

Annual Sustainability Report 2023

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ANNUAL SUSTAINABILITY REPORT 2023



Non-financial statement 2023

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We would like to thank everyone at Compagnia Siderurgica Spa who helped us draw up the Non-Financial Statement of the Sustainability Report and all the employees who contribute enthusiastically every day to the company's sustainable development.



Corporate Social Responsibility

Corporate Social Responsibility entails a commitment to incorporate a series of new concepts such as environmental sustainability, ethics in business activities and in interactions with interested parties, as well as business integrity and product liability, in the economic and financial cycle. The company's goal is to embark on a journey that increasingly takes into consideration environmental and social dynamics through more efficient use of resources, production activities, and coordination of its people company wide.

Our company's extraordinary growth entails an obligation for us to increasingly promote sustainable and transparent activities in a constantly changing world.

Sustainability Report

Compagnia Siderurgica Spa is aware of the growing importance of sustainability and the impact it has on the territory; for this reason, top management has decided to undertake a sustainability process aimed at the continuous improvement of economic, environmental and social management. Along these lines, Compagnia Siderurgica is committed to reporting in detail the activities carried out and the goals it intends to achieve in the future, also through the publication of the Sustainability Report.

This report aims to draw attention to global challenges, raising awareness and fostering a desire to contribute to a fair and sustainable future.



1. Letter to stakeholders

Dear all,

I am pleased to present our first Sustainability Report, which analyses data and performance for the year 2023.

This report reflects our ongoing commitment to responsible and transparent business practices, highlighting our progress and challenges in pursuing our sustainability goals.

The sustainability report illustrates our environmental, social and economic impact, as well as the actions we have already taken, some of which we have set as goals, to mitigate negative impacts and maximise benefits for the community.

We are aware of the importance of operating in a sustainable way and are committed to improving our performance so that future generations will not have to suffer the negative effects of our actions today on the world of tomorrow.

Compagnia Siderurgica creates and distributes wealth by contributing to the economic growth of the area it is located in. In creating these values, it is also careful to preserve others such as an informed use of resources, which is why technological innovation is one of the recurring topics in our business management, but appreciation, respect and the safety of the people who work every day to offer our customers top-quality products is no less important.

Compagnia Siderurgica closed the 2023 financial year with a value of production of over 52 million euros, thanks also to its ability to seize the opportunities offered by the market. Employment numbers are constant and statistics show an employee loyalty level that allows the company to have the expertise required to satisfy customer needs.

Compagnia Siderurgica aims to grow its business around the key values it upholds: tradition and innovation, quality, safety, work ethics. In our sector, characterised by operators of different sizes and types of production, it is important to stay abreast of technological innovation, which not only improves the product in terms of quality, but also provides greater protection of the environment, thanks to lower consumption and reduced emissions, and greater protection of people.

Caring for the Human Resources has always been the guiding principle of Compagnia Siderurgica's growth, where training plays a key role both for new hires and mid-career employees. It is in this context that our collaboration with the world of education develops, taking part in internship programmes and career guidance events organised by local schools. These initiatives contribute to school-to-work alternation but also to creating a pool of potential future employees.

I would like to thank everyone who works in Compagnia Siderurgica with commitment and professionalism: by sharing our goals and values, together we can build a greater, more ethical company with a smaller carbon footprint.

The Chairman

Roberto Spezzapria



2. Introduction

Compagnia Siderurgica has decided to expand its strategy also by drawing up this document, the Sustainability Report, addressed to all stakeholders, that outlines its commitment to sustainability and corporate social responsibility, publishing in a transparent manner all the concrete actions it has implemented and intends to implement to face the environmental, social and ethical challenges that will emerge in the coming years.

Analysis and mapping of possible risks and opportunities is the first step in reporting on the company's processes, supplementing its activities with actions aimed at reducing any inefficiencies, preparing action plans aimed at promoting a new culture within the organisational structure that includes diversity across the departments and improving the use of materials.

It is crucial to share this journey with our stakeholders as we believe that the activities we undertake, in addition to becoming a common path, can lead to global awareness of these issues.

Together we can shape a sustainable and responsible future.

To ensure that this document is reliable and to demonstrate its transparency, we have decided to follow the guidelines of the 'GRI Sustainability Reporting Standards' drawn up by the Global Reporting Initiative (GRI).

The Sustainability Report refers to the year 2023 and has been drawn up based on the principles for defining the Accuracy, Balance, Clarity, Completeness, Verifiability and Timeliness of the report, as expressed by the GRI Standards.

An appendix to the document contains the "GRI Content Index" with details of the content reported in accordance with the GRI.

The document is not subject to independent assurance.

3. Mission and principles

Compagnia Siderurgica is a dynamic and clearly structured company that over time has gained an increasingly prominent position on the Italian and European industrial scene, mainly in the sheet metal processing and marketing sector, creating reliability and expertise.

Our company aims to develop innovative, technologically advanced machining processes that respect the environment and its collaborators.

The continuous improvement and desire to excel that governance conveys to every member of Compagnia Siderurgica is reflected in the final product, the result of a continuous evolutionary process that combines passion, attention to detail, and innovation.

The goal of becoming a leader in the reference market, consolidating relations with customers by offering highly qualified professional services, means that, in terms of business ethics and social responsibility, we have to be an important point of reference for employees, customers, suppliers and stakeholders in general.

In addition to aspects linked to the company's history, there is also a vision oriented towards the future and the challenges that our planet and the global context require us to face. In this regard, Compagnia Siderurgica has always been attentive to and aware of issues concerning its carbon footprint and is actively committed to helping achieve a balance between respect for the environment, the wellbeing of people, ethics and full transparency with partners and collaborators.



3.1 Main goals

The goals that the company has set with the publication of its social report are:

- **Transparency**: to provide useful and available information on the quality of the activities carried out from an ethical-social point of view as well as on the interactions between the company and the environment in which it operates, in order to facilitate and improve the stakeholders' understanding of its commitment;
- **Stakeholder engagement**: to provide an overview of performance, introducing an interactive process of corporate communication with stakeholders, enhancing their involvement in the reporting process, accepting feedback and suggestions for continuous improvement;
- Integrity: to give an account of the identity and system of reference values adopted by the company;
- **Relevance**: to set out the improvement goals that the company is committed to pursuing on relevant and significant topics;
- **Continuity**: the approach taken is long-term and reflects not only short-term achievements but also our vision for the future and long-term sustainability goals.



3.2 Methodological note

The sustainability report has been prepared based on the guidelines of GRI Standard: 2023.

This is the first concise edition of the report, with which the company undertakes to undertake a process of annual public reporting on its impacts on the economy, the environment and people, and on how these impacts are managed.

The content of the report has been defined according to the following principles:

- Stakeholder inclusiveness: stakeholders, with whom the company has undertaken a steadfast commitment of interaction and discussion, have been involved in defining the material topics.
- Materiality analysis: topics are dealt with according to their importance from the point of view of both internal and external stakeholders.



- Sustainability context: the report considers all dimensions of sustainability (economic, environmental and social).
- The principles of accuracy, balance, clarity, completeness and verifiability of information.

The reporting boundary of this report has been identified in the action of the company.

Since this is a first edition, it has not been possible to fully implement the principle of comparability with previous years.

With reference to the broader context of sustainable development, understood as 'development that meets the needs of the present without compromising the ability of future generations to meet their own needs', the Sustainable Development Goals (SDGs) of the United Nations 2030 Agenda, which the company has taken into consideration in pursuing economic, social and environmental sustainability, have been indicated.

Finally, as regards the principle of timeliness: reporting began simultaneously with the preparation of the 2023 Financial Statement. Stakeholders will be informed at the time of publication through direct and indirect activities and dissemination through the website and digital channels.

The dissemination of this document will follow two channels:

- externally, with the publication on the website and the availability of hard copies for stakeholders and, specifically, Customers;
- o internally, to shareholders, to create points for discussion in the meetings held during the year.

Where not specified, this document contains quantitative, qualitative and economic information at 31/12/2023.

3.3 Material topics

Compagnia Siderurgica has determined its material topics through a process aimed at identifying and assessing impacts (positive or negative) that saw the involvement of stakeholders and expert consultants on sustainability issues. The company then prepared a materiality questionnaire, consisting of 15 questions, which was administered to representatives of the different stakeholder categories (specifically, employees, customers and main suppliers in terms of the volumes traded with Compagnia Siderurgica). Each respondent was asked to give each question a score from 1 to 5 to establish the materiality, or relevance, of the topic for the company.

The same questionnaire was administered to representatives of the company, to identify correspondence between the stakeholders' assessment on materiality and that of the company.

The final score of each topic is the average of the two. The results of the questionnaire indicated an overall alignment between Compagnia Siderurgica's assessments and those of its stakeholders, with a shared opinion of the priority given to product-related issues (product quality and innovation), stakeholder satisfaction (customer and consumer satisfaction), governance issues (compliance with laws and regulations, product and raw material traceability, image and brand reputation, cybersecurity), and social issues (health, safety and human resources).



4. The company

4.1 Group profile

Compagnia Siderurgica offers its customers over 30 years of experience in the sheet metal processing and marketing sector.

Investments in advanced technologies, the reduction of energy consumption and the improvement of workers' safety have always been the driving force behind the company's growth, solidity and credibility. This has made Compagnia Siderurgica the point of reference for many Italian and European customers, offering a concrete approach for large industries that require not only the highest quality standards but also the appropriate certifications regarding the quality of materials in production processes and compliance with current regulations and the goals that these realities have long since imposed on themselves in their sustainability budgets.

Driven by a commitment to continual improvement, we have expanded and improved our product range to make it highly competitive and aligned with market needs. Our direct relationship with our customers and the skills we use on a daily basis allow us to meet new market challenges with increasingly effective and efficient solutions.

We are a point of reference for all sheet metal processing technologies such as cutting (plasma, laser and oxyfuel), calendering, machining, bending, sandblasting and bevelling.

4.2 History of the Group

Compagnia Siderurgica S.p.a. began operating in 1986 out of a mechanical workshop in Sarcedo.

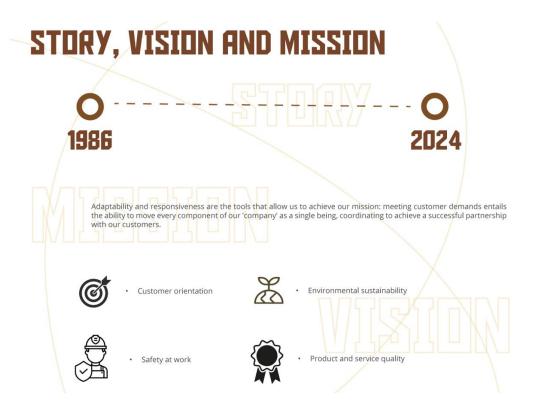
From the outset, the main activity was the machining and cutting of carbon steel sheets. More marginally, the company began to sell an oxy-fuel and plasma cutting fume extraction workbench.

The company's distinctive elements are based on the high level of know-how gained over the years and on a management philosophy that has enabled the development of an organisation capable of guaranteeing a complete service and the answer to all our customers' needs. The high qualitative value of the products and the desire to pursue full customer satisfaction are testified by the company's continuous investments aimed at improving the production processes and by the high level of technical know-how of the personnel who follow periodic and continuous training courses. The degree of organisational efficiency achieved, combined with the experience and state-of-the-art equipment, allows the company to rank among the best Italian and European companies for sheet metal processing.

Ongoing attention to the optimisation of systems and technological innovation is evident from the times in which the company responds to its customers' needs and from the quality of the final product characterised by high precision and excellent finish.

Compagnia Siderurgica carries out its activities at its headquarters - in Via Fossalunga 7 in the town of Sarcedo - which occupies an area of 20,000 square metres.





4.3 Concrete and constant growth

The development and growth that the company has achieved over the years is, once again, the result of continuous innovation. We currently use state-of-the-art machinery, not only from a mechanical point of view, but also from the point of view of energy consumption and operator safety, which is complemented by an organisational set-up designed around the management of all the company's production processes.

Our suppliers are chosen and assessed on the basis of product quality, and punctuality of deliveries, to ensure the supply of excellent products in the shortest possible time, along with their ethical soundness.

The coordination of all operational phases is the result of painstaking study of all the production processes involved, experience gained over the years, and a great deal of enthusiasm.

4.4 A wide range of products and services

To maintain excellent quality standards, we pay attention to three aspects:

- The selection of operators and professionals to carry out work to the highest standards, right down to the smallest detail;
- The use of 4.0 machinery and technologies that simultaneously guarantee quality, efficiency and cost savings;
- The choice of the best suppliers, to supply a high-level product in the set times and with reliable deliveries.







MACHINING CENTRES

- No. 1 ANAYAK 5-SIDE MACHINING CENTRE
- No. 3 MILLING MACHINES (DOOSAN AND SIMAK) No. 1 CMA DRILLING MACHINE

PRESS BENDING DEPARTMENT

- No. 1 BENDING PRESS WITH A WORKING AREA OF 12000 mm OBTAINED WITH TWO MACHINES THAT CAN OPERATE IN TANDEM WITH LENGTHS OF 7000 mm AND 5000 mm AND POWER OF 1000 tons AND 500 tons
- No. 1 BENDING PRESS WITH AREA 6200 mm AND POWER 650 tons
- No. 1 BENDING PRESS WITH AREA 4100 mm AND POWER 200 tons No. 1 BENDING PRESS WITH AREA 4100 mm AND POWER 400 tons
- N. 3 STRAIGHTENING PRESSES

- No. 6 BEVELLING STATIONS
- No. 2 MARKING STATIONS
- No. 1 SANDBLASTER FOR CUT PARTS No. 1 COSTA SANDER

SHEET METAL DEPARTMENT

No. 1 SHEET METAL SANDBLASTER No. 1 ULTRASONIC CONTROL STATION

Sheet metal cutting

Oxy-fuel cutting

Oxy-fuel cutting is a flexible and cost-effective technology for the thermal cutting of sheet metal up to 600 mm thick. The in-house oxy-fuel cutting department, set up when the company was founded, offers long-standing experience and a large machine range, consisting of 6 oxy-fuel plants with a working area of 3,000 x 24,000 mm. The knowhow and equipment available allow the manufacture of parts with thicknesses from 10 mm up to 600 mm. The oxyfuel cutting technology has been implemented with two new solutions: BEVEL and DRILL. Like all our processing operations, these technologies are characterised by high precision and quality.

Plasma

Plasma cutting is the perfect balance between cutting quality, productivity and operating costs. This technique involves the use of a plasma torch. Gas is expelled through the nozzle, creating an electric arc between the electrode and the element. This step transforms the gas into plasma, which brings the metal to the melting temperature and thus performs the cutting operation. Cutting sheet metal using this technology is ideal for the manufacture of carbon steel, stainless steel and aluminium parts, with thicknesses from 3 mm to 40 mm.

Laser

Laser cutting is the solution that combines efficiency and quality. This technique guarantees high precision, speed and versatility. In order to meet customer demands and to complete the production cycle, a 15 kW Laser Bevel fibre cutting system was purchased in 2023 to cut sheet metal up to a maximum length of 12 metres.



Engineering

Fume extraction workbenches for thermal cutting

In addition to focusing on its core business, Compagnia Siderurgica is also highly appreciated as a company specialised in the design, construction and manufacture of fume extraction workbenches for high productivity thermal cutting with CE marking and 4.0 certificates.

Machining

Calendering

Calendering is an indispensable process in the production of pipes or cones from solid sheet metal. Sheet metal calendering is another service offered to customers alongside sheet metal cutting, Compagnia Siderurgica's core business. The calenders used, together with the experience and skill of the operators, allow us to produce and control calendering of various geometric shapes in addition to the traditional cylindrical ones.

CNC machining

To complete the cut product, Compagnia Siderurgica also has a CNC machining department, which offers excellent precision for small machining operations to large, welded structures. This area has modern CNC machining centres, to offer services such as milling, drilling, boring, either to complete the cut part or as contract machining. The parts produced have centesimal precision and are controlled by qualified operators at the sampling stage before production.

Bending

Sheet metal bending is the process that includes a machining step to give the cut component the desired shape. The bending of sheet metal and plates according to drawing is one of the most requested processes by the market available at Compagnia Siderurgica, allowing the specific semi-finished products to be produced to the customer's specifications. The experience of our operators is combined with state-of-the-art 3D development software that recreates the part according to the customer's needs by analysing the feasibility assumptions. This winning combination of skills allows the realisation of bends with high standards of precision and accuracy even in the most complex cases.

Sandblasting

Sandblasting is the best method to clean the surface of sheet metal. The process is performed using metal microspheres projected at high speed onto the surface of the sheet metal. The process is used to clean the sheet metal surface and prepare it for subsequent applications.

Bevelling

Bevelling is the universal solution for the preparation of edges in the welding process. Besides facilitating welding, this process also allows good penetration of the weld pool. Bevelling is a strong point in the supply of semi-finished parts. It can be performed in several ways, i.e. through chip removal, mechanical nibbling or oxy-fuel cutting (Bevel). The staff, highly qualified in bevelling, ensures that the processed product has the best characteristics for correct assembly.

Warehouse and sales

The Company has a large stock of raw materials, ready for sale or processing specifically requested by the customer. The sale of carbon steel sheets in different thicknesses and sizes is also a service provided to complement the services we offer.



Products

- Structural carbon steel
- Hardened steels with high elastic limit for structural purposes
- Wear-resistant hardened steels
- Abrasion-resistant manganese steels
- Steels for boilermaking and pressure vessels
- Steel alloys for high and medium temperatures
- Steels for boilermaking and pressure vessels with Hic Test
- Corrosion-resistant steels (Corten)
- Stainless steels

5. Governance and Compliance

5.1 Corporate Governance System

Compagnia Siderurgica is a company established under Italian law majority-owned by Finspe Srl, a holding company established under Italian law, and by other shareholders. The Board of Directors consists of 5 members and the Board of Statutory Auditors has 3 full members (and 2 alternate ones). The turnover in 2023 was approximately EUR 52 million and the organisation will, in the near future, be subject to Directive No. 2022/2464 concerning sustainability reporting, also called CSRD (Corporate Sustainability Reporting Directive).

5.2 Organisational Structure of Compagnia Siderurgica S.p.A.

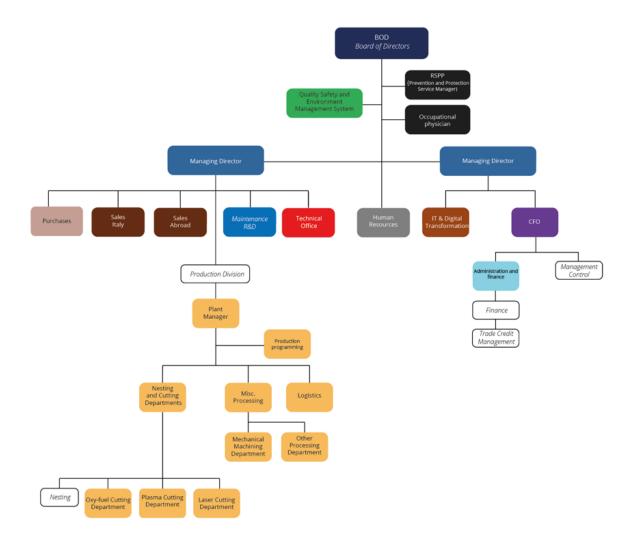


The employees at 31.12.2023 consisted of 14 women and 87 men.

The organisation is shown in specific organisational charts drawn up based on the company management model to which reference is made for further details.



5.3 Organisational Chart



5.4 Main Company Functions (Activities and Services)

Compagnia Siderurgica offers the following services:

- Institutional representation and stakeholder relations;
- Technical consultancy for job orders;
- General contractor;
- Commercial activities;
- Project and organisational service consultancy;
- Staff training.

5.5 Company Compliance

Compagnia Siderurgica S.p.A., recognises as a fundamental principle that of guaranteeing the performance of its activities in compliance with the law, current rules and regulations in the areas in which it operates, as well as the principles and procedures established for this purpose. Indeed, compliance with laws and regulations emerged as a



material topic of sustainability in the activities carried out for the preparation for this Report, i.e. it was widely emphasised by both the organisation and the stakeholders in the materiality questionnaire, confirming it as a priority to be maintained.

In this regard, Compagnia Siderurgica has, since June 2021, adopted an Organisation, Management and Control Model to create a system of rules to prevent and avoid unlawful conduct.

The Model also defines the autonomous powers of initiative and control of the Supervisory Body (henceforth also SB) which, in line with the requirements of Italian Legislative Decree 231/2001, has been appointed by the Board of Directors and has the task of constantly verifying compliance with the rules as of the Model, supervising its operation, proposing its constant updating, and reporting to the Board of Directors itself, which will decide based on the information received. Any reports of breaches must be communicated to this body using the channels set up for this purpose.

On 17.12.2023, the company complied with the regulations set out in Legislative Decree no. 24 of 10 March 2023, which came into force on 30 March 2023 by way of implementation of EU Directive 2019/1967 on whistleblowing. Indeed, it is important to safeguard the privacy, and thus the safety, of anyone who reports any kind of ethical violations and unlawful conduct. It is therefore planned to introduce an IT whistleblowing platform that protects the confidentiality of the identity and personal data of whistleblowers. However, the measure also has an immediate impact on other issues such as personal data protection, IT security and, in general, the governance and monitoring of internal compliance processes.

Adequate information has been given to employees and a training programme is being set up as required by the regulations.

Policies have been published on the company website and access has been provided to the secure channel for any grievances of third parties and stakeholders regarding any wrongdoing.

The task of managing the channel was assigned to the Supervisory Body.

The company supports and promotes actions aimed at ensuring that its internal and external operations are carried out in accordance with the principles of ethics and integrity: in carrying out their functions, everyone who works in the name of and on behalf of Compagnia Siderurgica is required to adopt a conduct inspired by transparency and moral integrity, in particular the principles of honesty, fairness and good faith.

The company is aware of the risks and consequences arising from the breach of mandatory or self-regulatory rules and of the related possible judicial and administrative sanctions, as well as the reputational damage that may be caused as a direct consequence of any inappropriate or unlawful conduct of its employees and/or collaborators. Therefore, all Compagnia Siderurgica employees are required to comply with current laws and internal company regulations and to behave in a proper manner, regardless of their role and function within the company.

To this end, the company aims to consolidate and promote the ethical-corporate responsibility of its business activities also by adopting a Code of Ethics, pursuant to the provisions of Italian Legislative Decree 231/2001. Although the law does not require companies to have a Code of Ethics, it was considered of fundamental importance to formalise the set of values, ethical principles and behavioural rules underlying the company's actions and responsibilities with its stakeholders by sharing them with everyone who comes into contact with the company.

The Code of Ethics outlines all the fundamental values for the group:

 a collaborative spirit as a means of achieving internal cohesion and of creating an environment inspired by the criteria of equality and mutual respect;



- a meritocratic criterion with which it remunerates its employees by assessing their professionalism, experience and ability to achieve the goals assigned in absolute compliance with the law;
- pursuit of its economic, productive and corporate goals in compliance with legality, fairness and transparency of action;

The Code of Ethics is not a substitute for national or international standards, but is a supplementary document aimed at reinforcing their principles. The addressees, specifically employees, directors, collaborators, consultants, agents, auditors and independent auditors, are required to comply with the provisions, rules and principles contained in this document.

Compagnia Siderurgica will not tolerate any kind of corruption, whether active or passive, and is committed to complying with anti-corruption laws. The company assumes and promotes the fulfilment of any legislative initiative aimed at encouraging ethical and responsible business conduct, condemning any form of activity aimed at altering the rules of the market.

Anti-corruption, unfair competition and antitrust are covered by the 231 Management Model, the Code of Ethics and Policies defined by the Company.

For in-depth examination, please consult the Code of Ethics published on the company website.

5.6 Company policy

Compagnia Siderurgica has always been a point of reference in improving the services offered to the customer by respecting the requirements and expectations of the parties concerned. In this regard, it pays special attention and care to the working areas of the plants, always in compliance with the regulations in force and the health and safety of workers.

The Company has implemented an Organisation, Management and Control Model (MOG), also commonly referred to as an integrated management system, in accordance with the requirements of ISO 9001:2015 and ISO 14001:2015, in order to achieve internationally recognised standards for identifying, managing and monitoring all significant aspects related to the quality of our service, as well as the environmental aspects impacting our business, both in terms of legislation and its own voluntary improvement.

For in-depth examination, please consult the corporate policy document published on the company website.

6. Our customers. Innovation and Technology

6.1 Technical support and service

Compagnia Siderurgica, based on the experience gained, has equipped itself with a complete range of machines and equipment dedicated to satisfying the multiple demands of its customers in the field of sheet metal processing, both from heavy plate and coils. Founded as a company exclusively dedicated to sheet metal cutting using oxyfuel technology, over the years it has added machines for plasma and laser cutting. It has also developed, with an everincreasing level of specialisation, all the processes necessary to provide a complete service to the customer, such as deburring, bevelling, straightening, punching, bending, machining and assembly by welding.

Acclaimed for the quality, productivity and reliability of its organisation, Compagnia Siderurgica caters to customers that are 'market leaders' in the various markets and that operate in any product sector that needs to use ferrous material.

All companies in the world of metalworking are also potential customers.



6.2 Logistics

Between 2021 and 2022, the company built a 5,245 square metre extension, of which 3,200 sqm are used as a shipping department. The increase in the production surface area has led to a review of production layouts to make the sheet metal machining processes more efficient and significantly reduce production inefficiencies, conveying material along a logical path from the raw material warehouse to the area dedicated to packaging and shipping.



6.3 Research and development

Consolidated experience gained over time, combined with research and development activities, allows Compagnia Siderurgica to offer its customers innovative solutions that are always in keeping with each specific requirement thanks to state-of-the-art processing and products.

The constant technological upgrading of the activities is the result of the company's research and development, which has introduced experience and skills over time, becoming a real asset for the company.

6.4 Customer satisfaction

Customer satisfaction is a crucial element for the success of any company, and for Compagnia Siderurgica as well; indeed, this topic was the material topic with the highest score both for the organisation and for our stakeholders. Careful analysis of customer needs enables assessment of the effectiveness of the services offered and identification of areas for improvement.

Compagnia Siderurgica gathers feedback from its customers by sending out an MOS 2.16 satisfaction questionnaire, but also by maintaining constant relations with them, through targeted visits by area managers, and through constant telephone contact.



We are convinced that the relationship must always be a top priority with a view to customer loyalty.

7. Sustainability at Compagnia Siderurgica S.p.A.

7.1 Approach to sustainability

In the Sustainability Report, Compagnia Siderurgica reports not only on aspects related to the impact of its actions in the environmental, social, economic and governance spheres included in its mission, but also takes into consideration the stakeholders involved.

Therefore, the aspects of materiality (which include relevant topics and issues regarding responsibility of action) interact with the concept of interested parties and stakeholders, i.e. the subjects (individuals, groups, organisations, companies) that are affected in any way by the organisation's activity: due to interests, rights, legitimate expectations, or business relations, or in any case due to possible external effects (positive or negative) that derive from the transactions carried out by the organisation.

7.2 Stakeholder engagement

The achievement of Compagnia Siderurgica's corporate goals is the result of constant dialogue with all internal and external stakeholders. This dialogue enables the company not only to understand the needs, interests and expectations of its stakeholders, but also to identify the best ways to generate shared value.

A clear and precise sustainability strategy first identifies the organisation's typical stakeholders by assessing their relevance to the organisation itself. Compagnia Siderurgica has identified different categories of stakeholders starting from an analysis that takes into consideration a number of companies operating in the relevant sector. We have selected our stakeholders considering their business activities and their social role in the context they operate in. The table below shows the main stakeholders and their respective relationships with the company, as well as typical moments of interaction by stakeholder category.

STAKEHOLDERS	RELATIONSHIPS WITH THE COMPANY	MOMENTS OF INTERACTION
CUSTOMERS	EXTERNAL	Frequent by e-mail, telephone, visits
MEMBERS/ SHAREHOLDERS	INTERNAL/EXTERNAL	Daily, in person
EMPLOYEES	INTERNAL	Daily, in person
SUPPLIERS	EXTERNAL	Personal meetings with the main suppliers, or by telephone
ENTITIES, INSTITUTIONS, TRADE ASSOCIATIONS	EXTERNAL	Depending on needs/opportunities
LOCAL COMMUNITIES	EXTERNAL	Depending on needs/opportunities

7.3 Sustainability management: the integrated quality-environment system

As mentioned in section 5.6, the company has introduced an integrated management system certified according to ISO standards concerning quality and environment and aims as a short-term goal (2024) to include safety (ISO 45001:2023) and energy (ISO 50001:2018) certifications.



7.4 Quality certification

The quality of the materials processed and their traceability are essential conditions that identify and give the right image of our company in the market it operates in.

Each supply is accompanied by certificates of the raw material. The material is only of EU origin.

The company uses Accredia-certified laboratories for supplementary tests or analyses, with the issue of test reports, to complete the documentation supplied.

The company is UNI EN ISO 9001:2015 and EN 1090 (Execution Class EXC4) certified.

7.5 Trade and industry associations

Compagnia Siderurgica is a member of Confindustria (General Confederation of Italian Industry). Relations with the Association are of a consulting and training nature. Therefore, depending on the need and topic, the Association is contacted to receive an informed opinion on the questions of interest. Moreover, the company takes part in training meetings depending on the topics of interest to the company.

The annual meeting of Confindustria is an important moment to present and discuss the entrepreneurial fabric of the territory.

Compagnia Siderurgica is also registered with SiderWeb that provides a whole series of surveys and prospective analyses on raw material trends. We also attend the meetings organised, which are useful from a training point of view but also for networking as they represent an excellent opportunity to meet and compare notes with other sector operators.

7.6 Environmental certification

Compagnia Siderurgica has also supplemented its quality management system with an environmental management system that complies with the requirements of UNI EN ISO 14001:2015.

As regards environmental management, the following significant environmental aspects have been identified, correctly managed and are constantly monitored:

- Fire prevention;
- Atmospheric and greenhouse gas emissions;
- Water resources;
- Energy resources;
- Waste management.

Processes are regularly and formally controlled in order to minimise their environmental impact, bring them into line with environmental legislation and make them adaptable to any future environmental requirements that the market may demand in the short and medium term.

The certification of compliance with ISO 14001 is a tangible demonstration of a commitment pursued over time and a responsible and informed philosophy.

Supplementing the integrated system with certifications related to the management of safety aspects (i.e. compliance with UNI EN 45001:2023), and energy aspects (compliance with UNI CEI EN ISO 50001:2018) is also planned as a goal for 2024.



7.7 Goals

The company actively strives to interpret its goals and activities according to the 17 Sustainable Development Goals (**SDGs**) proposed in Agenda 2030, adopted on 25 September 2015 by the United Nations General Assembly.

The proposed activities and goals for the 2023-2025 three-year period are detailed below.

7.7.1 Activities and Goals of Compagnia Siderurgica for the 2023-2025 three-year period

Area	Specific Goal	2023	2024 Goals	2025 Goals
	Obtain ISO 45001 - 50001 certification		х	
	Accident reduction, near miss investigation and accident/incident analysis	х	x	x
	Ensure the proper handling of the personal data of natural and legal persons according to European Regulation No. 679/16 (GDPR)	x	x	x
	Designate a Data Protection Officer (DPO)	х		
Social goals	Confirm and update the Register of Data Processing Activities (Privacy Register)		x	
(safety, well-being, privacy)	Maintain non-occupational accident insurance at the company's expense	x	x	x
	Maintain supplementary health insurance with Metasalute	x	x	x
	Increase the number of employees trained in the use of defibrillators (at least 2 more than at present)		x	
	Offer ESG training to all employees			x
	Evaluate activities aimed at fostering a good internal climate		x	
	Evaluate compliance of rainwater collection with law		x	
	Formalise operating instructions for goods storage as a function of the discharge of rainwater into the sewer system		x	
Environmental goals	Install and commission a new photovoltaic system	х	x	
(water, energy, environmental management)			x	
	Extended air quality monitoring (for at least one week)		x	
	Maintain ISO 14001 certification	x	x	х
	Calculate plastic waste reduction from the water distributor project		x	
Governance (cyber security, ethics,	Amend 231 model to incorporate the new whistleblowing regulations	x		

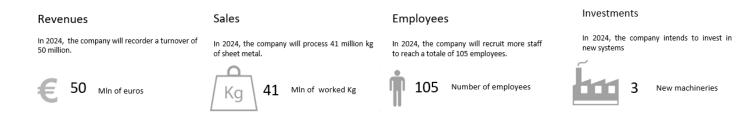


quality, supply chain) and/or economic goals	Implement at least one training session on other areas linked to the core business (e.g. whistleblowing)		x	
	Review policies and transmit to all employees	х	x	х
	Maintain the awareness projects programme	х	x	x
	Implement at least 2 awareness initiatives through short training events	х	x	x
	Implement IT regulations	х		
	Organise at least 1 employee awareness event (code of ethics and adoption of necessary measures, IT regulation, dematerialisation, etc.)		x	
	Include ESG criteria on the supplier assessment form		x	
	Include obligation to sign the code of conduct		x	
	Maintain ISO 9001 Quality Management System certification	х	x	х
	Draw up a sustainability policy that covers all processes, structures and services		x	

The activities for the year 2023 have already been fully implemented, in line with the proposed programme.

The goals for 2024 follow a regular schedule in the company's activities, so they are expected to be achieved

Budget 2024



8. Environmental Sustainability, acting for the future

8.1 The supply chain

In a highly competitive sector like that of steel and metals, it is fundamental to create an efficient supply chain that can mitigate the risks caused by the ever-growing logistical crises, the scarcity of raw materials and the possible interruption, even partial, of foreign market channels.

Analysing the 47 suppliers considered to be the most relevant (i.e. those with a purchasing flow of more than 50,000 euro), and who in total account for 96% of the economic volume of purchases made during the year, it emerged that almost all of them come from within a radius of less than 400 km.

Our supply chain is regularly monitored, and supplier evaluation is contemplated in the integrated management system, which regularly analyses the supplier database and highlights any critical issues.



Environmental certification and policy

For Compagnia Siderurgica, the environment is a basic resource for the community and, as such, must be safeguarded. Respect for the environment and a commitment to sustainability are imperative values.

To this end, activities are planned, pursuing a balance between economic and environmental needs, in compliance with applicable laws and regulations, offering the public authorities in charge of controlling, monitoring and protecting the environment its full cooperation.

This is why Compagnia Siderurgica has brought its environmental management system into line with the requirements of UNI EN ISO 14001:2015, as already detailed in section 7.6.

8.2 Energy Management

Energy is an extremely sensitive issue for the steel and metals industry, being both an environmental and economic aspect that is highly relevant to the current context. Aware of our responsibility as manufacturers of semifinished products with a major environmental impact, one of our goals is to constantly monitor energy indicators through the integrated management system, and to improve them.

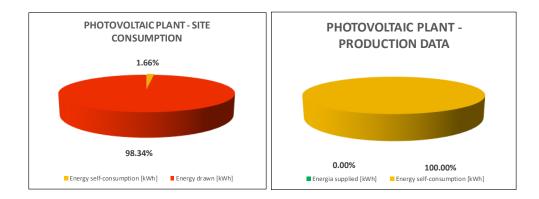
The energy sources used by Compagnia Siderurgica are:

- natural gas, for the operation of the thermal power plant and cutting plants;
- fuel, for the operation of the company fleet;
- electricity purchased from the grid.

The company installed a 42.2 kW photovoltaic plant in 2011. This will be supplemented with a further 300.12 kW for a total of approximately 342 kW, as of 2024. The plant is managed by a technical partner and is used for our own consumption needs.







The tables above indicate the percentage of self-consumption without the new photovoltaic system installed at the end of 2023, which will increase self-generated energy production to around 20% of the total consumed.

The tables below indicate the consumption of each source, represented separately.

Electricity consumption

Year	Tot kWh	Production ton/year	Energy Index	Тер
2021	2,217,380	41,808	53.037	510.00
2022	2,148,532	35,863	59.909	494.16
2023	2,101,683	38,700	54.307	483.39



Natural gas consumption

Year	Tot m3	Production ton/year	Energy Index	Тер
2021	7,081	41,808	0.169	5.79
2022	6,315	35,863	0.176	5.18
2023	7,642	38,700	0.197	6.27

Fuel consumption

Year	Tot litres	Production ton/year	Energy Index	Тер
2021	47,828.00	41,808.00	1.1440	43.91
2022	45,477.00	35,863.00	1.2680	41.75
2023	45,263.02	38,700.00	1.1695	41.55

8.3 Atmospheric emissions

The question of atmospheric emissions is priority for the metalworking sector as a whole; the company has therefore been monitoring this aspect for many years.

Compagnia Siderurgica S.p.A., in fact, is subject to the AUA (Single Environmental Authorisation) Decree no. 308/2023 of 19/12/2023 as a result of the plant modifications of the new investments made. The decree is valid for 15 years from the date of issue (it expires on 12/2038).

Furthermore, the presence of the integrated management system allows the company to properly monitor and manage the correctness of the analyses and their results.

With regard to greenhouse gas emissions, the organisation's carbon footprint (inventory of greenhouse gases, GHG) was assessed for the first time for categories 1 and 2, according to ISO 14064-1:2018.

Category 1 (or scope 1): direct emissions inside the company's infrastructure (headquarters and company vehicles)

- Fuel for the company fleet and facilities;
- Gas for heating and operations;
- Any topping up of greenhouse gases, e.g. in cooling equipment.

Category 2 (or scope 2): Indirect emissions from purchased energy

- Electricity.

The results of this first year 2023 are as follows:



Emission categories	tCO2e	Emission factor	Source of emission factor		
Category 1: Direct GHG emission and elimination					
Direct emissions from stationary combustion (natural gas)	16.20	53.115	EPA, "Emission Factors for Greenhouse Gas Inventories," Table 1 Stationary Combustion Emission Factors, March 9, 2018		
Direct emission from mobile combustion (diesel)	122.17	10.216	EPA, "Emission Factors for Greenhouse Gas Inventories", March 9, 2018; WRI, GHG Protocol - Emission Factors from Cross-Sector Tools, April 2014		
Category 2: Indirect emissions from purch	ased energy cons	umption			
Indirect emissions from imported electricity	535.93	0.255	National energy mix Italy. ISPRA 2023		
TOTALE	674.30				

Note: the quantification was carried out using the GHG Protocol "GHG emission calculation tool"; the calculation was made internally and was not verified by an independent body. The possible extension and validation of the quantification will be subject to evaluation in the company to decide on its inclusion as a short-term sustainability goal.

8.4 Water management

The Company promotes an informed and responsible use of water resources and implements actions to reduce and contain its consumption in the medium and long term, also through specific monitoring. The environmental management system implemented by the company provides for continuous monitoring of consumption to detect any leaks due to possible breakages in pipes and systems, or to their improper use. Water can be used both for hygiene-health purposes and in the production cycle.

In line with the integrated management system, storm and runoff water in the fenced courtyards is constantly monitored.

Consumption in recent years is detailed below; it should be noted that the water intensity (i.e. water consumption related to annual production) shows steadily decreasing values.

Year	Tot m3	Production ton/year	Water intensity
2021	1035	41,808	0.025
2022	849	35,863	0.024
2023	834	38,700	0.022

8.5 Waste

Compagnia Siderurgica contributes to environmental protection, taking the utmost care to avoid any discharge and illegal emission of harmful materials and complying strictly with the specific prescriptions for the treatment of waste or processing residues that are considered to be hazardous.



The processing carried out has a low environmental impact because no chemicals that could create air or surface pollution are used.

In general, the waste produced in 2023 mainly comprises production waste (99.4%), i.e. ferrous waste, which is generally a category recovered almost in its entirety.

Type of waste	Kg produced in 2023
Ferrous waste	8,325,400.00
Packaging	33,180.00
Ancillary materials (filters, emulsions, discarded equipment, insulators, etc.)	13,230.00

Waste management complies with legislative requirements and therefore the company produces an annual MUD (Unique Environmental Declaration) document indicating the EWC codes transported during the year.

WASTE 2023					
EWC	DESCRIPTION	TOTAL in KG			
0.80318	Used printer toner cartridges, other than those mentioned in point 080317	50			
120101	Filings and shavings of ferrous materials	102,260			
120102	Dust and particles of ferrous materials	889,460			
120109*	Emulsions and solutions for machinery, not containing halogens	4,260			
120199	Wastes not otherwise specified, ferrous scrap	7,333,680			
130113*	Other oils for hydraulic circuits	2,720			
150101	Paper and cardboard packaging	5,120			
150103	Wood packaging	17,860			
150106	Mixed material packaging	10,200			
150203	Absorbents, filtering mat., rags and protective clothing, other than those mentioned in point 150202	530			



160211*	Discarded equipment containing chlorofluorocarbons, HCFCs, HFCs	480
160214	Discarded equipment other than that mentioned in points 160209 to 160213	1,410
160216	Parts removed from discarded equipment, other than those mentioned in point 160215	1,410
170904	Mixed construction and demolition wastes, other than those mentioned in points 170901, 170902 and 170903	1,860
120121	Tool bodies, used grinding material, materials other than those mentioned in point 120120	210
150202*	Absorbents, filtering mat., rags and protective clothing contaminated with hazardous substances	220
160601*	Lead batteries	80

Processing waste is ferrous scrap consigned to a specialised company that regenerates it, creating new raw material.

All suppliers used by the company for waste treatment are considered local (maximum distance 20 km from headquarters).

9. Social Sustainability, the Values of a Group

9.1 The people of Compagnia Siderurgica

Human resources play a crucial role in the company, as they are the driving force behind success and growth. From recruitment to personnel management, the skills and motivation of employees directly affect operational efficiency and innovation. Investing in the growth of human resources helps create a positive environment, fosters internal talent and promotes corporate cohesion, key elements for meeting challenges and achieving sustainable results in the long term.

This is why the company invests consistently in order to create and maintain a cohesive and motivated working environment. Refresher courses and listening are the basis for creating, developing and maintaining the professional skills of each employee while always paying due attention to personal well-being.

In 2023, Compagnia Siderurgica employed a total of 101 people, 96 per cent of whom were full-time employees and four people had a part-time employment agreement. All employees, with the exception of two people, were employed on a permanent basis, a sign of the company's desire to create a stable team with long-lasting relationships in order to share and pursue a long-term vision.

The company complies with the legislative requirements concerning health care according to the provisions of the national collective labour agreements (CCNL).



9.2 Protection of human rights and non-discrimination

We promote the respect and protection of the person's moral, cultural, physical and professional integrity in order to foster the growth of the professional capabilities of each member of staff and, consequently, the growth of the entire company.

The behaviour of the people who work with and for the Company in contact with customers, employees, suppliers, as well as with the community and the institutions that represent it, must always be inspired by the principles of honesty, fairness, impartiality and the absence of prejudice. The people and collaborators involved in the company's activities are a strategic and valuable resource and must contribute to the development and growth of professional assets. To increase the competitiveness and value of the company itself, the respect and protection of the person and of their moral, cultural, physical and professional integrity is promoted. Therefore, the people who work with and for the Company are required to avoid any form of discrimination, whether based on race, nationality, gender, age, disability, state of health, sexual orientation, political or trade union opinions, philosophical views or religious beliefs.

With regard to the composition and diversity of the company's work team, 7% of employees are covered by Law 68 supporting disabled labour, and 5% are of foreign nationality. Female employees make up 13%, which is in line with other companies in the sector.

9.3 Training and resource development

Compagnia Siderurgica promotes activities aimed at enhancing and increasing the skills, abilities and knowledge of each employee, whether of a professional or relational nature, aware that a healthy environment not only favours the employee's quality of life but also maximises the achievement of the company's goals, making them not only those of the company but also personal.

Training and resource development plans are drawn up on a programmed way. Training courses not only represent an opportunity for professional growth but also a valuable opportunity to meet and compare notes with colleagues.

The company offers its employees training on both the generic and specific obligations of the work activities required by law. However, in addition to regulatory compliance, it also offers additional training on topics that are considered most relevant to people's awareness and their continuous improvement.

9.4 Welfare and performance evaluation

Integrating corporate welfare programmes with performance appraisal is a key strategy to improve employee welfare and working efficiency.

Offering benefits such as health insurance, non-occupational accident insurance and personal growth programmes not only promotes individual well-being, but also contributes to an inclusive and people-oriented corporate culture.

This is why the company has set itself the goal of implementing a performance appraisal process, linked to clear and transparent goals so as to acknowledge and reward employees' contribution to the company's success. This synergy between welfare and performance appraisal can increase employee satisfaction, reduce turnover (although this is not currently a particularly significant figure) and create a working environment that fosters individual and collective growth.

In 2024, a training course will be organised for managers that will create added value not only for the managers themselves but, by extension, for all employees.



9.5 Health and safety

Compagnia Siderurgica operates in accordance with both national and international best practices, following the logic of containing risks related to the health and safety of its workers. Special attention and great commitment is paid to issues related to the health and safety of workers, which represent fundamental and imperative topics on which to operate through prevention, technological development, training and continuous monitoring.

Safety issues are dealt with by a specially set-up committee, adopting all organisational, management and technical measures, continuous adaptation to new technologies, adoption of up-to-date personal protective equipment, and development of training courses.

Specifically, the Company and all its employees are required to:

- comply with current legislation on health and safety at work;
- disseminate information on company risks to all workers, and constantly train them on the work they perform;
- ensure the consultation, participation and awareness of workers on occupational health and safety issues;
- define and implement production processes and activities with criteria able to prevent possible accidental events, safeguarding the safety and health of workers and the population, adopting systems with high safety standards;
- favour all activities aimed at achieving the identified safety goals;
- prioritise preventive actions and internal investigations to protect workers' health and safety, so as to significantly reduce the probability of accidents and injuries occurring.

Compagnia Siderurgica, therefore, works to guarantee:

- The physical and moral integrity of its collaborators;
- Working conditions that respect individual dignity;
- Safe and healthy working environments.

The Company is required to constantly monitor all risks related to worker safety, also in relation to the lay-out and organisation of workplaces in such a way as to ensure adequate accident prevention and a clean, healthy and safe working environment.

For more details, please refer to the Compagnia Siderurgica risk assessment document.

9.6 Support for local communities

The responsibilities and impacts of Compagnia Siderurgica's activities are recognised not only within Compagnia Siderurgica itself, but also and above all in the community, especially the local one.

In recent years, the company has taken part in various community-led initiatives:

- Cultural and sports sponsorships;
- Volunteer support project:
- Support for the "Ci sto a fare fatica" project organised by the Town of Sarcedo to employ young people in useful jobs during the summer;
- Participation in the Welfare Care project and Telethon.



10. Work sustainability

Compagnia Siderurgica is attentive to the principles of Sustainable Work as it guarantees personal dignity, contract safety, safe working conditions, fair income, equality and personal well-being. It combats all forms of exploitation and opens the door to dialogue with people on these issues.

Sustainable Work creates living and working conditions that support people so that they can develop their professionalism and remain active throughout their lives in a perspective of constant employability, ensuring an adequate balance between personal and working life and satisfaction for the individual and the organisation; it eliminates factors that discourage or prevent people from entering, staying or growing in the labour market by creating conditions that enhance individual contribution, ensuring fairness and inclusion for all.

Work Sustainability must be developed consistently with ESG standards without compromising the ability of future generations to enter or remain in the labour market, avoiding the waste of human and environmental resources, investing in skills, innovation and relationships.

Indeed, also following the goal of creating a solid and efficient team, during 2023 the company took part in initiatives such as:

- Careers guidance for seventh graders;
- Company internships organised by vocational schools;
- PCTO (Paths for soft skills and orientation) guidance for secondary school students.

11. Appendix

11.1 ICS and the Sustainable Development Goals in the 2030 Agenda

To be in line with the global challenges that the present day poses, and to begin a path of aligning institutional activity with the tools globally used to report on efforts towards sustainable development, Compagnia Siderurgica has begun to incorporate some of the goals and activities set out in the 17 Sustainable Development Goals (SDGs) proposed in the 2030 Agenda, adopted on 25 September 2015 by the United Nations General Assembly. The SDGs goals and targets included in the activities carried out by Compagnia Siderurgica are listed below.

SDGs GOAL	TARGETS	COMPAGNIA SIDERURGICA ACTIVITIES
Best for all people and all ages	3.8 Achieve universal health coverage, including financial risk protection, access to quality essential health-care services and access to safe, effective, quality and affordable essential medicines and vaccines for all.	Supplementary healthcare coverage with Metasalute.
Ensure inclusive and equitable quality	4.4. By 2030, substantially increase the number of youth and adults who have relevant skills, including technical and vocational skills, for employment, decent jobs and entrepreneurship.	Staff awareness raising programme via a proprietary app and continuous short training courses (outside the compulsory safety training programme)
education and promote lifelong learning opportunities for all		



Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all.	8.3 Promote development-oriented policies that support productive activities, decent job creation , entrepreneurship, creativity and innovation, and encourage formalization and growth of micro-, small- and medium-sized enterprises including through access to financial services.	 Goals to improve internal work such as: Internal climate analysis Training programme to raise awareness on various topics Implementation of a robot line to transport material inside the plant
	8.5 By 2030, achieve full and productive employment and decent work for all women and men, including for young people and persons with disabilities, and equal pay for work of equal value.	
Promote just, peaceful and inclusive societies for sustainable development, providing access to justice for all, creating effective, accountable and inclusive institutions at all levels	 16.6 Develop effective, accountable and transparent institutions at all levels. 16.7 Ensure responsive, inclusive, participatory and representative decision-making at all levels 16.10 Ensure public access to information and protect fundamental freedoms, in accordance with national legislation and international agreements 	Implementation of necessary improvements in the following areas: - Data protection and privacy - Cybersecurity - Code of Ethics - IT regulations - Dematerialisation
Strengthen the means of implementation and revitalize the global partnership for sustainable development.	 17.13 Enhance global macroeconomic stability, including through policy coordination and policy coherence 17.17 Encourage and promote effective public, public-private and civil society partnerships, building on the experience and resourcing strategies of partnerships. 	 Predominantly short supply chain (see section 8.2) Constant monitoring of the supply chain through the integrated management system (quality-environment) Goal of implementing the safety and energy management system (ISO 45001 and ISO 5001) with assessment of the supply chain for these topics in the near future