

SESA GROUP SUSTAINABILITY PLAN 2026-2027

Aligned with the CSRD Directive and ESRS Standards



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1. Introduction

The Sustainability Plan for 2026-2027, which outlines policies aimed at generating and distributing resources to all stakeholders, represents the Group's medium- to long-term strategic vision and the means of communicating the targets and actions to be taken to achieve them.

By integrating its Sustainability Plan with its mission and purpose, the Sesa Group proactively addresses market challenges, promoting sustainable, inclusive and long-lasting development.

The Sustainability Plan, in relation to the material issues identified and reported in the Integrated Annual Report, sets sustainability targets linked to concrete actions to be taken to achieve them. Each target has been linked to a specific macro area (Environmental, Social, and Governance) and to the related material issues in that area.

In defining the Sustainability Plan, we also took into account the **Sustainable Development Goals (SDGs)**, i.e., the targets promoted by the United Nations and published in the 2030 Agenda for Sustainable Development. In addition, we identified the Group's sustainability targets that we believe, with our commitment, can contribute to the achievement of nine of the seventeen SDGs that the Group recognizes as relevant to its business and in line with its guidelines.

The targets of the Plan are updated annually and take into account the results achieved and those still to be achieved, as well as new priorities that may come up over time.

The Plan therefore describes in detail the main actions already undertaken, the results achieved and future targets, in accordance with the CSRD Directive and ESRS standards.

2. Approccio strategico alla Sostenibilità

Sustainability is a strategic driver for the Sesa Group, guiding its long-term choices and the creation of shared value. Since its foundation, Sesa has made technology a driver of sustainable progress, promoting innovation, skills, and digitalization in the areas where it operates.

Sustainability is a core value that defines the identity of the Sesa Group. Since 2018, the Group has consolidated its commitment by structuring a non-financial reporting system and publishing an annual Sustainability Report. In 2022, Sesa was among the first companies in the sector to publish an Integrated Annual Report, offering stakeholders a comprehensive document that combines financial performance and ESG results with the aim of providing transparency and an integrated view of value.

In 2025, we also integrated the principles of the CSRD regulation and began a review of our strategy to ensure full compliance with ESRS standards. This has led to the adoption of a more structured language, measurable targets, greater transparency in governance, and the strengthening of control and monitoring mechanisms.

Our strategic approach is based on three fundamental principles:

- **ESG integration into business strategy:** sustainability targets have been progressively integrated into industrial planning and management systems, with measurable indicators and KPIs. Investment, development and governance decisions are also assessed on the basis of their environmental and social impact;
- **Sustainable innovation and digital transformation:** by offering solutions, services and platforms that promote environmental protection and efficient use of resources, and by promoting cloud computing and artificial intelligence, we support companies in their green digital transition. At the same time, we invest in technological projects with a positive ESG impact;
- **Shared value for people and territories:** the Group's growth has always been accompanied by a tangible commitment to local communities, training, employee well-being and the promotion of diversity. The Sesa Foundation is the most direct expression of this approach, through high-impact cultural, educational and social initiatives.

3. ESG Governance and Coordination Structure

Sustainability governance within the Sesa Group is managed by a defined structure involving several company levels, ensuring ongoing and strategic ESG issues oversight.

Above all, the Board of Directors has a key role in ensuring that sustainability is fully integrated into the company's strategy. Since 2021, the Group has formally included the target of sustainable growth in its Articles of Association, confirming the importance it attaches to these issues. In 2022, the Board of Directors established a dedicated Sustainability Committee, composed of members with specific expertise, responsible for supporting the Board and the Chief Executive Officer in decisions relating to the most significant ESG issues, such as policy definition, risk and opportunity assessment, and monitoring of sustainable investments.

At the operational level, the coordination of sustainability-related activities is assigned to the Group Sustainability Officer, who is responsible for developing ESG strategies, coordinating action plans across the various business units and supervising the preparation of the Integrated Annual Report, thus ensuring transparency and consistency in reporting. In addition, he coordinates the Sustainability Operational Committee, a working group involving key function managers that is responsible for implementing and monitoring ESG initiatives.

This multi-level structure allows the Sesa Group to integrate sustainability not only as a compliance issue, but as a key strategic lever for long-term value creation, while ensuring continuous and transparent dialogue with all stakeholders.

The Sustainability Committee meets regularly to:

- Monitor ESG performance indicators;
- Assess sustainability risks and opportunities;
- Define strategic priorities and approve ESG policies..

Furthermore, the integration of ESG targets has also been extended to variable management remuneration, encouraging the achievement of environmental and social targets.

4. Double Materiality Analysis

During 2025, we carried out a comprehensive update of our materiality analysis, involving internal and external stakeholders. The most relevant material topics have been identified both in terms of the Group's impact on the environment and society (inside-out materiality) and in terms of sustainability risks/impacts on the business (outside-in).

For a detailed and in-depth analysis of the activities and interventions related to the topics identified in the materiality matrix, please refer to the Group's Integrated Annual Report. This document provides a detailed overview of the processes, plans, and results achieved in relation to each of the identified ESG priorities, offering a comprehensive and transparent overview of our actions. The Report is therefore an essential source for understanding how the Sesa Group translates its sustainability strategies into concrete initiatives, monitored through clear and measurable indicators, and how these contribute to creating value for both the company and its stakeholders.

5. ESG actions and results achieved as of April 30, 2025

The Sesa Group has demonstrated a strong and growing commitment to promoting a culture of sustainability that involves every aspect of its business model. This commitment is reflected in a wide range of strategic and operational actions aimed at generating positive impacts on the environment, society and corporate governance, helping to create sustainable and lasting value over time.

The actions taken and progress made can be analysed along the three fundamental dimensions of ESG: Environment, Social and Governance, which are all key pillars for building a sustainable and resilient business model over time.

Environment:

- Energy transition: progressive reduction of Scope 1 and 2 CO₂ emissions through energy efficiency improvements at operational offices and the transition to electricity from renewable sources (over 90% by 2023);
- Sustainable mobility: promotion of electric and hybrid vehicles for the company fleet and use of agile working to reduce travel;
- Resource management: implementation of digital systems for real-time consumption monitoring;
- Circular economy and waste management: promotion of separate waste collection within operational offices, encouraging the recycling of electronic and paper materials and reducing waste destined for disposal;
- Sustainable suppliers: selection of partners with high environmental standards;
- Awareness and training: initiatives to increase internal environmental culture, with engagement projects and collaboration with local authorities.

Social:

- Training and skills development: ongoing training on digital innovation, sustainability, D&I and personal development, with personalised programmes to promote professional growth and continuous upskilling of employees
- Gender equality and inclusion: active policies to increase female representation within the Group, mentoring programmes dedicated to women and initiatives aimed at creating a fair and inclusive work environment;
- Integration and development of young people: structured apprenticeship, internship and mentoring programmes for the integration of young talent, with a specific focus on digital skills and new professional skills required by the market;
- Organisational well-being: initiatives dedicated to health, work-life balance, psychological support and prevention programmes, with the aim of creating a healthy, motivating and respectful working environment;
- Diversity & Inclusion: promotion of an open corporate culture that respects differences, with awareness-raising activities and specific policies to ensure equal opportunities for all;
- Social responsibility and local commitment: strengthening the role of the Sesa Foundation, which supports educational, cultural and social projects, with a particular focus on digital inclusion, STEM education and the development of local communities.

Governance:

- ESG governance structure: the Group has established a Sustainability Committee with specific responsibilities, composed of members of top management, which oversees the implementation of ESG strategies and constantly monitors performance in the Environmental, Social and Governance areas;
- ESG integration in the Board of Directors: sustainability is a cross-cutting issue in the activities of the Board of Directors, which monitors ESG issues and considers their impact in strategic decisions, thus ensuring careful and responsible leadership with regard to Environmental, Social and Governance aspects;
- Code of Ethics and compliance: continuous updating of the Group's Code of Ethics, with rigorous principles of integrity, legality, transparency and respect for human rights, to which all employees and partners must adhere;

- Anti-corruption and whistleblowing policy: strengthening anti-corruption procedures and implementing secure and confidential reporting channels (whistleblowing) to protect those who report illegal or non-compliant behavior;
- Transparency and reporting: commitment to transparent and accurate communication of ESG performance through the Integrated Annual Report, with progressive evolution of reporting in line with CSRD regulations and ESRS standards.
- Integration of ESG objectives into remuneration: linking variable management remuneration to the achievement of specific ESG targets, incentivising behaviour and results consistent with the Group's sustainable strategy;
- ESG risk management: implementation of a system for identifying, assessing and mitigating sustainability-related risks, integrated into the Group's overall risk management processes;
- Continuous training: training programs dedicated to employees, managers, and directors on ESG issues, to spread skills and awareness across the whole organization.

6. Future targets (2026-2027) and alignment with ESRS

In line with the sustainability path started in previous years, the Sesa Group is looking to the future with the aim of further strengthening the integration of ESG criteria into the company's strategy and operating plans. The introduction of the CSRD Directive and the European Sustainability Reporting Standards (ESRS) represents a turning point in sustainability reporting, requiring an increasingly structured, measurable, and transparent approach.

In this context, Sesa intends to continue its commitment, turning regulatory standards into opportunities to generate shared value in the medium to long term. The ESG targets set for the period 2026-2027 reflect a strategic vision focused on energy transition, the enhancement of human capital, the digitization of reporting processes, and the strengthening of sustainable governance.

Through continuous alignment with ESRS, the Group aims to improve the quality of non-financial data, ESG risk management capabilities, and stakeholder engagement, making sustainability an essential driver of competitiveness and resilience.

ESG Targets for 2026-2027

Area	ESRS	KPI	UoM	Baseline (30/04/2025)	Targets	Actions	SDGs
Environment	E1-5: Energy consumption and energy mix	Supply of 100% renewable energy with low impact	Green kWh/Total kWh	95%	2026: 96% on total energy 2027: 97% on total energy	Increase in the number of 100% Green contracts	SDG 7, 13
	E1-6: Total GHG emissions (Scope 1+2)	Scope 1+2 emissions per capita	tCO ₂ Eq/HR	0.99	2026: -2% vs 2025 2027: -3% vs 2026	New 100% green contracts; increase in green energy self-production	SDG 7, 13
	E1-6: Intensity of gross GHG emissions	Total GHG emissions as a percentage of net revenue	tCO ₂ Eq/€	1.80	2026: -2% vs 2025 2027: -3% vs 2026	New 100% green contracts; increase in green energy self-production	SDG 13
Social	S1-9: Diversity metrics	Number of permanent employees	Employees number	6,322	2026: +5% vs 2025 2027: +2.5% vs 2026	Internal hiring; integration of new M&As	SDG 8
	S1-9: Diversity metrics	Women as a percentage of total HR	% women/total HR	32%	2026/2027: >30% (threshold)	Appointment of Diversity Manager; Recruitment targets	SDG 5, 10
	S1-9: Diversity metrics	% incoming turnover	% Employees hired/total HR	13%	2026/2027: >5% (threshold)	Hiring policies; Induction, training and support	SDG 5, 10
	S1-9: Diversity metrics	% outgoing turnover	% former employees/total HR	7%	2026/2027: <12% (threshold)	Training and development plans	SDG 5, 10
Governance	G1: Business conduct	Number of meetings held by the Sustainability Committee	Numbers of meetings held	2 meetings	2026: 3 meetings (+50% vs 2025) 2027: 4 meetings (+100% vs 2025)	Increased involvement of the SC	SDG 16, 17
	G1: Business conduct	Whistleblowing solved reports (if any)	Number of solved reports	100% (no reports)	2026/2027: >95% (threshold)	Ongoing training on ethics, integrity, and internal policies	SDG 16, 17

6.1 Definition of Roles and Responsibilities in relation to ESG Action Lines

To ensure the effective implementation of the ESG action lines defined in this Plan, the Sesa Group has assigned specific roles and responsibilities to different organisational levels, with the aim of ensuring accountability, transparency and continuous monitoring.

- **Board of Directors (BoD)**

Responsibilities: approves the Sustainability Plan and periodically reviews its progress; ensures that the ESG strategy is aligned with the company's overall purpose and targets.

Role: strategic leadership and supervision of the effectiveness of ESG actions.

- **Sustainability Committee**

Responsibilities: supporting the Board of Directors in strategic decisions relating to sustainability; defining ESG priorities, assessing risks and opportunities, and monitoring progress in relation to the targets set.

Role: advisory and operational body that integrates ESG expertise into governance decisions; the Chief Executive Officer ensures the link between governance and operational implementation.

- **Chief Executive Officer**

Responsibilities: ensuring the implementation of the ESG Plan, coordinating actions between company departments in line with the guidelines of the Committee and the Board of Directors.

Role: operational leadership in the implementation of ESG commitments; internal promotion of a culture of sustainability.

- **Group Sustainability Officer**

Responsibilities: developing and implementing ESG strategies; coordinating reporting activities and communicating with external stakeholders and supervisory bodies.

Role: technical and operational management of the ESG Plan, interaction with stakeholders, Sustainability Committee and supervisory bodies.

- **Sustainability Operational Committee**

Responsibilities: implementing the individual actions set out in the ESG Plan at an operational level, with the involvement of the heads of the main corporate functions (HR, IT, Legal, Operations, Purchasing, Communications, etc.).

Role: committee responsible for operational management, with the task of translating strategic guidelines into concrete actions; promoting collaboration between the company departments involved and ensuring the effective execution of ESG activities at cross-functional level.

- **Department Managers**

Responsibilities: integrate ESG targets into daily activities in line with the Plan guidelines; ensure the collection of reliable data for reporting purposes.

Role: promote the integration of sustainability into operational and decision-making processes. Facilitate dialogue between strategy and daily activities, raise awareness among teams and ensure alignment with the Group's ESG standards and commitments.

- **Internal Audit and Risk Management**

Responsibilities: verifying compliance with ESG policies, data accuracy and the effectiveness of internal controls; contributing to ESG risk assessment.

Role: control and assurance oversight.

- **All Employees and Collaborators**

Responsibility: acting in line with company values and actively contributing to the achievement of ESG targets.

Role: active and responsible participation in the company's ESG culture.

6.2 Definition of resources allocated to ESG action lines

The Sesa Group's 2026-2027 Sustainability Plan includes a structured organisation of operational and management resources to support the implementation of ESG action lines. Although there is no dedicated budget, ESG initiatives are integrated into operational plans and planning processes. economic

and financial aspects of the several corporate functions, thereby ensuring the availability of the necessary resources for each area of intervention.

Integrated financial resources: The economic resources allocated to ESG initiatives are allocated within the ordinary budgets of the relevant departments (e.g. HR for training, Real Estate for energy efficiency, IT for ESG digitalisation).

ESG activities are included in the annual and multi-year planning of company activities, ensuring consistency between the targets of the Plan and industrial priorities. The allocation of resources is monitored by the Group Sustainability Officer, in collaboration with the departments involved, to ensure alignment with the targets of the Plan.

Operational resources: The Sustainability Operational Committee coordinates the implementation of ESG actions, involving designated representatives from key business functions. Each function is required to integrate ESG initiatives into its internal processes, ensuring the availability of the necessary skills, tools and operational time. Digital tools for monitoring and collecting ESG data are already integrated into the company's information systems.

Synergies and support: Synergies between company departments, coordinated by the Group Sustainability Officer, are a key element in the effective management of resources, with a view to shared efficiency and accountability.

7. Commitments to transparency and digitisation

In the light of European regulatory developments, in particular with the introduction of the CSRD Directive and ESRS standards, the Sesa Group has strengthened its commitment to transparency and digitalisation, considering them key elements for sustainable, accessible and reliable reporting.

Transparency: Transparency is at the heart of the relationship of trust between the company and its stakeholders. With this aim in mind, the Group has adopted an integrated and increasingly detailed reporting approach, designed to provide a comprehensive picture of both financial and non-financial value creation.

Since 2022, Sesa has published its **Integrated Annual Report**, a pioneering document in Italy that combines economic and financial performance with ESG results, offering a unified and transparent view of the Group's strategy and impact.

An independent assurance process has been implemented for the most relevant ESG data in order to guarantee the reliability and comparability of the information.

The Group has established an **internal ESG data validation process** involving all relevant corporate functions, thereby strengthening the control and quality of the reported data. This process involves several levels of the company and includes systematic checks to ensure the quality of the information that is then communicated to stakeholders and included in official reports.

Firstly, data is collected through a centralised system that integrates information from all company departments involved in ESG issues: from the environmental area to human resources management, to governance and compliance aspects. Each data point is supported by clear documentation that certifies its source, measurement methodology and update frequency, thus ensuring complete traceability. The managers of the individual areas – figures dedicated to the management and supervision of ESG data – are responsible for verifying the accuracy and consistency of the information collected. This step involves a careful review of the data, the analysis of any anomalies or inconsistencies and their correction, with a continuous comparison between historical data and new values to monitor trends and progress.

At the same time, the process includes cross-checks by internal auditing teams, which periodically verify the accuracy of the data and the application of collection and validation procedures. These internal audits are essential for identifying any critical issues and for continuously improving the control system. In view of the adoption of the new CSRD regulations and ESRS standards, this validation process has been further strengthened, with particular attention to data transparency and accuracy, in order to ensure strong ESG reporting that is suitable for review by external auditors.

In summary, the internal ESG data validation process is a key element for the Sesa Group in ensuring the credibility of its commitment to sustainability, creating the necessary conditions for clear and responsible communication with all stakeholders.

Communication is aimed not only at investors, but also at employees, customers, local communities, institutions and partners, through thematic reports and specific engagement initiatives.

Digitalisation: Digitalisation is not only a strategic area for the Group's business, but also a tool that enables sustainability and transparency. The adoption of advanced technologies allows for more effective monitoring of ESG performance and the use of data in decision-making.

An **internal digital platform has been developed for the collection and monitoring of ESG data**, integrated with the company's information systems, which allows sustainability indicators to be tracked in real time.

The sustainability report is now published in XHTML/ESEF format, in line with the requirements of the EU Delegated Regulation on digital reporting.

At the operational level, the digitisation of business processes has led to a significant reduction in paper use, optimisation of document flows and process traceability, contributing to environmental efficiency.

The integration of transparency and digitisation allows the Sesa Group to proactively address the challenges of sustainability, promoting an open, responsible business model that is ready to meet the increasingly aware and informed needs of stakeholders.

8. Final remarks

The Sesa Group is firmly committed to pursuing an increasingly sustainable business model, deeply integrating ESG principles into its corporate strategy and operational activities. The ESG Plan presented here is not only a timely and structured response to the regulatory requirements of the CSRD Directive, but above all a concrete manifestation of our desire to generate shared value over time for both internal and external stakeholders.

Through a constant and cross-functional commitment involving all corporate functions, from governance to operational management, we have built an integrated system that continuously monitors, measures and improves Environmental, Social and Governance performance. The strengthening of ESG data validation processes and the adoption of cutting-edge digital systems allow us to guarantee the transparency and reliability of information, which are fundamental elements for maintaining the trust of investors, customers, employees and the community.

Our vision of sustainability is not limited to a set of isolated actions but translates into a corporate culture that promotes responsible innovation, environmental protection and people's well-being. Human capital is at the centre of the strategy, through inclusive policies, targeted training programmes and welfare initiatives that promote diversity and encourage skills development.

On the environmental front, the Sesa Group has embarked on a concrete path of decarbonisation and energy efficiency, aiming to significantly reduce greenhouse gas emissions and optimise the use of natural resources. These efforts are in line with global climate change targets and translate into tangible results, such as increased use of energy from renewable sources and sustainable waste management.

In terms of governance, the adoption of strict codes of ethics, the implementation of anti-corruption control systems and the promotion of a culture of transparency and accountability form the basis of our long-term credibility and sustainability. The close integration of ESG objectives into incentive systems also ensures that sustainability performance is an integral part of assessments and decision-making processes at all levels of the company.

Looking ahead, the Sesa Group is committed to further strengthening its ESG management system, fully aligning itself with the new ESRS standards and expanding the scope of reporting to include indirect emissions from the value chain (Scope 3). The goal is to consolidate a solid and innovative business model capable of proactively addressing global challenges and creating a lasting positive impact on the environment, people and society.

All this is in line with our purpose: *“create long-term sustainable value for all stakeholders, promoting the digital innovation of companies and organizations and the well-being of people, by embracing the new waves of technology innovation”*. This commitment is the driving force behind every decision and action we take, combining our responsibility towards the planet with our desire to promote human and social development. With this clear and shared vision, the Sesa Group is a key partner and leader in the transition towards a more sustainable, fair and innovative future.