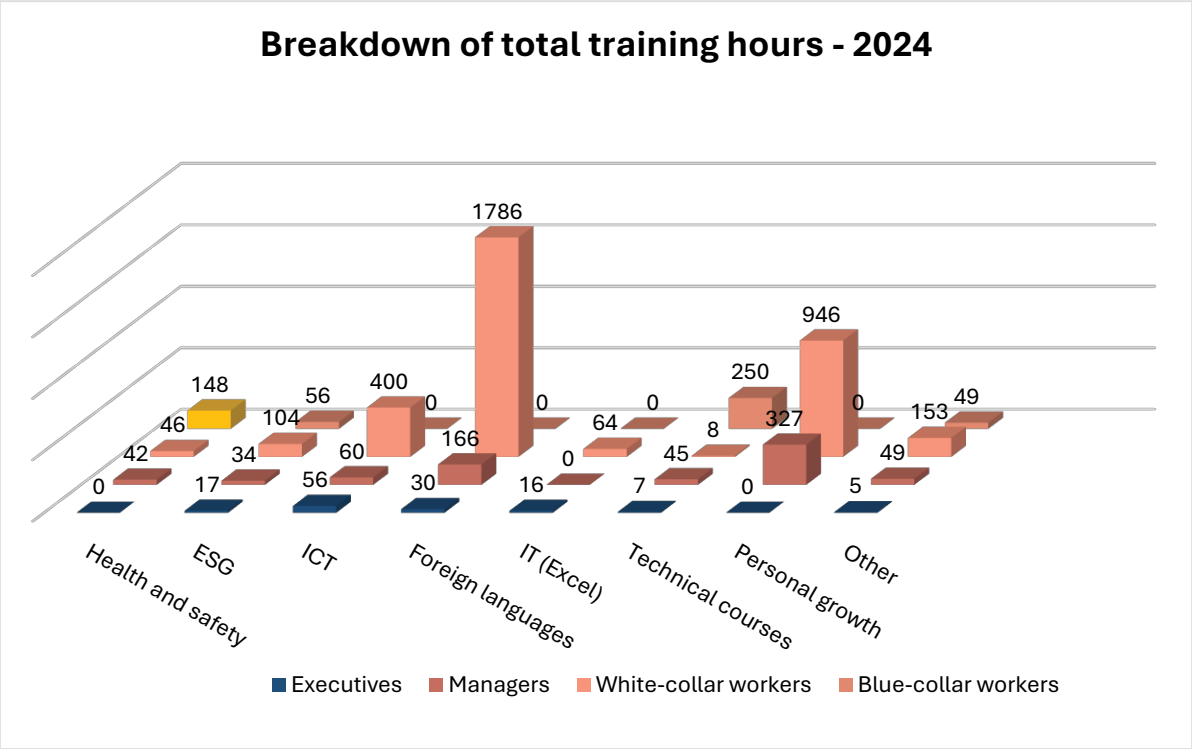
4.1.3 Development and Training

Employee well-being and the enhancement of human capital are fundamental to ensuring the success, competitiveness, and long-term development of CTA Group.
For this reason, all employees are offered appropriate growth opportunities, with each individual involved in a development path focused on building skills and competencies, and the promotion of training and information activities at all organizational levels.

From the recruitment and selection of candidates, the human resources management process is carried out internally within the Group. To support onboarding and integration — both organizationally and culturally — each company introduces new hires to their role through onboarding procedures that include:

- role, responsibilities, and reference contacts;
- instructions for using systems and tools;
- QHSE management systems (including mandatory training on occupational health and safety);
- company regulations, principles, and codes of conduct.

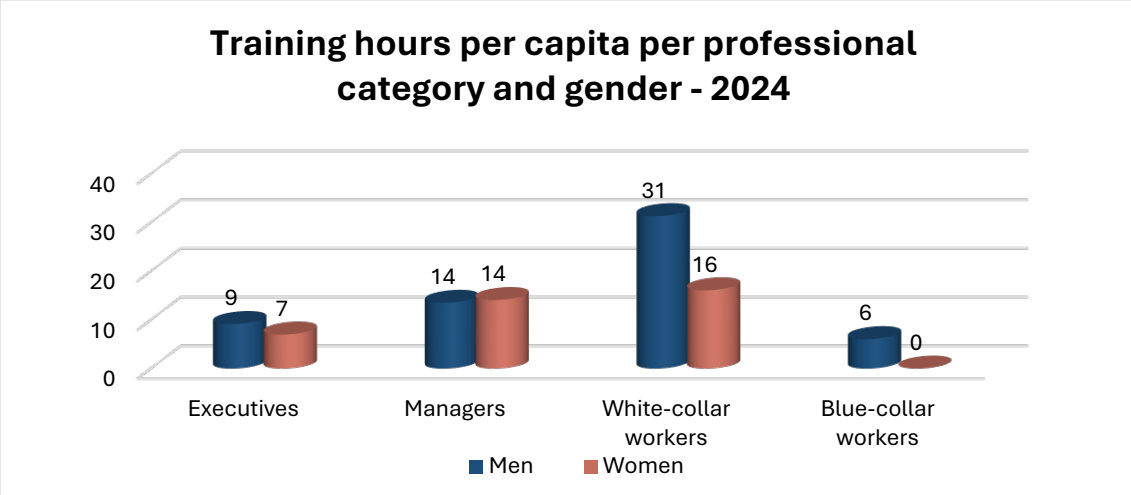
Subsequently, each employee is involved – in ways that vary depending on their experience and professional skills – in a continuous skills development process through on-the-job learning and periodic participation in specific training courses. Each company prepares annual training plans aimed at strengthening employees' technical and transversal knowledge and updating work methodologies.
Training provided to employees is organized and managed both internally and with the support of external consultants, for example in language courses and IT resource usage. Some training courses are also periodically organized by manufacturers of the commercialized materials.
Overall, in 2024, nearly 5,000 hours of training were delivered to Group employees — approximately 25% more than in 2023 — distributed as shown in the chart below.



Among the most relevant categories in terms of hours delivered are foreign languages and personal development, highlighting CTA Group's commitment to investing in the individual growth of its employees. Other key topics include ICT, health and safety, ESG, and technical training.

Technical and health & safety training courses are primarily targeted at blue-collar workers, while all other types of training are mainly directed toward white-collar employees, middle managers, and executives, who make up more than 70% of the Group's workforce.

Training data by professional category and gender is distributed as follows.



The process of employee growth and development also includes a periodic evaluation of performance and results achieved, which may be either individual or collective (in relation to business objectives and continuous improvement goals defined within ISO management systems). When the evaluation is individual, it is carried out with varying degrees of formalization depending on the role performed.
Performance evaluations are conducted in each company at least annually and are aimed both at identifying areas for improvement in the management of activities for individual employees and business units, and at collecting feedback to plan any corrective actions to enhance efficiency at the organizational and operational level.
Employee development is further supported throughout the Group by a continuous commitment to promoting internal mobility aimed at reaching leadership positions, empowering employees and enhancing their skills with a view to maintaining and leveraging corporate know-how.
Executives are subject to incentive policies that reward the achievement of corporate and/or individual objectives. In the final part of 2023, during the annual objective-setting process for the following fiscal year, an ESG objective was assigned to the group of Managers.
An example of the Group's ongoing commitment to employee engagement and development is the Induction Project, carried out in November 2023 as the first initiative at consolidated level and described in detail in the box below. The same initiative will be repeated biennially in autumn 2025.

Induction Project

In 2023, the Induction Project was carried out — an event held biennially in which new hires from CTA, Raccortubi, and TLP who joined during the 2021/2022 biennium — around 30 people — met with company management, got to know new colleagues, and worked together by sharing ideas, expectations, and values.
The event will be held again in 2025 and aims to lay the foundation for effective collaboration and collective growth, contributing to the Group's long-term success.

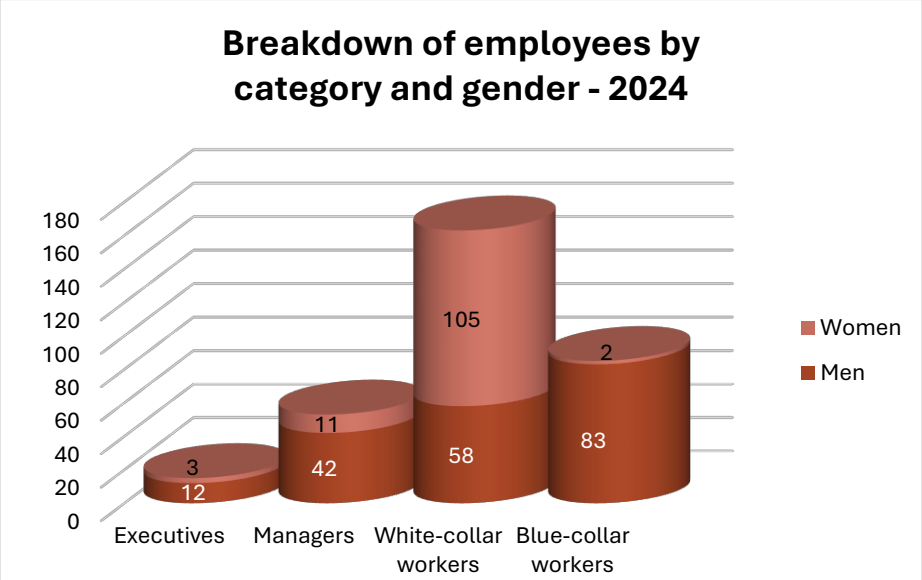
<u>The Results</u>

- **Effective Onboarding**
- **Strategic Collaborations**
- **Inclusion and Empowerment**

4.1.4 Well-being and Inclusion

CTA Group places constant attention on the inclusion and well-being of each individual employee, aiming to strengthen their sense of belonging and ensure a positive and welcoming work environment where employees can develop their full potential.

Regarding Diversity and Inclusion (D&I) topics, all companies within the Group promote – through specific documentation such as policies and regulations (e.g., the Code of Ethics) and institutional communication – behavioral principles that reject any form of discrimination, taking into account the cultural and legal specificities of each country. The implementation of these principles is monitored by HR managers and the Executive Management, which has the authority to take action and apply sanctions in case of violations of company rules.
As part of and in confirmation of this commitment, in early June 2025 CTA Group, represented by its CEO Francesca Santini, signed the "Charter for Equal Opportunities and Equality at Work" together with the Industrial Union. This declaration of intent represents the Italian adaptation of the European Commission's Diversity Charters, aimed at promoting gender equality and inclusion within corporate culture and human resource management policies.
In terms of gender diversity, currently around 40% of CTA Group employees are women. The distribution by professional classification and gender, illustrated in the chart, shows a clear female majority in clerical roles. In fact, among white-collar employees, women represent approximately 65% compared to men in the same role, with lower representation at executive and managerial levels, where women account for about 20% compared to men.



Specifically, considering Executive Management at consolidated level — defined as the first and second organizational levels below the administrative and supervisory bodies (Board) — the following data is recorded:

Executive Diversity	Group 2023		Group 2024	
	Number	%	Number	%
Men	59	65.6%	58	65.2%
Women	31	34.4%	31	34.8%
Total	**90**	**100%**	**89**	**100%**

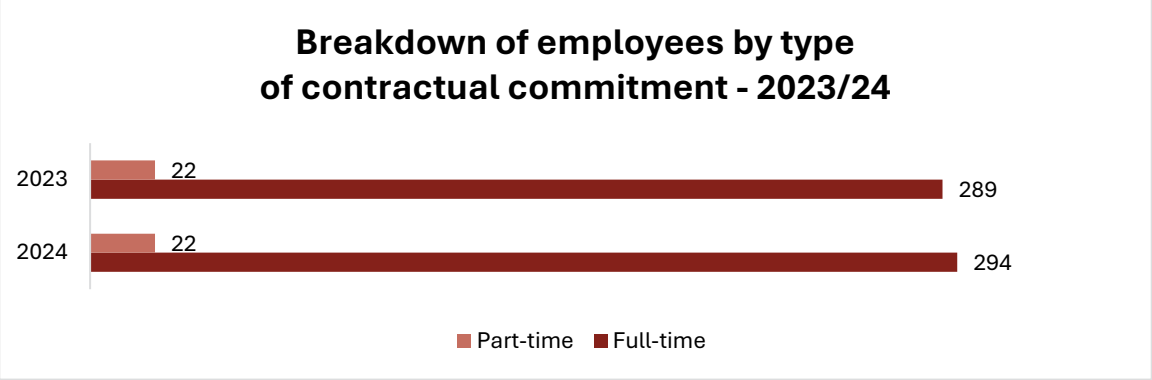
The Group's commitment to diversity and inclusion is also reflected in the daily execution of business activities: every day, multiple cultures collaborate across the 16 sites located in Europe, South America, the Middle East, and Asia.
In this regard, CTA Group's guiding values are expressed through the words of President Pollastrini, who emphasizes the Group's commitment and need to continuously adapt its working methods to an international perspective and intercultural dialogue, in order to improve both internal and external relationships and to compete and meet the needs of an international clientele.

CTA Group: from italocentric to international

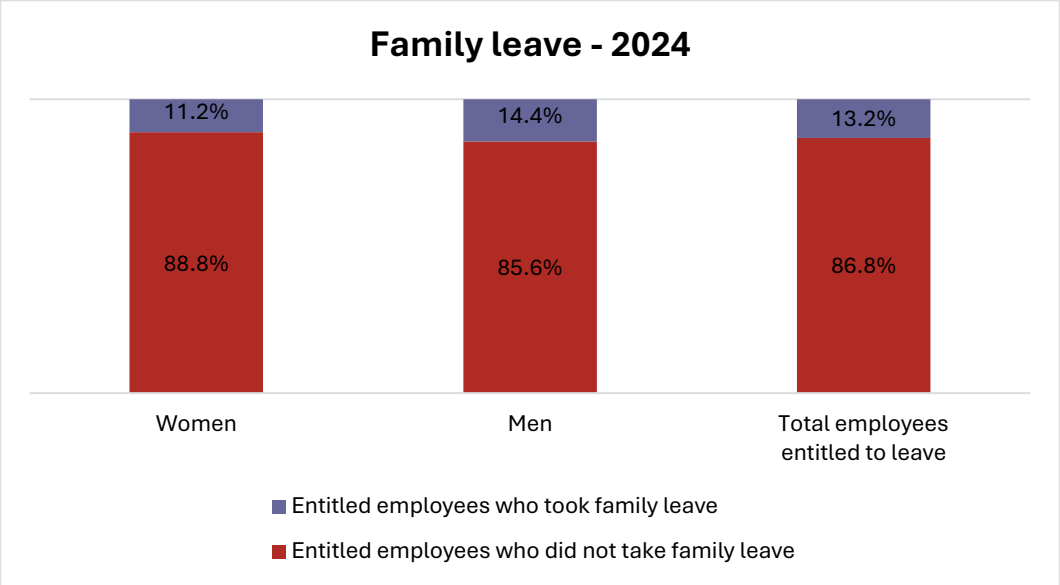
- *Being open to cultural differences*
- *Overcoming the invisible barriers that divide our world*
- *Enhancing cultural diversity respect for individual differences*
- *Identify what makes our culture different from others in order to open up to understanding*
- *Starting from the similarities*

Regarding the psycho-physical well-being of employees, the commitment of the companies within the Group focuses on the following areas:

- the possibility of accessing part-time contracts — where job duties allow — for employees who request them for personal reasons; in this regard, data for the 2023/24 biennium is shown in the chart below;



- the guarantee for 100% of employees to benefit from family leave, which was requested and granted to 13% of the Group's employees in 2024, as shown in the following chart;



- the possibility of using agile work arrangements (smart working) and increased schedule flexibility — where job duties allow — to support a better work-life balance;
- the implementation of medical prevention campaigns; in the Group's main companies, health prevention initiatives have been promoted through screenings and awareness campaigns. In particular, in 2024, male employees at CTA participated in the "Men's Health Campaign 2024 — Male Prevention" organized by LILT (Italian League for the Fight Against Cancer), and the company also promoted a flu prevention campaign;
- the possibility of receiving osteopathic treatments as part of the wellness package offered to employees of CTA, TLP, and Raccortubi in Italy;
- the provision of psychological support for listening and assistance, as well as the evaluation of the work environment and any work-related stress situations;
- the offering of welfare benefits to strengthen employees' economic well-being and support parenthood;
- the preparation of a workplace climate survey to be distributed in 2025, aimed at assessing employee satisfaction and perception, in order to gather feedback and identify areas for improvement.

4.2 Customers

For CTA Group, ensuring customer satisfaction is one of the most important priorities: the relationship with its clients is based on values such as professionalism, efficiency, and quality, with the aim of anticipating every possible need.
For this reason, all the Group's main operational areas are equipped with Quality Management Systems certified in accordance with the most important ISO industry standards, which — through the definition of specific organizational structures and procedures — allow the Group to:

- implement continuous performance monitoring;
- identify and correct any non-conformities;
- improve effectiveness and efficiency in product manufacturing or service delivery.

CTA (Italy, Iberia, Asia)	**TLP**	**ALCO**	**EITI**	**Raccortubi (Italy and foreign branches)**	**Tecninox**
ISO 9001	ISO 9001	ISO 9120 ISO 19443	ISO 9001	ISO 9001	ISO 9001

In addition to certified management systems, the Group also holds certifications for various application sectors, such as the BV Marine & Offshore NR320 for Tecninox and Raccortubi, international approvals for product commercialization, and specific approvals issued by end customers — further demonstrating the quality of the products and services offered.
Starting in 2024, the Group launched a process to review and integrate practices defined within these Quality Management Systems, aimed at ensuring greater consistency across the Group.
Overall, with regard to customer relationship management, these practices across all CTA Group companies primarily focus on:

- quality control of distributed materials (and partially manufactured by Tecninox);
- customer satisfaction analysis and complaint management.

For the first aspect, each company's material purchasing activities include both a thorough supplier qualification process (including on-site audits conducted by Quality department staff) and specific quality control procedures to verify the conformity and compliance of purchased materials with agreed standards. These procedures include:

- standard checks upon receipt of materials in warehouses, where designated personnel complete checklists for external visual inspection;
- more in-depth sample checks (destructive and non-destructive tests), carried out by qualified Group employees and accredited external laboratories, aimed at testing dimensional and qualitative characteristics.

Regarding Tecninox's production activities, quality controls are embedded in every phase of the manufacturing process — from the careful selection of raw materials to significant investments in technology, such as the implementation of a robotic cell for dimensional checks, PMI, marking, and packaging, ensuring the delivery of high-quality finished products.

Internal tests include hardness testing, PMI, dye penetrant testing, and magnetic particle inspection; other destructive and non-destructive tests are entrusted to external laboratories accredited by international bodies, with which the Group maintains long-standing collaborations.

As for customer satisfaction, systems are in place across Group companies to monitor client satisfaction levels through multiple channels, such as direct contact with sales representatives or the distribution of specific questionnaires designed to identify potential areas for improvement in order and project management.

The results of these activities — developed in line with ISO Quality standards — are periodically reviewed by Group management during Management Reviews, through which the following actions are taken:

- assessment of specific customer satisfaction indicators;
- definition of potential changes to processes, roles, or responsibilities;
- establishment of objectives for the following year.

Each company within the Group is therefore committed to promptly resolving any complaints, ensuring immediate support and communication through the appropriate departments.

4.3 Relationship with the Community

Maintaining and enhancing long-term relationships with the local communities relevant to the company's activities forms the foundation for business success and the shared creation of value and well-being for current and future generations.

For this reason, the CTA Group has always been committed to playing an active and engaged role in promoting the economic, social, and cultural development of the community, with particular attention to the metropolitan city of Turin and neighboring municipalities — where the company originated and grew to reach an international scale. Since the founding of CTA S.p.A. in 1959, a strong bond has developed with the Turin area, demonstrated by participation in numerous initiatives promoting Corporate Social Responsibility.

In 2024, the Group strengthened its commitment to social responsibility by funding and promoting projects, initiatives, sporting events, and educational activities for younger generations, as outlined in the table below.

As part of a consolidated approach to managing these practices, the initiatives supported by the Raccortubi Group in recent years have also been integrated, highlighting a shared sensitivity toward corporate social responsibility projects. The goal is to create a positive and lasting impact on the social fabric, promoting pathways for growth, autonomy, and integration through concrete and targeted support.

SCOPE	BENEFICIARY	MOTIVATION
	ASD Pro Eureka	Continuation of the commitment in support of ASD Pro Eureka, aimed at creating a space for social interaction and community engagement for young people within the municipality of Settimo Torinese. This initiative, which involved a significant investment of both financial and non-financial resources, is described in greater detail in the following pages.
	Contrametric Ensemble - ETS	Financial support for the implementation of artistic and musical initiatives and activities of the young Turin-based orchestra Contrametric Ensemble, founded in September 2020 with the aim of being a safe harbor where young people can grow artistically and gain direct exposure to the profession of musician.
	LILT	Participation in the breast cancer awareness campaign in collaboration with LILT (Italian League for the Fight Against Cancer). In June and July 2024, preventive health screenings were carried out for male employees of the CTA Group who took part in the "Men's Health Campaign 2024 – Prevention for Men," held at the Grezzago and Grugliasco offices.
	Balconi Azzurri	Donation to the association "I Balconi Azzurri," founded during the COVID-19 pandemic with the aim of providing practical and financial support to those in need.

	IEO-MONZINO Foundation	Donation to the IEO-MONZINO Foundation, which supports research on cancer and cardiovascular diseases carried out by the European Institute of Oncology (IEO) and the Monzino Cardiology Center—two internationally recognized centers of excellence.
	The City of Women APS	Donation to the association "La Città delle Donne APS," founded in 2019 with the aim of providing listening and support to women who are victims of violence, minors, and individuals in vulnerable situations such as the elderly, people with disabilities, and immigrants. Its main objective is to combat all forms of discrimination and violence against those belonging to the most fragile segments of society by offering concrete support.

Among the main initiatives supported by the CTA Group in 2024, particular significance is given to the inauguration in May 2024 of the new sports facility of ASD Pro Eureka in Settimo Torinese, whose modernization was financed by the CTA Group in the previous year.

The event was attended by the Mayor of the city, the President of the FIGC (Italian Football Federation) for the Piedmont and Aosta Valley Committee, and the Deputy Vice President of the National Amateur League, highlighting how the investment has transformed the new facility into a cutting-edge center, recognized as one of the most important football complexes in Piedmont.

The executive project involved a complete redesign of the area and the implementation of every intervention according to the highest standards of quality and environmental sustainability. For example, the 11-a-side football fields were built with a vertical drainage sub-base, considered a next-generation solution in terms of energy savings, durability, and system reliability.

The 7-a-side and 5-a-side football fields were also built using the same system and are available to the entire community of Settimo Torinese for friendly matches and amateur tournaments.

In September 2024, the new facility hosted the **International Tournament Città di Settimo Torinese Under 11**, welcoming some of the most prestigious youth teams from professional clubs in Italy and abroad, such as Real Madrid, Barcelona, Ajax, Milan, Inter, Juventus, and Torino — confirming the high technical level and prestige of the event.

Alongside the sports activities, social and educational projects were also carried out, such as support for the **Pro Eureka "Special Football"** team, dedicated to children with disabilities.

Additionally, with the start of the upcoming season, a new initiative focused on healthy nutrition is planned, developed with the support of specialized psychologists and nutritionists.

CDA Group

COSTRUIRE INSIEME UN FUTURO

di sport e solidarietà

Inaugurato il nuovo **Centro Sportivo Guido Sattin** a Settimo Torinese

5 GOVERNANCE

5.1 Business Conduct

The Group pays particular attention to adopting business practices that are both efficient and respectful of principles of social and ethical responsibility, taking into account the complexity of corporate processes, the international scope of its activities, and the wide range of stakeholders with whom it interacts.

In this regard, in addition to what is described in section 1.3 concerning the organization of operational activities, over the years specific policies and safeguards have been defined to properly guide corporate conduct and culture:

- The Code of Ethics, adopted by both CTA and Raccortubi, outlines the values that must inspire the behavior of all individuals who, at various levels of responsibility and within the affiliated companies, contribute through their actions to the execution of activities — including consultants and/or external collaborators, commercial and operational partners.

  The application and compliance with the respective Codes are monitored by Management and promoted through dedicated awareness initiatives aimed at personnel. The guiding principles of both companies' Codes are presented in the following box.

CTA GROUP

Legality – Loyalty and Fairness – Honesty
Equity – Transparency – Impartiality
Professionalism – Confidentiality – Health and Safety

- The **Whistleblowing System**, implemented between 2023 and 2024 in both CTA and Raccortubi, in compliance with EU regulations and Legislative Decree 24/2023.

  The whistleblowing platform allows the reporting of unlawful conduct — defined as per Article 2 of the aforementioned decree — carried out by company personnel or occurring in the context of business activities.

  Reports can be submitted through multiple communication channels designed to protect whistleblowers from retaliation, including the option to remain anonymous if requested.
- The Organization, Management and Control Model in accordance with the requirements of Legislative Decree 231/2001, adopted in 2020 by CTA and in 2024 by Raccortubi.

  Its key components include:
  - An activity aimed at mapping areas at risk of unlawful conduct (so-called "sensitive" activities), identifying examples of potential ways in which offenses could be committed and the instrumental/functional processes within which, in principle, the conditions and/or means for committing such offenses might occur;

- A procedural framework that oversees all company activities, including those identified through the aforementioned mapping as being more exposed to potential risks of criminal offenses;
- The establishment of a Supervisory Body, entrusted with specific tasks to monitor the effective implementation and application of the Model in accordance with the Decree;
- A disciplinary system designed to ensure the effective enforcement of the Model, including disciplinary actions and sanctions applicable to Recipients in the event of violations of the provisions contained in the Model itself;
- Ongoing information and training activities on the contents of the Model; these activities aim to promote awareness of Legislative Decree 231/2001 and its related provisions, and are addressed to all personnel. However, the content and delivery methods are tailored based on the Recipient's role, the risk level of the area in which they operate, and whether they hold representation or management functions.

With regard to specific sustainability topics, in 2024 CTA introduced the ESG Policy within its Quality, Environment, Health and Safety at Work Policy, along with the Regulation for the ESG Committee, which had already been established in 2023.
As part of the ESG (Environmental, Social, Governance) Policy, the CTA Group is committed to pursuing a responsible approach to sustainability, aligning with global sustainable development goals and working daily to reduce environmental impacts and promote an economy that generates positive social value for citizens and the local community. The Regulation of the ESG Committee sets out the rules regarding its composition, operating procedures, responsibilities, powers, and resources granted to the committee.

The Group's ongoing focus on responsible business conduct has led to excellent performance in ESG assessment questionnaires shared by clients and financial institutions, as highlighted in section 2.1, and has resulted in the following achievements:

- CTA's registration in the White List of the Prefecture of the Province of Turin, which includes suppliers, service providers, and contractors not subject to attempted mafia infiltration, even if operating in high-risk sectors;
- The improvement of CTA's Legality Rating, which reached the highest level. Initially obtained in 2022, the rating was updated after 24 months.

Legality rating

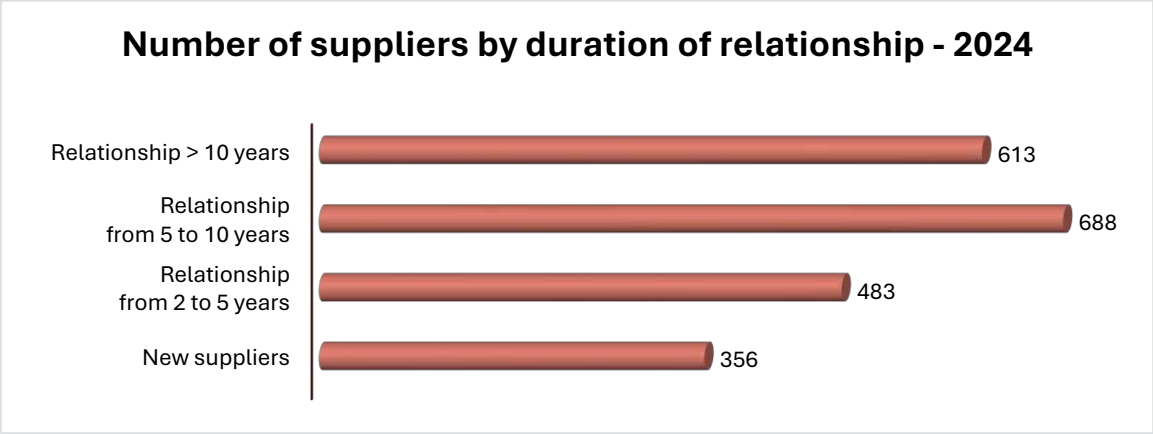
The legality rating is a summary indicator of the compliance with high legality standards.
It may be required from companies who meet specific size criteria and uses a score of a minimum of one to a maximum of three 'stars'.

In 2023, CTA S.p.A. renewed the application for the granting of the legality rating already obtained in 2022, receiving the maximum score ( ).

5.1.1 Supply Chain

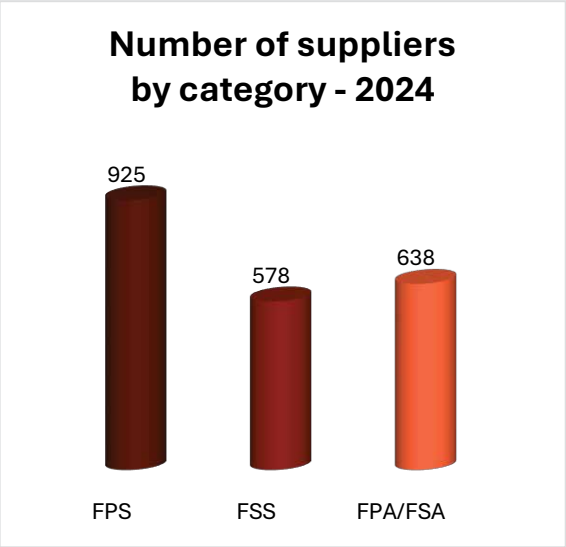
The Group operates in a highly competitive sector, facing large-scale competitors. In order to preserve and expand its market share, a strategy has been implemented focusing on the development of a distinctive (yet fundamentally essential within the sector) intangible asset: relationships with suppliers (see, for example, the partnership with the Tenaris Group, section 1.2).
Supplier relationships across all Group companies are guided by the values outlined in specific regulatory references such as the Code of Ethics, which — both in CTA and Raccortubi — identifies core values including legality, loyalty and fairness, equity, transparency, impartiality, and confidentiality. These relationships are also based on the intention to establish ongoing and synergistic collaborations built on trust.

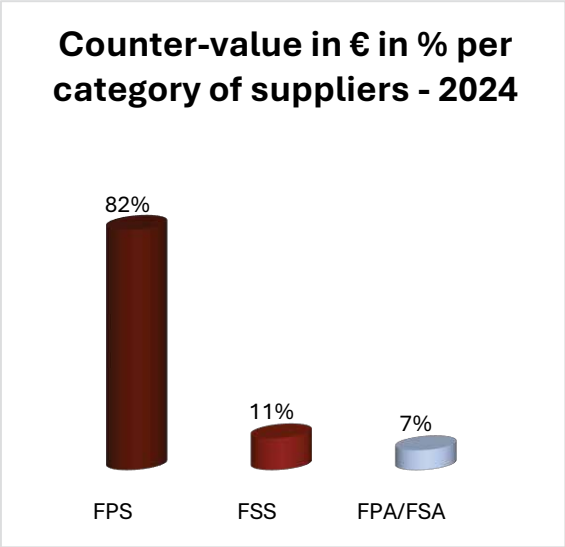
Aware of the strategic and operational importance of the supply chain, the Group considers it essential to select stable and reliable partners in order to build long-term relationships.
In this regard, the following data were recorded in 2024 concerning the duration of supplier relationships.



Suppliers are divided into three macro-categories, each with different procedures for selection, qualification, monitoring, and evaluation:

- Strategic Product Suppliers — SPS
- Strategic Service Suppliers — SSS
- Auxiliary Product and Service Suppliers — APS and ASS





In all cases, the selection process is based on the following behavioral principles (as outlined in the 231 Model):

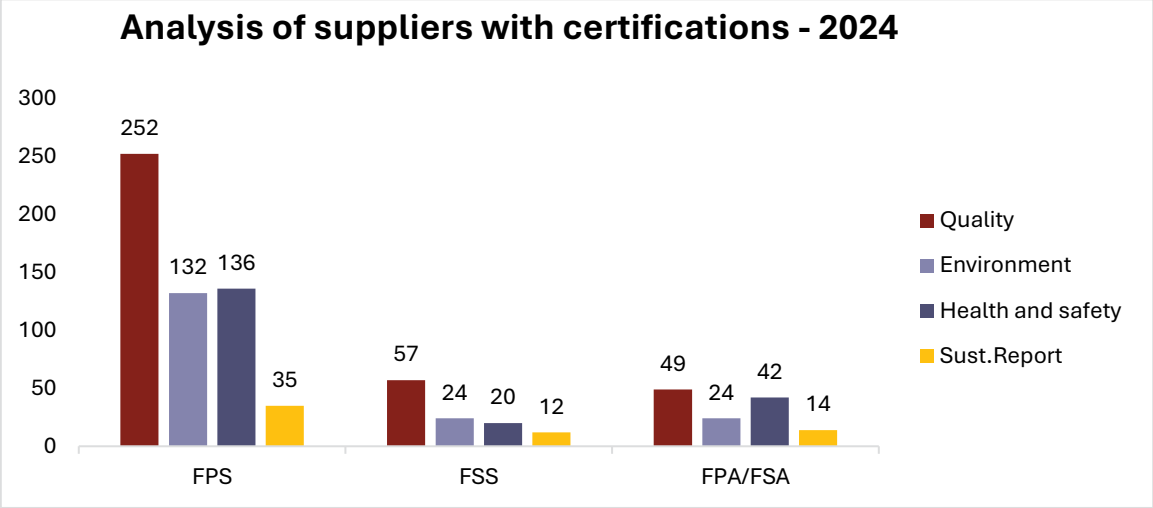
- Selection according to predefined criteria of transparency, quality, and cost-effectiveness;
- Verification of the integrity and reliability of suppliers and business partners (both commercial and financial) through the acquisition of specific information and public data;
- Periodic review of the alignment between the conditions applied with suppliers and business partners (both commercial and financial) and market conditions;
- Verification of compliance with regulatory requirements regarding occupational health and safety and environmental protection.

Monitoring of **Strategic Product Suppliers (SPS)** and **Strategic Service Suppliers (SSS)** is a continuous process; evaluation, however, is conducted annually and involves both management and the Purchasing and Quality departments. These teams assess the volume of products or services purchased and any non-conformities, implementing corrective actions where necessary.

As part of the monitoring phase, for Strategic Product Suppliers, the Purchasing department may visit the supplier's facilities to better coordinate project management activities or to assess production performance, thereby confirming or reconsidering actual production capacity.
In cases of significant non-conformities, **"special audits"** may be conducted, focusing on root cause analysis and the coordinated definition of corrective actions.

Given the potentially significant impacts of supply chain activities and the awareness that sustainability goals can only be achieved through collaboration, the Group is committed to seeking partnerships with entities that share values focused on protecting people and the environment.

In this regard, following an initial evaluation in 2023 of a sample consisting of the top 20 suppliers in the SPS category, in 2024 the analysis was expanded to include all types of suppliers with certifications and sustainability reports. The data are presented below.



As established in the ESG Plan, new qualification criteria for Auxiliary Product Suppliers (APS) were introduced at the end of 2023, promoting the selection of local suppliers to help mitigate the environmental impact of logistics.

In 2024, the Group began conducting an additional evaluation of the supply chain, which will continue into 2025, with the aim of progressively adopting further supplier management criteria that encourage responsible behavior and take into account environmental and social risks along the material procurement chain.

METHODOLOGICAL NOTE

This document constitutes the Sustainability Report of the CTA Group for the 2024 financial year and informs the Group's stakeholders about results, actions, and objectives in the areas of environmental, social, and governance sustainability.
The document, which has not been audited, was prepared on a voluntary basis with reference to the GRI Standards (Global Reporting Initiative) and taking into account the cross-cutting and thematic principles of the European Sustainability Reporting Standards (ESRS), in line with the Group's operational and governance characteristics.
Unless otherwise specified, the reporting scope coincides with the legal and operational sphere of influence of the CTA Group, which includes the companies listed in section 1.1.
The preparation process for this document, structured on an annual basis, included the following activities:

- Engagement with management, document analysis, and interviews with heads of key operational areas to assess the organizational context and the main social and environmental impacts;
- Engagement with management to identify and assess material topics;
- Definition of a content index based on qualitative and quantitative information aligned with the use of GRI indicators in the economic, environmental, and social domains;
- Collection and systematization of data related to the 2023/24 financial years.

The summary section "Appendix – Data," available in the final pages of this document, is an integral part of the Sustainability Report and links the topics discussed in the text to specific indicators. The data refer to the 2024 financial year and — where available — also to 2023, in order to enable data comparability and assess performance trends. Where appropriate, references to significant subsequent events occurring in the early months of 2025 are included.
To ensure accurate representation, the use of estimates has been limited as much as possible; where estimates have been used, they are based on the best available methodologies and are clearly indicated.

For further clarification or additional information regarding this Sustainability Report, please contact the following email address: esg@ctaspa.it.

APPENDIX – DATA

Tab. E1 – Internal Energy Consumption – 2023/2024		
ENERGY CONSUMED WITHIN THE ORGANIZATION	**2023**	**2024**
Methane for stationary combustion [m³]	519.275	548.004
LPG for stationary combustion [l]	40	890
Gasoline for transportation [l]	2.510	12.787
Diesel for transportation [l]	29.510	58.259
Electricity (total consumed) [kWh]	1.760.150	1.840.370

Tab. E2 – Energy Consumption (GJ) – 2023/2024		
ENERGY CONSUMED WITHIN THE ORGANIZATION	**2023**	**2024**
Methane for stationary combustion [m³]	18.478	19.500
LPG for stationary combustion [l]	1	21
Gasoline for transportation [l]	80	408
Diesel for transportation [l]	1.056	2.086
LPG for transportation [l]	6.336	6.625
Electricity (total consumed)	18.478	19.500
Total energy consumption (GJ)	***25.951***	***28.640***

Tab. E3 – Electricity – 2023/2024		
ELECTRICITY	**2023**	**2024**
Total electricity purchased (kWh)	**1.613.301**	**1.727.203**
Total electricity purchased and covered with Guarantees of Origin (G.O.) (kWh)	495.187	487.465
% coverage with G.O. of purchased electricity	30,69%	28,22%
Total self-produced electricity (kWh)	**218.090**	**200.029**
Total self-produced and consumed electricity (kWh)	146.849	113.167
Total self-produced electricity fed into the grid (kWh)	71.241	86.862
% self-consumption of self-produced electricity	67,33%	56,58%

Tab. E4 – GHG Emissions (Market Based) – 2023/2024										
Market based	**CTA**		**TLP**		**RT**		**TX**		**Group**	
EMISSIONS (tons CO_2e)	**2023**	**2024**	**2023**	**2024**	**2023**	**2024**	**2023**	**2024**	**2023**	**2024**
Scope 1 Emissions	**216**	**232**	**30**	**25**	**153**	**111**	**250**	**273**	**649**	**641**
1.1 - Stationary Combustion	88	85	11	11	151	20	248	271	498	387
1.2 - Fugitive Emissions	0	0	0	0	0	0	0	0	0	0
1.3 - Mobile Combustion	128	147	19	14	2	91	2	2	151	254
Scope 2 Emissions	**1**	**0**	**0**	**0**	**166**	**217**	**298**	**310**	**465**	**527**
2.1 - Electricity Consumption	1	0	0	0	166	217	298	310	465	527
Scope 3 Emissions	**88.345**	**50-139**	**12.820**	**11.345**	**11.410**	**14.117**	**317**	**327**	**112.892**	**75.928**
3.1 - Purchased Goods and Services	81.189	46.629	12.348	10.919	10.734	13.373	95	99	104.366	71.020
3.3 - Fuel- and Energy-Related Activities Not Included in Scope 1 or Scope 2	45	47	6	5	78	65	133	142	262	259
3.4 - Upstream Transport and Distribution	5.864	2.328	350	296	348	453	2	2	6.564	3.079
3.5 - Waste Generated in Operations	26	33	6	6	7	14	42	43	81	96

3.6 - Business Travel	96	122	0	0	17	27	0	0	113	149
3.7 - Employee Commuting	297	303	70	70	192	185	38	41	597	599
3.9 - Downstream Transport and Distribution	828	677	40	49	34	0	7	0	909	726
TOTAL	**88.562**	**50.371**	**12.850**	**11.371**	**11.729**	**14.445**	**865**	**910**	**114.006**	**77.097**

Tab. E5 – GHG Emissions (Location-Based) – 2023/2024

Location based	**CTA**		**TLP**		**RT**		**TX**		**Group**	
EMISSIONS (tons CO_2e)	**2023**	**2024**	**2023**	**2024**	**2023**	**2024**	**2023**	**2024**	**2023**	**2024**
Scope 1 Emissions	**216**	**232**	**30**	**25**	**153**	**111**	**250**	**273**	**649**	**641**
1.1 – Stationary Combustion	88	85	11	11	151	20	248	271	498	387
1.2 – Fugitive Emissions	0	0	0	0	0	0	0	0	0	0
1.3 – Mobile Combustion	128	147	19	14	2	91	2	2	151	254
Scope 2 Emissions	**132**	**129**	**9**	**9**	**105**	**138**	**189**	**197**	**435**	**473**
2.1 – Electricity Consumption	132	129	9	9	105	138	189	197	435	473
Scope 3 Emissions	**88.368**	**50.162**	**12.822**	**11.347**	**11.394**	**14.097**	**289**	**298**	**112.873**	**75.904**
3.1 – Purchased Goods and Services	81.189	46629	12.348	10.919	10.734	13.373	95	99	104.366	71.020
3.3 – Fuel- and Energy-Related Activities Not Included in Scope 1 or Scope 2	68	70	8	7	62	45	105	113	243	235
3.4 – Upstream Transport and Distribution	5.864	2328	350	296	348	453	2	2	6.564	3.079
3.5 – Waste Generated in Operations	26	33	6	6	7	14	42	43	81	96
3.6 – Business Travel	96	122	0	0	17	27	0	0	113	149
3.7 – Employee Commuting	297	303	70	70	192	185	38	41	597	599
3.9 – Downstream Transport and Distribution	828	677	40	49	34	0	7	0	909	726
TOTAL	**88.716**	**50.523**	**12.861**	**11.382**	**11.652**	**14.346**	**728**	**768**	**113.957**	**77.019**

Tab. E6 – Material Consumption – 2023/2024

Material	**Unit of measure**	**2023**	**2024**
Paints	kg	5.483	5.555
Paper and cardboard	kg	36.259	23.244
Wood	kg	315.727	392.900
Plastic	kg	18.083	4.823
Polyester	kg	86.375	157.586
Stretch film	kg	1.214	1.554
Synthetic oils	kg	1.380	1.656
Hydrogen peroxide for pickling	kg	1.465	2.198
Pickling acid	kg	4.320	2.880
Polymer (painting)	kg	4.800	6.400
Metals (straps)	kg	270	0
Other mix	kg	80	3.050
TOTAL	kg	**475.456**	**601.846**

Tab. E7 – Water Consumption – 2023/2024		
WATER SOURCE (tot m³)	**2023**	**2024**
Groundwater (aquifer)	571	624
Water from third parties (aqueduct)	32.959	30.797
Surface water	0	0
Total consumption	33.530	31.421

Tab. E8 – Waste Generated – 2023/2024				
CER Code	**Description**	**Unit of measure**	***2023***	***2024***
02.01.04	Plastic waste	kg	21.560	2.710
06.05.02*	Processing sludge containing hazardous substances (acid sludge)	kg	4.716	6.710
07.06.08*	Other residues and reaction by-products (protective coating polymer)	kg	4.269	97
08.03.18	Used printing toner cartridges	kg	240	23
11.01.12	Aqueous washing solutions	kg	8.480	0
12.01.01	Iron filings and shavings	kg	0	5.540
12.01.03	Non-ferrous material filings, flakes and powders	kg	33.080	44.240
12.01.07*	Mineral oils for machinery not containing halogens (recovered waste oil)	kg	1.000	900
12.01.09*	Emulsions and solutions for machinery not containing halogens	kg	6.470	8.760
12.01.14*	Processing sludge containing hazardous substances (tumbler)	kg	0	796
12.01.16*	Abrasive blasting residues containing hazardous substances (grinding)	kg	11.106	13.948
12.01.21	Used tool bodies and ground materials	kg	208	130
12.01.99	Waste not otherwise specified	kg	1.540	11.610
15.01.01	Paper and cardboard packaging	kg	4.470	5.430
15.01.02	Plastic packaging	kg	7.552	9.770
15.01.03	Wooden packaging	kg	79.850	85.110
15.01.04	Metal packaging	kg	0	4.260
15.01.06	Mixed-material packaging	kg	21.260	28.420
15.01.10*	Packaging containing residues of hazardous substances	kg	1.278	960
15.01.11*	Metal packaging with hazardous residues	kg	0	5
15.02.02*	Hazardous absorbents and filter materials	kg	2.645	3.135
16.02.13*	Discarded hazardous equipment	kg	108	50
16.02.14	Discarded non-hazardous equipment	kg	702	53
16.05.04*	Pressurized gas containers	kg	49	0
17.04.05	Iron and steel	kg	77.460	54.520
20.01.01	Paper and cardboard	kg	6.620	1.417
20.03.01	Undifferentiated municipal waste	kg	0	3.100
	TOTAL	**kg**	***296.023***	***291.694***

Tab. E9 – Waste Hazard Classification – 2023/2024		
	2023	**2024**
Hazardous	31.641	35.361
Non-hazardous	264.382	256.333

Tab. E10 – Waste Treatment – 2023/2024		
Type of treatment	**2023**	**2024**
Preparation for reuse	208	130
Recycling	256.454	257.080
Other recovery operations	30.565	23.624
Quantity sent for recovery	**287.227**	**280.834**

Incineration with energy recovery	4.031	4.150
Landfill	4.716	6.710
Other disposal operations	49	0
Quantity sent for disposal	**8.796**	**10.860**

Tab. S1 – Total number of employees by job classification and gender – 2023/2024

CLASSIFICATION	2023			2024		
	Men	Women	**Total**	Men	Women	**Total**
Executives	14	3	**17**	12	3	**15**
Managers	36	9	**45**	42	11	**53**
White-collars	60	106	**166**	58	105	**163**
Blue-collars	81	2	**83**	83	2	**85**
TOTAL	**191**	**120**	**311**	**195**	**121**	**316**

Tab. S2 – External Workforce – 2023/2024

	2023			2024		
	Men	Women	**Total**	Men	Women	**Total**
Self-employed workers	1	0	**1**	0	0	**0**
Temporary agency workers	4	5	**9**	14	6	**20**
Interns	2	2	**4**	1	5	**6**
Contracted workers (Cooperative)	1	0	**1**	2	0	**2**
TOTAL	**8**	**7**	**15**	**17**	**11**	**28**

Tab. S3 - Total number of employees by classification and age group – 2022/2023

CLASSIFICATION	2023				2024			
	<30 years of age	30-50 years of age	>50 years of age	**Total**	<30 years of age	30-50 years of age	>50 years of age	**Total**
Executives	1	9	7	**17**	0	10	5	**15**
Managers	3	17	25	**45**	3	23	27	**53**
White-collars	25	99	42	**166**	27	95	41	**163**
Blue-collars	12	38	33	**83**	12	36	37	**85**
TOTAL	**41**	**163**	**107**	**311**	**42**	**164**	**110**	**316**

Tab. S4 – Total number of employees by contract type and gender – 2023/2024

CONTRACT TYPE	2023			2024		
	Men	Women	**Total**	Men	Women	**Total**
Permanent contract	184	116	**300**	182	115	**297**
Fixed-term contract	6	3	**9**	12	5	**17**
Variable-term contract	1	1	**2**	1	1	**2**
TOTAL	**191**	**120**	**311**	**195**	**121**	**316**

Tab. S5 - Turnover – 2023/2024

TURNOVER	USCITE	
	2023	**2024**
Executives	1	3
Managers	3	1
White-collars	7	16
Blue-collars	8	4
Total outgoing employees	19	24
Total number of employees	**311**	**316**
Turnover rate	**6%**	**8%**

Tab. S6 – Health and Safety Management System – 2023/2024				
HEALTH AND SAFETY	**2023**		**2024**	
	Number	% of the total	Number	% of the total
Employees covered by a certified health and safety management system (e.g., ISO 45001)	246	79%	252	80%
Employees covered by a non-certified health and safety management system	65	21%	64	20%
Employees not covered by any health and safety management system	0	0%	0	0%
TOTAL	**311**	**100%**	**316**	**100%**

Tab. S7 – Workplace Injuries – 2023/2024		
	2023	**2024**
Total number of workplace injuries	4	0
of which with serious consequences	0	0
Number of deaths due to workplace injuries	0	0
Number of deaths due to occupational illness	0	0
Total ordinary working hours	499.940	470.113
Total overtime hours	11.263	12.126
Total hours worked	**511.203**	**484.263**
Total hours lost due to injury	**456**	**0**
% of hours lost over total	0,09%	0,0%
Number of working days lost due to workplace injuries	57	0
Injury rate (injuries / total hours worked) × 1.000.000	7,8	0

Tab. S8 – Occupational Diseases – 2023/2024		
	2023	**2024**
Total number of recordable cases of occupational disease	0	0

Tab. S9 – Total Training Hours by Professional Category and Gender (Mandatory and Non-Mandatory) – 2023/2024				
	2023		**2024**	
	Men	**Women**	**Men**	**Women**
Executives	98	47	110	21
Managers	381	122	568	155
White-collars	1.415	1.047	1.817	1.690
Blue-collars	445	6	503	0
TOTAL	**2.339**	**1.222**	**2.960**	**1.866**

Tab. S10 – Total Training Hours by Area (Mandatory and Non-Mandatory) – 2024				
	Executives	**Managers**	**White-collars**	**Blue-collars**
Health and Safety	0	42	46	148
ESG	17	34	104	56
ICT	56	60	400	0
Anti-corruption	0	0	0	0
Foreign languages	30	166	1.786	0
Personal growth	0	327	946	0
IT (Excel)	16	0	64	0
Technical courses	7	45	8	250
Other	5	49	153	49
TOTAL	**131**	**723**	**3.507**	**503**

Tab. S11 – Average Training Hours per Capita by Professional Category and Gender (Mandatory and Non-Mandatory) – 2023/2024				
	2023		2024	
	Men	Women	Men	Women
Executives	7	16	9	7
Managers	11	14	14	14
White-collars	24	10	31	16
Blue-collars	5	3	6	0

Tab. S12 – Percentage of Employees Who Participated in Periodic Performance and Career Development Reviews – 2023/2024				
	2023		2024	
	Men	Women	Men	Women
Executives	86%	33%	92%	33%
Managers	83%	67%	90%	73%
White-collars	87%	92%	86%	92%
Blue-collars	88%	50%	88%	50%

Tab. S13 – Executive Diversity – 2023/2024				
	2023	%	2024	%
Men	59	66%	58	65%
Women	31	34%	31	35%
Total	**90**	**100%**	**89**	**100%**

Tab. S14 – Total Number of Employees by Full-Time, Part-Time Status and Gender – 2023/2024						
FULL-TIME PART-TIME	2023			2024		
	Men	Women	**Total**	Men	Women	**Total**
Full-time	185	104	**289**	189	105	**294**
Part-time	6	16	**22**	6	16	**22**
TOTAL	**191**	**120**	**311**	**195**	**121**	**316**

Tab. S15 – Family Leave – 2023/2024				
	2023		2024	
	Men	Women	Men	Women
Employees entitled to family leave	88	69	153	89
% of employees entitled to family leave	46%	58%	78%	74%
Entitled employees who took family leave	13	10	22	10
% of entitled employees who took family leave	15%	14%	14%	11%

Tab. S16 – Collective Bargaining – 2023/2024		
Number of employees covered by collective bargaining agreements	271	275
% of employees covered by collective bargaining agreements	87%	87%

Tab. S17 – Employees Belonging to Protected Categories – 2023/2024				
	2023		2024	
	Men	Women	Men	Women
Number of employees belonging to vulnerable categories	7	3	10	7
% of employees belonging to vulnerable categories	4%	3%	5%	6%

Tab. S18 – Social Protection – 2023/2024		
	2023	**2024**
Number of employees covered by social protection, through public programs or company-provided benefits, against income loss due to significant events	256	259
% of employees covered by social protection	82%	82%

Tab. G1 - Supplier Contribution Analysis by Category - 2023/2024							
SUPPLIER TYPE	**Description**	**Number**		**Countervalue in mln €**		**Ctv in € in %**	
		2023	**2024**	**2023**	**2024**	**2023**	**2024**
Strategic Product Suppliers	*Pipes, fittlings, flanges and other related products in carbon, alloy and stainless steel.*	801	925	178,96	167,13	83%	82%
Strategic Service Suppliers	*All products and services having an impact on the quality of the product/service provided by CTA Group*	517	578	24,97	22,05	12%	11%
Auxiliary Product/ Service Suppliers	*All other products and services.*	462	638	10,64	13,76	5%	7%
	Total	**1.167**	**2.141**	**214,57**	**202,94**	**100%**	**100%**

Tab. G2 – Supplier Contribution Analysis (value in € million) by Location – 2024						
SUPPLIER	**SPS**		**SSS**		**APS/ASS**	
	2024	**(%)**	**2024**	**(%)**	**2024**	**(%)**
Italy	13,75	33%	1,96	43%	0,98	42%
Rest of Europe (SEE)	9,09	22%	1,31	29%	0,82	36%
Extra-EU	18,64	45%	1,30	28%	0,51	22%
Total	**41,48**	**100%**	**4,57**	**100,0%**	**2,31**	**100%**

Tab. G3 – Number of Suppliers with Process Certifications – 2024			
PROCESS CERTIFICATIONS	**SPS**	**SSS**	**APS/ASS**
Quality	252	57	49
Environment	132	24	24
Occupational Health and Safety	136	20	42
Sustainability reporting	35	12	14
Other Certifications	4	7	34

Tab. G4 – Breakdown of Total Number of Suppliers by Duration of Relationship – 2024				
RELATIONSHIP	**SPS**	**SSS**	**APS/ASS**	**Total**
New	76	79	201	356
of which audited on site	4	3	2	9
relationship from 2 to 5 years	226	124	133	483
relationship from 5 to 10 years	319	204	165	688
relationship >10 years	304	170	139	613
Total	**925**	**578**	**638**	**2.141**

GRI INDEX

Statement of use	The CTA Group has reported the information cited in this GRI content index for the period from January 1, 2024 to December 31, 2024 with reference to the GRI Standards.
GRI 1 used	GRI 1: Foundation 2021 – Reporting with reference to the GRI Standards

GRI Standard	Information	Reference in the Document
GRI 2: Informativa generale 2021	2-1 Organization Details	1.1 The Group
	2-2 Entities Included in the Organization's Sustainability Reporting	METHODOLOGICAL NOTE
	2-3 Reporting Period, Frequency, and Contact Point	METHODOLOGICAL NOTE
	2–4 Restatement of the information	Any discrepancies between the 2023 data presented in this report and the 2023 data included in the 2023 report are due to the inclusion, in this Sustainability Database, of data from some CTA Group companies that were not available the previous year.
	2–5 External Assurance	This SR is not subject to audit.
	2–6 Activities, value chain, and other business relationships	1.2 Business Model
	2–7 Employees	4.1.1 Human Resources, APPENDIX – DATA: *Tab. S1, Tab. S3, Tab. S4, Tab. S14*
	2–8 Non-employee workers	4.1.1 Human Resources, APPENDIX – DATA: *Tab. S2*
	2–9 Governance structure and composition	1.3 Organisation and Control
	2–10 Appointment and selection of the highest governance body	1.3 Organisation and Control
	2–11 Chair of the highest governance body	1.3 Organisation and Control
	2–12 Role of the highest governance body in overseeing the management of impacts	1.3 Organisation and Control
	2–13 Delegation of responsibility for managing impacts	1.3 Organisation and Control
	2–14 Role of the highest governance body in sustainability reporting	1.3 Organisation and Control
	2–15 Conflicts of interest	5.1 Business Conduct
	2–16 Communication of concerns	5.1 Business Conduct
	2–17 Collective knowledge of the highest governance body	1.3 Organisation and Control
	2–18 Evaluation of the performance of the highest governance body	N.A.
	2–19 Remuneration policies	1.3 Organisation and Control
	2–20 Process for determining remuneration	1.3 Organisation and Control
	2–21 Ratio of annual total compensation	N.A.
	2–22 Statement on sustainable development strategy	2.1 Our Approach
	2–23 Commitments made through policies	2.1 Our Approach
	2–24 Integration of policy commitments	2.1 Our Approach
	2–25 Processes to remediate negative impacts	N.A.

GRI Standard	Information	Reference in the Document
	2–26 Mechanisms for seeking advice and raising concerns	5.1 Business Conduct
	2–27 Compliance with laws and regulations	5.1 Business Conduct
	2–28 Membership of associations	2.1 Our Approach
	2–29 Approach to stakeholder engagement	2.2 Double Materiality Analysis
	2–30 Collective bargaining agreements	APPENDIX – DATA: *Tab. S16*
GRI 3: Material Topics 2021	3–1 Process to determine material topics	2.2 Double Materiality Analysis
	3–2 List of material topics	2.2 Double Materiality Analysis
	3–3 Management of material topics	2.2 Double Materiality Analysis
GRI 201: Economic Performance 2016	201–1 Direct economic value generated and distributed	1.1 The Group
	201–2 Financial implications and other risks and opportunities due to climate change	2.2 Double Materiality Analysis
	201–3 Defined benefit plan obligations and other retirement plans	N.A.
	201–4 Financial assistance received from government	N.A.
GRI 202: Market Presence 2016	202–1 Ratios of standard entry level wage by gender compared to local minimum wage	Non-material topic
	202–2 Proportion of senior management hired from the local community	Non-material topic
GRI 203: Indirect Economic Impacts 2016	203–1 Infrastructure investments and services supported	3.1 Energy Consumption, 4.3 Relationship with the Community
	203–2 Significant indirect economic impacts	N.A.
GRI 204: Procurement Practices 2016	204–1 Proportion of spending on local suppliers	5.1.1 Supply Chain, APPENDIX – DATA: *Tab. G2*
GRI 205: Anti-corruption 2016	205–1 Operations assessed for risks related to corruption	N.A.
	205–2 Communication and training about anti-corruption policies and procedures	4.1.3 Development and Training, APPENDIX – DATA: *Tab. S10*
	205–3 Confirmed incidents of corruption and actions taken	In 2024 there were no incidents of corruption
GRI 206: Anti-competitive Behavior 2016	206–1 Legal actions for anti-competitive behavior, anti-trust, and monopoly practices	In 2024 there were no legal actions for anti-competitive behaviour, anti-trust, and monopoly practices
GRI 207: Tax 2019	207–1 Approach to tax	Non-material topic
	207–2 Tax governance, control, and risk management	Non-material topic
	207–3 Stakeholder engagement and management of concerns related to tax	Non-material topic
	207–4 Country-by-country reporting	Non-material topic
GRI 301: Materials 2016	301–1 Materials used by weight or volume	3.3 Use of Materials, APPENDIX – DATA: *Tab. E6*
	301–2 Recycled input materials used	3.3 Use of Materials
	301–3 Reclaimed products and their packaging materials	N.A.
GRI 302: Energy 2016	302–1 Energy consumption within the organization	3.1 Energy Consumption, APPENDIX – DATA: *Tab. E1, Tab. E2, Tab. E3*
	302–2 Energy consumption outside of the organization	N.A.
	302–3 Energy intensity	N.A.
	302–4 Reduction of energy consumption	N.A.
	302–5 Reduction in energy requirements of products and services	N.A.

GRI Standard	Information	Reference in the Document
GRI 303: Water and Effluents 2018	303–1 Interactions with water as a shared resource	The activities carried out by the CTA Group do not involve significant interactions with water resources. Data related to consumption and withdrawals are reported in the section APPENDIX – DATA
	303-2 Management of water discharge-related impacts	
	303-3 Water withdrawal	
	303-4 Water discharge	
	303-5 Water consumption	3.3 Use of Materials, APPENDIX – DATA: *Tab. E7*
GRI 304: Biodiversity 2016	304-1 Operational sites owned, leased, managed in (or adjacent to) protected areas and areas of high biodiversity value outside protected areas	Non-material topic: None of the CTA Group's sites are located in or adjacent to protected areas or areas of high biodiversity value outside protected areas.
	304-2 Significant impacts of activities, products, and services on biodiversity	Non-material topic: The activities carried out by the CTA Group — mainly design and marketing — along with the products and services sold, do not have a direct impact on biodiversity.
	304-3 Habitats protected or restored	Non-material topic: The CTA Group does not carry out operations involving the protection and/or restoration of habitats.
	304-4 IUCN Red List species and national conservation list species with habitats in areas affected by operations	Non-material topic: none of the CTA Group's sites operate in areas that represent habitats for species listed in the IUCN "Red List" or in national conservation lists.
GRI 305: Emissions 2016	305-1 Direct (Scope 1) GHG emissions	3.2 Greenhouse Gas Emissions, APPENDIX – DATA: *Tab. E4, Tab. E5*
	305-2 Energy indirect (Scope 2) GHG emissions	3.2 Greenhouse Gas Emissions, APPENDIX – DATA: *Tab. E4, Tab. E5*
	305-3 Other indirect (Scope 3) GHG emissions	3.2 Greenhouse Gas Emissions, APPENDIX – DATA: *Tab. E4, Tab. E5*
	305-4 GHG emissions intensity	N.A.
	305-5 Reduction of GHG emissions	3.2 Greenhouse Gas Emissions
	305-6 Emissions of ozone-depleting substances (ODS)	N.A.
	305-7 Nitrogen oxides (NOX), sulfur oxides (SOX), and other significant air emissions	N.A.
GRI 306: Waste 2020	306-1 Waste generation and significant waste-related impacts	3.4 Waste Management
	306-2 Management of significant waste-related impacts	3.4 Waste Management
	306-3 Waste generated	3.4 Waste Management, APPENDIX – DATA: *Tab. E8*
	306-4 Waste diverted from disposal	3.4 Waste Management, APPENDIX – DATA: *Tab. E9*
	306-5 Waste directed to disposal	3.4 Waste Management, APPENDIX – DATA: *Tab. E9*
GRI 308: Supplier Environmental Assessment 2016	308-1 New suppliers that were screened using environmental criteria	5.1.1 Supply Chain
	308-2 Negative environmental impacts in the supply chain and actions taken	N.A.

GRI Standard	Information	Reference in the Document
GRI 401: Employment 2016	401-1 New employee hires and employee turnover	4.1.1 Human Resources, APPENDIX – DATA: *Tab. S5*
	401-2 Benefits provided to full-time employees that are not provided to temporary or part-time employee	N.A.
	401-3 Parental leave	4.1.4 Well-being and Inclusion, APPENDIX – DATA: *Tab. S15*
GRI 402: Labor/Management Relations 2016	402-1 Minimum notice period for operational changes	Non-material topic
GRI 403: Occupational Health and Safety 2018	403-1 Occupational health and safety management system	4.1.2 Health and Safety
	403-2 Hazard identification, risk assessment, and incident investigation	N.A.
	403-3 Occupational health services	4.1.2 Health and Safety
	403-4 Worker participation, consultation, and communication on occupational health and safety	N.A.
	403-5 Worker training on occupational health and safety	4.1.2 Health and Safety, APPENDIX – DATA: *Tab. S10*
	403-6 Promotion of worker health	4.1.2 Health and Safety
	403-7 Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	5.1.1 Supply Chain
	403-8 Workers covered by an occupational health and safety management system	4.1.2 Health and Safety, APPENDIX – DATA: *Tab. S6*
	403-9 Work-related injuries	4.1.2 Health and Safety, APPENDIX – DATA: *Tab. S7*
	403-10 Work-related ill health	4.1.2 Health and Safety, APPENDIX – DATA: *Tab. S8*
GRI 404: Training and Education 2016	404-1 Average annual training hours per employee	4.1.3 Development and Training, APPENDIX – DATA: *Tab. S11*
	404-2 Programs for upgrading employee skills and transition assistance programs	4.1.3 Development and Training, APPENDIX – DATA: *Tab. S9, Tab. S10*
	404-3 Percentage of employees receiving regular performance and career development reviews	4.1.3 Development and Training, APPENDIX – DATA: *Tab. S12*
GRI 405: Diversity and Equal Opportunity 2016	405-1 Diversity of governance bodies and employees	4.1.4 Well-being and Inclusion, APPENDIX – DATA: *Tab. S1, Tab. S3, Tab. S13, Tab. S17*
	405-2 Ratio of basic salary and remuneration of women to men	N.A.
GRI 406: Non-discrimination 2016	406-1 Incidents of discrimination and corrective actions taken	In 2024, no incidents of discrimination were recorded.
GRI 407: Freedom of Association and Collective Bargaining 2016	407-1 Operations and suppliers in which workers' rights to freedom of association and collective bargaining may be at risk	N.A.
GRI 408: Child Labor 2016	408-1 Operations and suppliers at significant risk for incidents of child labor	N.A.
GRI 409: Forced or Compulsory Labor 2016	409-1 Operations and suppliers at significant risk for incidents of forced or compulsory labor	N.A.
GRI 410: Security Practices 2016	410-1 Security personnel trained in human rights policies or procedures	N.A.
GRI 411: Rights of Indigenous Peoples 2016	411-1 Incidents of violations involving rights of indigenous peoples	N.A.

GRI Standard	Information	Reference in the Document
GRI 413: Local Communities 2016	413-1 Operations with local community engagement, impact assessments, and development programs	4.3 Relationship with the Community
	413-2 Operations with significant actual and potential impacts on local communities	4.3 Relationship with the Community
GRI 414: Supplier Social Assessment 2016	414-1 New suppliers that were screened using social criteria	5.1.1 Supply Chain
	414-2 Negative social impacts in the supply chain and actions taken	N.A.
GRI 415: Public Policy 2016	415-1 Political contributions	Non-material topic
GRI 416: Customer Health and Safety 2016	416-1 Assessment of the health and safety impacts of product and service categories	Non-material topic
	416-2 Incidents of non-compliance concerning the health and safety impacts of products and services	Non-material topic
GRI 417: Marketing and Labeling 2016	417-1 Requirements for product and service information and labeling	Non-material topic
	417-2 Incidents of non-compliance concerning product and service information and labeling	Non-material topic
	417-3 Incidents of non-compliance concerning marketing communications	Non-material topic
GRI 418: Customer Privacy 2016	418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data	In 2024, no substantiated complaints were recorded regarding breaches of customer privacy or loss of customer data.

[i] The methane consumption of CTA's foreign branches (CTA Asia, CTA Caspian, CTA Dubai, CTA Iberia, CTA Polska) is not included, as the costs are covered under the lease agreements for the premises.
[ii] The electricity consumption of CTA's foreign branches (CTA Asia, CTA Caspian, CTA Dubai, CTA Iberia, CTA Polska), as well as EITI, Raccortubi UK, and TLP, is not included, as the costs are covered under the lease agreements for the premises.
[iii] The calculation includes the four main companies of the CTA Group: CTA S.p.A., TLP, Raccortubi S.p.A., and Tecninox.
[iv] The material consumption of CTA's foreign branches (CTA Asia, CTA Caspian, CTA Dubai, CTA Iberia, CTA Polska) and Raccortubi Middle-East is not included, as these are commercial offices where material consumption is negligible.
[v] The waste data refers to the following main companies: ALCO, CTA S.p.A., Raccortubi S.p.A., Raccortubi UK, Tecninox, and TLP. The other sites generate only a negligible amount of municipal waste, mostly related to office activities.

CREDITS

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