

SUSTAINABILITY

REPORT
2025



INTRODUCTION.....	3
Chairman's letter.....	3
FOREWORD.....	5
External context analysis – Reference sector.....	5
ORGANISATION.....	8
Information about the Organisation.....	8
Distinctive factors.....	9
Governance, values and recognition.....	10
Management systems and certifications.....	12
SUPPLY CHAIN RESPONSABLE.....	15
SUSTAINABILITY ANALYSIS AND STRATEGY.....	20
Stakeholders.....	20
Sustainability due diligence.....	23
MATERIALITY ASSESSMENT.....	28
Strategic Sustainability Plan.....	29
ESG PERFORMANCE.....	34
ENVIRONMENT.....	34
Energy and climate change.....	37
Greenhouse gas (GHG) emissions.....	38
Product LCA – Carbon Footprint of the aluminium alloy wheel.....	39
Water resources.....	41
Waste and circular economy.....	42
Pollution prevention.....	45
PEOPLE – OUR WORKFORCE.....	47
Policies and principles.....	47
Employment and workforce characteristics.....	47
Occupational health and safety.....	48
Training.....	49
Employee engagement and internal communication.....	50
PEOPLE – COMMUNITIES, CUSTOMERS AND CONSUMERS.....	51
Relationship with the local community.....	51
Customers and end consumers.....	52
APPENDICES.....	54
Methodological Note.....	54
Focus on sustainability due diligence and materiality assessment.....	57
ESRS–GRI–IFRS–SDGs correlation table.....	61



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CHAIRMAN'S LETTER

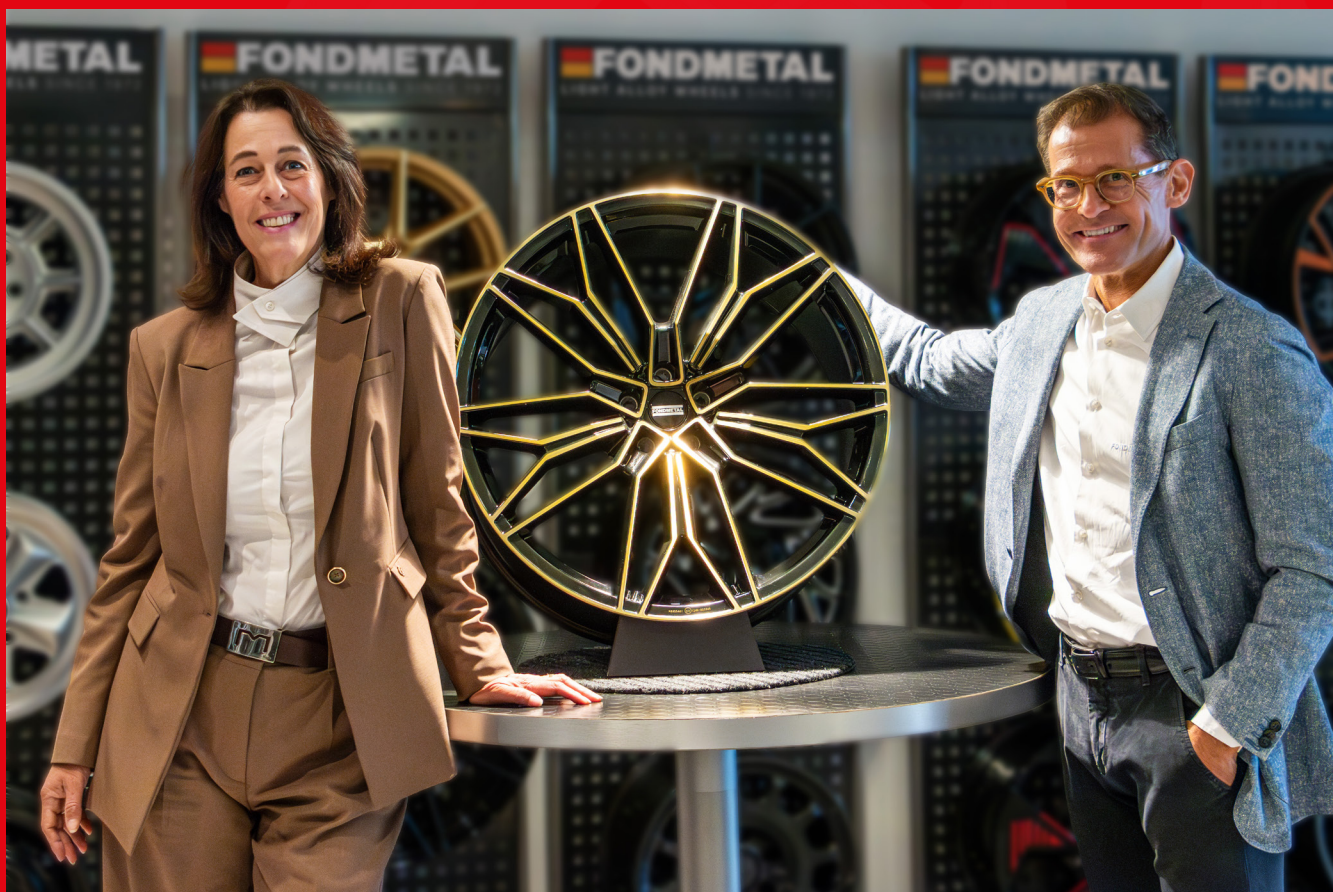
"We are pleased to present our third Sustainability Report, an important communication tool through which we share with you the results we have achieved in the field of sustainability and corporate social responsibility. Our commitment to sustainability is reflected in the actions we take to reduce our environmental and social impact.

We are committed to monitoring and reducing our greenhouse gas emissions, increasing the use of renewable energy, minimizing waste, and adopting sustainable practices throughout our supply chain. Through this Sustainability Report, we aim to share our progress with you, while also acknowledging the challenges that still lie ahead.

We are continuously committed to improving our sustainability performance and fostering an open and transparent dialogue with all our stakeholders to ensure balanced and sustainable long-term growth.

We invite you to read our Sustainability Report and join us as we continue our journey toward sustainable and responsible development. Thank you for your trust and continued support."

Chairman and CEO
Stefano Rumi



Alessandra Rumi

Vice Chairman

Stefano Rumi

Chairman and CEO

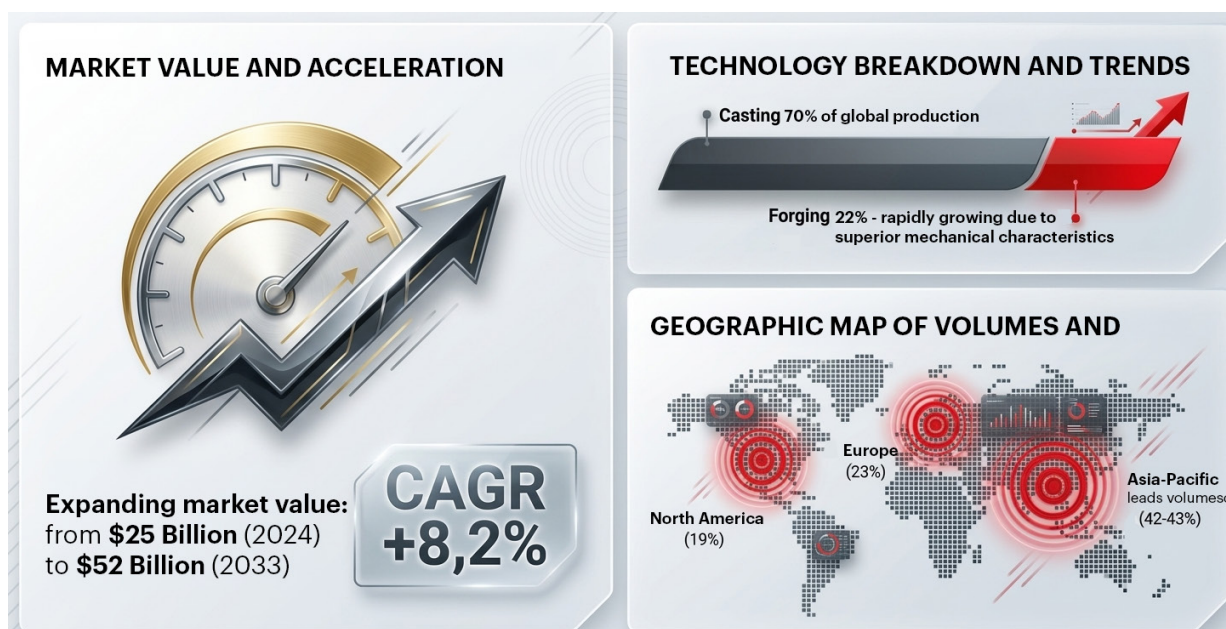
“We are continuously committed to improving our sustainability performance and fostering an open and transparent dialogue with you.”

EXTERNAL CONTEXT ANALYSIS – REFERENCE INDUSTRY

Fondmetal S.p.A. operates in the aluminum alloy wheel manufacturing sector for motor vehicles, an industry undergoing significant transformation. This analysis outlines the main macroeconomic trends, competitive dynamics across the value chain, growth prospects, and systemic risks that may influence the Company's operations.

GLOBAL MARKET AND VALUE CHAIN STRUCTURE

The global automotive alloy wheel market was valued at approximately USD 25 billion in 2024 and is projected to exceed USD 52 billion by 2033, growing at a CAGR of 8.2% (Straits Research, 2025). Other market analysts estimate growth rates ranging from 2.8% to 8.2%, depending on the segment, with the aluminum wheel segment alone valued between USD 15 and 22 billion in 2024 (Global Growth Insights; Cognitive Market Research). Cast wheels account for approximately 78% of global production, while forged wheels (22%) are experiencing faster growth due to their superior mechanical properties. The Asia-Pacific region leads the market in production volume (42–43%), followed by Europe (23%) and North America (19%) (Market Reports World, 2024).



Upstream, the value chain is centered on suppliers of primary and secondary aluminum alloys, as well as manufacturers of surface treatment and finishing materials. The quality and carbon intensity of purchased aluminum are becoming increasingly important risk factors, particularly in light of the CBAM regulatory framework. Downstream, Fondmetal primarily serves mid-range and premium OEM automotive manufacturers, as well as international importers and distributors. This market positioning entails growing expectations regarding product quality, ESG traceability, and certified product carbon footprint. From a competitive standpoint, Fondmetal competes with established European manufacturers, specialized Italian producers, emerging low-cost competitors from Turkey and Eastern Europe, and large globally integrated manufacturers.

MACROECONOMIC TRENDS AND GROWTH OUTLOOK

Electrification and lightweighting: Global electric vehicle sales exceeded 17 million units in 2024 (+25% year-on-year, IEA Global EV Outlook 2025). Battery electric vehicles (BEVs) require lighter wheels to offset the weight of battery packs, and the aluminum wheel segment for electric vehicles is expected to grow at an annual rate of 10% through 2025 (Global Growth Insights). In Europe, hybrid electric vehicles (HEVs) gained approximately 21 percentage points in market share during 2024 (Allianz

Research, 2025). Replacing steel wheels with aluminum alloy wheels can reduce vehicle weight by up to 20%, improving fuel efficiency by 5–10% (The Aluminum Association; U.S. Department of Energy).

SUV/Premium segment and aftermarket: The SUV segment is recording the highest growth rate in the industry (+5.8% annually, Global Growth Insights), further strengthening demand for high-quality alloy wheels. The aftermarket, where custom wheels account for more than 60% of the aesthetic segment (Market Reports World), represents an additional channel for long-term structural growth.

Trade tensions and macroeconomic uncertainty: The 25% U.S. tariffs on imported automobiles introduced in March 2025, together with the resulting uncertainty across European markets, affected demand from Fondmetal’s OEM customers. An EU–U.S. agreement reached in July 2025 reduced tariffs to 15% for selected sectors, although the overall market environment remains volatile. McKinsey estimates that the transition to electric mobility could reduce the European automotive industry’s value added by as much as EUR 370 billion (Automotive Manufacturing Solutions, 2025).

ESG REGULATORY FRAMEWORK

CSRD/ESRS: The new sustainability reporting requirements are progressively extending from major OEMs to the supply chain. Compliance with the ESRS is becoming a market access requirement for first-tier suppliers.

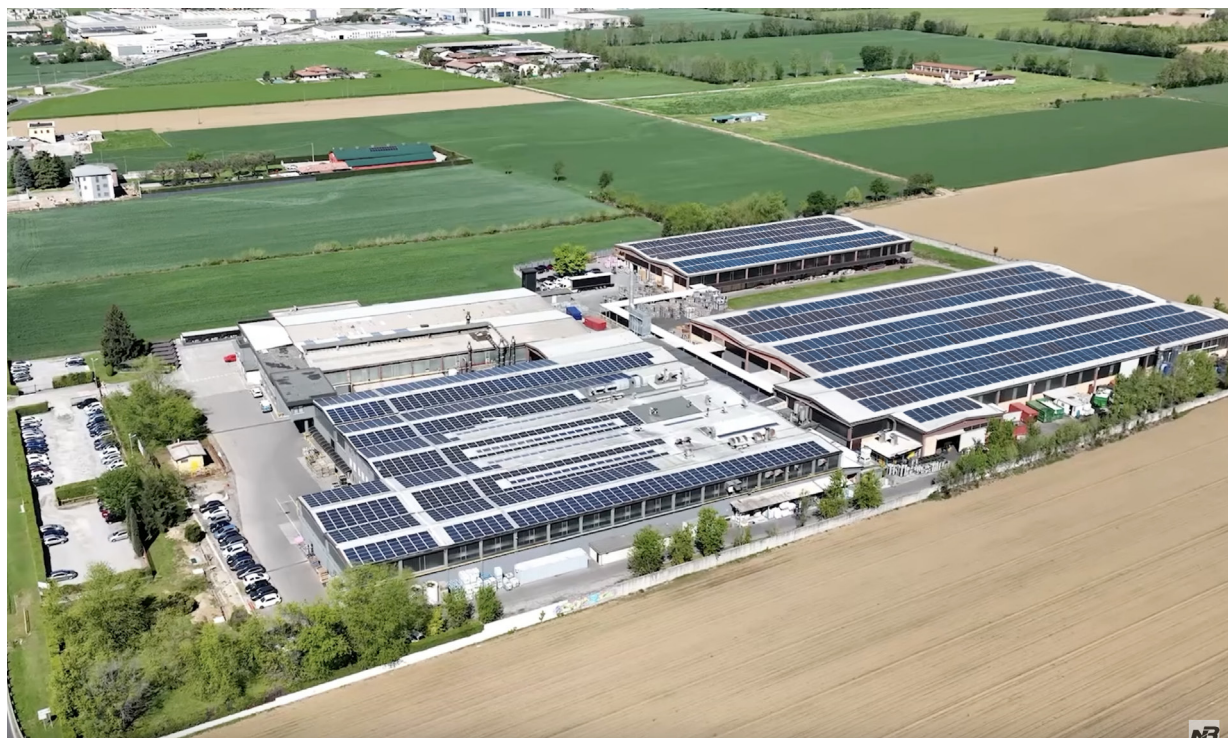
CBAM (Reg. UE 2023/956): As of 1 January 2026, the Carbon Border Adjustment Mechanism (CBAM) entered its definitive implementation phase, requiring EU importers of non-EU aluminum to purchase CBAM certificates corresponding to the embedded emissions of imported products, based on the average EU ETS allowance price. The gradual phase-out of free EU ETS allowances (2026–2034) will increase production costs for European primary aluminum suppliers. From 2028, CBAM is expected to be extended to approximately 180 categories of aluminum- and steel-intensive products, including automotive components (European Commission; Renewable Matter, 2025). In this context, the use of post-consumer recycled aluminum and the traceability of supply chain emissions are becoming strategic levers for managing regulatory and economic risks.

KEY INDUSTRY RISKS

MAIN INDUSTRY RISKS Aluminum accounts for ~45% of costs. Price fluctuations and the phase-out of ETS allowances impact procurement.	COMPETITIVE PRESSURE Non-EU and Turkish manufacturers operate at lower costs. Aggressive Chinese competition in the high-volume aftermarket segment.	ESG & CBAM COMPLIANCE Stricter regulations require costly investments in data collection and reporting systems, weighing proportionally on SMEs.
SUPPLY CHAIN Reliance on non-EU primary aluminum exposes to carbon leakage risks and supply disruptions due to geopolitical tensions.	AUTOMOTIVE SLOWDOWN Declining OEM EBITDA margins (<8%) translate into immediate price pressure across the entire supplier network.	TECHNOLOGICAL EVOLUTION The rise of software-defined and BEV vehicles requires rapid upskilling to remain relevant as an OEM supplier.

Sources: Straits Research (2025) – Automotive Alloy Wheel Market Report | Global Growth Insights (2024) – Aluminum Alloy Automotive Wheels Market | Market Research Future (MRFR) Analysis (2025) | Market Reports World (2024) – Aluminum Alloy Wheels Market | Cognitive Market Research (2024) | Allianz Research – How Europe Can Take Back the Wheel (February 2025) | IEA – Global EV Outlook 2025 | OICA – Production Statistics 2024 | PwC – Automotive Industry Outlook (2025) | McKinsey / Automotive Manufacturing Solutions (July 2025) | Automotive Logistics Media (2025) | European Commission – CBAM Regulation (EU) 2023/956 | Deloitte Italy – CBAM 2026 | Renewable Matter (December 2025) | The Aluminum Association | U.S. Department of Energy – Fuel Economy Reports.





8

ORGANIZATIONAL INFORMATION

HISTORY

Fondmetal was founded in 1972 in Palosco, a small town in the province of Bergamo, on the border with the province of Brescia, through the vision of entrepreneur Gabriele Rumi, who carried forward and renewed a long-standing family tradition. As early as 1908, the great-grandfather of the current owners, Stefano and Alessandra Rumi, operated an iron foundry. The company began as an aluminum foundry serving third-party customers, gradually specializing in components for the automotive industry—including intake manifolds, crankcases, and oil pans—before producing high-precision parts such as cylinder heads and engine blocks for the Maserati Biturbo. However, it was the energy crisis of the 1970s, the so-called “austerity” period, that prompted Gabriele Rumi to make a bold strategic decision: to free the company from its dependence on contract manufacturing by launching its own product. For a man with a passion for motorsport and automotive engineering, the choice naturally fell on light-alloy wheels—a market in which Fondmetal would go on to establish internationally recognized leadership over the following decades.

The passion for motorsport has always been an integral part of Fondmetal’s history. As early as 1983, the Company entered the world of Formula 1 as a sponsor, associating its brand with Bergamo-born driver Piercarlo Ghinzani. In 1989, Fondmetal acquired a majority stake in the Osella Formula 1 team, which competed in the 1990 World Championship as Fondmetal-Osella. In 1991, the Company made its debut as an official Formula 1 constructor. Its single-seaters—the Fomet 1, designed in Bicester by Robin Herd, Tino Belli, and Tim Holloway, followed by the GR02, designed by Sergio Rinland and voted by Autosport as one of the most beautiful Formula 1 cars of all time—competed in two World Championship seasons with drivers including Olivier Grouillard and Gabriele Tarquini. Although the racing adventure came to an end in 1992, Fondmetal’s commitment to motorsport continued. In 1997, Gabriele Rumi acquired a majority stake in the Minardi Formula 1 Team, ensuring its survival until 2001. At the same time, Fondmetal Technologies, through its Aerolab division, developed aerodynamic research and engineering solutions for Formula 1 teams

including Benetton, Tyrrell, Renault F1, Spyker/Force India, and the new Team Lotus/Caterham. In 2025, after more than two decades, Fondmetal returned to the pinnacle of motorsport by becoming the Official Wheel Supplier of the Aston Martin Aramco Formula One® Team, bringing the name of Palosco back to the Formula 1 World Championship paddock. Today, Fondmetal has more than fifty years of history—the Company's 50th anniversary was celebrated in the summer of 2022—and is recognized as a leading manufacturer of light-alloy wheels for the OEM/OES and aftermarket (AM) sectors. The technological expertise developed through decades of motorsport, together with international approvals (TÜV, ECE, and NAD) and management system certifications (IATF 16949, UNI EN ISO 14001, and UNI EN ISO 9001), forms the foundation of a level of quality recognized by the world's leading automotive manufacturers. Today, the Company is led by Stefano and Alessandra Rumi, who continue the legacy of a business built on Bergamo's engineering tradition, entrepreneurial vision, and a genuine passion for the automotive world.

DISTINGUISHING FACTORS

More than fifty years of experience have shaped a competitive business model built on a set of mutually reinforcing strengths: technical expertise, certified quality and reliability, a dual-market approach, and a continuous commitment to innovation focused on product sustainability.

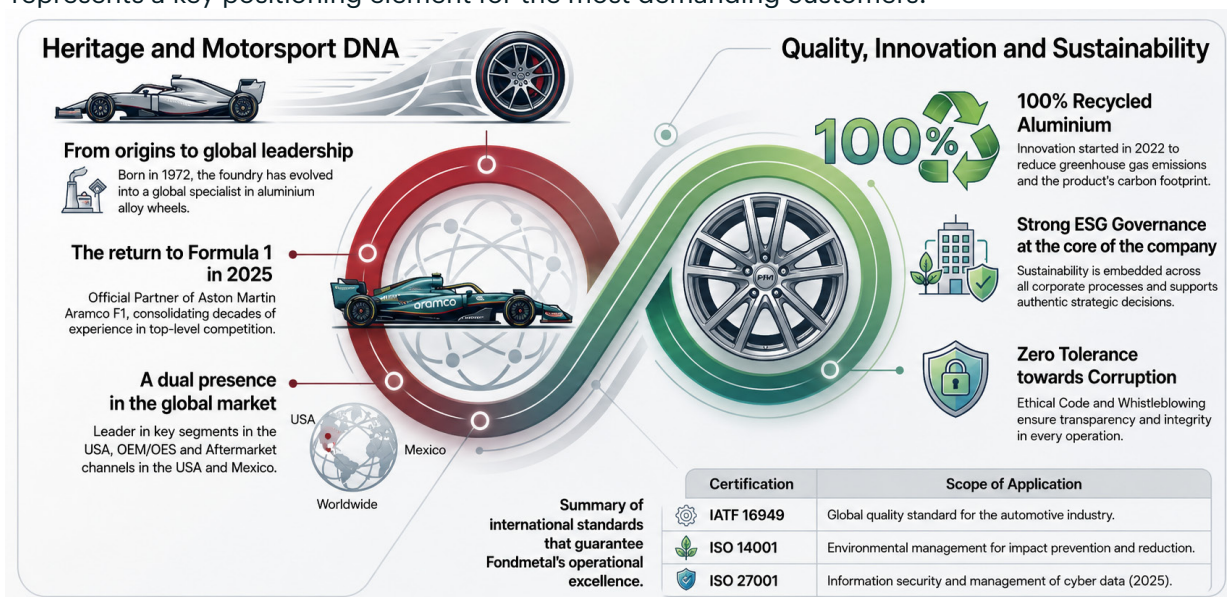
Technical expertise built through real-world experience. Fondmetal's involvement in Formula 1—as an official constructor with its own single-seaters (1991–1992), as majority shareholder of the Minardi Formula 1 Team (1997–2001), and through the Aerolab division, which provided aerodynamic development for teams including Renault F1, Force India, and Caterham—has generated a wealth of engineering know-how that extends far beyond brand visibility. In 2025, the Company's appointment as the Official Wheel Supplier of the Aston Martin Aramco Formula One® Team marked the highest expression of this journey, confirming technical expertise recognized at the most demanding levels of the global automotive industry.

Certified reliability. Fondmetal's integrated management system provides the operational framework through which quality and consistent performance are embedded in robust, verifiable processes. International approvals and certifications—including ECE, KBA, NAD, and ABE—ensure access to Europe's most highly regulated markets, particularly Germany, and constitute a significant barrier to entry that is difficult to replicate in the short term. Technical expertise is consistently recognized by customers as the Company's greatest strength, ranking as the primary driver of satisfaction in annual customer surveys.

Dual presence in the OEM and aftermarket sectors. Fondmetal's presence in both the OEM/OES channel—serving mid-range and premium automotive manufacturers—and the aftermarket, where custom alloy wheels account for more than 60% of the styling segment (Market Reports World), enables the Company to combine rigorous engineering standards with the flexibility to meet diverse market demands. An international commercial network, with direct operations in the United States and Mexico, further strengthens this positioning beyond the European market.

Innovation focused on product sustainability. The collaboration with a university to identify a 100% recycled secondary aluminum alloy—launched in 2022—and the availability of a certified product LCA study place Fondmetal ahead of emerging environmental traceability requirements and regulatory expectations. In an industry where aluminum accounts for a significant share of production costs, and where the carbon intensity of raw materials is set to become an increasingly

important competitive factor, the ability to measure and communicate product footprint already represents a key positioning element for the most demanding customers.



GOVERNANCE, VALUES AND RECOGNITIONS

Fondmetal is a family-owned company with a governance model that combines entrepreneurial leadership with an increasingly structured managerial organization. The Company's highest governing body is the Board of Directors, composed of three members: Stefano Rumi (Chairman and Legal Representative), Alessandra Rumi (Vice Chairwoman), and Maria Uberti (Board Member). The governance model is characterized by the active, day-to-day involvement of the Board members in the Company's operations. Strategic decisions—including those related to sustainability—are taken collectively, with direct oversight ensuring alignment between strategic direction and operational execution. Reporting to the Board are the Company's management functions and production activities, including Manufacturing, Product Design, and New Product Development, coordinated by an Operations Manager responsible for overseeing overall operational efficiency. Fondmetal's commercial presence extends internationally through Fondmetal Automotive USA and Fondmetal Mexico, which serve their respective markets. This lean organizational structure enables rapid decision-making and close alignment across the business.

SUSTAINABILITY GOVERNANCE

ESG matters are not delegated to a peripheral function; they are overseen directly at the highest level of the Organization. The Chairman and Vice Chairwoman of the Board of Directors are continuously informed on sustainability matters and assume direct responsibility for them. Since 2025, Alessandra Rumi has formally served as **Sustainability Manager**, formalizing a role she had already been performing through the oversight of the ISO 14001 Environmental Management System, responsibility for waste management, and the supervision of personnel-related matters. This direct connection between governance and ESG strategy is what enables sustainability to be genuinely integrated into the Company's decision-making processes. Operational support is provided by the **Sustainability Team**, composed of Senior Management, the Sustainability Manager, the Quality Manager, the Plant Manager, and an external sustainability consultant. The Team meets regularly to assess and manage material impacts, risks, and opportunities, review the effectiveness of management systems, and propose action plans with defined objectives, timelines, and allocated resources. During each meeting, the Team reviews the results of ESG questionnaires completed by stakeholders, monitors key performance indicators (KPIs), and identifies material topics in accordance with the double materiality principle. This is

where sustainability moves beyond a statement of intent and becomes an integral part of day-to-day business management.

VALUES

The generational transition from Gabriele Rumi to Stefano and Alessandra Rumi was more than a simple succession; it reaffirmed that, at Fondmetal, values are not merely inherited along with the business—they are actively renewed through the Organization's everyday culture. These values are safeguarded and formalized through the Company's Code of Ethics, which establishes binding standards of conduct for all employees and sets out the Organization's guiding principles: transparency, integrity, collaboration, efficiency, fair competition, crime prevention, and confidentiality. The Company's strength, reliability, and reputation—built over more than half a century of activity—are reflected in long-lasting relationships of trust with customers, suppliers, and the local community.

"We love what we do. We focus entirely on our work. Even when it seems we have reached the highest level, we are never truly satisfied, because we believe there is always room for improvement—even in the smallest details that may seem insignificant to others, but never to us."

— **Gabriele Rumi, Founder of FONDMETAL**

It is precisely this commitment to excellence—continuous improvement as an enduring mindset rather than a final destination—that forms the clearest link between Fondmetal's identity and its ESG approach. The Company's values are not merely statements of principle; they are reflected in its governance choices, its commitment to people and the local community, its investments to reduce the environmental impact of production, and its openness to dialogue with stakeholders. At Fondmetal, the Company's values are not separate from sustainability—they are its very foundation.

RESPONSIBLE BUSINESS CONDUCT AND ANTI-CORRUPTION

Fondmetal recognizes transparency, integrity, and fairness as the fundamental principles guiding its business conduct. The Company's **Code of Ethics**, publicly available on its corporate website in the Codes and Other Documents section, translates these principles into operational rules applicable at every level of the Organization and across all types of business relationships.

Fondmetal adopts a **zero-tolerance** approach to corruption: no form of bribery, extortion, or improper conduct is tolerated, whether involving public officials or private entities. The Company does not make contributions to political parties, foundations, political movements, or candidates, either directly or indirectly. No incidents of corruption were reported during 2025. This commitment is consistent with United Nations Sustainable Development Goal 16 (Peace, Justice and Strong Institutions) and with the disclosure requirements set out in ESRS G1-4 and ESRS G1-5.

To further strengthen these governance mechanisms, Fondmetal has implemented a **whistleblowing procedure** that enables employees and collaborators to confidentially report conduct that violates the Company's Code of Ethics. The reporting channel ensures the confidentiality of the whistleblower's identity and provides full protection against retaliation. No significant whistleblowing reports were received during 2025.

RECOGNITIONS

The credibility of a company's commitment is also measured by its willingness to undergo independent external assessment. Over the years, Fondmetal's growing focus on sustainability has been recognized through ESG ratings and participation in specialized networks—independent acknowledgements that the Company is committed to strengthening and enhancing over time.

Recognition / Network	Description
AGCM Legality Rating	Awarded on 20 December 2023. It certifies Fondmetal's compliance with high standards of legality and confirms the Company's financial reliability in its relationships with public funding institutions.
EcoVadis	An internationally recognized independent assessment of supply chain sustainability performance. Participation in EcoVadis enables customers to evaluate Fondmetal's ESG profile as a supplier.
Supplier Assurance	Organization that promotes a systematic approach to risk management and human rights due diligence throughout the supply chain.

MANAGEMENT SYSTEMS AND CERTIFICATIONS

Fondmetal's organizational structure is supported by an **Integrated Management System** encompassing quality, environmental management, and, more broadly, ESG principles in their entirety. Far from being merely a regulatory requirement, this system serves as the operational framework through which the Company's values are translated into processes that are verifiable, measurable, and continuously improved over time.

The cornerstone of this framework is the **Integrated Quality and Environmental Policy**, established and regularly reviewed by Top Management as part of the Management Review process. The Policy defines the strategic objectives of the management system and provides the framework for the continuous improvement of quality and environmental performance. Fondmetal recognizes that excellence in these areas creates tangible competitive advantages and is therefore committed to minimizing the environmental impacts of its activities wherever this is technically feasible and economically sustainable.

All Company processes have been mapped, monitored, and managed through the Quality World platform, which systematically maintains and updates the Integrated Management System documentation.

The management system certifications currently held by the Company demonstrate the high level of organizational maturity achieved:

IATF 16949:2016 is the internationally recognized standard for quality management in the automotive industry, requiring defect prevention, variation reduction, and continuous improvement throughout the supply chain.

UNI EN ISO 9001:2015 provides the foundation for this framework by ensuring systematic process control, consistent performance, and the structured management of non-conformities.

ISO 14001:2015 guides the Company's environmental management through a preventive and proactive approach based on risk assessment, compliance with legal requirements, and the definition of continuous improvement objectives. Its implementation also enhances environmental awareness among both employees and management.

With **regard to product** approvals, Fondmetal holds **ECE (UN/ECE)** certification, which allows the free marketing of its alloy wheels throughout the European Union and in all countries that have adopted the UN/ECE vehicle regulations. The Company also holds KBA (Kraftfahrt-Bundesamt) certification, mandatory for the German market, confirming compliance with the safety requirements of the German Road Traffic Regulations, as well as NAD approval, issued by the Italian Ministry of Infrastructure and Transport, and ABE approval, the German type approval for aftermarket vehicle components.

The Company's management system continues to evolve. In 2025, Fondmetal achieved **ISO 27001:2022** certification, the leading international standard for information security and data management, marking a significant milestone in an era of increasingly digitalized production processes and growing cybersecurity risks.

Looking ahead, during the 2026–2028 period, the Company aims to obtain **UNI EN ISO 45001:2023** certification, the international standard for occupational health and safety management systems. This certification will further strengthen the “Social” dimension of Fondmetal's ESG framework by formalizing practices that are already embedded in the Company's culture and day-to-day operations.

Fondmetal's Integrated Management System inherently encompasses the ESG dimensions. Accordingly, the sustainability-related risks and opportunities are identified within each management subsystem, for which appropriate assessments of impacts, risks, and opportunities have been carried out across environmental, social, and governance topics.

The progressive expansion of the Company's certification framework is not a mere formal exercise; rather, it reflects a strategic decision to make sustainability—in all its dimensions—a structural, measurable, and verifiable element of Fondmetal's business model.



SUPPLY CHAIN RESPONSABLE

Fondmetal considers its supply chain an integral part of its sphere of responsibility. Purchased materials—starting with aluminum, the Company's primary raw material—have a significant influence on the environmental profile of the finished product, while the conditions under which suppliers operate define the ethical boundaries of the entire Organization. Managing procurement responsibly therefore means ensuring not only quality and operational reliability, but also, with an increasing level of commitment, the sustainability of the supply chain.

FONDMETAL's supply chain consists of **three types of suppliers**: suppliers of goods (equipment, vehicles, and tools necessary for carrying out work activities or supporting them), **suppliers of consumables** (goods that are consumed during the course of work activities), and **service providers** (consulting, technical assistance, repairs, and training acquired to ensure the proper functioning of business processes).

At the date of this Sustainability Report, Fondmetal's supplier base comprises more than 150 active suppliers, classified according to the level of impact they have on the finished product. Primary suppliers provide products or services that directly affect the finished product and are further divided into selected suppliers, chosen independently by Fondmetal based on its internal evaluation criteria, and customer-designated suppliers, specified directly by the customer. **Secondary suppliers** provide catalog products or services that do not directly affect the finished product; for this category, verification is limited to confirming quantities and compliance with the Delivery Note. Supplier selection is based on objective and transparent criteria, defined by applicable regulations and the Company's internal procedures. The evaluation process considers the supplier's ability to maintain appropriate quality management systems, the availability of adequate resources and organizational capabilities, and its capacity to comply with confidentiality obligations. All supplier selection procedures are conducted in accordance with the principles of fair and open competition.

Fondmetal has deliberately **developed a short** and local supply chain, giving preference to suppliers located in close proximity to its Palosco production facility. This approach reduces financial and logistical risks, shortens lead times, and limits emissions associated with long-distance transportation. The geographical distribution of the current supplier base reflects this strategy: **61% of suppliers are located in Lombardy**, 22% in the rest of Italy, 14% elsewhere in Europe, and only 4% in the rest of the world. Overall, 83% of the Company's suppliers are based in Italy, confirming a strong local sourcing strategy that Fondmetal considers both a competitive advantage and a responsible business choice.

SUPPLIER QUALIFICATION AND MONITORING PROCESS

Suppliers are selected through a standardized process governed by Operating Procedure POGE 002 – Supplier Management. The qualification of a new supplier may take place through three different methods.

The product sample evaluation is the procedure adopted for occasional suppliers or suppliers that have not yet been qualified. If the sample is approved, the supplier is entered into the supplier register with the status "Qualified." If the sample is approved with reservations, the supplier is added to the register but remains subject to enhanced monitoring during subsequent deliveries. If the sample requires further evaluation, the supplier is not added to the register and a new sample submission is requested.

The supplier assessment questionnaire is reviewed by the Quality Management System Manager, the Product Certification Manager, and the Purchasing Manager, who determine

whether an on-site supplier audit is required. **A specific qualification process is also in place for non-accredited external laboratories** performing calibration activities. Upon completion of the qualification process, a supplier that has been deemed Qualified or Conditionally Qualified is included in the approved supplier list and becomes subject to periodic review, conducted at least annually as part of the Management Review process. Where qualification through product sampling is not feasible or is considered insufficient, Fondmetal conducts **second-party audits** directly at the supplier's premises, providing an independent assessment of the supplier's actual quality performance.

Fondmetal requires its suppliers to develop, implement, and continuously improve a quality management system certified to ISO 9001:2015, in line with the Company's objective of progressively aligning its supply chain with the IATF 16949 standard governing quality management in the automotive industry. All primary suppliers undergo an annual requalification process based on a structured periodic supplier evaluation system.

For all primary suppliers—and, where necessary, for secondary suppliers—Fondmetal carries out **continuous performance evaluation and monitoring**. A dedicated inspection checklist is established for each type of supply, and the required acceptance controls are performed upon receipt. The main evaluation criteria include product quality compliance, on-time delivery performance, and compliance with ordered quantities. Operating Procedure POGE 002 includes a specific section dedicated to the **management of suppliers whose activities may affect the environment, health, and safety**. The responsible manager verifies that these suppliers meet the Company's minimum health and safety requirements and provides them with the necessary documentation, including the DUVRI (Single Document for the Assessment of Interference Risks) for joint risk assessment, health and safety risk information, the contractor's declaration, and the documentation required for the coordination of occupational health and safety activities for contracted work. Only after this documentation has been reviewed does Fondmetal assess the supplier's inclusion in the approved supplier list. The annual requalification process also verifies that all required documentation remains complete and up to date.



SUS

In the 2024 Sustainability Report, the chapter dedicated to the supply chain concluded by noting that the Company was assessing the introduction of specific criteria to incorporate respect

for human rights, environmental protection, and sustainability into its supplier qualification process. During 2025, this assessment evolved into a structured and tangible initiative. Fondmetal launched a project involving Senior Management, the Sustainability Manager, the Quality Department, and an external ESG reporting consultant, with the objective of explicitly integrating sustainability into the supplier qualification and management process. This initiative is fully aligned with the commitments set out in this Sustainability Report, the requirements of ESRS S2, and the growing expectations of customers regarding responsible supply chain management. The project resulted in the development of three new tools, which will become operational from January 2026:

Tool	Description
Sustainable Supply Chain Code of Ethics	Defines the ethical, environmental, and social principles that Fondmetal requires its primary suppliers to uphold, expanding upon and detailing the commitments set out in the Company's Code of Ethics. It covers human rights, working conditions, environmental protection, anti-corruption, and corporate governance. Primary suppliers are required to comply with its provisions and to promote the same principles throughout their critical supply chain. The document serves as the reference framework for ESG supplier assessments and complements Operating Procedure POGE 002, Revision 13.
Supplier ESG Checklist – Self-Assessment Declaration of Compliance	A structured questionnaire covering the three ESG pillars—Environmental, Social, and Governance—to be completed by each primary supplier during the qualification process and at every annual requalification. It includes an ESG Self-Declaration of Compliance, through which the supplier confirms the accuracy of the information provided, commits to the continuous improvement of its ESG performance, and authorizes Fondmetal to carry out verification activities and on-site audits at its facilities.
Procedure POGE 002 – Revision 13	Update of the Supplier Management Operating Procedure to integrate ESG assessment into every stage of the supplier lifecycle, including initial qualification, periodic performance monitoring, second-party audits, and the Supplier Qualification Team's management review. The revised procedure introduces the new Section 4.14 – Sustainable Supplier Management and includes the Internal Supplier ESG Mapping as a tool for ongoing monitoring and oversight.

The three tools are complementary: the Code of Ethics defines the guiding principles, the ESG Checklist translates those principles into verifiable requirements, and the updated operating procedure establishes when and how they are applied throughout the supplier lifecycle. Starting in 2026, **the ESG assessment** will become an integral part of the second-party audits conducted on primary suppliers, and the results will contribute to the supplier's overall qualification score. Any ESG non-conformities identified during the audit will be addressed through a jointly agreed corrective action plan with clearly defined implementation deadlines established at the conclusion of the audit.

The Internal Supplier ESG Mapping, managed by the Quality Department, records for each primary supplier the results of the ESG Checklist, the findings of the ESG section of second-party audits, the certifications held, any greenhouse gas emissions reduction targets, and ESG scores provided by third-party assessment platforms. The mapping is updated at least annually and following each supplier audit, providing the information base on which the Supplier Qualification Team makes decisions regarding supplier retention, development, or removal from the approved supplier list.

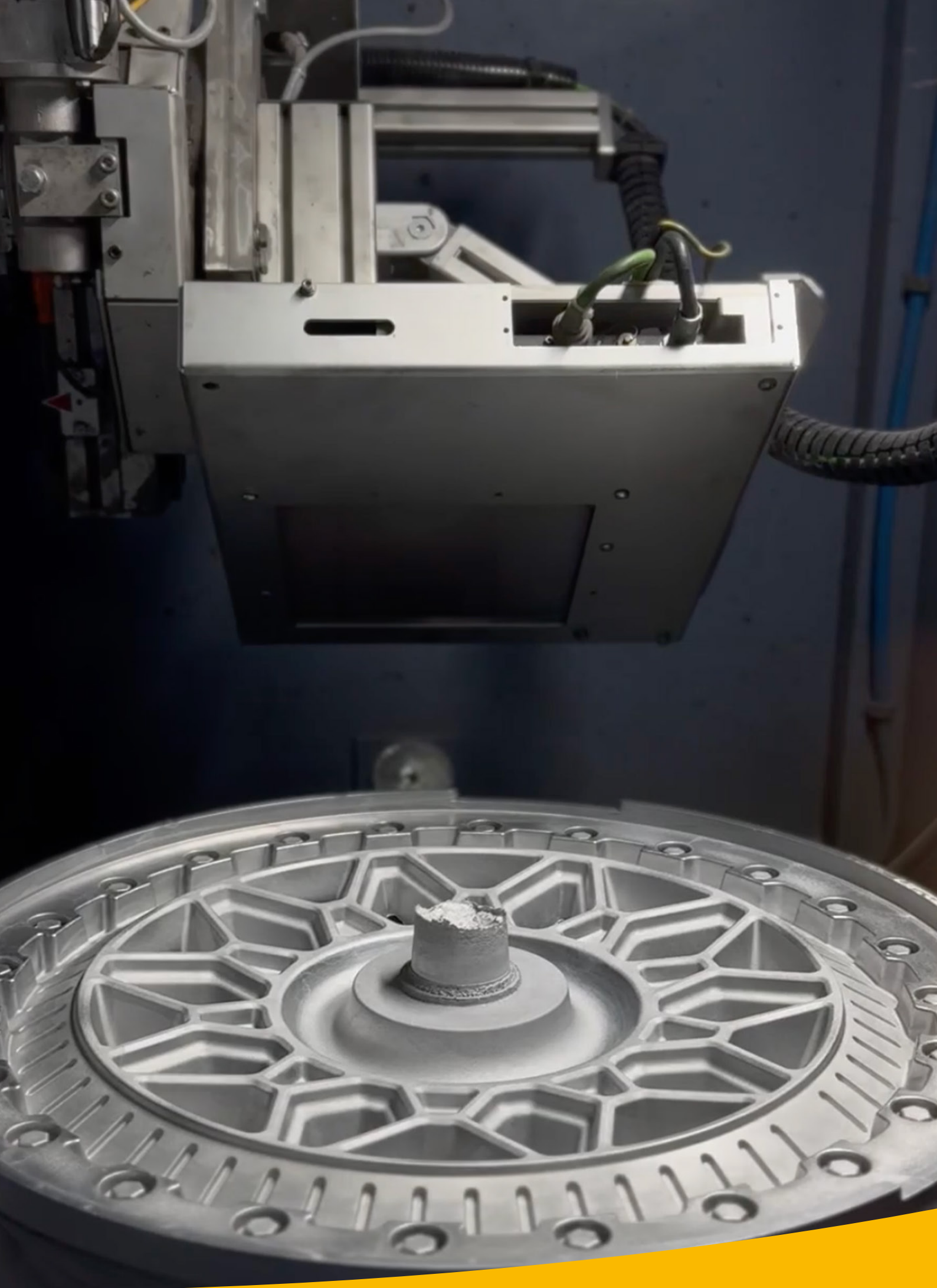
Suppliers are required to promptly notify Fondmetal of any material changes affecting their ESG compliance, including changes in corporate ownership or structure, the loss of certifications, process changes with significant environmental impacts, or any sanctions or legal proceedings that may affect their ESG performance.

SUPPLIER ENGAGEMENT TARGET: a gradual and consistent commitment across the supply chain

Reducing upstream Scope 3 GHG emissions—those embedded in purchased aluminum and outsourced processing activities—cannot be achieved through a single action. It requires a structured and progressive approach: first measuring emissions, then setting science-based targets, and finally engaging the supply chain in a systematic and meaningful way.

For 2026, Fondmetal has established three interconnected objectives that will form the foundation of this journey. The first is the measurement of upstream Scope 3 GHG emissions, with particular focus on purchased goods and outsourced processing activities. Without a reliable baseline, it is not possible to set credible targets or monitor progress over time. The second objective is to join the Science Based Targets initiative (SBTi), the internationally recognized framework that enables companies to establish greenhouse gas reduction targets aligned with climate science and consistent with the goals of the Paris Agreement. The third objective—building on the first two—is the formal launch of the Supplier Engagement Target. Fondmetal is committed to ensuring that, by 2031, at least 67% of its strategic suppliers by procurement spend have established greenhouse gas emissions reduction targets or have made a public commitment to do so.





STAKEHOLDERS

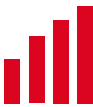
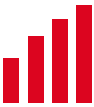
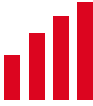
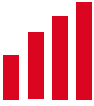
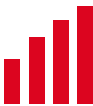
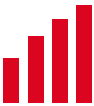
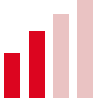
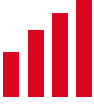
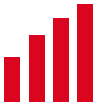
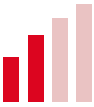
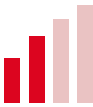
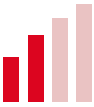
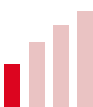
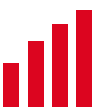
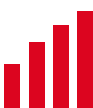
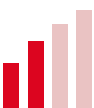
IDENTIFICATION AND MAPPING

Fondmetal recognizes structured stakeholder engagement as a strategic management tool. It is not merely a formal exercise: understanding the expectations of those who are affected by the Company's activities—or who may influence them and its value chain—is essential for producing credible sustainability reporting and supporting responsible business decisions. This approach is consistent with the requirements of the ESRS, particularly the disclosure requirements of ESRS 2 (SBM-2 and IRO-1) concerning the understanding of stakeholders' interests and perspectives within the double materiality assessment process.

Stakeholders are individuals or organizations that may influence the Company and/or be affected by its activities, either directly or through its value chain. Fondmetal has carried out a systematic stakeholder mapping process, classifying stakeholders according to the nature and intensity of their relationship with the Company by distinguishing between those who influence the Organization and those who are affected by it. For each stakeholder category, the Company has identified the most appropriate engagement approaches.

The table below summarizes the main stakeholder groups identified by Fondmetal and the corresponding engagement channels:

20

Stakeholder Category	Engagement Channels*	Impact on the Organization	Impact of the Organization
Ownership			
Human Resources	  		
Customers	 		
Suppliers	  		
Financial Institutions / Investors			
Trade Unions / Industry Associations	 		
Local Communities			
Regulatory Authorities / P.A.			
	 Inform  Engage  Monitor		

Among the stakeholder groups identified above, some are informed of the outcomes of the process, including through the publication of this Sustainability Report, while others have been directly involved in the materiality assessment and sustainability due diligence processes.

THE ESG STAKEHOLDER ENGAGEMENT PROCESS

In line with the requirements of ESRS 2 (SBM-2), Fondmetal established a dedicated ESG stakeholder engagement process in 2025, complementing its established dialogue channels with **targeted sustainability questionnaires** addressed to three key stakeholder groups: employees, customers, and suppliers. This represents the second consecutive assessment cycle—a continuity that Fondmetal regards as a methodological commitment rather than a one-off exercise. The questionnaire results were analyzed by the Quality Manager and the Sustainability Team, shared with Top Management, and integrated into the double materiality assessment process, contributing to the identification and prioritization of the Impacts, Risks, and Opportunities (IROs) required under ESRS 1 and ESRS 2.

A. Employee questionnaire

The employee questionnaire achieved a 56% response rate in 2025, representing a 25% increase compared with the previous edition and ensuring representation from all seven Company departments. More than one-third of respondents supplemented their answers with open comments, providing valuable insights into internal communication, workplace quality, work-life balance, and employee welfare initiatives.

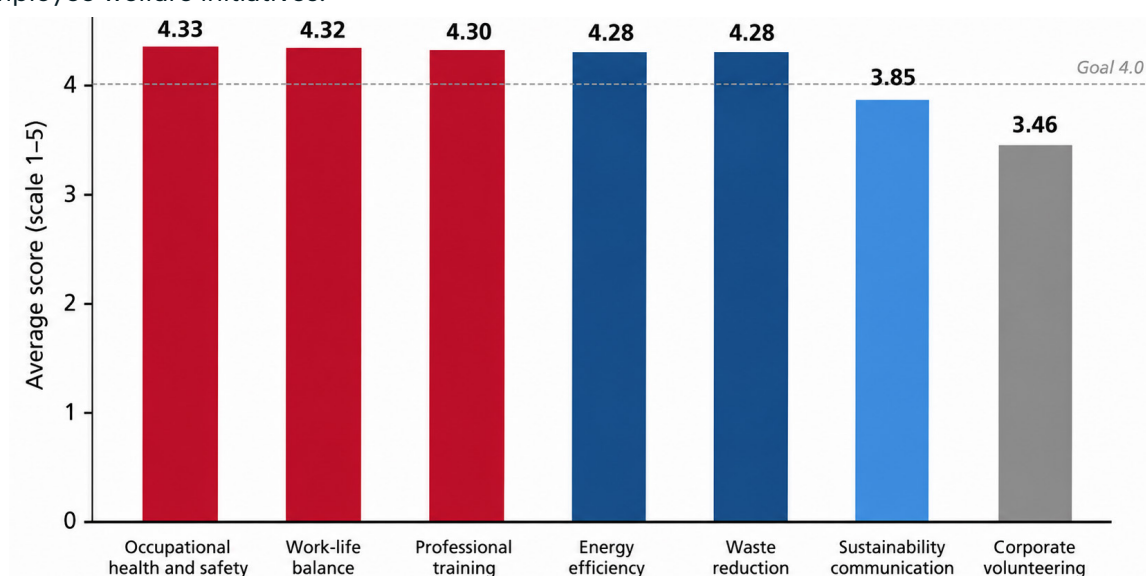


Figure 1 – Average score of ESG topics as perceived by employees (1-5 scale)

The sustainability topics considered most important by employees are occupational **health and safety and product safety** (4.33/5), **work-life balance initiatives** (4.32/5), **professional development opportunities** (4.30/5), and **energy efficiency and waste reduction** (both 4.28/5). These findings directly inform the materiality assessment and help guide the Company's sustainability priorities and action plans.

B. Customer questionnaire

The relationship with customers extends well beyond a single communication channel. It is **built on continuous**, cross-functional dialogue involving the Sales, Quality, and Production departments. As part of the Company's annual customer satisfaction survey, a dedicated ESG section has been included since 2023. Approximately half of the customers contacted responded to the survey.

The topics identified as the highest priorities were health and safety—understood both as occupational health and safety and product safety—and the reduction of energy, water, and resource consumption. Fondmetal's technical expertise continues to be recognized as the Company's greatest strength and the most highly valued customer satisfaction factor.

Key priorities identified through the survey:

- **Occupational health and safety and product safety** – the highest-priority topic, unanimously recognized by respondents.
- **Reduction of energy, water, and resource consumption** – the second most significant priority in terms of perceived relevance.
- **Product quality and supplier technical expertise** – the highest-rated customer satisfaction attribute across the entire survey.
- **Responsible supply chain management** – an emerging topic highlighted in the open-ended responses, reflecting growing customer expectations regarding supply chain transparency.

The strong alignment between customer priorities and the Company's internal priorities—particularly in relation to safety and the responsible management of resources—confirms the consistency between Fondmetal's strategic positioning and the expectations of its commercial stakeholders.

C. Supplier questionnaire

The ESG supplier questionnaire achieved a response rate of nearly 70%, a level considered both representative and encouraging. The survey supports sustainability reporting across the value chain in accordance with ESRS S2, E1, E5, and G1, while also contributing to the Company's sustainability due diligence process in line with the OECD Due Diligence Guidance and the EFRAG IG2 Implementation Guidance.

Questionnaire structure: The questionnaire was designed in two distinct and complementary sections, each serving a specific purpose within the stakeholder engagement process.

- The first section was designed to collect suppliers' **perceptions of materiality**. Suppliers were asked to assess the importance they attribute to a range of ESG topics—including occupational health and safety, energy efficiency, diversity and inclusion, cybersecurity, and product life cycle assessment (LCA). Responses, provided on a 1–5 scale, feed directly into the double materiality assessment required under ESRS 1, contributing to the evaluation of ESG topics from the perspective of the upstream value chain.
- The second section was designed to **assess suppliers' level** of ESG awareness and maturity by asking them to describe the sustainability initiatives they have already implemented. Specifically, suppliers were asked whether they have established ESG plans or formal policies, measure their greenhouse gas (GHG) emissions, have adopted a Code of Ethics or a Human Rights Policy, have implemented energy efficiency and waste reduction initiatives, and apply structured occupational health and safety measures. This section provides an overview of the ESG maturity of the supply chain and offers valuable insights to support supplier development activities and responsible procurement strategies.

The data collected indicate a supply chain with a strong and widespread awareness of sustainability issues. The first section of the questionnaire shows that occupational **health and safety** is considered the most important topic (4.8/5), followed by cybersecurity and waste reduction (both 4.3/5). The second section reveals that 95% of suppliers have implemented energy efficiency initiatives, 68% have established a sustainability plan or formal ESG policies, and 100% have adopted occupational health and safety measures. **Responsible sourcing, human rights, and anti-corruption** also emerged as key priorities in the open-ended responses, reflecting a supply chain that is increasingly aware of its role within Fondmetal's ESG value chain.

INTEGRATION OF THE RESULTS INTO THE DOUBLE MATERIALITY ASSESSMENT PROCESS

The overall results of the stakeholder engagement process were integrated into Fondmetal's double materiality assessment, contributing to the identification and prioritization of Impacts, Risks, and Opportunities (IROs) in accordance with the requirements of ESRS 1 and ESRS 2 (IRO-1). Stakeholder engagement played a central role in both the Company's sustainability due diligence process and its materiality assessment, enabling internal and external perspectives to be incorporated into the identification of material sustainability topics. The summary table below provides an overview of the contribution made by each stakeholder group to the assessment process.

Stakeholder	Engagement Tool	Key Topics Identified	Relevant ESRS Standard
Employees	ESG Questionnaire	Health and safety, training, employee welfare, and the environment	ESRS S1, E1
Customers	Customer Satisfaction Survey + ESG Section	Health and safety, waste reduction, responsible sourcing, quality, and innovation	ESRS G1, E1, E5, S2
Suppliers	ESG Questionnaire	Responsible sourcing, health and safety, energy efficiency, and human rights	ESRS S2, E1, E5, G1

SUSTAINABILITY DUE DILIGENCE

Throughout 2025, the **Sustainability Team** (comprising Senior Management, the Sustainability Manager, the Quality Manager, the Plant Manager, and an external sustainability consultant) met regularly to **assess and manage material impacts, risks, and opportunities**, as well as to review the results and effectiveness of the management systems and the related policies and procedures. During these meetings, the Team also assesses the Company's strengths and areas for improvement; reviews the results of stakeholder questionnaires; monitors KPIs and evaluates progress against established objectives; proposes action plans with defined timelines and budgets; and identifies material topics in accordance with the double materiality principle. Sustainability due diligence is the process through which Fondmetal identifies, assesses, prevents, and mitigates its actual and potential adverse impacts on people and the environment, while also identifying the ESG-related risks and opportunities that are material to the Company's performance. The methodological details—including the assessment process, scoring criteria, information sources, and scope of analysis—are described in the Appendix.

SCOPE OF THE ASSESSMENT – FONDMETAL'S VALUE CHAIN



The table below presents Fondmetal's mapping of Impacts, Risks, and Opportunities (IROs), organized by the relevant thematic ESRS standard. For each IRO, the table identifies the corresponding topic/sub-topic, a brief description, its classification (impact, risk, or opportunity), the relevant area of the value chain, the priority level resulting from the double materiality assessment, and the related United Nations Sustainable Development Goals (SDGs).

ESRS	Topic / Sub-topic	IRO Description	Type	Scope	Priority	SDG
ENVIRONMENTAL DIMENSION (E)						
E1 – Climate Change (ESRS E1)						
E1	GHG Emissions – Scope 1 & 2	Direct greenhouse gas emissions generated by melting processes, painting operations, heat treatment, and energy consumption.	Neg. Imp	Direct Operations	High	SDG 13
E1	GHG Emissions – Scope 3 (Upstream)	Embedded greenhouse gas emissions associated with purchased primary aluminum.	Neg. Imp	Upstream Value Chain	High	SDG 13
E1	Energy Transition	The increasing share of renewable energy sources (photovoltaic and 100% Italian hydropower) reduces exposure to EU ETS-related costs and strengthens Fondmetal's ESG positioning with OEM customers. It represents both a financial opportunity and a positive environmental impact.	Pos. Imp./ Opp.	Direct Operations	High	SDG 7.13
E1	CBAM Risk	Increased procurement costs for non-EU aluminum, with a potential impact on operating margins.	Financial Risk	Upstream Value Chain	High	SDG 13
E1	Lightweighting for EVs	Growing demand for lightweight wheels for electric vehicles, strengthening Fondmetal's positioning as a high-end OEM and aftermarket supplier with recognized technical expertise.	Fin. Opp.	Downstream Market	High	SDG 9.13
E2 – Pollution (ESRS E2)						
E2	Atmospheric Emissions – Painting Operations	Release of VOCs (volatile organic compounds) and particulate matter during painting operations, controlled through extraction systems and monitored under the ISO 14001 Environmental Management System.	Neg. Imp	Direct Operations	Medium	SDG 3.11
E2	Dust Management (EWC 08 01 12)	70% reduction in "Dust" waste (EWC 08 01 12) achieved through the installation of a new powder coating booth, resulting in the progressive reduction of the associated potential negative environmental impact.	Imp.Risk / Pos. Imp.	Direct Operations	Medium	SDG 12
E2	Chemicals Used in Surface Treatment Processes	Use of paints and chemical products for anodizing and surface finishing processes, managed in accordance with ISO 14001 procedures.	Pos. Imp./ Opp.	Direct Operations	Medium	SDG 3.12

ESRS	Topic / Sub-topic	IRO Description	Type	Scope	Priority	SDG
E3 – Water and Marine Resources (ESRS E3)						
E3	Water Consumption in Production Processes	Water used in cooling processes and surface treatment operations, monitored through KPIs with annual performance targets.	Neg. Imp.	Direct Operations	Low	SDG 6
E5 – Resource Use and Circular Economy (ESRS E5)						
E5	Use of Secondary Aluminum (2R Alloy)	The use of an alloy containing 97% post-consumer recycled aluminum reduces the consumption of primary aluminum and lowers the product's carbon intensity.	Pos. Imp./ Opp.	Direct Operations	High	SDG 12
E5	Research on a 100% Recycled Aluminum Alloy (University of Padua)	Collaboration on the development of an alternative alloy made from 100% recycled aluminum, with an estimated 90-95% reduction in energy consumption compared with primary aluminum.	Pos. Imp. / Opp.	Direct Operations	High	SDG 9.12
E5	Recovery and recycling of high-value production scrap	Sale of aluminum cores, machining chips, and metal samples for recycling, supporting the circularity of the production process.	Pos. Imp.	Direct Operations	Medium	SDG 12
E5	Waste Management	Annual monitoring of waste by EWC category, supported by dedicated KPIs and an overall waste reduction target.	Neg. Imp.	Direct Operations	Medium	SDG 12
SOCIAL DIMENSION (S)						
S1 – Own Workforce (ESRS S1)						
S1	Occupational Health and Safety	Risk of occupational accidents and work-related illnesses in production departments; roadmap toward ISO 45001:2023 certification by 2028.	Impact Risk / Neg. Imp.	Direct Operations	High	SDG 3.8
S1	Training and Skills Development	Investment in technical training and ESG-related education, generating a positive impact on employees' skills, employability, and productivity.	Pos. Imp.	Direct Operations	Medium	SDG 4.8
S1	Working Conditions and Fair Remuneration	Regular employment contracts governed by the applicable National Collective Labour Agreements (CCNLs), within a family-owned business that places strong emphasis on employee well-being.	Pos. Imp.	Direct Operations	Medium	SDG 8
S1	Diversity and Inclusion	Gender equality in the workforce and in remuneration, supported by inclusion and non-discrimination policies as key drivers of organizational development.	Pos. Imp.	Direct Operations	Medium	SDG 5.8
S1	Employee Engagement	Annual ESG survey of employees (second consecutive year), with feedback integrated into the double materiality assessment process	Pos. Imp.	Direct Operations	Medium	SDG 8
S2 – Workers in the Value Chain (ESRS S2)						
S2	Working Standards in the Supply Chain	Annual ESG assessment of suppliers through dedicated questionnaires (70% response rate); integration of human rights criteria into the supplier qualification process; supplier audit procedures enhanced with ESG assessment criteria.	Pos. Imp. / Opp.	Upstream Value Chain	Medium	SDG 8
S3 – Affected Communities (ESRS S3)						
S3	Impact on the Local Community (Palosco/Bergamo)	Strong roots in the Bergamo area, generating a positive impact on the local economy, employment, and manufacturing know-how.	Pos. Imp.	Local Community	Medium	SDG 11
S4 – Consumers and End-users (ESRS S4)						
S4	Product Safety and Homologation	Compliance with ECE, KBA, NAD, and ABE homologation standards ensures a positive impact on end-user safety while meeting stringent regulatory requirements.	Pos. Imp.	Product / Market	High	SDG 3.9
S4	Product Life Cycle Assessment (LCA) and Environmental Transparency	Availability of a certified Product Life Cycle Assessment (LCA), developed in collaboration with the University of Padua, to meet OEM requirements for a traceable product carbon footprint.	Pos. Imp. / Opp.	Product / Market	High	SDG 12
GOVERNANCE DIMENSION (G)						
G1 – Business Conduct (ESRS G1)						
G1	Integrity and Anti-corruption	Adoption of a Code of Ethics, with zero tolerance for corruption and improper business practices; AGCM Legality Rating obtained.	Pos. Imp.	Governance	High	SDG 16

ESRS	Topic / Sub-topic	IRO Description	Type	Scope	Priority	SDG
G1 — Corporate Conduct (ESRS G1)						
G1	Cybersecurity and Data Protection	ISO 27001:2022 certification achieved in 2025, providing a structured approach to managing cyber risk in an increasingly digitalized production environment.	Pos. Imp. / Risk	Governance	High	SDG 9.16
G1	Responsible Sourcing	Annual supplier qualification and assessment, with the progressive integration of structured ESG criteria (human rights and environmental performance) into supply chain management.	Pos. Imp. / Opp.	Upstream Value Chain	High	SDG 12.17
G1	ESG Regulatory Compliance (CSRD/ESRS)	Voluntary sustainability reporting in accordance with the ESRS standards.	Fin. Opp.	Governance / Market	High	SDG 17
G1	Access to Sustainable Finance	Opportunity to reduce the cost of debt.	Fin. Opp.	Governance / Market	Medium	SDG 17

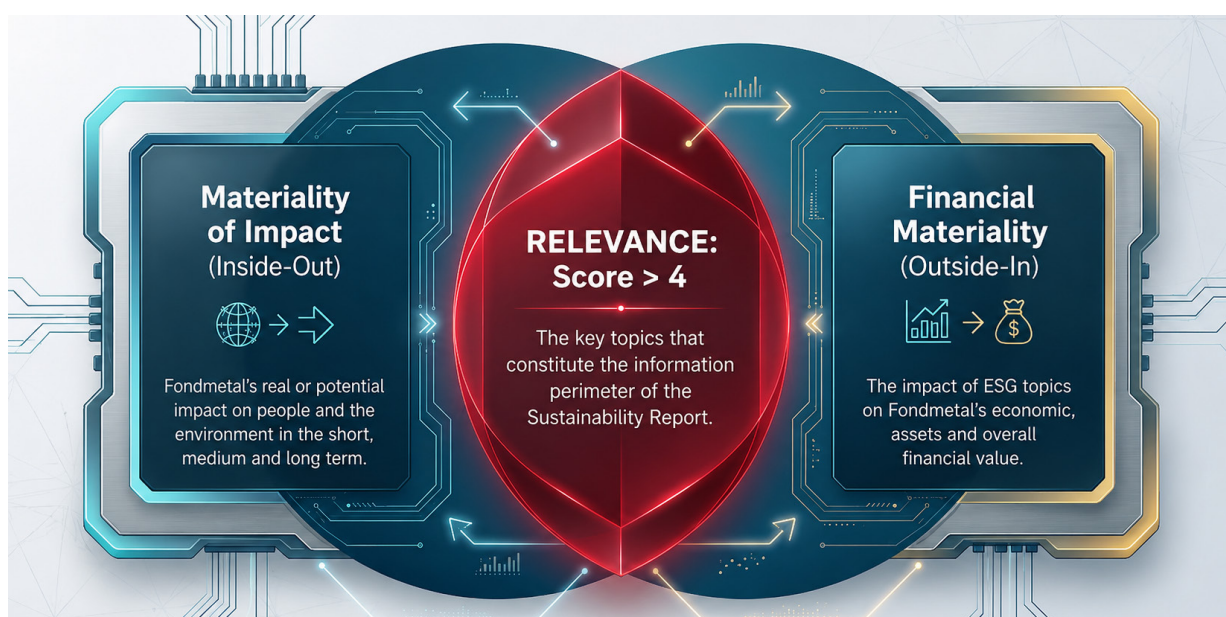


MATERIALITY ASSESSMENT

Following the sustainability due diligence process and stakeholder engagement activities described in the previous sections, FONDMETAL conducted a structured assessment of the ESG topics relevant to its organization, based on the double materiality principle set out in the ESRS. The assessment considers two complementary perspectives: impact materiality and financial materiality.

Impact materiality: a sustainability matter is considered material when the company causes, contributes to, or is directly linked to actual or potential positive or negative impacts on people or the environment over the short, medium, and long term.

Financial materiality: a sustainability matter is considered financially material when it generates, or could reasonably be expected to generate, significant effects on the company's financial position, financial performance, cash flows, or access to finance, in terms of risks or opportunities. FONDMETAL's materiality assessment reflects both the impact and financial perspectives, as well as the interconnections between them.



Details of the materiality assessment process are provided in the Appendix. The ESG topics identified by the Organization and its stakeholders as particularly relevant were prioritized through a scoring system ranging from 1 to 5. Topics with a score above 4 were considered material. These material topics define the reporting scope of this Sustainability Report.

Material Topic	Sub-topics	ESRS Standard	Priority	Time Horizon
Reduction of Resource Consumption and Pollution	Climate Change – GHG Emissions Renewable Energy and Energy Efficiency Pollution – VOC and Particulate Matter Emissions	ESRS E1, E2	High	Short to Long Term
Circular Economy	Circular Economy – Recycled Aluminium Product Life Cycle Assessment (LCA) and Environmental Transparency	ESRS E5	High	Medium to Long Term
Occupational Health and Safety	Workers' Health and Safety	ESRS S1	High	Short Term
Employee Well-being and Development (Training)	Working Conditions – Training and Skills Development – Employee Benefits	ESRS S1	High	Medium Term

Product Quality and Safety	Product Safety and Quality Product Life Cycle Assessment (LCA) and Environmental Transparency	ESRS S4, E5	High	Medium to Medium Term
Information Security	Cybersecurity (ISO 27001) Integrity and Governance Compliance	ESRS G1	High	Short Term
Responsible Sourcing	Responsible Sourcing Workers in the Value Chain – Human Rights in the Supply Chain Local Community – Regional Impact	ESRS G1, S2, S3	High	Medium Term
Research, Development and Innovation	Circular Economy – Recycled Aluminium (Research on Recycled Alloy Development) Product Safety and Homologation (Technical Innovation)	ESRS E5, S4	High	Medium to Long Term

Based on the material topics identified, FONDMETAL has defined a sustainability strategy structured around specific objectives, priority actions, and key performance indicators (KPIs). Details of the commitments and performance associated with each material topic are presented in the following sections of this Sustainability Report.

SUSTAINABILITY STRATEGIC PLAN

FONDMETAL's Sustainability Strategic Plan is neither a static document nor an annual exercise. The objectives it sets out have a multi-year horizon, reflecting the structural nature of the ESG transformation the Organization is committed to pursuing. What changes each year is the reporting: with every new edition of the Sustainability Report, FONDMETAL provides a transparent and verifiable account of the progress made against its commitments, updates the status of its objectives, and defines new actions where opportunities for improvement or emerging priorities are identified. This approach represents a concrete expression of transparency towards stakeholders: not a statement of intent, but an accountability document. Consistency, pragmatism, and genuine commitment are the guiding principles of this section, which builds upon the commitments presented in the 2024 Sustainability Report and provides the foundation for future reporting in 2026.

When reading the Plan, it is useful to consider the different levels of maturity with which FONDMETAL manages its ESG topics. Some areas—such as Product Quality and Safety, Occupational Health and Safety, and Energy Efficiency—have been strategic priorities for many years. In these areas, management systems are well established, certifications are in place, and opportunities for radical improvement are naturally more limited.

At the same time, the double materiality assessment carried out in 2025 confirmed the need to strengthen the Organization's focus on topics that currently show a lower level of management maturity relative to their strategic importance. These are the areas where the greatest potential exists to deliver tangible and measurable improvements in the coming years.

2025 RESULTS

During 2025, FONDMETAL focused a significant part of its efforts on three priority topics identified through the materiality assessment.

Information Security was strengthened through the achievement of **ISO 27001:2022** certification, the leading international standard for information security management, marking a significant milestone in an era of increasingly digitalized production processes.

Employee Well-being was enhanced through the introduction of two new welfare initiatives (nutritionist and dental care services), complementing the Metasalute healthcare fund provided

under the National Collective Labour Agreement (CCNL). **Responsible Sourcing reached** a new level of operational maturity with the development of the Supplier ESG Checklist, the Sustainable Supply Code of Ethics, and the Supplier Management Procedure incorporating ESG criteria. These tools extend FONDMETAL's ESG expectations throughout its supply chain. From an environmental perspective, the commissioning of the Company's second photovoltaic system (1,241.55 kWp, operational since February 2025) increased self-generated electricity to 14.8% of total energy consumption, in addition to electricity sourced entirely from certified renewable energy.

PRIORITIES FOR 2026 AND BEYOND

Looking ahead to 2026 and the following two years, FONDMETAL will focus its sustainability strategy on five key priorities. The first is **SBTi validation**. Joining the Science Based Targets initiative (SBTi) will enable the Company to align its greenhouse gas reduction targets with internationally recognized scientific criteria, consistent with the 1.5°C global warming pathway. The second priority is to further **strengthen Responsible Sourcing** through the advancement of the Supplier Engagement Target and the preparation of a report in accordance with the German Supply Chain Due Diligence Act (LkSG). The third is the continuation of the Training and People Development journey through a cross-functional learning program covering leadership, communication, artificial intelligence, and cybersecurity. The fourth priority focuses on **Employee Well-being**, with the introduction of additional welfare initiatives (psychological counselling and massage therapy services) and a structured review of remuneration policies. Finally, FONDMETAL will continue to drive product innovation by launching production of the new AISi10Sr alloy (≥95% recycled content) and advancing the development of the water-cooled mould prototype for the foundry process.

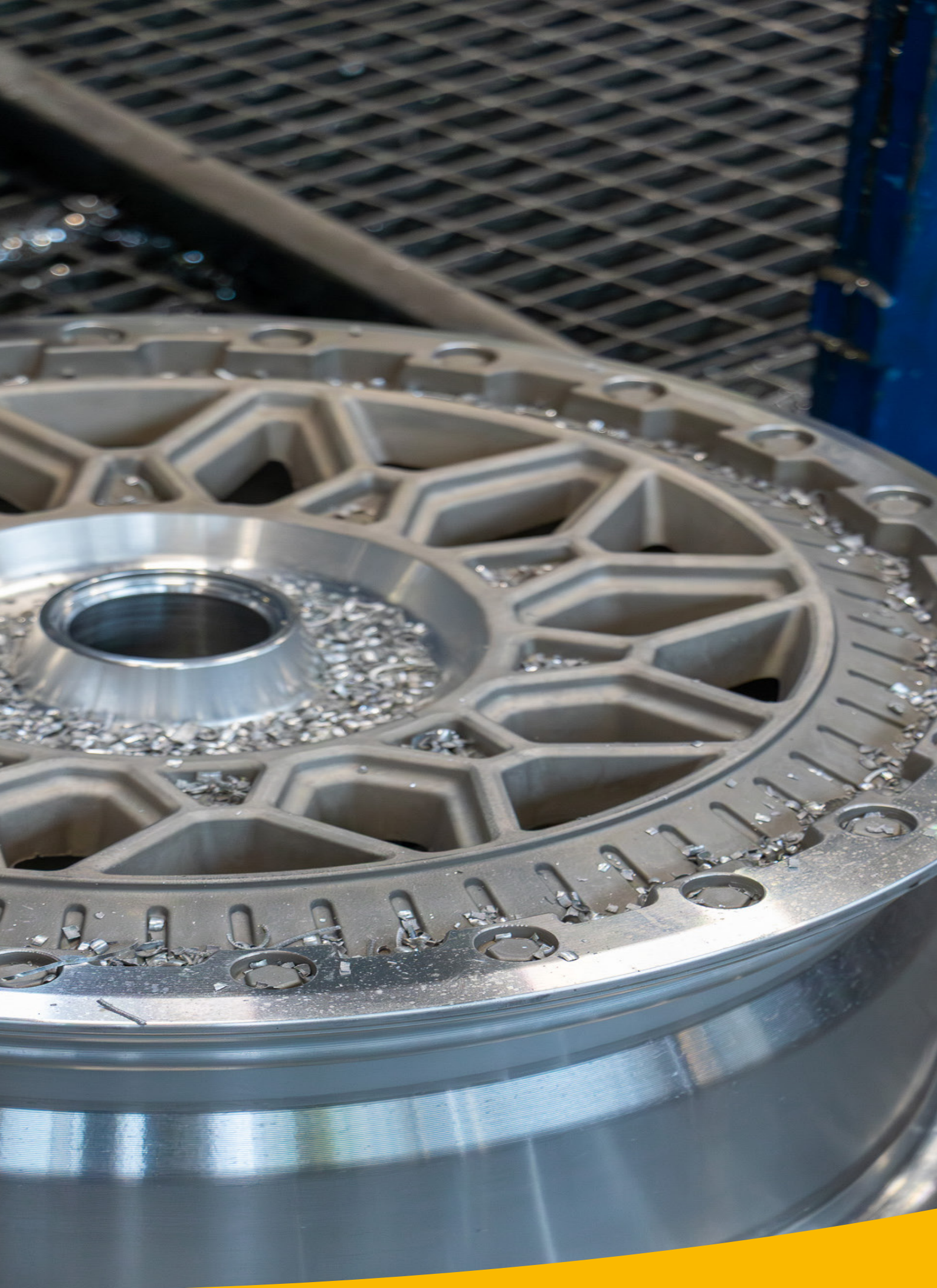
TABLE OF ESG OBJECTIVES AND CORRELATION WITH THE SDGs — ESRs 2 MDR-T

Pillar	Material Topic	Objective / Action	Status	Target	SDGs
E – ENVIRONMENT					
E	Renewable Energy and Energy Efficiency	Maintain 100% renewable energy coverage through certified renewable electricity (Guarantees of Origin – GOs) and on-site photovoltaic self-generation.	Achieved	2025 – Confirmed	SDG 7 · 13
E	GHG Emissions – Baseline	Calculation of Scope 1 and Scope 2 GHG emissions using the Persefoni platform in accordance with the GHG Protocol. Definition of the 2025 baseline year for the Science Based Targets initiative (SBTi).	Achieved	2025 – Baseline Established	SDG 13
E	SBTi Validation	Join the Science Based Targets initiative (SBTi) and obtain validation of the Company's greenhouse gas emissions reduction targets (1.5°C-aligned).	In Progress	2026	SDG 9 · 13
E	GHG Emissions – Scope 3	Launch the measurement of upstream Scope 3 GHG emissions (aluminium and outsourced processing) in accordance with ESRs E1-6.	In Progress	2026	SDG 12 · 13
E	Supplier Engagement Target	At least 67% of strategic suppliers, by procurement spend, shall have adopted validated GHG emissions reduction targets by 2031. Baseline year: 2026.	New 2026–2027	2026–2031	SDG 12 · 13 · 17
E	Circular Economy – New Recycled Alloy	Launch OEM production of the AISi10Sr alloy (≥95% recycled aluminium), with an estimated CO ₂ emissions reduction of more than 80% compared with conventional primary LPDC alloy.	In Progress	Production Launch in 2027	SDG 9 · 12
E	Product LCA	Update the Product Life Cycle Assessment (LCA), using the 2023 University of Padua study as the baseline and incorporating 2027 data.	New 2027	2026	SDG 9 · 12

E	VOC Emissions Reduction – Powder Coating Booth	Achieve a 70% reduction in EWC 08 01 12 powder waste through the new powder coating booth installed in Paint Shop 2 in 2025.	In Progress	2026 Results	SDG 12
E	Photovoltaic System on the Raw Wheel Warehouse	Investment in a photovoltaic system to reduce electricity consumption in the raw wheel warehouse.	New 2027–2028	2028	SDG 7
E	Water-Cooled Foundry Mould	Develop a low-pressure casting prototype featuring a water-cooled foundry mould instead of conventional air cooling, with the aim of reducing energy consumption and improving casting quality.	In Progress	2025–2027	SDG 9 · 12
E	Maintain and continuously improve the Environmental Management System (ISO 14001)	Complete the ISO 14001 surveillance audit and update the register of significant environmental aspects and impacts.	In Progress	Ongoing	SDG 12 · 13
S – SOCIAL					
S	Occupational Health and Safety	Install horizontal pedestrian crossing markings. Introduce equipment to reduce manual materials handling (MMH) in the Packaging Department (automatic laser system and box-packing robot). Train new supervisors to ensure full shift coverage.	Achieved	2025	SDG 3 · 8
S	Occupational Health and Safety – ISO 45001	Implement the UNI EN ISO 45001:2023 certification process for the Occupational Health and Safety Management System.	New 2027–2028	2028	SDG 3 · 8
S	Employee Well-being – 2025	Launch employee welfare partnerships providing access to nutrition and dental care services, effective from 2025.	Achieved	2025	SDG 3 · 8
S	Employee Well-being – 2026	Introduce employee welfare partnerships for psychological counselling and massage therapy services, while evaluating additional welfare initiatives.	New 2026–2027	2026	SDG 3 · 8
S	Professional Training	Deliver ISO 27001 training for the IT and Quality teams, together with training on Quality Control laboratory equipment.	Achieved	2025	SDG 4 · 8
S	Cross-Functional Training – 2026	Deliver a cross-functional training programme covering leadership, communication, performance management, artificial intelligence, and cybersecurity.	New 2026–2027	2026	SDG 4 · 8
S	Inclusion and Protected Categories	Establish a partnership with L'Ancora Cooperative.	Achieved	2026 — operativo	SDG 8 · 10
S	Remuneration Policy	Launch a structured review of the Company's remuneration policies to ensure internal equity and external competitiveness.	New 2026–2027	2026–2027	SDG 8 · 10
S	Strengthening Internal Gender Equality Policies	Assess the current situation regarding workforce composition, career development, and remuneration; define corporate gender equality policies; and implement the core procedures of a Gender Equality Management System.	New 2026–2027	2026–2027	SDG 5 · 8

S	Stakeholder Engagement and Local Community	Host the FAI Autumn Days 2025, opening the production facility to the public. Continue the sponsorship of Scuderia M.A.R.S. (Marzoli Institute). Promote the Creative Contest and Scholarship Programme for employees' children (2025–2026 edition).	Achieved	Recurring – Annual	SDG 4 · 11
G – GOVERNANCE					
G	Information Security	Achieve ISO/IEC 27001:2022 certification in 2025, establishing a structured approach to cybersecurity risk management in an increasingly digitalized manufacturing environment.	Achieved	2025 – Certified	SDG 9 · 16
G	TISAX Certification	Launch the TISAX certification process, the automotive industry's standard for information security across the supply chain.	New 2026–2027	2027	SDG 9 · 16
G	Responsible Sourcing	Implement an ESG Supplier Checklist, a Sustainable Supply Chain Code of Ethics, and an ESG assessment and qualification procedure for primary suppliers, effective from 2026.	Achieved	2025–2026	SDG 12 · 17
G	Human Rights in the Supply Chain – LkSG	Prepare a compliance report in accordance with the German Supply Chain Due Diligence Act (Lieferkettensorgfaltspflichtengesetz)	New 2026–2027	2026–2027	SDG 8 · 16 · 17
G	Product Quality and Safety	Maintain IATF 16949 and ISO 9001 certified management systems.	Achieved	Ongoing	SDG 9 · 12
G	Research, Development and Innovation	R&D on secondary aluminium alloys. Development of a water-cooled foundry mould prototype. Reduction of the product carbon footprint through process innovation.	In Progress	2025–2027	SDG 9 · 12
G	ESG Reporting and Transparency	Publish the Sustainability Report annually. Update the EcoVadis rating and Supplier Assurance assessment. Progress toward independent third-party assurance.	In Progress	Annual	SDG 16 · 17

Regulatory reference: ESRS 2 MDR-T (Metrics and Targets), ESRS 2 MDR-A (Actions and Resources), GRI 2-22 (Statement on Sustainable Development Strategy). The targets marked "New 2026–2027" have been approved by Management and incorporated into the operational plan. Detailed performance results are reported in the ENVIRONMENT, PEOPLE, and GOVERNANCE sections of this Sustainability Report.



ENVIRONMENT

Environmental management represents one of FONDMETAL's long-term strategic pillars within its ESG journey. This chapter reports the Company's environmental performance for the 2025 reporting period in accordance with **ESRS E1** (Climate Change and Energy), **ESRS E3** (Water and Marine Resources), and **ESRS E5** (Resource Use and Circular Economy), identified as material topics through the double materiality assessment.

In 2025, FONDMETAL made significant structural progress across its supply chain by formalizing its **responsible sourcing** framework and extending its ESG expectations to primary suppliers through the introduction of an ESG Supplier Checklist, a Sustainable Supply Chain Code of Ethics, and a dedicated supplier assessment and qualification procedure. For 2026, the Company has established two key climate objectives: the validation of its greenhouse gas (GHG) **emissions reduction plan through the Science Based Targets initiative (SBTi)** and the launch of its **Supplier Engagement Target**, with the objective of ensuring that at least 67% of strategic suppliers adopt validated GHG reduction targets by 2031. The 2025 GHG inventory will serve as the baseline year for all future performance comparisons.

ENVIRONMENTAL POLICY AND MANAGEMENT SYSTEM

FONDMETAL is certified to **ISO 14001:2015** for its Environmental Management System. The Company's Environmental Policy commits the Organization to:

- Make every organizational, operational, and technological effort to prevent noise, water, air, and soil pollution;
- Minimize energy and water consumption and waste generation, promoting recovery and recycling wherever possible;
- Monitor atmospheric emissions and wastewater discharges in order to minimize their environmental impact;
- Identify and implement solutions to reduce greenhouse gas (GHG) emissions;
- Engage suppliers and business partners by promoting and sharing the Company's environmental expectations.

The environmental management system involves the **regular monitoring of KPIs**, with annual targets for energy and water consumption and waste generation. By 2025, all the main targets had been met.

Environmental KPI Table – 2025 Results vs. Targets

KPI	Target	2025 Results	OK
Electricity Consumption (kWh/kg of molten product)	< 1,80	1,009	OK
Natural Gas Consumption (m³/kg of molten product)	< 0,40	0,224	OK
Water Consumption (litres/kg of molten product)	< 6,000	0,973	OK
Total Waste Generation (kg/kg of molten product)	< 0,23	0,108	OK
Hazardous Waste (% of Total Waste)	< 8%	6,6%	OK

Source: Valutazione_KPI2025.xlsx – ISO 14001 Environmental Management System.

PRODUCTION PROCESS AND SIGNIFICANT ENVIRONMENTAL ASPECTS

As part of its ISO 14001 Environmental Management System, FONDMETAL has identified and mapped each stage of its production process, analyzing input resource flows and outputs in terms of emissions, resource consumption, and waste generation. This assessment forms the **basis for identifying significant environmental** aspects and impacts in accordance with ESRS E1 and ESRS

E2, and supports the definition of annual environmental improvement objectives. The production process consists of 10 stages: Melting/Casting, Riser Cutting, Deburring and Heat Treatment (outsourced process), Machining, Painting, Packaging, Shipping, Quality Control, Maintenance, and Other Activities. The following table provides an overview of the main stages (1, 2, 4, 5, and 6), together with their respective sub-processes and significant environmental aspects. For each stage, it identifies the main input resources, atmospheric emissions (including the relevant authorized emission points), waste generated, and materials sent for recovery and recycling.

Stage 1	Melting / Casting	HIGH significance – Atmospheric emissions · Refractory waste
Sub-process	IN – Incoming Resources	OUT – Emissions · Waste · Materials Sent for Recovery
Material Receiving	Aluminium Alloys Electricity	No significant atmospheric emissions. Waste: Incoming packaging waste – EWC 15 01 01 (R) · EWC 15 01 02 (R)
Melting	Electricity + Natural Gas Raw Materials: 2R Alloy, AlSi7 Alloy Auxiliary Materials: Dressing Flux	Atmospheric emissions: Dust, fluorides – Emission points E37, E38, E39 Noise: External: 69 dB(A) (daytime) · 58 dB(A) (night-time) · Internal: <90 dB(A) Waste: Dross and spill residues – EWC 10 03 16 (R) · Refractory materials – EWC 16 11 04 (D) · Blasting dust – EWC 16 03 04 (D) Recovery: Metal dross -> remelting
Heating · Degassing · Process Parameter Control	Natural Gas · Electricity Auxiliary Materials: Additives, Nitrogen, Argon (Gas Cylinders)	Atmospheric emissions: Emission point E31 Waste: Extraction and degassing system cleaning residues Recovery: Metal samples – EWC 10 03 16 (R)
Gravity Die Casting / Low-Pressure Casting	Water (Cooling) · Electricity Auxiliary Materials: Filter Mesh, Mold Coatings, Talc	Atmospheric emissions: Emission point E31 Waste: Dross, talc, refractory materials, low-pressure furnace residues, low-pressure glycol water, refractory coatings, rock wool – EWC 16 11 04 (D) · EWC 16 03 04 (D)
Drilling · Deflashing	Electricity Auxiliary Materials: Hydraulic Power Unit Oil	Atmospheric emissions: None Recovery: Aluminium chips – EWC 12 01 03 (R)-> Remelting Recovery: Aluminium sprues – EWC 12 01 03 (R)-> Remelting
Cycle 2	Riser Cutting	MEDIUM Aspect – Metal Recovery
Sub-process	IN — Input Resources	OUT — Emissions · Waste · Recovery
Riser and Gating Removal	Electricity Auxiliary Materials: Cutting Blades, Hydraulic Power Unit Oil, Blade Lubricant	Noise · Fine Metal Dust Waste: Worn Cutting Blades Recovery: Risers, Aluminium Chips – EWC 12 01 03 (R) -> Remelting
Sprue Cutting	Electricity Auxiliary Materials: Cutting Blades, Hydraulic Power Unit Oil, Blade Lubricant	Noise · Fine Metal Dust Waste: Worn Cutting Blades, Aluminium Filings Recovery: Aluminium Sprues – EWC 12 01 03 (R) -> Remelting
Palletising	Electricity Auxiliary Materials: Labels, Pallets, Polypropylene Strapping, Cardboard Dividers	Atmospheric Emissions: None Waste: Label Backing Paper, Cardboard – EWC 15 01 01 (R) -> Sent for Recovery
Cycle 4	Machining	HIGH Aspect — Hazardous Waste · Oil Mist · Emission Points E35/E36
Sub-process	IN — Input Resources	OUT — Emissions · Waste · Recovery
Turning	Electricity · Natural Gas Auxiliary Materials: Cutting Fluids, Guideway Oil, Coolant Oil, CNC Cutting Tools, Pallets, Dividers	External Noise: <65 dB(A) (daytime) · <55 dB(A) (night-time) · Oil Mist Waste: Guideway Oil – EWC 13 02 05* (R) · Coolant Oil – EWC 13 01 05* (D) · LLDPE – EWC 15 01 02 (R) · Worn CNC Cutting Tools Recovery: Aluminium Chips – EWC 12 01 03 (R)->

Diamond Cutting	Electricity · Natural Gas Auxiliary Materials: Additive, Cutting Tools, Oil, Wheel Protection Caps	Atmospheric Emissions: Emission Points E35, E36 – Oil Mist Waste: Coolant Oil – EWC 13 01 05* (D) · LLDPE – EWC 15 01 02 (R) · Worn Cutting Tools Recovery: Aluminium Chips – EWC 12 01 03 (R) -> Remelting
Helium Leak Testing	Electricity · Natural Gas · Water Auxiliary Materials: Helium (Inert Test Gas), Degreasing Agent, Adhesive Tape	Atmospheric Emissions: None Waste: Guideway Oil – EWC 13 02 05* (R) · Coolant Oil – EWC 13 01 05* (D) · Contaminated Water Note: Helium Consumption Monitored
Drilling	Electricity · Natural Gas Auxiliary Materials: Additive, Cutting Tools, Oils, Pallets, Dividers	Noise · Brushing Dust Waste: Guideway Oil – EWC 13 02 05* (R) · Coolant Oil – EWC 13 01 05* (D) · Worn Cutting Tools
Chip Recovery System · Wheel Shot Blasting	Electricity · Water Auxiliary Materials: Filter Paper, Coolant Oil, Red Fused Alumina	Atmospheric Emissions: None Waste: Used Filter Paper · Emulsion – EWC 13 01 05* (D) Recovery: Aluminium Chips – EWC 12 01 03 (R) -> Remelting
Cycle 5	Painting	HIGH Aspect – VOC Emissions · Wastewater · Hazardous Waste
Sub-process	IN — Input Resources	OUT — Emissions · Waste · Recovery
Pre-treatment	Electricity · Natural Gas Auxiliary Materials: Degreasing Agent · Deoxidising Agent · Fluorozirconium Treatment	Atmospheric Emissions: Emission Points E11, E12, E13, E14, E15, E16, E17, E19, E20 Waste: Spent Process Baths – EWC 11 01 12 (D) · Rinse Solutions · Empty Chemical Containers – EWC 15 01 10* (R)
Powder Coating · Curing	Electricity · Natural Gas Auxiliary Materials: Powder Coating	Atmospheric Emissions: Emission Points E5, E21 (Application) · E4, E22 (Curing) · E3, E23A (Cooling) Waste: Powder Coating Residues – EWC 08 01 12 (D) · Cardboard Boxes – EWC 15 01 01 (R) · Plastic Bags – EWC 15 01 02 (R)
Water-Based Liquid Coating · Flash-Off	Electricity · Natural Gas Auxiliary Materials: Water-Based Liquid Paint · Denaturing Agent	VOC Emissions: Emission Points E8A, E8B, E10A, E10B, E24, E25 (Metallic Coating Application) · E6A, E6B, E27, E28 (Clear Coat Application) · E7, E9, E26/E29 (Flash-Off) Internal Noise: <85 dB(A) Waste: Spray Booth Water – EWC 08 01 20 (D) · Paint Sludge – EWC 08 01 14 (R) · Empty Paint Cans – EWC 15 01 10* (R) · Solvent-Contaminated Water
Final Curing	Electricity · Natural Gas	Atmospheric Emissions: Emission Points E1, E30
DEMI Plant · Paint Wastewater Treatment	Water · Electricity Auxiliary Materials: Hydrochloric Acid · Caustic Soda · Polyaluminium Chloride · Flocculating Agent · Activated Carbon · Quartzite	Discharge to the Surface Water Network (Cherio Stream): Zero Discharge Waste: Sludge – EWC 19 08 11* (D) · Evaporator Mother Liquor – EWC 07 07 01* (D) · Washing Water – EWC 11 01 12 (D) · Waste Paints and Varnishes – EWC 08 01 11* (D) · Spent Activated Carbon – EWC 19 02 09* (D) · Concentrates – EWC 16 10 04 (D) · Paint Sludge – EWC 08 01 14 (R)
Cycle 6	Packaging	LOW Aspect – Packaging Recovery
Sub-process	IN — Input Resources	OUT — Emissions · Waste · Recovery
Wheel Packaging	Electricity Auxiliary Materials: Abrasive Paper · Plastic Cups · Cardboard Discs · LLDPE · Labels · Adhesive/Thermal Tape · Pallets · Polyethylene Bags · Cardboard Boxes · Cardboard/PE Dividers · Protective Covers · Polystyrene	Atmospheric Emissions: None Waste/Recovery: Cardboard – EWC 15 01 01 (R) · Plastic/LLDPE – EWC 15 01 02 (R) · Used Abrasive Paper – EWC 12 01 17 (D) · Polypropylene Strapping – EWC 15 01 02 (R) — Predominantly Sent for Recovery

The manufacturing processes enable the recovery of valuable production scrap, which is transferred to specialised operators. This primarily includes aluminium sprues, chips and metal samples, which are reintroduced into the production cycle through remelting, making a direct contribution to the circular economy and to the reduction of Scope 3 emissions across the value chain.

ENERGY AND CLIMATE CHANGE

ELECTRICITY CONSUMPTION

In 2025, FONDMETAL consumed a total of **8,880,405 kWh of electricity**. 100% of this demand was met through renewable energy sources, supplied via two complementary channels:

- **Photovoltaic Self-Generation** — FONDMETAL operates two photovoltaic systems at its Palosco site. The second system, with an installed capacity of 1,241.55 kWp, entered into operation on 27 February 2025. During 2025, the two systems generated a total of 1,311,908 kWh, covering 14.8% of the Company's total electricity demand and avoiding approximately 604.6 tonnes of CO₂ emissions.
- **Grid Electricity with Guarantees of Origin (GOs)** — Since 1 July 2023, FONDMETAL has sourced its electricity exclusively from certified renewable energy sources. In 2025, the Company's electricity supplier was ENI Plenitude S.p.A., under a contract guaranteeing that 100% of the electricity supplied is covered by Guarantees of Origin (GOs) certified by the Italian Energy Services Operator (GSE). Consequently, the 7,568,497 kWh of electricity purchased from the grid are considered renewable for market-based reporting purposes (ESRS E1-6).

Electricity	2025 (kWh)	% tot. 2025
Self-Generated from Photovoltaic Systems	1.311.908	14,8%
Purchased from the Grid (100% Renewable with Guarantees of Origin)	7.568.497	85,2%
Total Electricity Consumed	8.880.405	100%
Of Which from Renewable Sources	8.880.405	100%

FONDMETAL's energy **monitoring** extends well beyond aggregate consumption figures. The Company collects and analyses electricity consumption data for each production department, pursuing a dual objective: to ensure a high level of environmental control within its ISO 14001 Environmental Management System and to support the accurate allocation of energy costs for management accounting purposes. Department-level monitoring enables the Company to identify consumption peaks, plan targeted energy efficiency initiatives, and assess the effectiveness of the measures implemented over time.

NATURAL GAS CONSUMPTION

Natural gas is used primarily in the foundry, the painting department, and for heating the production facilities. In 2025, total consumption amounted to **1,969,034 Sm³**, equivalent to **18,705,823 kWh** of thermal energy (lower heating value (LHV): 9.5 kWh/Sm³, Italian standard).

From January to July 2025, natural gas was supplied by ENI Plenitude S.p.A.; from August 2025 onwards, the supplier was Sorigenia S.p.A.

Compared with 2024, natural gas consumption increased by **+ 15.4%** (from 1,706,681 Sm³ to 1,969,034 Sm³), primarily due to higher production volumes and increased foundry operations.

Natural Gas	2025	2024	Change
Consumption (Sm ³)	1.969.034	1.706.681	+15,4%
Consumption (Thermal kWh, LHV 9.5 kWh/Sm ³)	18.705.823	16.213.470	+15,4%
Renewable Share	0% (fossil)	0%	-

TOTAL ENERGY MIX AND RENEWABLE SHARE

Adding together electricity and thermal energy consumption, FONDMETAL's total energy consumption in 2025 amounted to **27,586.2 MWh**. Of this total, 8,880.4 MWh (**32.2%**) came from renewable sources, representing the Company's entire electricity consumption, fully covered by self-generated photovoltaic electricity and Guarantees of Origin (GOs). The remaining 18,705.8 MWh (67.8%) originated from fossil fuels, consisting entirely of natural gas.

Energy Carrier	MWh 2025	% of Total	Source
Self-Generated Electricity (Photovoltaic)	1.311,9	4,8%	Renewable
Grid Electricity (100% Covered by Guarantees of Origin (GOs))	7.568,5	27,4%	Renewable
Natural Gas (Thermal Energy)	18.705,8	67,8%	Fossil
TOTAL	27.586,2	100%	32,2% ren.

Note: The photovoltaic self-generation percentages reported in this section are based on two different calculation bases. In the "Electricity" table, the 14.8% figure represents the share of photovoltaic self-generation relative to total electricity consumption (8,880.4 MWh). In the "Energy Carrier" table, which presents the overall energy mix, the 4.8% figure represents the share of the same photovoltaic generation relative to the Company's total energy consumption, including both electricity and thermal energy (27,586.2 MWh). Both percentages are correct: the difference reflects solely the reference denominator used (electricity consumption versus total energy mix) and does not indicate any inconsistency in the data.

GREENHOUSE GAS (GHG) EMISSIONS

FONDMETAL has initiated a programme to quantify its environmental impact, beginning with its direct emissions (Scope 1) and indirect emissions associated with purchased energy (Scope 2).

GHG EMISSIONS CALCULATION TOOL

For the calculation of Scope 1 and Scope 2 emissions, FONDMETAL has adopted the Persefoni platform, recognised as a leading carbon accounting software solution and used by major companies and financial institutions worldwide. Persefoni is aligned with the GHG Protocol, ESRS E1, and the Partnership for Carbon Accounting Financials (PCAF). It enables greenhouse gas emissions data to be managed with the same level of rigour, traceability, and governance applied to corporate financial data. The 2025 GHG emissions calculated through Persefoni constitute the Company's baseline year for the Science Based Targets initiative (SBTi) validation scheduled for 2026.

SCOPE 1 — DIRECT EMISSIONS

Scope 1 emissions include stationary combustion (natural gas used in the foundry, painting department, and building heating), mobile combustion (Company vehicles), and any fugitive emissions from fluorinated gases (F-gases). The calculation was carried out using the Persefoni platform, applying the ISPRA National Inventory Report (NIR) 2024 emission factors for natural gas and the DEFRA 2024 emission factors for Company vehicles. Total Scope 1 emissions for 2025 amounted to **4,100.74 tCO₂e**, comprising:
Stationary combustion (natural gas – foundry, painting department, and building heating): **4,066.92**

tCO₂e. Mobile combustion (Company vehicle fleet): **33.82 tCO₂e.** The 2025 figure represents an increase compared with 2024, primarily attributable to the rise in natural gas consumption (+15.4%) and the adoption of a more comprehensive calculation methodology incorporating updated emission factors. Accordingly, the 2025 results constitute the Company's GHG baseline for SBTi validation.

SCOPE 2 – INDIRECT EMISSIONS FROM PURCHASED ELECTRICITY

FONDMETAL adopts the market-based approach as its primary ESRS reporting method, recognising the Company's use of renewable electricity certified through Guarantees of Origin (GOs).

- **Market-based:** Scope 2 (market-based): 0 tCO₂e — Grid electricity supply fully covered by renewable Guarantees of Origin (GOs) (ENI Plenitude, Guarantees of Origin certified by the Italian Energy Services Operator (GSE)).
- **Location-based:** Scope 2 (location-based): 2,294.7 tCO₂e — Calculated using the Persefoni platform for the Company's site at Via Bergamo 4, Palosco (BG), Italy, applying the ISPRA 2024 emission factor for the Italian electricity grid. This complementary metric is required under ESRS E1-6 disclosure requirements.

SCOPE 3 – VALUE CHAIN EMISSIONS

For a manufacturing company whose primary raw material is aluminium, Scope 3 emissions represent the largest share of its overall carbon footprint. The principal upstream categories are purchased goods and services (primarily aluminium) and outsourced processing activities, while the main downstream categories include distribution and end-of-life treatment of sold products. Measuring Scope 3 emissions is a key objective for 2026 and represents an essential prerequisite for establishing a Supplier Engagement Target and achieving Science Based Targets initiative (SBTi) validation.

2026 OBJECTIVE – SBTi VALIDATION AND SUPPLIER ENGAGEMENT TARGET

FONDMETAL has established, as a key objective for 2026, the consolidation and validation of its emissions reduction plan through the Science Based Targets initiative (SBTi), the internationally recognised framework aligned with climate science and the goals of the Paris Agreement. The 2025 GHG emissions data will serve as the baseline year for the Company's Near-Term and Long-Term SBTi targets. From 2026, FONDMETAL will formally launch its Supplier Engagement Target. By 2031, at least 67% of strategic suppliers, measured by procurement spend, will be required to have established validated GHG reduction targets (through the Science Based Targets initiative (SBTi), SME Climate Hub, or equivalent schemes) or to have made an equivalent public commitment (baseline year: 2026), in accordance with the Company's Sustainable Supply Chain Code of Ethics.

PRODUCT LIFE CYCLE ASSESSMENT (LCA) – CARBON FOOTPRINT OF THE ALUMINIUM ALLOY WHEEL

In 2023, FONDMETAL initiated and completed, in collaboration with the Department of Industrial Engineering (DTG) of the University of Padua, its first formal Life Cycle Assessment (LCA) study on the production of aluminium alloy wheels. The project—Application of LCA Methodologies to Assess the Environmental Impact of Aluminium Alloy Wheels—quantified the Product Carbon Footprint (PCF) of FONDMETAL's entire production range in accordance with ISO 14040, ISO 14044, and ISO 14067.

Methodology and Scope

The assessment follows the four phases required by the ISO standards for LCA studies:

(1) goal and scope definition;

(2) Life Cycle Inventory (LCI); (3) Life Cycle Impact Assessment (LCIA), using the IPCC GWP 100-year methodology; 4) interpretation of the results.

The system boundary adopted is gate-to-gate, covering the production process from the receipt of the aluminium alloy through to the finished, packaged product ready for shipment. The functional unit is a single finished wheel, classified by diameter (17-inch small, 19-inch medium, and 21-inch large) and by finishing and packaging configuration. The study analysed FONDMETAL's two manufacturing processes: Gravity Die Casting (GDC), which uses a secondary aluminium alloy with a high recycled content (AlSi10 2R, >95% post-consumer recycled content), and Low Pressure Die Casting (LPDC), which, in the configuration analysed, uses a primary aluminium alloy produced from bauxite extraction (AlSi7Mg). This distinction is fundamental to understanding the difference in carbon footprint between the two manufacturing processes. Key Results — kg CO₂e per kg of Aluminium Processed

The following table summarises the emissions expressed in kg CO₂e per kg of aluminium processed, a metric that is more appropriate than emissions per finished wheel when comparing products of different wheel sizes.

Wheel Configuration	Small Wheels (17")	Medium Wheels (19")	Large Wheels (21")	Class Average
Gravity Die Casting — Full-Colour (Boxed)	1,83	1,79	1,77	1,81
Gravity Die Casting — Full-Colour (Palletised)	1,73	1,68	1,70	1,77
Gravity Die Casting — Diamond-Cut (Boxed)	1,89	1,84	1,83	1,76
Gravity Die Casting — Diamond-Cut (Palletised)	1,78	1,74	1,75	-
Low Pressure Die Casting — Full-Colour (Boxed)	10,16	11,21	10,01	10,07
Low Pressure Die Casting — Full-Colour (Palletised)	9,97	11,13	9,95	11,19

Functional unit: One finished aluminium alloy wheel. System boundary: Gate-to-gate (from receipt of the aluminium alloy to the packaged finished product). Standards: ISO 14040 / ISO 14044 / ISO 14067 (Product Carbon Footprint). Impact assessment method: IPCC GWP 100-year. Software: SimaPro using the ecoinvent databases. Source: University of Padua – Department of Industrial Engineering (DTG), November 2023.

The most significant finding of the study concerns the comparison between the two manufacturing processes: for a typical 19-inch wheel, production using the GDC process generates approximately 1.79 kg CO₂e/kg of aluminium, compared with 11.21 kg CO₂e/kg of aluminium for LPDC using primary aluminium alloy—an 85% reduction. The principal reason is the different origin of the aluminium alloy: producing primary aluminium from bauxite is highly energy-intensive, whereas secondary aluminium alloy requires approximately 90–95% less energy. The aluminium ingot—that is, the production of the aluminium alloy itself—accounts for around 85% of total emissions in the LPDC scenario, while in the GDC process this contribution is dramatically reduced through the use of recycled aluminium.

IDENTIFIED IMPROVEMENT OPPORTUNITIES

The analysis identified two principal opportunities for reducing the product carbon footprint. The first, which has already been implemented, is the replacement of the primary aluminium alloy used in the LPDC process with the new AlSi10Sr alloy (containing more than 95% recycled content).

Tests conducted between 2022 and September 2025 confirmed both its technical feasibility and its environmental benefits, achieving a CO₂ reduction of more than 80% compared with the LPDC configuration using primary aluminium alloy. Production is scheduled to commence in 2027. The second opportunity, assessed as a hypothetical scenario, involves the internal recycling of aluminium chips. By remelting the aluminium chips generated during machining to produce 2R alloy, emissions are estimated to decrease by 43% in the GDC scenario (from 26.4 to 15.0 kg CO₂e per average wheel) and by 16% in the LPDC scenario (from 141 to 119 kg CO₂e per average wheel).

INTEGRATION WITH ESRS E1 REPORTING AND FUTURE OBJECTIVES

The LCA study provides the methodological foundation for reporting the Product Carbon Footprint (PCF) required under ESRS E1, particularly in relation to the downstream perspective (Scope 3 – use of sold products). The results are already being used in commercial communications with customers, who are increasingly requesting traceability of the carbon footprint associated with product components. FONDMETAL has set the objective of updating the product LCA by 2028, in order to incorporate the actual 2027 consumption data into the life cycle inventory, include the new AlSi10Sr alloy in the baseline scenario, and further improve the quantification of CO₂ emissions across the product's entire life cycle.

WATER RESOURCES

With reference to the disclosure requirements of ESRS E3-2 and E3-4, FONDMETAL monitors its water consumption through direct readings from the meters installed on the wells at its Palosco site, which constitute the Company's sole water supply source. Water performance data are based on direct measurement, with no use of estimates or sampling. In 2025, a total of 8,560 m³ of water was abstracted (+16.4% compared with 7,355 m³ in 2024), reflecting the increase in production volumes. The most significant figure is the level of water reuse: 7,893.9 m³, equivalent to 92.2% of the total water abstracted, calculated as the difference between the volume of water abstracted and the volume disposed of as liquid hazardous waste.

Water Resource	2025 (m ³)	2024 (m ³)	Change
Water Abstracted (Artesian Well)	8.560	7.355	+16,4%
Water Disposed of as Liquid Hazardous Waste	666,1	517,0 *	-
Water Reused in the Production Process	7.893,9	6.838,0	+15,4%
% of Water Reused Relative to Total Water Abstracted	92,2%	92,9%	Stable

*Estimated 2024 value. Methodology: Water reused = Water abstracted – Water disposed of as liquid hazardous waste.

Water reuse is made possible by the **wastewater recovery** plant serving the painting department, commissioned in 2019, which has completely eliminated discharges into the Cherio Stream and enabled a structural reduction in water abstraction. The most significant indicator is the comparison with the year in which the plant entered into operation: within a single year, water abstraction fell by approximately 19,000 m³ (–70%), decreasing from 27,185 m³ in 2019 to 8,107 m³ in 2020, before stabilising within a range of 7,000–9,000 m³, in line with production volumes. The following table illustrates the multi-year trend in water abstraction, highlighting the long-term impact of this investment.

Year	Water Abstracted (m³)	Note
2019	27.185	DEMI Plant Commissioning Year
2020	8.107	–70% compared with 2019
2021	8.019	-
2022	8.845	-
2023	8.855	–70% compared with 2019
2024	7.355	-
2025	8.560	+16.4% vs 2024 (Higher production volumes)

WASTE AND CIRCULAR ECONOMY

The management of hazardous and non-hazardous industrial waste is governed by Italian Legislative Decree No. 152/2006 and is fully traceable through the waste loading and unloading register and the Single Environmental Declaration (MUD). Operational responsibility rests with the Sustainability Manager, Alessandra Rumi, who also oversees the Company's ISO 14001 Environmental Management System. In 2025, FONDMETAL generated a total of 1,621,570 kg (1,621.6 tonnes) of industrial waste. The increase compared with 2024 is primarily attributable to two factors: the higher volume of aluminium filings and machining chips generated by the machining department, reflecting increased production volumes, and the presence of exceptional construction and demolition waste (40,140 kg, compared with 10,930 kg in 2024). Excluding these exceptional components, the kg of waste per kg of molten product KPI remained within the target value of 0.23.

WASTE BY PRODUCTION AREA – 2025 VS 2024

Production Area	2025 (kg)	2024 (kg)	Var. %	% of Total (2025)
Foundry	108.887	207.876	–47,6%	6,7%
Painting	703.084	549.993	+27,8%	43,4%
Machining Department	664.640	346.822	+91,6%	41,0%
Quality / Laboratory	6.228	3.219	+93,5%	0,4%
All Departments / Miscellaneous	138.731	101.831	+36,2%	8,5%
TOTAL	1.621.570	1.209.741	+34,0%	100%

Source: RIFIUTI_2025.xlsx. Data derived from the waste loading and unloading register and Waste Identification Forms (MUD).

With regard to the recovery of valuable metallic production residues, these materials are transferred to specialised refiners for remelting, allowing them to re-enter the production cycle as secondary aluminium. The significant reduction in foundry waste recorded in 2025 (–47.6% compared with 2024) is not attributable to a decrease in slag generation—which, in line with higher production volumes, actually increased—but rather to the decision to manage an increasing proportion of foundry slag as a by-product instead of as waste.

From the end of 2024, FONDMETAL began supplying part of its foundry slag as a by-product to a specialist aluminium recovery company based in the Province of Brescia. The proportion managed under this approach increased from 6.5% of the total slag generated in the previous year to 61.6% in 2025. As a result, the quantity of foundry slag classified as waste declined substantially.

In 2024, a **new dust collection** system was also installed, which significantly reduced waste classified as dust (EWC 160304), with 2025 figures in line with KPI targets. The investment is part of the effort to reduce dust emissions into the atmosphere (ESRS E2).

WASTE DESTINATION: RECOVERY AND DISPOSAL

The classification by destination shows a **55.5%** recovery rate by weight. The principal waste streams sent for recovery (R) are aluminium filings and machining chips from the machining department (643,700 kg—recycled as secondary metal), foundry slag and metal spill residues (93,460 kg), together with mixed packaging waste, paper, plastics, and ferrous scrap. Waste sent for disposal (D) consists primarily of wastewater and sludge from the painting department, which are managed by authorised waste treatment operators.

Category	2025 (kg)	% su totale	Destination
Waste Sent for Recovery (R)	900.525	55,5%	Recovery
Waste Sent for Disposal (D)	721.045	44,5%	Disposal
of which Hazardous (EWC Code)	~ 107.159	6,6%	R + D
of which Non-Hazardous	~ 1.514.411	93,4%	Prev. R

Hazardous waste (EWC): waste paints and varnishes containing solvents (08 01 11), evaporator cleaning solutions (07 07 01*), non-chlorinated emulsions (13 01 05*), metal sludge (12 01 18*), rinse water containing hazardous substances (11 01 11*), contaminated packaging (15 01 10*), and absorbent materials/oil (15 02 02*, 13 02 05*).

CIRCULAR ECONOMY AND MATERIAL INNOVATION — THE NEW, MORE SUSTAINABLE ALUMINIUM ALLOY

Circular economy principles are embedded within FONDMETAL's production model as a core element of its operations. In 2025, this approach reached a significant new milestone through a project that extends well beyond conventional waste management: **the development and forthcoming industrial introduction of a new aluminium alloy with an exceptionally high content of post-consumer recycled material**, designed for the original equipment manufacturer (OEM) automotive market. The project originated from a research collaboration launched in 2022 with the University of Padua under the research programme Development of Secondary Aluminium Alloys for Automotive Wheels, completed in 2023. Industrial trials conducted between December 2022 and September 2025 confirmed both the technical feasibility and the environmental benefits of the new alloy, paving the way for its introduction into the production process in 2027.

THE NEW AISi10Sr ALLOY — TECHNICAL CHARACTERISTICS AND ENVIRONMENTAL IMPACT

The current production process uses two aluminium alloys: AlSi7Mg (containing up to 25% recycled

material, used for low-pressure casting of OEM wheels) and AlSi102R (containing more than 95% recycled material, used for gravity casting of aftermarket wheels). The new alloy—AlSi10Sr—is derived from AlSi102R and was developed through a dedicated optimisation of its chemical composition to make it suitable for the low-pressure casting process. This development ensures compatibility with the sealed furnaces used in this technology while maintaining the mechanical properties required for OEM applications. With the introduction of the new alloy, the content of post-consumer recycled material exceeds 95%, matching the level already achieved for the aftermarket (AlSi102R), but applied for the first time to the OEM product line. The Life Cycle Assessment (LCA) carried out as part of the research collaboration with the University of Padua demonstrated that the adoption of AlSi10Sr results in a reduction in CO₂ emissions of more than 80% compared with the AlSi7Mg alloy currently used for original equipment production.

This project is directly aligned with the regulatory developments affecting the automotive sector. Regulation (EU) 2019/631 establishes CO₂ emission reduction targets for new vehicles, while vehicle manufacturers are increasingly requiring suppliers to provide traceable information on the carbon footprint of their components. Offering an alloy wheel manufactured from a secondary aluminium alloy with an exceptionally high recycled content for the OEM market represents a tangible response to these regulatory requirements, while also providing a significant competitive advantage with OEM customers that place particular emphasis on ESG performance. With the introduction of the new alloy into production, FONDMETAL's manufacturing portfolio will comprise three aluminium alloys: **AlSi7Mg** (OEM, low-pressure casting, up to 25% recycled content), **AlSi102R** (aftermarket, gravity casting, more than 95% recycled content), and **AlSi10Sr** (OEM, low-pressure casting, more than 95% recycled content). This transition represents a structural turning point in the company's product carbon footprint, delivering direct benefits for downstream Scope 3 emissions (use of sold products) and reducing the overall carbon footprint of the wheel declared to OEM customers.

COMPARISON OF ALUMINIUM ALLOYS — ENVIRONMENTAL IMPACT

Alloy	Market	Process	% Recycled Material	CO ₂ vs AlSi7Mg
AlSi7Mg	OEM (Vehicle Manufacturers)	Low-Pressure Casting	Max 25%	Baseline
AlSi10 (2R)	Aftermarket	Gravity Die Casting	> 95%	Reduction > 80%
AlSi10Sr — New (2027)	OEM (Vehicle Manufacturers)	Low-Pressure Casting	> 95%	Reduction > 80%

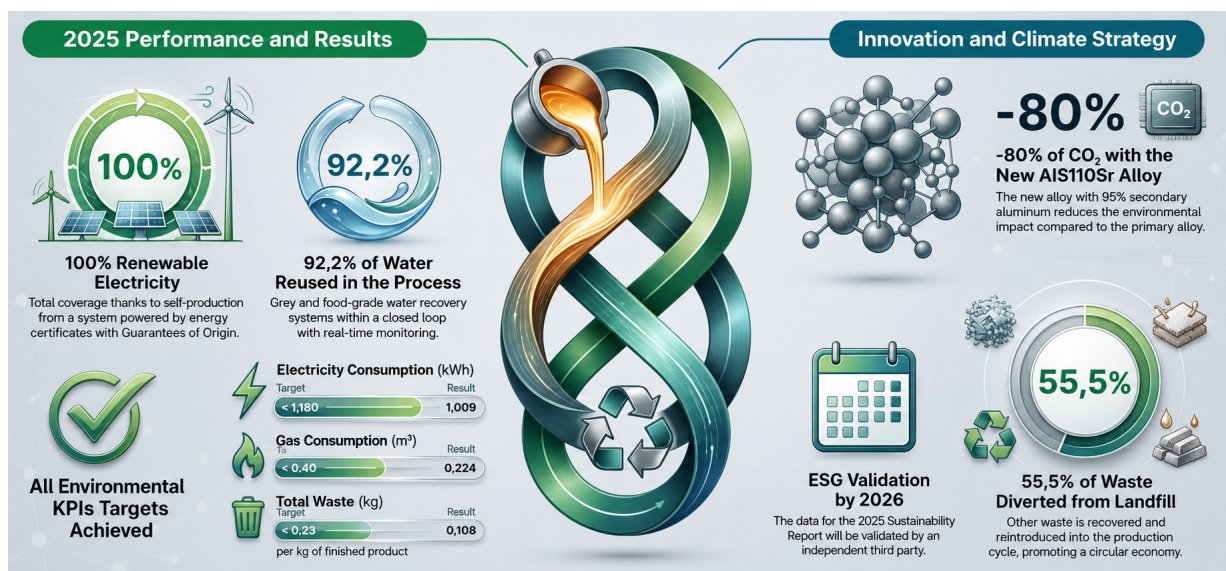
Source: Environmental Impact Assessment — FONDMETAL S.p.A., January 2026. Life Cycle Assessment (LCA) conducted as part of the research collaboration with the University of Padua (2022–2023). The >80% CO₂ reduction refers to the comparison with the AlSi7Mg alloy used for low-pressure cast OEM wheels.

POLLUTION PREVENTION

FONDMETAL manages atmospheric emissions from its painting, foundry, and surface treatment operations through the environmental permits required under the applicable legislation for its Palosco production site. All environmental permits are valid and up to date.

The **painting** department represents the primary area of focus for volatile organic compound (VOC) emissions. Continuous monitoring, periodic analytical testing, and the management of waste through authorised operators ensure compliance with the emission limits established by the relevant permits. The **foundry** is subject to monitoring of dust and fluoride emissions at the authorised emission points (E37, E38 and E39). The measured values consistently confirm concentrations well below the permitted limits, with no direct correlation to furnace production capacity. The wastewater treatment plant, operational since 2019, represents the company's principal structural measure for the prevention of water pollution.

Finally, with regard to the protection of biodiversity and soil (ESRS E4-3), the company does not operate in or near protected or environmentally sensitive natural areas, and its activities do not have a direct impact on habitats at risk.





PEOPLE — OUR EMPLOYEES

People are at the heart of FONDMETAL's development model. For more than 50 years, the company has built its competitive advantage not only on technological expertise but also on its human capital. Respectful working conditions, a strong commitment to health and safety, continuous training, and open dialogue with employees are principles that predate regulatory requirements and have been formally embedded in the Company's **Code of Ethics** since 2017. This chapter reports the Company's social performance relating to its workforce for the 2025 reporting period, in accordance with ESRS S1 (Own Workforce) and ESRS S3 (Affected Communities), which were identified as material topics through the double materiality assessment.

POLICIES AND PRINCIPLES

FONDMETAL formalises its commitment to its employees through its Code of Ethics and its Integrated Quality and Environmental Policy. The fundamental principles governing the Company's relationship with its people are:

- An absolute prohibition of all forms of forced and child labour, full compliance with applicable employment legislation, and the exclusion of commercial relationships with suppliers that employ underage workers.
- Non-discrimination in recruitment and professional development, with all decisions based exclusively on merit and the suitability of candidates for the required roles.
- Protection of the moral integrity of employees through a zero-tolerance approach to harassment, discrimination, or any conduct detrimental to the individual, irrespective of age, gender, nationality, political opinions, or religious beliefs.
- Periodic statistical analyses, carried out by the Human Resources Department, to monitor the absence of discriminatory practices and provide regular reporting to senior management and the Supervisory Body established pursuant to Italian Legislative Decree 231/2001.
- An active whistleblowing channel, accessible to employees and collaborators, enabling the confidential reporting of conduct that violates the Code of Ethics. No significant reports were recorded during 2025.

47

EMPLOYMENT AND WORKFORCE PROFILE

As at 31 December 2025, FONDMETAL employed **138 direct employees**, supplemented by **55 temporary agency workers**, bringing the total workforce to 193 people. The use of agency workers reflects the seasonal production peaks and operational flexibility requirements of the automotive sector. In 2025, the Company's employee turnover rate was approximately **8%**.

Workforce	2025	2024
Direct Employees	138	139
Temporary Agency Workers	55	40
Total Workforce	193	179

All direct employees are employed under the National Collective Labour Agreement (CCNL) for the Metalworking Industry. The Company ensures transparency in contractual terms and conditions and full compliance with legislation governing part-time employment. Among direct employees, permanent full-time contracts are the predominant form of employment, accounting for 98% of the workforce.

FONDMETAL's direct employees are firmly rooted in the area surrounding its production facility in Palosco. Approximately 80% reside in the provinces of Bergamo and Brescia. This strong local presence generates a direct positive impact on the surrounding community (ESRS S3) by supporting employment, income generation, and social cohesion within the Bergamo area. Eighty-two per cent of direct employees are Italian nationals, while the remaining 18% are foreign nationals originating from the following countries: Albania, Algeria, Bangladesh, The Gambia, Ghana, Guinea, India, Morocco, Senegal, and Serbia. The demographic profile of FONDMETAL's direct employees reflects a well-balanced workforce across different generations, with an average age of 40.2 years. The significant proportion of employees under the age of 30 (more than 28% of the workforce analysed) demonstrates the Company's ability to attract young talent, in line with its medium- to long-term vision.

Women are the least represented gender within the workforce, with 18 women out of a total workforce of 193 people, accounting for 9% of the Company's total workforce (direct employees and temporary agency workers). From a governance perspective, the composition of the Board of Directors (three members, two of whom are women) reflects a significant female presence at the highest levels of the Organisation. The Organisation employs workers falling within the Italian legal definition of protected categories (categorie protette). As at 31 December 2025, FONDMETAL employed five people belonging to this category. In line with previous years, in 2025 FONDMETAL also formalised an agreement (Article 14, Italian Legislative Decree No. 276/2003) with L'Ancora Social Cooperative, entered into with the Province of Bergamo – Targeted Employment Office (Ufficio Collocamento Mirato). The agreement provides for the employment of two people with disabilities at the cooperative following the award of a contract by FONDMETAL.

In 2025, among direct employees, six employees took maternity/paternity leave, nine employees made use of the leave provided for under Italian Law No. 104/1992 to care for family members with disabilities, and one employee exercised the right to trade union leave. With regard to temporary agency workers, in 2025 there was one worker who made use of leave under Italian Law No. 104/1992 and one who took maternity/paternity leave.

OCCUPATIONAL HEALTH AND SAFETY

Occupational health and safety is the most material topic for FONDMETAL employees (score: 4.33/5 in the internal ESG questionnaire). The Organisation addresses this topic through an integrated system of prevention, assessment and continuous training. The applicable regulatory framework is Italian Legislative Decree No. 81/2008, as subsequently amended. The Risk Assessment Document (DVR) is continuously reviewed to identify and assess potential risks in all production departments. FONDMETAL aims to achieve ISO 45001:2023 certification by 2028, as formal recognition of the occupational health and safety management system already in place.

OCCUPATIONAL ACCIDENTS — HISTORICAL TREND

Accident Indicator	2025	2024	2023
Total Number of Occupational Accidents	2	3	3
Number of Fatal Occupational Accidents	0	0	0

FONDMETAL's preventive measures include: continuously evolving risk analysis, the adoption of the best available technologies, the updating of working methods, and a mandatory safety training programme. The approach is proactive: training precedes exposure to risk and represents the first

line of defence.

SUPPLEMENTARY HEALTHCARE COVERAGE — METASALUTE FUND

As provided for under the National Collective Labour Agreement (CCNL) for the Metalworking Industry, all FONDMETAL employees have access to the Metasalute Fund (managed by Intesa Sanpaolo Protezione). The Fund provides healthcare benefits for employees and their families through two schemes: direct assistance (agreements with accredited healthcare facilities) and indirect assistance (reimbursement of expenses and National Health Service (SSN) co-payments). The benefits cover hospitalisation, physiotherapy, dental care, preventive healthcare and much more, in accordance with the 2024–2026 Healthcare Plans available on the Metasalute Fund website.

TRAINING

FONDMETAL provides training and skills development activities not only to comply with applicable legal requirements, but also to ensure an appropriate professional development path for its employees.

Training Type	Content	Hours 2025	N. destinatari
Mandatory	Occupational health and safety (Italian Legislative Decree No. 81/2008), risk prevention, personal protective equipment (PPE), emergency procedures	54	26 workers
Voluntary / professional	CAD/CAM, Microsoft 365, waste management, Agile Scrum, management control, sustainability, etc.	155	34 Office employees
Cybersecurity (digital)	Weekly* anti-phishing and digital skills training for all computer users.	Continuous	Everyone
On-the-job	Practical on-the-job training for production line staff; management of quality non-conformities; training with managers	1114	46 workers, 35 Office employees
Total classroom training		1.323	88

All employees who use IT tools receive training aimed at raising awareness of cyber risks and improving their digital skills. This training is provided on a weekly basis and is followed by a multiple-choice quiz.

In 2025, 209 hours of classroom training were delivered, in addition to 1,114 hours of on-the-job training, for a total of 1,323 training hours delivered (comparison: 1,393 training hours were delivered in 2024).

The Company therefore provides its employees with the most appropriate tools according to their roles, characteristics and development path. This involves designing personalised training plans based on the actual needs of both the employee and the Company. This is made possible through a personnel assessment carried out with the aim of improving skills. Department managers, the Quality Manager and Management assess the strengths and areas for improvement of each employee. The results are recorded in the **Competence Matrix** document, which makes it possible to maintain a historical record of the data and monitor each employee's development. Based on the outcomes of these assessments and the information summarised in the document, training activities are organised and delivered for small homogeneous groups or individual employees.

EMPLOYEE ENGAGEMENT AND INTERNAL COMMUNICATION

FONDMETAL has established a system of continuous employee feedback through **periodic**

questionnaires, which in 2025 achieved a 56% response rate. Compared with the previous edition, participation increased by 25%, with all seven company departments represented. Thirty-three per cent of respondents supplemented their answers with open comments, indicating genuine and constructive dialogue. The results of the questionnaires are collected and shared with the Quality Manager, the Plant Manager and Management. The questionnaires, completed anonymously by employees, make it possible to collect direct feedback on employee satisfaction and the topics they consider most relevant. They also make it possible to gather comments and suggestions to improve the Organisation.

Employee engagement also takes place through the **Company's monthly newsletter**, which serves as an internal communication channel for sharing company news. Daily dialogue between department managers and Management is the main channel for identifying needs, critical issues and opportunities for improvement.

2025 marked a significant acceleration in FONDMETAL's corporate **welfare programme**, resulting from employee feedback (the topic of 'work-life balance agreements' was identified as the second most important) and an explicit strategic decision by Management. During 2025, FONDMETAL introduced **two new agreements** with wellbeing professionals for its employees:

- Nutritionist – Nutritional counselling and personalised nutrition plans
- Dentist – Dental services under a preferential agreement

These agreements complement the healthcare coverage provided by the Metasalute Fund (under the National Collective Labour Agreement (CCNL) for the Metalworking Industry), creating an integrated healthcare package covering nutrition, dental care, hospital care and rehabilitation.

For 2026, FONDMETAL has planned the introduction of two additional services to support the physical and mental wellbeing of its employees:

- Psychologist – Individual psychological support for employees who request it, in complete confidentiality.
- Massage therapist – Preventive and stress-relief massage therapy services, with particular attention to workers in production departments exposed to repetitive physical strain.

These investments in the physical and mental wellbeing of employees form part of the strengthening of human capital as a long-term competitive lever, in line with ESRS S1 and with the material topic 'Employee Wellbeing and Development' identified in the double materiality assessment.

FONDMETAL's relationship with its employees extends to their families through practical welfare initiatives, which have become a structured and recurring part of the Company's approach. In 2025, the **"Draw the Wheel of Your Dreams"** competition attracted the participation of numerous children, with eight winners receiving admission tickets to amusement parks. As part of its corporate welfare initiatives, FONDMETAL has decided to launch the creative competition **"A Slogan That Makes Dreams Turn"** in 2026, open to the children of employees attending primary school and lower secondary school. The competition will invite participants to create an original slogan for the alloy wheels produced by the Company, encouraging creativity, self-expression and family engagement. The winners will receive four tickets to a well-known amusement park in Lombardy.

"IN MEMORY OF GABRIELE RUMI" SCHOLARSHIP

FONDMETAL has established the "In Memory of Gabriele Rumi" Scholarships, an annual award

dedicated to the children of deserving employees attending upper secondary school or university. The awards allocated for 2025 are: €1,000 for two university students (€500 each) and €700 for two upper secondary school students (€350 each). The same annual award has also been confirmed for 2026. This initiative, named after the Company's founder, gives concrete expression to the values that FONDMETAL inherited from Gabriele Rumi: excellence as a daily commitment, recognition of merit and the promotion of future generations.

PEOPLE — COMMUNITIES, CUSTOMERS AND CONSUMERS

RELATIONSHIP WITH THE LOCAL COMMUNITY

FONDMETAL has set itself the objective of adopting the principles of social responsibility in order to support human values and integration. The Company has always conducted its activities in an ethical manner, placing the values of its founder and the Rumi family at the centre of its approach.

Particular attention is given to the relationship with the local community. On the one hand, the Organisation is committed to limiting and mitigating its impact on the community in relation to environmental issues, particularly climate change mitigation (over the years, the Company has invested in improving its environmental performance and in generating its own energy; please refer to the relevant section). On the other hand, it promotes initiatives that have a direct and positive impact on the community, particularly from a social perspective. For example, the Company's workforce decisions have an impact on local employment: approximately 80% of FONDMETAL employees live near the production site.

In addition, the Organisation has chosen to entrust bagging activities to disadvantaged people through the agreement entered into with L'**Ancora Social Cooperative**. The collaboration with the Cooperative has already been renewed for 2026.

SPONSORSHIP OF M.A.R.S. RACING TEAM

FONDMETAL supports **M.A.R.S. Racing Team** (a school project of the Marzoli Upper Secondary School in Palazzolo sull'Oglio), in which students design, build and promote a scale model of a racing car. The Company took part in the official presentation event of the racing team at the **Porsche Experience Center Franciacorta** (10 February 2025), enthusiastically attending the technical presentation and the prototype built by the students. This partnership gives concrete expression to FONDMETAL's commitment to supporting the technical education of young people and their path towards the automotive industry from their school years.

FAI OPEN DAY — OPENING OF THE PRODUCTION SITE TO THE PUBLIC

In October 2025, FONDMETAL took part in the **FAI Autumn Days**, opening its production site in Palosco to the public. The event, organised with guided tours every 15 minutes for groups of up to 25 people, gave visitors the opportunity to discover the history of FONDMETAL—from wheel production to the world of Formula 1—and the manufacturing processes that have built its international reputation. Admission was free and the site was accessible. The initiative strengthens the relationship between the Company and the local community in the Province of Bergamo and is consistent with its ESG journey of transparency and openness towards local stakeholders.

CUSTOMERS AND END CONSUMERS

The Organisation is committed to customer satisfaction and therefore pays particular attention to product **quality** and safety. This commitment is pursued through the implementation of a management system strongly focused on quality. It should be noted that FONDMETAL is certified to

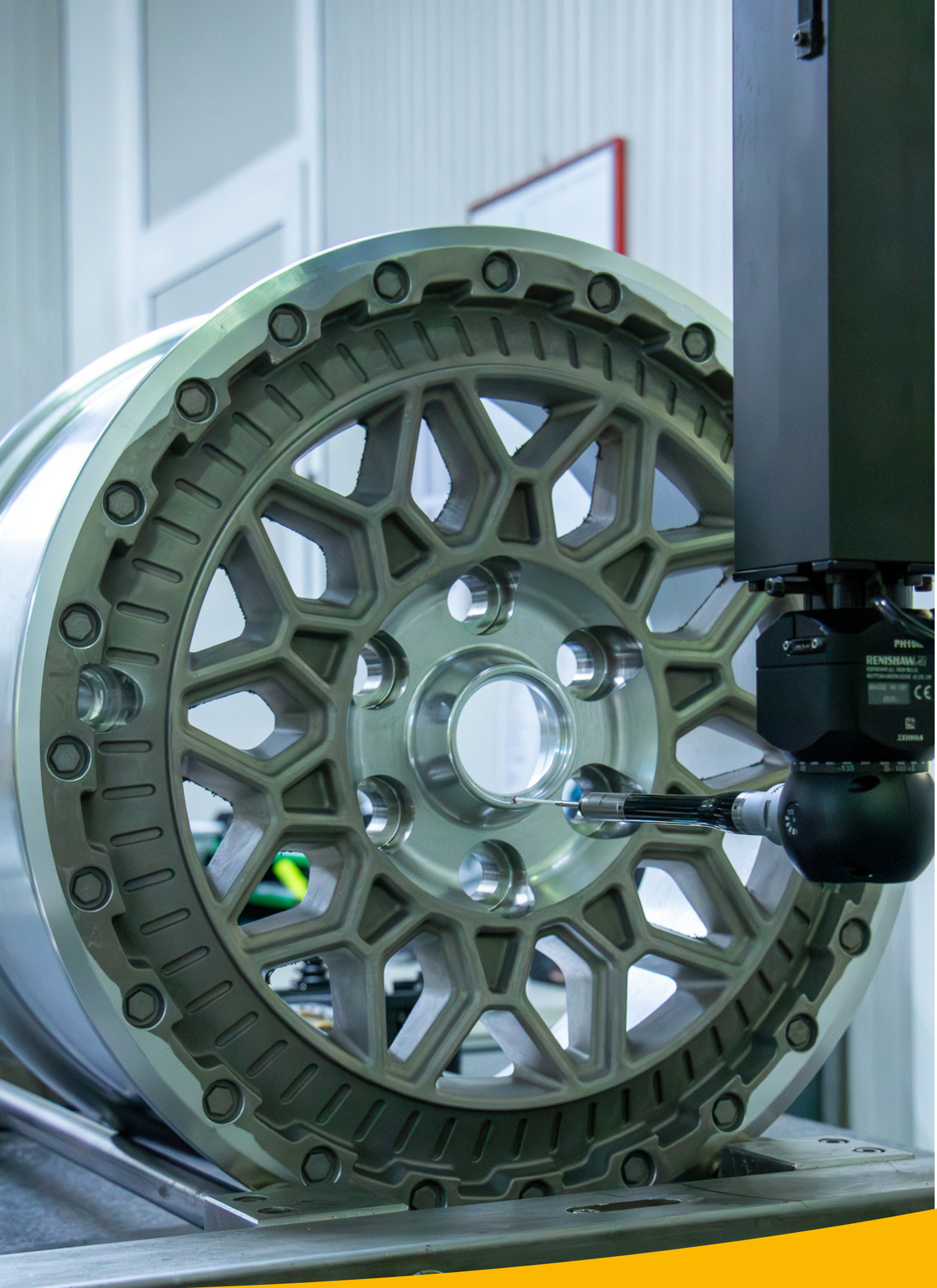
both UNI EN ISO 9001:2015 and IATF 16949:2016.

The Code of Ethics and the Integrated Policy set out the commitments that the Organisation undertakes towards customers and end users. These commitments relate to transparency and fairness in communications, product and service quality, **product safety** and **continuous improvement**, which includes:

- Prompt and accurate customer support; Continuous improvement of the product/service provided;
- Careful supplier selection;
- Widespread digitalisation;
- Benchmarking with companies in the sector to increase knowledge and competitive advantage;
- Periodic review of its management systems and objectives.

In order to understand and address customer needs, FONDMETAL periodically carries out customer satisfaction surveys to assess the achievement of its service improvement objectives. These surveys are conducted annually, analysed by the Quality Department and shared with Management. Since 2023, customers have also been asked to answer questions on ESG topics. The latest surveys achieved a response rate of approximately half of the participants.

Dialogue with customers is not limited to surveys but is based on continuous interaction, maintained and supported throughout the Organisation, starting with Management, the Sales Department, Design, the Quality Department and Logistics. The Quality Department plays a particularly important role in all aspects, including the management of complaints and non-conformities.



METHODOLOGICAL NOTE

This 2025 Sustainability Report represents FONDMETAL S.p.A.'s third non-financial reporting document and relates to the financial year ended 31 December 2025. Its publication forms part of the continuous improvement journey launched in 2023 and demonstrates the Organisation's increasing maturity in the management and communication of its environmental, social and governance (ESG) performance.

This **document has been prepared** on a voluntary basis, as FONDMETAL does not currently fall within the scope of companies required to prepare sustainability reports under Directive (EU) 2022/2464 (Corporate Sustainability Reporting Directive – CSRD), transposed into Italian law by Italian Legislative Decree No. 125 of 6 September 2024. Nevertheless, the Organisation has consciously chosen to adopt the most advanced European reporting standards, anticipating regulatory developments and strengthening stakeholder confidence.

REFERENCE STANDARDS AND PRINCIPLES

This Sustainability Report has been prepared with reference to the regulatory framework introduced by Directive (EU) 2022/2464 (CSRD) and the **European Sustainability Reporting Standards (ESRS)**, adopted by the European Commission through Commission Delegated Regulation (EU) 2023/2772 of 31 July 2023. The ESRS, developed by the European Financial Reporting Advisory Group (EFRAG), constitute the European framework for sustainability reporting and comprise 12 standards: 2 cross-cutting standards (ESRS 1 – General Requirements and ESRS 2 – General Disclosures) and 10 topical standards, divided into the environmental (E1–E5), social (S1–S4) and governance (G1) categories.

REGULATORY DEVELOPMENTS: THE SIMPLIFIED ESRS

FONDMETAL closely monitors developments in the European regulatory framework for sustainability reporting, which accelerated significantly during 2025 and the first months of 2026. On 26 February 2025, the European Commission proposed the Omnibus package, introducing simplifications to the CSRD, the EU Taxonomy and the CSDDD. At the Commission's request, EFRAG prepared a proposal for simplified ESRS, delivering its final technical advice on 3 December 2025. The legislative process concluded with the approval of the European Parliament (16 December 2025) and the Council of the European Union (24 February 2026): Directive (EU) 2026/470 (Omnibus Directive) entered into force on 18 March 2026. The Directive raises the CSRD thresholds to companies with more than 1,000 employees and €450 million in turnover, refocuses the CSDDD on larger companies (removing the obligation to adopt a climate transition plan and postponing its application until 2029), and introduces a "value chain cap": large companies may not request ESG information from suppliers with fewer than 1,000 employees beyond a standardised minimum dataset (VSME). The simplified ESRS have yet to be formally adopted and are expected to apply from FY2027 (with optional application from 2026).

Although FONDMETAL has chosen to adopt the ESRS currently in force, the Organisation has analysed the simplified ESRS in order to understand the ongoing developments and assess the opportunity to progressively adapt its reporting system to the evolving European regulatory framework, while maintaining a high level of disclosure and transparency towards all stakeholders.

REGULATORY REFERENCES AND SOURCES CONSULTED

In addition to the ESRS, the preparation of this document has taken into account the main regulatory references and international and national best practices, including:

- EFRAG Implementation Guidance (IG1, IG2 and IG3), which provides methodological guidance for the application of the ESRS and the identification of material topics.
- GRI – CSRD Essentials Guidance, to facilitate understanding by stakeholders familiar with the GRI framework.

- Appendix V – Comparison of IFRS and ESRS 1 and 2.
- Appendix VI – Glossary and Acronyms.
- “The Sustainability Dialogue between SMEs and Banks” (Italian Ministry of Economy and Finance – MEF), which provides guidance for companies on communicating ESG information to the banking sector. UNI/PdR 18:2016 – Social responsibility of organisations – Guidelines for the application of UNI ISO 26000.
- UNI 11919-1:2023 – National application model of UNI EN ISO 26000:2020, Part 1: Guidelines for the application of UNI EN ISO 26000 – Guidance on social responsibility.
- UNI 11919-2:2024 – National application model of UNI EN ISO 26000:2020, Part 2: Reporting and accountability processes.
- SRG 88088:2024 Standard on the requirements for the certification of sustainability management systems.
- United Nations 2030 Agenda – Sustainable Development Goals (SDGs), to identify the Organisation’s contribution to the United Nations Sustainable Development Goals.
- OECD Due Diligence Guidance for Responsible Business Conduct (2018), for the implementation of due diligence processes throughout the value chain.

REPORTING BOUNDARY AND REPORTING PERIOD

The reporting boundary of this Sustainability Report coincides with that of FONDMETAL S.p.A. and relates to the activities of the production site, where the Company’s registered office and operational headquarters are located in Italy. Where relevant, the report also considers value chain aspects and indirect impacts, including those relating to its foreign subsidiaries (Fondmetal Automotive USA Corporation, Fondmetal Technologies Srl, and Fondmetal Mexico S. de R.L. de C.V.), although the ESG reporting boundary has not been formally extended to include these entities in the present edition. The Organisation confirms the commitment, already expressed in the previous report, to progressively expand the reporting boundary towards the full inclusion of its subsidiaries in future editions.

The reporting period is the 2025 financial year, corresponding to the calendar year from 1 January 2025 to 31 December 2025. With this edition, FONDMETAL further consolidates its reporting system by introducing, where available, comparative data on a three-year basis (2023–2025) to support the readability of performance trends.

The Sustainability Report is published on an **annual** basis, in line with the Company’s financial reporting cycle. With regard to the disclosure of exceptional events occurring during the reporting period, no exceptional events or significant operational disruptions were recorded during the 2025 financial year.

REPORTING PRINCIPLES

In preparing this Sustainability Report, the following fundamental principles of information quality, in accordance with ESRS 1, have been applied:

- **Relevance:** the report includes information on topics that may substantially influence stakeholders’ assessments and decisions, or that reflect the Organisation’s significant impacts on people, the environment and the economy.
- **Completeness:** the report covers all material topics identified through the double materiality assessment and provides sufficient information to enable an overall assessment of sustainability performance.
- **Accuracy:** the information is presented with sufficient precision and detail to enable stakeholders

to assess the Organisation's performance, including verifiable quantitative data and clearly explained calculation methodologies.

- **Balance:** the report reflects both positive aspects and areas for improvement in an impartial manner, enabling a reasoned and authentic assessment.
- **Clarity:** the information is presented in a clear and accessible manner for all stakeholders using the report, including through tables, charts and cross-references.
- **Comparability:** the information is presented consistently over time in relation to previous editions and, where possible, in a way that enables comparison with other organisations in the sector.
- **Verifiability:** the data are collected, recorded, processed and presented in such a way that they can be subject to third-party verification.

ASSURANCE AND APPROVAL

The 2025 Sustainability Report has been prepared under the responsibility of the Management of FONDMETAL S.p.A., with the coordination of the corporate functions involved in the management of ESG matters (the Sustainability Team). The report has not been subject to external assurance by an independent audit firm.

CONTACTS

For further information regarding FONDMETAL's ESG performance, or to provide comments and feedback on this report, please contact the Organisation at: info@fondmetal.com

FOCUS ON SUSTAINABILITY DUE DILIGENCE AND MATERIALITY ASSESSMENT

PART A — Sustainability Due Diligence

What is Sustainability Due Diligence

ESRS 1 — General Requirements (Commission Delegated Regulation (EU) 2023/2772)
 “Due diligence is the process through which undertakings identify, prevent, mitigate and account for actual and potential adverse impacts on people and the environment connected with their own activities and their business relationships throughout the entire value chain.”

The concept is introduced by the Corporate Sustainability Reporting Directive (CSRD) (Directive (EU) 2022/2464) as a key element of sustainability reporting and is operationalised through the ESRS. It is not a formal requirement limited to external reporting: the CSRD requires due diligence to be a genuine process, embedded in the Organisation’s governance and integrated into its existing management systems.

Before the CSRD, non-financial reporting (Non-Financial Reporting Directive (NFRD), Directive 2014/95/EU) was limited to describing ESG policies and results. The CSRD changes this paradigm: it no longer asks only what an undertaking does in relation to sustainability, but how it manages its impacts and through which process it has identified what is material. Due diligence therefore becomes the driving force behind the sustainability report: without it, sustainability reporting lacks a verifiable methodological foundation.

One of the most significant innovations introduced by the CSRD compared with the previous framework concerns the extension of the scope of analysis: the ESRS require due diligence to consider not only the undertaking’s direct operations, but the entire value chain—upstream (suppliers of raw materials, components and services) and downstream (customers, distributors, product use and end of life). For FONDMETAL, this means that the risks and impacts associated with the aluminium purchased, outsourced processing and the final destination of the wheels produced fall within the Organisation’s scope of analysis and responsibility.

METHODOLOGICAL REFERENCE: THE OECD GUIDANCE (2018)

The OECD Due Diligence Guidance for Responsible Business Conduct is the principal methodological reference for structuring the due diligence process. The Guidance sets out due diligence in six sequential steps and constitutes the operational framework adopted by FONDMETAL, as described in detail in the following section.

THE RELATIONSHIP BETWEEN DUE DILIGENCE AND DOUBLE MATERIALITY

Sustainability due diligence and the double materiality assessment (or materiality assessment) are not parallel and independent processes: the latter is the principal output of the former. It is through due diligence—the analysis of the context, stakeholder engagement, and the assessment of impacts and risks—that FONDMETAL builds the information base on which it then applies the principle of double materiality to determine which ESG topics are sufficiently material to require reporting and action. In the subsequent stages, due diligence continues to support the sustainability report by defining policies, objectives, KPIs and improvement plans for each material topic identified.

STAGES OF THE DUE DILIGENCE PROCESS

Stage	Description	Activities	Output	Main Sources
1	Policies and Management Systems	Mapping of existing corporate policies; integration of due diligence into certified management systems.	Framework of relevant policies and management systems.	Code of Ethics; Integrated Policy; POGE_002_13; certification documentation.
2	Identification IRO	Desk research on comparable sector sustainability reports; analysis of the applicable topical ESRS; stakeholder engagement; analysis of the sector's regulatory and competitive context.	Longlist of IROs by ESG area and value chain segment.	Sector sustainability reports; topical ESRS; outputs from ESG questionnaires; context analysis.
3	Assessment and Scoring	Assessment of impacts; assessment of risks and opportunities; sessions with the Sustainability Team and functional management.	Prioritised IRO table (High / Medium / Low).	Internal meetings; management systems; operational data.
4	Monitoring	Monitoring of the KPIs associated with each material IRO; periodic review by the Sustainability Team; verification of the effectiveness of mitigation measures.	ESG KPI dashboard; periodic reports to Management.	Corporate management systems; ISO 14001 records.
5	Communication	Reporting of IROs and actions in the Sustainability Report.	Sustainability Report	This document
6	Remediation	Definition of remedial measures in line with the UN Guiding Principles on Business and Human Rights.	Documented remediation plans (where applicable).	UNGP; OECD Guidelines (2018).

IRO ASSESSMENT AND SCORING CRITERIA

Negative and positive impacts are assessed on the basis of four parameters, in line with ESRS 1 and EFRAG IG1: scale, scope, irremediability and likelihood.

For ESG risks and opportunities with a potential impact on FONDOMETAL's financial position or access to capital, the assessment considers:

- Likelihood of occurrence: in the short term (<2 years), medium term (2–5 years) and long term (>5 years).
- Potential financial magnitude: estimated impact on revenues, costs, access to credit and regulatory compliance costs.
- Time horizon: a criterion for the classification and prioritisation of IROs within the sustainability strategic plan.

PART B — Double Materiality Assessment (Materiality Assessment)

The principle of double materiality

Double materiality — a fundamental principle of the ESRS — requires each ESG topic to be assessed from two complementary perspectives:

Impact materiality — Inside-out	Financial materiality — Outside-in
How FONDMETAL's activities generate impacts — positive or negative — on people and the environment, over the short, medium and long term.	How ESG matters — risks, opportunities, regulatory and market pressures — affect FONDMETAL's financial performance and strategy.

A topic is considered material — and must be reported — if it exceeds the materiality threshold in at least one of the two perspectives.

Terminology note: the terms materiality and relevance are used interchangeably in this document, in line with the Italian ESG terminology, where the English term materiality refers to the importance and relevance of a topic for reporting purposes.

STAGES OF THE DOUBLE MATERIALITY ASSESSMENT PROCESS

The assessment was conducted for the second consecutive year, in line with the requirements of ESRS 1 and ESRS 2 (IRO-1), involving Management, the main operational functions and an external consultant specialising in ESG reporting.

Stage	Title	Activities	Output	Main sources
1	Context analysis	Analysis of the automotive and aluminium sectors; regulatory trends (CBAM, CSRD, EV transition); competitive environment; FONDMETAL's production-specific characteristics; review of comparable sustainability reports.	Context map for each ESG area.	Sector analysis; comparable sustainability reports; regulatory analysis.
2	Longlist IRO	Identification of potentially material ESG topics based on the 10 topical ESRS, sector-specific characteristics (CBAM, EV lightweighting, aluminium LCA) and the regulatory context.	Longlist of IROs by ESRS standard.	Topical ESRS; EFRAG IG2; sector analysis.
3	Stakeholder engagement.	Administration of structured ESG questionnaires to employees, customers and suppliers (~70%). The feedback collected is integrated into the assessment of IROs in accordance with ESRS 2 SBM-2 and IRO-1.	Materiality score for each ESG topic by stakeholder category.	Outputs from the ESG questionnaires (see the Stakeholder Engagement chapter).
4	Scoring and prioritisation.	Quantitative assessment on a 1–5 scale for each IRO from both perspectives (impact and financial). Integration of stakeholder scores as a weighting factor. Materiality threshold: score >4 out of 5.	Prioritised shortlist of IROs — Double Materiality Matrix.	Sustainability Team workshops; management data; questionnaire outputs.

5	Management validation.	Discussion with Management and the operational functions for the critical review of the IROs and the validation of the identified priorities. Approval by Management.	Final list of material topics.	Internal sessions with Management and the Sustainability Manager.
6	Reporting boundary.	Definition of the eight material topics and development of the strategic plan, including objectives, actions and KPIs.	Materiality Assessment and Strategic Plan chapters of this Report.	This document.

THE ROLE OF STAKEHOLDER ENGAGEMENT IN THE MATERIALITY ASSESSMENT

The results of the ESG questionnaires directly informed the materiality assessment through three distinct functions:

- Input for the inside-out perspective: stakeholders' perceptions of the relevance of each ESG topic contributed to defining the scale and scope of the perceived impacts.
- Weighting factor in the scoring: for topics with convergence across multiple stakeholder categories, the weight assigned in the final assessment was increased.
- Thematic warning signal: topics recurring in the open-ended responses — in particular responsible sourcing, human rights and cybersecurity — contributed to the identification of IROs that may have been underestimated by the desk analysis.

PRIORITY LEVELS AND MATERIALITY THRESHOLDS

The classification criteria are common to both processes (due diligence and materiality assessment):

ESRS–GRI–IFRS–SDGs CORRELATION TABLE

Level	Classification criteria	Implications for reporting
High	IROs with a high score on at least two impact parameters, or with significant financial magnitude and/or high likelihood. For materiality: score >4 on a 1–5 scale.	Reported in detail in the Report; subject to objectives and KPIs within the sustainability strategic plan.
Medium	IROs with a medium score or with localised/ reversible impacts; relevant but with a sufficient degree of control. Score between 3 and 4.	Reported in the Report; monitored through KPIs; candidates for escalation in future editions.
Bassa	IROs with a low score across all parameters; impacts addressed through existing management systems. Score <3.	Included in the IRO table for completeness; monitored without specific short-term objectives.

The following table maps the correlation between the ESRS applied in this Sustainability Report, the corresponding GRI Standards and IFRS S1/S2, the sections of the document where the disclosures are presented, and the related Sustainable Development Goals (SDGs). The Report has been prepared on a voluntary basis in accordance with the ESRS (Commission Delegated Regulation (EU) 2023/2772), ensuring interoperability with the GRI-CSRD Essentials (EFRAG) and with reference to the IFRS S1/S2 standards issued by the ISSB.

Methodological note: FONDMETAL S.p.A. identified eight material topics through a double materiality assessment (ESRS 2 IRO-1). The mapping includes only those ESRS standards identified as material; non-material standards are listed in the Methodological Note of this Report. The GRI and IFRS columns indicate the degree of interoperability but do not constitute a formal statement of compliance with those frameworks.

ESRS Standard	GRI Standard	IFRS S1 / S2	Report Section	SDGs
GENERAL AND CROSS-CUTTING DISCLOSURES				
ESRS 2 – GOV-1 Role of the governance bodies	GRI 2-9 GRI 2-12 GRI 2-13	IFRS S1 – par. 14-20 Governance	Governance and Values — Governance bodies; Board of Directors' oversight of ESG matters; ESG responsibilities within Management.	SDG 16 SDG 17
ESRS 2 – SBM-1 Business model and value chain	GRI 2-1, 2-2 GRI 2-6	IFRS S1 – par. 21-30 Strategy & Business Model	Who We Are — History and values; production of aluminium alloy wheels for the automotive OEM sector; presence in international markets; value chain structure (casting, machining and painting).	SDG 8 SDG 12
ESRS 2 – SBM-2 Interests and views of stakeholders	GRI 2-29	IFRS S1 – par. 21-30	Stakeholders — Stakeholder map; ESG questionnaires administered to employees, OEM customers and suppliers; stakeholder engagement results.	SDG 17
ESRS 2 – IRO-1 Double Materiality Assessment	GRI 3-1 GRI 3-2 GRI 3-3	IFRS S1 – par. 45-60 Risk Management	Sustainability Due Diligence — IRO (Impacts, Risks and Opportunities) table; double materiality assessment; materiality threshold (score >4/5); eight material topics.	SDG 17
ESRS 2 – MDR-M/T Metrics and targets	GRI 2-22	IFRS S1 – par. 33(d) Metrics & Targets	Sustainability Strategic Plan — Multi-year objectives with KPIs for each material topic; 2025 implementation status (achieved / in progress / new for 2026–2027).	SDG 17
ENVIRONMENT — Climate, Energy, Water Resources, Circular Economy				
ESRS E1-1 Climate transition plan	GRI 201-2 GRI 305-1 GRI 305-2	IFRS S2 – 10(a): Transition plan IFRS S2 – par. 14-16	Environment — Climate and Energy: SBTi commitment (GHG target validation expected in 2026); Scope 1 and 2 emissions reduction target; energy efficiency plan and photovoltaic system. [Formal climate transition plan currently under development.]	SDG 7 SDG 13
ESRS E1-4 GHG emissions reduction targets	GRI 305-4 GRI 305-5	IFRS S2 – 33(b): GHG targets IFRS S2 – par. 34-36	Environment — GHG emissions: SBTi targets under validation; Supplier Engagement Target (≥67% of strategic suppliers with GHG reduction targets by 2031); base year 2025.	SDG 9 SDG 13
ESRS E1-5 Energy consumption and renewable energy sources	GRI 302-1 GRI 302-3 GRI 302-4	IFRS S2 – Appendix B Climate-related metrics	Environment — Energy: electricity and thermal energy consumption (natural gas); photovoltaic system; efficiency of melting and painting processes; historical energy consumption data for 2022–2025.	SDG 7 SDG 13

ESRS E1-6 Scope 1, Scope 2 and Scope 3 GHG emissions	GRI 305-1 GRI 305-2 GRI 305-3	IFRS S2 – 29: GHG emissions IFRS S2 – par. 29-32	Environment — GHG emissions: Scope 1 (fuels, melting furnaces, fleet); Scope 2 (purchased electricity); upstream Scope 3 (primary and secondary aluminium). [Full Scope 3 assessment in progress.]	SDG 12 SDG 13
ESRS E2-1/4 Air emissions and VOC emissions	GRI 305-7 GRI 416-1	IFRS S2 – Physical risk (chemicals, regulatory)	Environment — Air quality: VOC and particulate emissions from painting processes; monitoring of Integrated Environmental Authorisation (AIA) requirements; technical measures to reduce emissions.	SDG 3 SDG 12
ESRS E3-1 Water policy	GRI 303-1 GRI 303-2	IFRS S2 – Water-related risks (Physical risk)	Environment — Water resources: water management policy; monitoring of water withdrawals from the industrial water supply network; use in production processes (cooling and painting).	SDG 6 SDG 12
ESRS E3-4 Water consumption and withdrawals	GRI 303-3 GRI 303-4 GRI 303-5	IFRS S2 – Appendix B Water consumption metrics	Environment — Water resources: water consumption by source and use; historical data series; water intensity indicators per unit produced.	SDG 6
ESRS E5-1 Circular economy policy	GRI 301-1 GRI 301-2 GRI 301-3	IFRS S2 – Circular economy (indirect – Scope 3)	Environment — Circular economy: use of recycled (secondary) aluminium as a strategic raw material; research into 100% recycled alloys; product Life Cycle Assessment (LCA); circular management of metal scrap.	SDG 12
ESRS E5-5 Waste	GRI 306-1 GRI 306-2 GRI 306-3 GRI 306-4	IFRS S2 – Waste metrics (Appendix B)	Environment — Waste: industrial waste by type (hazardous/non-hazardous); metal scrap sent for recovery; waste paint, paint sludge and packaging waste; recovery versus disposal rate.	SDG 12
SOCIAL — Workforce, Value Chain, Communities, Consumers				
ESRS S1-1 Policies for the workforce	GRI 401-1 GRI 401-2 GRI 2-7	IFRS S1 – Social capital (par. 29-30)	People — Employment: 2025 workforce data (direct employees and temporary agency workers); National Collective Labour Agreement (CCNL) for the Metalworking Industry; turnover and net balance; contracts by type and gender.	SDG 8 SDG 10
ESRS S1-8 Dialogue with the workforce	GRI 402-1 GRI 407-1	IFRS S1 – Human capital	People — Industrial relations: workers' representative body (RSU); consultation on occupational health and safety (H&S) and work organisation; company-level collective agreements.	SDG 8
ESRS S1-13 Training and professional development	GRI 404-1 GRI 404-2 GRI 404-3	IFRS S1 – Human capital par. 29(b)	People — Training and development: training hours per employee; technical skills development plans (CNC machining, foundry, painting); mandatory occupational health and safety (H&S) training; upskilling programmes.	SDG 4 SDG 8
ESRS S1-14 Occupational health and safety	GRI 403-1 GRI 403-2 GRI 403-9	IFRS S1 – Human capital Health & Safety metrics	People — Occupational health and safety: historical series of workplace accidents (2022–2025); Frequency Index (FI), Severity Index (SI) and Incident Index (II); updated Risk Assessment Document (DVR); ISO 45001 under evaluation; management of specific risks (molten metals, noise, painting).	SDG 3 SDG 8
ESRS S1-16 Fair remuneration	GRI 202-1	IFRS S1 – Social capital Remuneration	People — Working conditions and welfare: remuneration in accordance with the National Collective Labour Agreement (CCNL) for the Metalworking Industry; corporate welfare programme (Metasalute, nutritionist and dentist agreements); gender pay gap [data being collected for future editions].	SDG 8 SDG 10
ESRS S1-17 Diversity and inclusion	GRI 405-1 GRI 405-2	IFRS S1 – Social capital Diversity & Inclusion	People — Diversity and inclusion: workforce composition by gender; presence of foreign workers; integration of people with disabilities; non-discrimination policies.	SDG 5 SDG 8

APPENDICES

ESRS S2 Workers in the value chain	GRI 408-1 GRI 409-1	IFRS S1 – Supply chain Social capital	Responsible sourcing — IRO S7: risk relating to working conditions at non-EU suppliers; ESG Supplier Checklist; Sustainable Supply Code of Ethics; ESG criteria for supplier qualification.	SDG 8 SDG 16
ESRS S3 Local communities	GRI 413-1 GRI 413-2	IFRS S1 – Social capital Community engagement	People — Communities and local area: employment impact in the Palosco (BG) and Valle Cavallina area; local welfare initiatives; dialogue with local authorities and trade associations.	SDG 11 SDG 17
ESRS S4 Consumers and OEM Customers.	GRI 417-1 GRI 416-1 GRI 416-2	IFRS S1 – Social capital Product responsibility	Product quality and safety — IATF 16949; IATF Customer-Specific Requirements (automotive OEMs); zero-defect approach and PPM management; transparency regarding alloy composition and product environmental performance.	SDG 8 SDG 16
ESRS S4 – R&D and product innovation	GRI 416-1	IFRS S1 – Social capital Product innovation	Research, development and innovation — Development of high-recycled-content aluminium alloys; lightweight design for electric vehicles; product Life Cycle Assessment (LCA); collaborations with research centres and OEMs for next-generation wheels.	SDG 9 SDG 13
GOVERNANCE — Business Conduct, Ethics and Cybersecurity				
ESRS G1-1 Code of conduct and governance	GRI 2-23 GRI 2-24 GRI 2-25	IFRS S1 – Governance par. 14-20	Governance and values — Code of Ethics; internal control system; Organisational Model pursuant to Legislative Decree 231/2001; anti-corruption policy; whistleblowing system.	SDG 16 SDG 17
ESRS G1-2 Responsible sourcing	GRI 2-6 GRI 308-1 GRI 414-1	IFRS S1 – Supply chain Governance	Responsible sourcing — Supplier management procedure with ESG criteria (POGE_002); ESG Supplier Checklist; Sustainable Supply Code of Ethics; GHG Supplier Engagement Target.	SDG 12 SDG 17
ESRS G1-3 Anti-corruption and compliance	GRI 205-1 GRI 205-2 GRI 205-3	IFRS S1 – Governance Compliance & Ethics	Governance and values — Organisational Model pursuant to Legislative Decree 231/2001; Supervisory Body; anti-corruption training; zero corruption cases during the reporting period; compliance with Italian Legislative Decree No. 231/2001.	SDG 16
ESRS G1 Cybersecurity and data protection	GRI 418-1	IFRS S1 – Governance Cybersecurity & Data	Governance — Cybersecurity; ISO 27001:2022 certification obtained in 2025; Information Security Management System (ISMS); management of cyber risk in the context of the digitalisation of production processes; compliance with the GDPR.	SDG 9 SDG 16
ESRS 2 – GOV-4 ESG integration into governance	GRI 2-9 GRI 2-10 GRI 2-11	IFRS S1 – Governance par. 14-20	Governance and values — Integration of ESG matters into strategic decision-making; oversight by Management; corporate sustainability reference framework; multi-year ESG plan.	SDG 16
ESRS G1 Regulatory compliance in the automotive sector	GRI 307-1	IFRS S1 – Governance Regulatory compliance	Quality and management systems — ISO 9001, ISO 14001 and IATF 16949 certifications; REACH compliance; compliance with the End-of-Life Vehicles Directive; CBAM (Carbon Border Adjustment Mechanism) under monitoring.	SDG 16
ESRS 2 – Reporting: Access to sustainable finance	GRI 2-22	IFRS S1 – Governance Transparency & Reporting	Methodological Note — Voluntary adoption of the ESRS; interoperability with GRI-ESG Essentials; dialogue with financial institutions on ESG matters; potential green loans and sustainability-linked loans.	SDG 8 SDG 17



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