SESA GROUP
SUSTAINABILITY PLAN 2027–2028

In line with the CSRD Directive and the ESRS Standards

CONTENTS

1. Introduction

The **Sustainability Plan for the period 2027–2028**, which sets out the policies designed to generate and distribute resources to all stakeholders, represents the Group’s medium- to long-term strategic vision and communicates the targets and the actions required 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-term development.

The Sustainability Plan, with regard to the material issues identified and reported in the Integrated Annual Report, sets out sustainability targets linked to concrete actions to be undertaken to achieve them. Each of the targets has been linked to a specific macro-area (Environmental, Social and Governance) and to the relevant material issues within that area.

In defining the Sustainability Plan, we also considered the **Sustainable Development Goals (SDGs)**, goals promoted by the United Nations and published in the 2030 Agenda for Sustainable Development. The Group’s sustainability targets have been identified, and we believe that, through our commitment, these can contribute to the achievement of, in particular, nine of the seventeen SDGs, which the Group recognises as relevant to its business and in line with its strategic direction.

The Plan’s targets are updated annually and take into account the results achieved and those still to be achieved, as well as new priorities that arise over time.

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

2. Strategic Approach to Sustainability

For the Sesa Group, sustainability is a strategic driver that guides long-term decision-making and the creation of shared value. Since its foundation, Sesa has made technology a driving force for sustainable progress, promoting innovation, skill development and digitalization in the communities where it operates.

Sustainability is a core value that defines the Sesa Group’s identity. Since 2018, the Group has reinforced its commitment by establishing 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 single document that combines financial performance and ESG results with a view to transparency and an integrated perspective on value.

In 2025, we also incorporated the principles of the CSRD legislation and began a review of our strategy to ensure full compliance with ESRS standards. This involved adopting a more structured approach, setting measurable targets, ensuring greater transparency in governance, and strengthening control and monitoring mechanisms.

Our strategic approach is based on three key areas:

- **Integration of ESG into corporate strategy**: sustainability targets have been progressively integrated into business planning and the management system, 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 the efficient use of resources, as well as cloud computing and artificial intelligence, we support businesses in their green digital transition. At the same time, we invest in technology projects with a positive ESG impact;

- **Shared values for people and communities:** the Group’s growth has always been matched by a concrete commitment to local communities, training, staff wellbeing and the promotion of diversity. The Sesa Foundation is the most direct expression of this, through high-impact cultural, educational and social projects.

The 2027–2028 Sustainability Plan (approved by the Board of Directors on 16 July 2026) builds on the previous 2026–2027 Plan (approved by the Board of Directors on 17 July 2025), developing its content through a process of continuous improvement based on the results achieved, developments in the ESG landscape and the progressive strengthening of the integration of sustainability into the Group’s strategy.

3. ESG Governance and Coordination Structure

Sustainability governance within the Sesa Group is managed by a clearly defined structure, which involves different corporate levels, ensuring continuous and strategic oversight of ESG issues.

At the top, the Board of Directors plays a key role in guiding the integration of sustainability into the corporate strategy. Since 2021, the Group has formally incorporated the target of sustainable growth into its Bylaws, confirming the importance attributed to these issues. In 2022, the Board of Directors established a dedicated Sustainability Committee, comprising members with specific expertise, whose role is to support the Board and the Chief Executive Officer in decisions relating to the most significant ESG issues, such as policy formulation, the assessment of risks and opportunities, and the monitoring of sustainable investments.

At an operational level, the coordination of sustainability-related activities is entrusted to the Group Sustainability Officer, who is responsible for developing ESG strategies, coordinating action plans across the various business units and overseeing the preparation of the Integrated Annual Report, thereby ensuring transparency and consistency in reporting. In addition, the Group Sustainability Officer coordinates the Sustainability Operational Committee, a working group comprising heads of key functions, which is responsible for the practical implementation and monitoring of ESG initiatives.

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

The Sustainability Committee meets regularly to:

- Monitor ESG performance indicators;
- Assess the risks and opportunities relating to sustainability;
- Set strategic priorities and approve ESG policies.

Furthermore, the integration of ESG targets has also been extended to management's variable remuneration, providing incentives to achieve environmental and social targets.

4. Double Materiality Analysis

During 2026, we carried out a comprehensive update of our materiality analysis, involving both internal and external stakeholders. We identified the most relevant material issues, both in terms of the Group's impact on the environment and society (inside-out materiality) and in terms of the risks and impacts of sustainability on the business (outside-in).

For a detailed and in-depth analysis of the activities and initiatives linked to the issues identified in the materiality matrix, please refer to the 2026 Group's Integrated Annual Report. This document provides a detailed account of the processes, projects 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 resource 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, 2026

The Sesa Group has demonstrated a strong and growing commitment to promoting a culture of sustainability that embraces every aspect of its business model. This commitment takes the form of a series of strategic and operational measures, aimed at generating positive impacts on the environment, society and corporate governance, thereby helping to create sustainable and long-lasting value.

The actions undertaken and the progress made can be analysed across the three fundamental dimensions of ESG: environmental, social and governance, each of which represents an essential pillar for the consolidation of a sustainable and resilient business model over time.

Environment:

- nergy transition: gradual reduction in Scope 1 and 2 CO_2 emissions through energy efficiency improvements at operational sites and the transition to electricity from renewable sources (over 90% from 2023);
- Sustainable mobility: promoting electric and hybrid vehicles for the company fleet and utilising flexible working arrangements to reduce travel;

- Resource management: implementation of digital systems for real-time monitoring of consumption;
- Circular economy and waste management: promotion of separate waste collection at operational sites, encouraging the recycling of electronic and paper materials and reducing waste sent for disposal;
- Sustainable suppliers: selection of partners with high environmental standards;
- Awareness-raising and training: initiatives to foster an internal environmental culture, through engagement projects and collaboration with local authorities.

Social:

- Training and skills development: ongoing training on digital innovation, sustainability, diversity and inclusion, and personal development, with tailored programmes to support employees' professional growth and continuous upskilling;
- Gender equality and inclusion: proactive policies to increase the representation of women within the Group, mentoring programmes specifically for women, and initiatives aimed at creating a fair and inclusive working environment;
- Integration and development of young people: structured apprenticeship programmes, work placements and mentoring schemes to integrate young talent, with a particular focus on digital skills and the new professional roles required by the market;
- Organizational wellbeing: initiatives focused on health, work-life balance, psychological support and prevention programmes, with the aim of creating a healthy, motivating working environment that respects individual needs;
- Diversity & Inclusion: promoting an open corporate culture that respects differences, through awareness-raising initiatives and specific policies to ensure equal opportunities for everyone;
- Social responsibility and community engagement: 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 remit, comprising members of senior management,

which oversees the implementation of ESG strategies and continuously monitors performance in environmental, social and governance areas;
- ESG integration within the Board of Directors: sustainability is a cross-cutting issue in the Board's activities; the Board monitors ESG issues and takes their impact into account in strategic decisions, thereby ensuring thoughtful and responsible leadership with regard to environmental, social and governance matters;
- Code of Ethics and compliance: ongoing updating of the company's Code of Ethics, which sets out strict 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 whistleblowing channels to protect those who report unlawful or non-compliant behaviour;
- Transparency and accountability: a commitment to transparent and timely communication of ESG performance through the Integrated Annual Report, with reporting evolving progressively in line with the CSRD regulations and ESRS standards;
- Integration of ESG targets into remuneration: linking management's variable remuneration to the achievement of specific ESG targets, thereby incentivising behaviour and results consistent with the Group's sustainability 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;
- Continuing professional development: training programmes on ESG issues for employees, managers and directors, designed to foster cross-organizational expertise and awareness throughout the organization.

6. Future targets (2027-2028) and alignment with the ESRS

In line with the sustainability journey embarked upon in previous years, the Sesa Group looks to the future with the aim of further strengthening the integration of ESG criteria into its corporate strategy and operational processes. The entry into force of the CSRD Directive and the European Sustainability Reporting Standards (ESRS) marks a turning point in sustainability reporting, requiring an increasingly structured, measurable and transparent approach.

In this context, Sesa intends to continue its commitment, transforming regulatory standards into opportunities to generate shared value in the medium to long term. The ESG targets set for the period 2027–2028 reflect a strategic vision focused on the energy transition, the development of human capital, the digitalization of reporting processes and the strengthening of sustainable governance.

Through ongoing alignment with the ESRS, the Group aims to improve the quality of non-financial data, its capacity for managing ESG risks and its dialogue with stakeholders, making sustainability a key driver of competitiveness and resilience.

ESG Targets for 2027–2028

Area	ESRS	KPI	UoM	Baseline (30/04/2026)	Target	Actions	SDGs
Environment	E1-5: Energy consumption and mix	Supply of low-impact, 100% renewable electricity	Green kWh/Total kWh	95%	2027/2028: >97% of total energy consumption (threshold)	Increase the number of 100% renewable electricity contract	SDGs 7 and 13
	E1-6: Total GHG emissions (Scope 1+2)	Scope 1+2 emissions per capita	tCO_2 Eq/HR	0.95	2027: -2% vs 2026 2028: -3% vs 2027	New 100% renewable electricity contract; increase self-generation of renewable electricity	SDGs 7 and 13
	E1-6: GHG emissions intensity	Total GHG emissions relative to net revenue	tCO_2 Eq/€ Mn	1.75	2027: -2% vs 2026 2028: -3% vs 2027	New 100% renewable electricity contract; increase self-generation of renewable electricity	SDG 13
Social	S1-6: Characteristics of the undertaking’s employees	% of human resources on permanent contracts	% of HR	97%	2027/2028: >97% (threshold)	Internal Hiring; recruitment and retention targets	SDG 8
	S1-6: Characteristics of the undertaking’s employees	% of women on total HRs	Women/total workforce	32%	2027/2028: >30% (threshold)	Appointment of a Diversity Manager; Recruitment Targets	SDGs 5 and 10
	S1-6: Characteristics of the undertaking’s employees	% of incoming turnover	Hires/total workforce	11%	2027/2028: >5% (threshold)	Hiring policies; onboarding, training and support	SDGs 5 and 10
	S1-6: Characteristics of the undertaking’s employees	% of outgoing turnover	Outgoing HRs/ total workforce	6%	2027/2028: <12% (threshold)	Training and development plans	SDGs 5 and 10
Governance	G1: Business conduct	Number of meetings held by the Sustainability Committee	Number of meetings held	3 meetings	2027/2028: >= 3 meetings (threshold)	Increased involvement of Sustainability Committee	SDGs 16 and 17
	G1: Business conduct	Resolved whistleblowing reports (if any)	Number of solved reports	100% (no reports)	2027/2028: >95% (threshold)	Ongoing training on ethics, integrity and internal policies	SDGs 16 and 17
	G1: Business conduct	Maintenance and extension of management system certifications	Number of Certifications	ISO 9001-14001-27001, PDR 125, SA8000	2027/2028: Maintaining existing certifications and, where applicable, obtaining new ones	Internal and external audits; monitoring of management systems; ongoing training and process improvement	SDGs 16 and 17

6.1 Definition of Roles and Responsibilities in Relation to the ESG Action Plans

To ensure the effective implementation of the ESG action plans set out in this Plan, the Sesa Group has assigned specific roles and responsibilities at different levels of the organization, with a focus on accountability, transparency and ongoing monitoring.

- **Board of Directors (BoD)**

Responsibilities: approves the Sustainability Plan and regularly monitors its progress; ensures that the ESG strategy is aligned with the company's *purpose* and overall targets.
Role: provides strategic guidance and oversees the effectiveness of ESG initiatives.

- **Sustainability Committee**

Responsibilities: to support the Board of Directors in strategic decisions relating to sustainability; to define ESG priorities, assess risks and opportunities, and monitor progress against established targets.
Role: an 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: to ensure the implementation of the ESG Plan, coordinating actions across the company's departments in line with the guidelines set by the Committee and the Board of Directors.
Role: operational leadership in delivering on ESG commitments; promoting a culture of sustainability within the organization.

- **Group Sustainability Officer**

Responsibilities: to develop and implement ESG strategies; to coordinate reporting activities and engage with external stakeholders and supervisory bodies.
Role: technical and operational management of the ESG Plan; interaction with stakeholders, the Sustainability Committee and supervisory bodies.

- **Sustainability Operational Committee**

Responsibilities: to implement the individual actions set out in the ESG Plan at an operational level, involving the heads of the main corporate functions (HR, IT, Legal, Operations, Procurement, Communications, etc.).
Role: a committee responsible for operational management, tasked with translating strategic guidelines into concrete actions; it promotes collaboration between the relevant corporate functions and ensures the effective implementation of ESG activities across the organization.

- **Head of Department**

Responsibilities: to integrate ESG targets into day-to-day activities in line with the Plan's guidelines; to ensure the collection of reliable data for reporting purposes.
Role: to drive the integration of sustainability into operational and decision-making processes. To facilitate dialogue between strategy and day-to-day operations, raise awareness amongst teams and ensure alignment with the Group's ESG standards and commitments.

- **Internal Audit and Risk Management**

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

- **All Employees and Partners**

Responsibility: acting in line with the company's 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 the resources allocated to ESG initiatives

The Sesa Group's 2027–2028 Sustainability Plan requires a structured organization of operational and managerial resources to support the implementation of ESG action plans. Although no separate dedicated budget is provided for, ESG initiatives are integrated into the operational plans and economic and financial planning processes of the different company functions, thereby ensuring that the necessary resources are available for each area of action.

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

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

Operational resources: The Sustainability Operational Committee coordinates the implementation of ESG measures, involving designated representatives from the main corporate functions. Each function is required to integrate ESG initiatives into its internal processes, ensuring that the necessary expertise, tools and operational time are available. Digital tools for monitoring and collecting ESG data are in place and have already been integrated into the company's information systems.

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

7. Commitments to transparency and digitalization

In the changing European regulatory scenario, particularly following the adoption of the CSRD Directive and the ESRS standards, the Sesa Group has strengthened its commitment to transparency and digitalisation, considering them essential elements for sustainable, accessible and reliable reporting.

Transparency: Transparency is the foundation of the relationship of trust between the company and its stakeholders. With this in mind, the Group has adopted an integrated and progressively more detailed reporting approach, aimed at providing a comprehensive picture of the creation of both financial and non-financial value.

Since 2022, Sesa published the **Integrated Annual Report**, a pioneering initiative in Italy, which combines economic and financial performance with ESG results, offering a unified and transparent overview of the Group’s strategy and impacts.

An independent assurance process has been put in place for the most relevant ESG data, with a view to ensuring 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 corporate levels and includes systematic checks to ensure the quality of the information that is subsequently communicated to stakeholders and included in official reports.

Firstly, data collection takes place via a centralised system that integrates information from all the business functions involved in ESG matters: from environmental management to human resources, right through to governance and compliance. Each data point is supported by clear documentation certifying its source, the measurement methodology and the frequency of updates, thereby ensuring full traceability. The heads of the individual departments – who are responsible for managing and supervising ESG data – are responsible for verifying the accuracy and consistency of the information collected. This process 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 figures to monitor trends and progress.

At the same time, the process involves cross-checks by internal audit teams, which periodically carry out checks on the accuracy of the data and the application of data 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 paid to the transparency and accuracy of the data, so as to ensure robust ESG reporting that is suitable for audit 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 staff, customers, local communities, institutions and partners, through topic-specific reports and specific engagement initiatives.

Digitalization: Digitalization is not only a strategic area for the Group's business, but also a key enabler of sustainability and transparency. The adoption of advanced technologies allows for more effective monitoring of ESG performance and the use of data to inform decision-making.

An **in-house digital platform** has been developed for the **collection and monitoring of ESG data**, integrated with the company's IT systems, which enables 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 disclosure.

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

The integration of transparency and digitalisation enables the Sesa Group to tackle the challenges posed by sustainability proactively, promoting an open, responsible business model that is ready to respond to the needs of increasingly attentive and aware stakeholders.

8. Conclusions

The Sesa Group is fully committed to its path towards an increasingly sustainable business model, deeply embedding ESG principles into its corporate strategy and operational activities. The ESG Plan outlined here represents not only a timely and structured response to the regulatory requirements of the CSRD Directive, but above all a concrete demonstration of our commitment to generating shared value over time for both internal and external stakeholders.

Through a constant, cross-organizational commitment involving all business functions, from governance to operational management, we have built an integrated system that continuously monitors, measures and improves our environmental, social and governance performance. The strengthening of ESG data validation processes and the adoption of cutting-edge digital systems enable us to ensure the transparency and reliability of information – key factors in maintaining the trust of investors, customers, employees and the community.

Our vision of sustainability is not limited to a series of isolated actions, but is translated into a corporate culture that promotes responsible innovation, environmental protection and people's wellbeing. Human capital is at the heart of our strategy, through inclusive policies, targeted training programmes and welfare initiatives that value diversity and foster skills development.

On the environmental front, the Sesa Group has started a concrete programme 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 targets for combating climate change and are yielding tangible results, such as increased use of energy from renewable sources and sustainable waste management.

In the area of governance, the adoption of rigorous codes of ethics, the implementation of anti-corruption control systems and the promotion of a culture of transparency and accountability form the foundation upon which our long-term credibility and sustainability are built. The close integration of ESG targets into incentive schemes also ensures that sustainability performance is an integral part of assessments and decision-making processes at all levels of the organization.

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

All of this blends with our purpose: "*Create long-term sustainable value for all stakeholders promoting innovation, including digital innovation, in businesses and organizations, as well as the well-being of people*". This commitment guide our every decision and action, combining our responsibility towards the planet with our desire to promote human and social development. With this clear and shared vision, the Sesa Group positions itself as a key partner and a leading player in the transition towards a more sustainable, equitable and innovative future.