

# Ugitech Europe Sustainability Report

2025



Swiss  
Steel  
Group

Classification : public

# Introduction

The scope of this report includes all French (*Ugitech SA*), Italian (*Ugitech Italia*), and German (*Smez*) sites. It aligns with the requirements of the six Sustainable Development Goals (*SDGs*) selected by the Swiss Steel Group: *SDGs* 7, 8, 9, 12, 13, and 17. This document aims to present the progress made, the commitments undertaken, and the roadmap for the coming year.



This sustainability report was produced in collaboration with the communications agency Signature, which has been working with Ugitech in this area for four years. In 2025, the agency was awarded the “Agencies Actives” certification, a Corporate Social Responsibility (*CSR*) label that evaluates agencies’ commitment to specific issues: eco-design, accessibility, corporate philanthropy, mobility, and governance.

Cover photo: The Roselend Dam and Lake, commissioned in 1962, a major hydroelectric project in the Beaufortain region (Savoie), closely linked to the history of hydroelectric power in the Alps and contributing to the electricity supply for the Ugitech site in Ugine

## Power tomorrow.



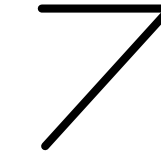
# Synchronise life.



**Make steel  
matter.**

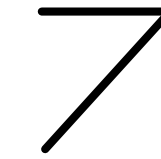


## INTRODUCTION



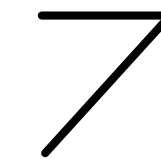
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## ENVIRONMENT



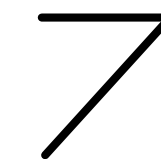
- 17 - Climate change
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## SOCIAL



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# Editorial

## **Combining sustainability, competitiveness, and transformation: a clear industrial vision.**

In a rapidly changing industrial environment, Ugitech, a subsidiary of Swiss Steel Group, continues to steadfastly pursue its commitment to responsibility and sustainable performance.

This 2025 Sustainability Report builds on our Extra-Financial Performance Statements. It reflects our commitment to transparency, risk management, and responsible value creation, by fully integrating Environment, Social, and Governance (ESG) issues at the heart of our strategy. Based on a rigorous double materiality analysis of Swiss Steel Group, structured governance, and the collective engagement of our teams, it clearly presents our business model, our levers for value creation, and the concrete actions we have implemented to address the challenges of the ecological and societal transition.

Our industry operates in a challenging environment, marked by geopolitical tensions, market volatility, and pressures on supply chains. At the same time, the green transition is profoundly transforming industrial models, accelerating technological disruption, and redefining standards for performance, traceability, and the environmental footprint of the metallurgy sector.

In this context, Ugitech is convinced that sustainability is a key driver of competitiveness and resilience.

Reducing environmental impacts, improving industrial efficiency, ensuring safety and employee engagement, and upholding ethical and reliable practices: these commitments directly strengthen the robustness and sustainability of our industrial model.

We have chosen to be a committed leader and driving force in the sector's transformation, by investing in technological innovation and the development of skills. This approach is fully aligned with our O2 corporate strategy, which is based on the conviction that industrial performance, environmental responsibility, and social commitment are inseparable. The success of this transformation depends above all on the women and men of Ugitech, whose expertise and commitment are crucial. I would also like to thank our partners and customers, with whom we are building the future.

In this report, Ugitech asserts that the stainless-steel industry can be a driving force for change by combining operational excellence, responsible innovation, and a strong local presence.

Stainless steel is indispensable, essential, inherently durable, and infinitely recyclable.

**“Let's make steel essential for a future that matters!”**

**Raphaël Rey**

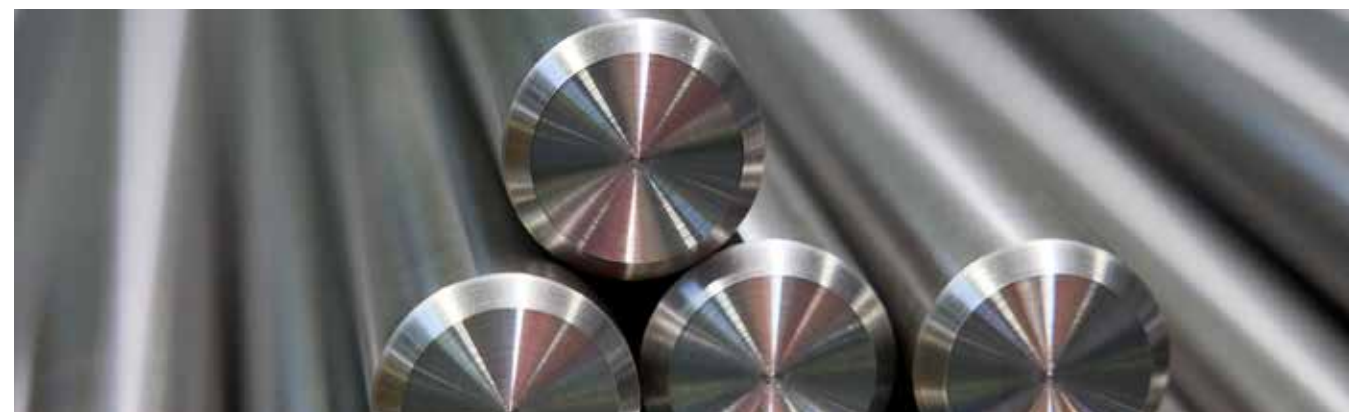
Director of Operations for Ugitech's Production Assets  
Chief Executive Officer of Ugitech SA



# Ugitech, a Swiss Steel Group member

## Swiss Steel Group's Business Model

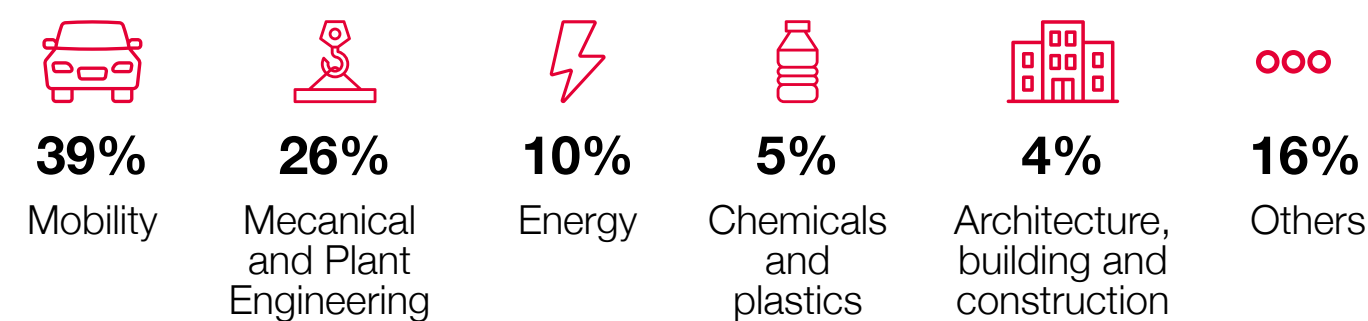
Today, Swiss Steel Group is one of the world's leading suppliers of customized solutions in the field of long products made from special steels. For both tool steel and stainless steel long products, the Group ranks among the leading manufacturers in the global market and is one of Europe's largest companies for alloy and high-alloy structural steels. With approximately 7,000 employees and its own production and distribution companies in 25 countries across five continents, the Group ensures comprehensive support and global supply for its customers and offers them a complete portfolio of products and services worldwide.



Engineering Steel Division	Stainless Steel Division	Tool Steel Division
Deutsche Edelstahlwerke (Germany)		
Ugitech (France, Italy, Germany)		
Steeltec (Switzerland)		
Finkl Steel (US, Canada)		

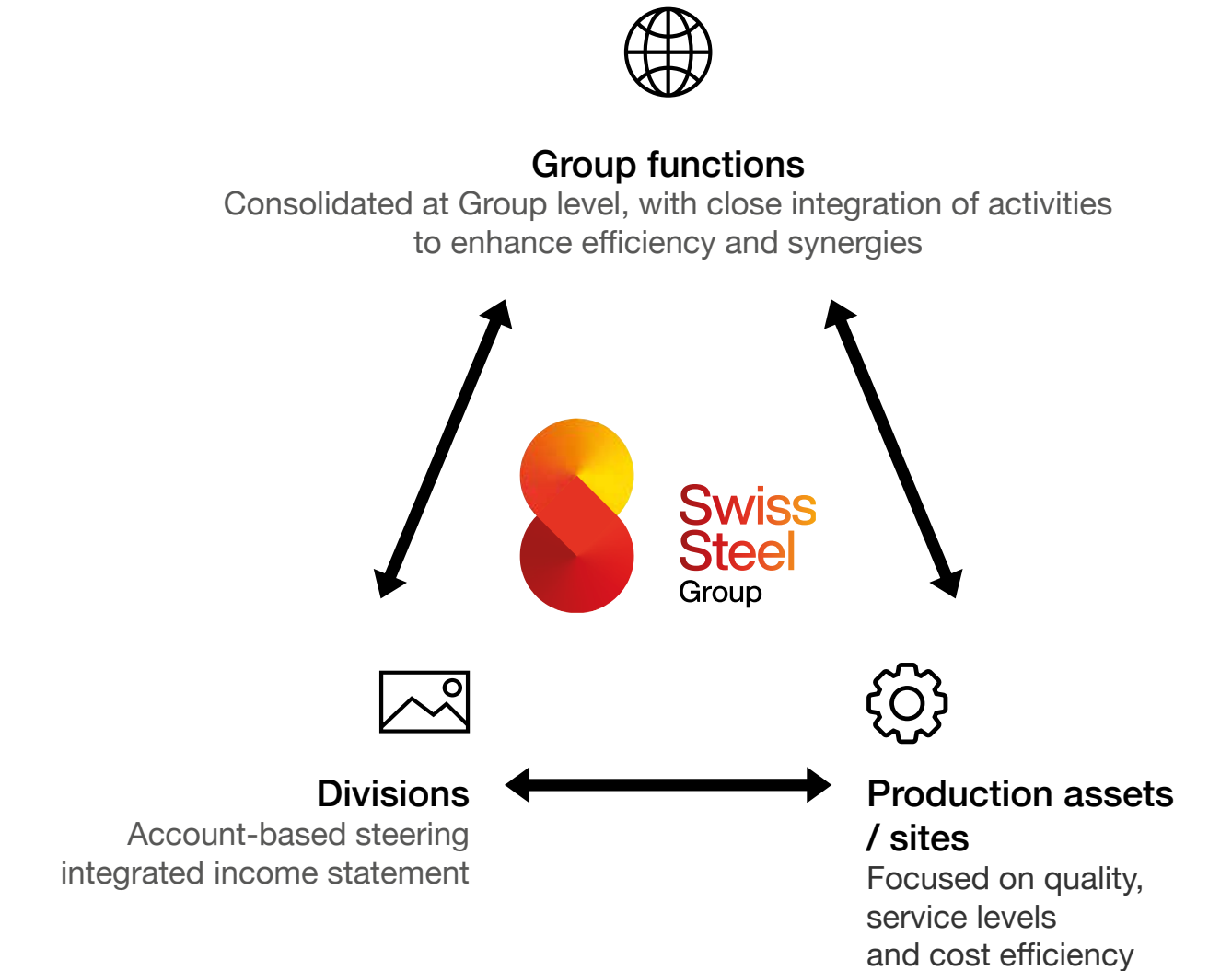


## Breakdown of revenue by sector



## A strong brand

Following the Group's reorganization, the former brands of the entities have been merged into a single strong brand: Swiss Steel Group. The logo continues to combine the colors of glowing steel with the infinity symbol, thus, symbolizing the Group's commitment to a sustainable value chain and a circular economy.



## The three pillars of Swiss Steel Group's 2025 strategic program

Swiss Steel Group bases its strategy on three key pillars:

### - Resilience and profitability



The foundation for increased profitability and future growth is resilience. We are strengthening our resilience by focusing on our core business and reassessing the future viability of our businesses.

### - Customer-Focused and reliability



To enable growth, we must understand and anticipate the needs and challenges of our customers. We are creating an integrated Swiss Steel Group that will increase efficiency and effectiveness, above all to better serve our customers.

### - Innovation and Sustainability



Building on a strong foundation, Swiss Steel Group has the potential to expand its market position in sustainable steel production. As part of this, we empower our customers in their decarbonization efforts to become leading sustainability champions.

**Building on the progress achieved under SSG 2025, Swiss Steel Group continues to advance and adapt its strategic focus in response to a changing industrial landscape. The focus remains on strengthening competitiveness, reinforcing sustainability and ensuring long-term relevance in key industrial applications, to prepare for future growth, as markets return. This next phase is guided by a broader strategic ambition and a refined framework that translates direction into clearer priorities and execution.**

“Make Steel Matter” expresses our intent to strengthen the relevance of steel in a rapidly changing industrial landscape, not only through high-quality products, but also by actively contributing to building awareness of how steel supports innovation, sustainability and industrial resilience.

We believe that we are well positioned to carry this ambition forward. Swiss Steel Group is one of Europe's leading electric arc furnace steel producers, with a production model based almost entirely on recycled steel. This circular approach results in a significantly lower carbon footprint compared with conventional steelmaking while supporting customers in their own decarbonization pathways. Our steels are used in a wide range of critical applications worldwide: from energy infrastructure and mobility solutions to advanced industrial manufacturing.

Through this broad industrial footprint, we have developed a deep insight into how value chains function, where performance matters most, and how customer requirements are evolving. As Swiss Steel Group continues to operate more closely as an integrated Group, we are increasingly able to leverage this collective expertise - turning shared knowledge into tangible value for customers and, ultimately, for society.

Steel remains indispensable to infrastructure, mobility, energy systems and advanced manufacturing. Ensuring its sustainable production, reliable performance and continued relevance is therefore both an industrial responsibility and a strategic opportunity.

Synchronise  
life.



Make steel  
matter.

Elevate  
everyday.



Make steel  
matter.

Connect  
everyone.



Make steel  
matter.

Over the past three years, Swiss Steel Group has demonstrated its ability to successfully navigate its transformation. It has the plan and the capabilities needed to ensure its future success by unlocking the potential of steel in every critical application of our time.

Swiss Steel Group brings out the best in steel:

- reaching 4 billion people every day with Swiss Steel Group steel,
- in over 10,000 applications,
- with more than 18,500 customers worldwide,
- with a carbon footprint 85 % lower than the industry average (*green steel*),
- thanks to approximately 7,000 employees.

As an integrated Group, it is a powerful partner for leading companies in global industry, driving progress behind the scenes. Thanks to its wide range of production processes, Swiss Steel Group can provide the perfect steel solution, even for the most demanding applications. With the circular economy and sustainability at the core of its DNA, it is already producing today the green steel of tomorrow.

### ESG: Swiss Steel Group is committed!

#### - EcoVadis Platinum Medal for Swiss Steel Group

This marks the fourth time that Swiss Steel Group has undergone an EcoVadis assessment. Each year, the Group has achieved or demonstrated improvement, earning Swiss Steel Group the Platinum rating after Bronze, Silver and Gold in February 2026, the highest rating awarded by EcoVadis.

With a score of 86 out of 100, Swiss Steel Group is now among the world's leading companies in terms of ecological transformation. Only 1 % of the more than 130,000 companies assessed by EcoVadis have so far achieved Platinum status in the EcoVadis rating system.

[Click here to learn more :](#)

<https://recognition.ecovadis.com/U0cPonZ3s0-hdBQDC9dI0g>




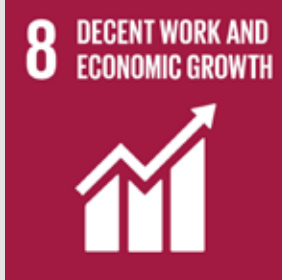
Swiss Steel Group's EcoVadis rating has improved year over year:





## The United Nations Sustainable Development Goals


In line with the dual materiality matrix and strategic priorities, Swiss Steel Group has selected six Sustainable Development Goals to which Ugitech can make a valuable and meaningful contribution, in accordance with the definitions of the goals established by the United Nations.


SDG	
	<p>“To meet the targets set by our commitment to the Science Based Targets Initiative (SBTi), we will further increase the share of renewable energy and aim to improve our energy efficiency. Our plants in Switzerland and Canada already use 100% energy from renewable sources. In Ugine and Emmenbrücke, we feed excess heat into the district heating networks.”</p>

	<p>“We employ approximately 7,000 people worldwide. Providing a safe work environment is our top priority. Every year, we contribute to education. Our technical, sales, and research teams develop innovative products that meet the needs of our customers. Through investment, innovation, and continuous improvement, we enhance our technological capabilities and our processes to achieve economic and environmental performance.”</p>
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SDG	
	<p>“Steel is an integral part of modern and sustainable infrastructure. Our technical, sales, and research teams develop innovative products that meet the needs of our customers. Through investment, innovation, and continuous improvement, we enhance our technological capabilities and our processes to achieve economic and environmental performance.”</p>

	<p>“Steel recycling is our core business. By using a 100% EAF production process based on scrap metal, we play an important role in promoting a circular economy. We strive to achieve the highest possible content of recycled materials in our products and avoid the use of virgin raw materials as much as possible. We cooperate with our business partners to recover by-products and waste, such as slag and dust.”</p>
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SDG	
	<p>“Our carbon footprint is significantly lower than the industry average, and thanks to our production process based on electric arc furnaces, we are well-positioned for a decarbonized future. In 2022, we committed to setting ambitious SBTi decarbonization targets and ensuring the monitoring of their implementation.”</p>

	<p>“Partnerships are a prerequisite for achieving our sustainability goals. We have established Green Steel partnerships with our customers and encourage fruitful partnerships in the field of waste and scrap management, as well as with local communities. Our research and development (R&amp;D) teams collaborate with renowned universities and participate in publicly funded research projects. In addition, we contribute to the industry’s efforts to establish relevant and appropriate standards by actively participating in association working groups.”</p>
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# Ugitech

## Ugitech's Business Model

Today, Ugitech stands out for its expertise in **the manufacturing of long products made of stainless steel and special steels:** iron-chromium alloys with a low carbon content.

They contain different alloys depending on the intended applications. Stainless steels are capable of withstanding both wet and dry corrosion. They are therefore suitable for all types of environments. Ugitech aims to become THE leader in this field by offering high-quality solutions tailored to the needs of each market.

Durability, health, safety, and performance are the key features of our grades: more than 300 grades are available to our customers, with shapes designed to meet the needs of every application.

Its product range includes:

- bars,
- drawn wire,
- wire rod,
- stainless steels for improved machinability, including the UGIMA® and UGIMA®-X series.



Thanks to its expertise and extensive industrial presence, Ugitech now holds a leading position in the European stainless-steel market. The company operates several industrial sites located in France (*Ugine, Imphy, Bourg-en-Bresse, Brionne*), Italy (*Milan, San Vendemiano*), and Germany (*Reichshof*).

3 000

Customers

1 582

Employees

47

Researchers

Headquarter in  
**Ugine,  
Savoie**

10 locations

- Ugine (France)
- Imphy (France)
- Grigny (France)
- Milan (Italy)
- Saint-Etienne (France)
- San Vendemiano (Italy)
- Bourg-en-Bresse (France)
- Reichshof (Germany)
- Brionne (France)
- Hemer (Germany)

## Ugitech's Strategy

### - Our Vision

Ugitech, a leading producer of long stainless-steel products, aims to:

- build closer relationships with customers,
- foster employee growth,
- tackle challenges and address the societal issues of

tomorrow by making a positive impact within its ecosystem,  
- be profitable and create long-term value.

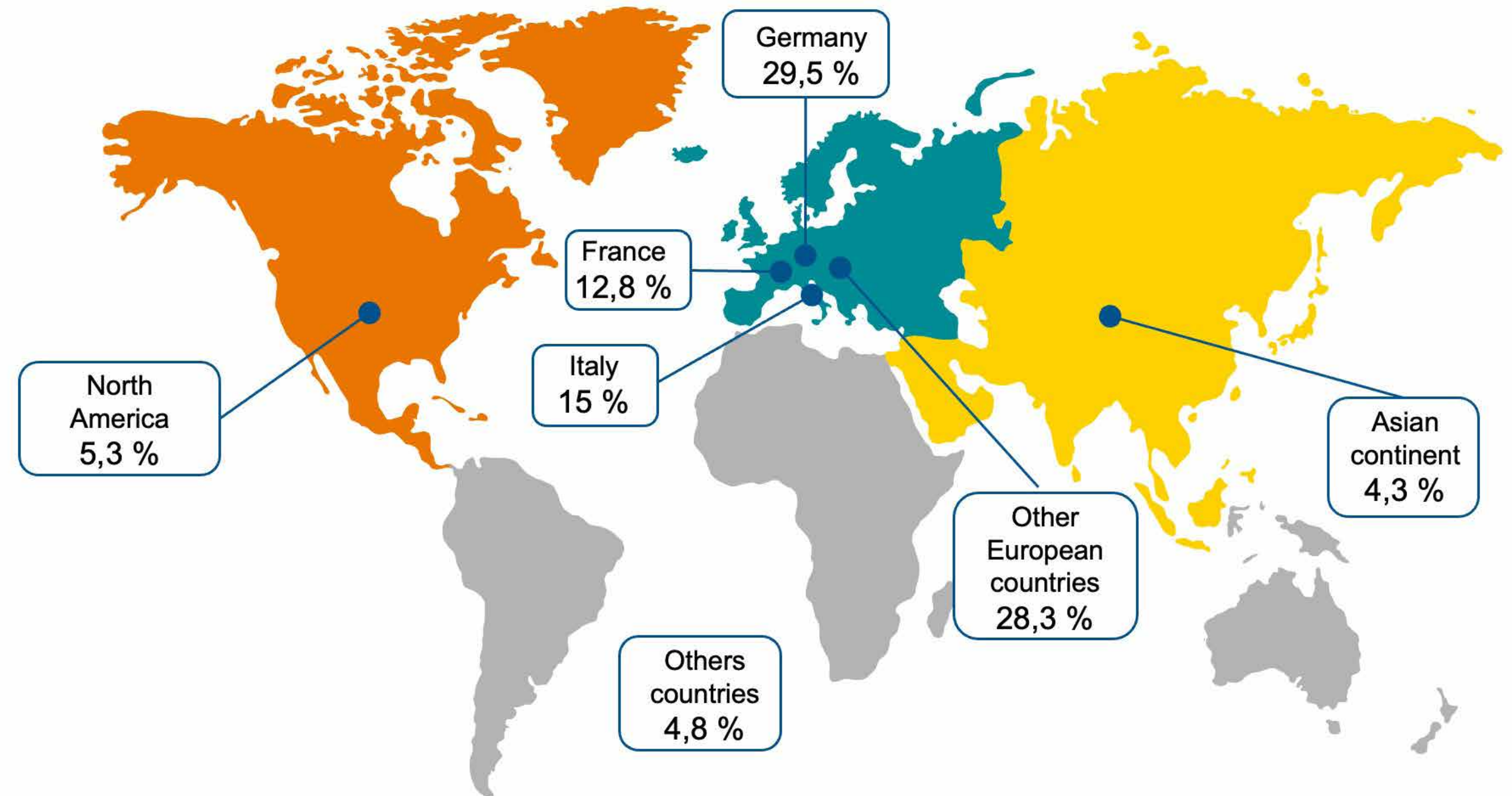
**- Our strategic priorities:**

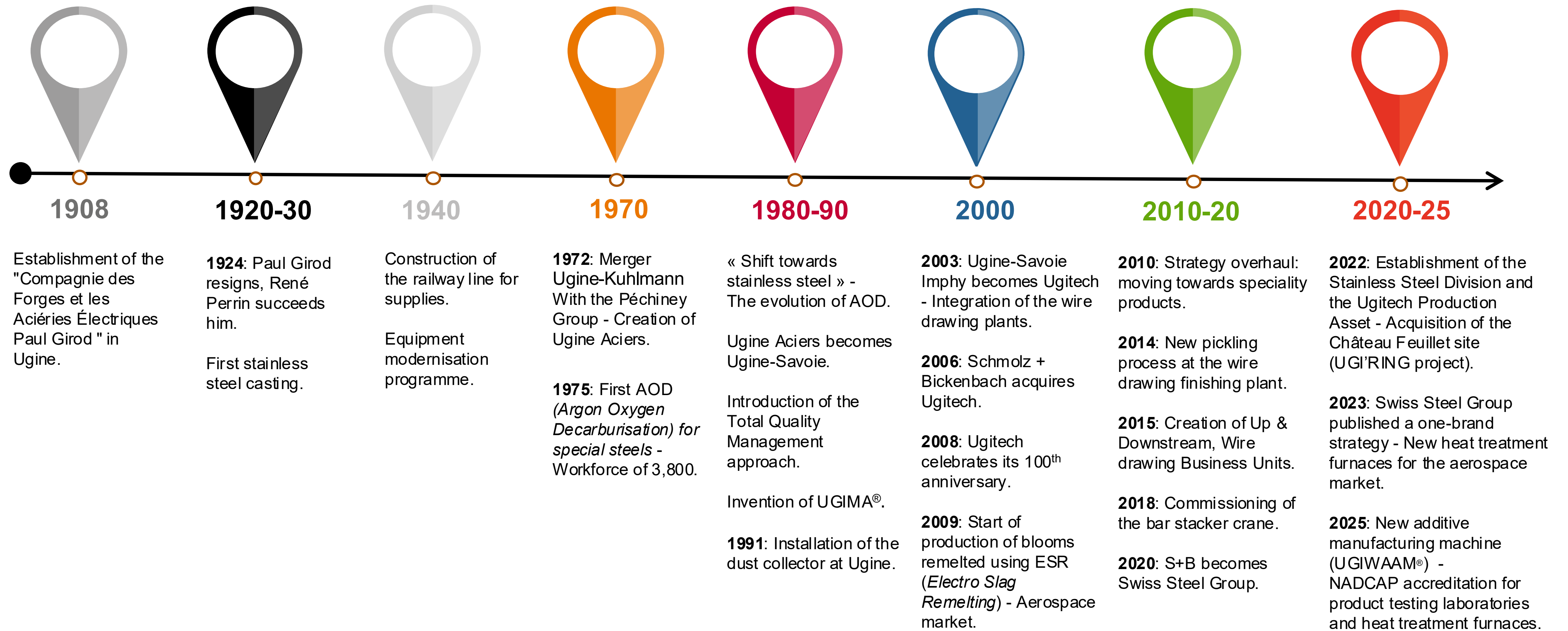
- Embed our commitment to corporate social responsibility to support a sustainable world
- Innovate for our customers by leveraging collective intelligence
- Ensure a lasting competitive advantage
- Accelerate our digital transformation

**Over 115 years of expertise**

A manufacturing process that relies on both hot-rolling facilities (such as the steel mill and the rolling mill) and facilities dedicated to finishing bars and wire rod.

Ugitech's main customers worldwide in 2025





## Paul Girod, a pioneer in building a sustainable business well ahead of his time

### - White coal: Ugitech's energy foundation

“White coal” refers to hydroelectric power generated by waterfalls, used to power industrial facilities. By the end of the 19<sup>th</sup> century, this resource had become a major driver of industrial development in Savoie.



Paul Girod

By harnessing hydropower as early as 1902, Paul Girod transformed Ugine into an industrial center of world renowned. In fact, in **1902, Paul Girod** purchased a waterfall on the Doron de Beaufort River in Venthon, near Ugine. There, he built an electrometallurgical plant powered by this renewable energy. The plant generated 4 MW, making it one of the most powerful in the Alps at the time, second only to the one in Chedde (7 MW). In **1904**, he founded the **Société d'Electro-chimie, d'Électro-métallurgie et des Aciéries Electriques d'Ugine (SECEMAEU)**, and then in 1908, the **Forges et Aciéries Paul Girod**, which would later become Ugitech. He thus chose to harness clean, local, and renewable energy, using the waterfalls of the Doron de Beaufort to power his electric furnaces. Later, the Mottets Dam was built on the Arly River to power the Mollières power plant in Ugine (46 MW), before being taken over by EDF in 1950. This innovative energy approach was already part of a sustainability strategy, long before the term was even in use.

### - A progressive social policy

Paul Girod did not limit himself to technical innovation. He designed a true industrial city, driven by a social vision that was deeply humanistic and decidedly modern for its time.

### - Urban Planning and Housing

He is having workers' housing complexes built to accommodate families for employees. He built communal

housing to accommodate unmarried workers. He provided villas for engineers and foremen, promoting a structured and inclusive social organization.



The administrative building of the Ugine Steelworks. It still serves as the administrative building for Ugitech today.

### - Health and Well-being

He established a clinic-hospital that provided free medical care to employees. In 1910, he launched the “Goutte de Lait” (“milk drop”) program, an initiative that distributed milk to the infants of staff members, thereby contributing to child health.

### - Women's employment

In 1909, he opened a hosiery workshop to provide employment for women, anticipating the challenges of equality and labor market integration.

### - Social rights

He introduced a weekly day off to improve working conditions. He established family allowances to support households. He welcomed a highly diverse working-class population: in 1931, 38% of Ugine's residents were foreigners, mainly Italians, Russians, and Poles, demonstrating a remarkable policy of social integration.



Phalanstères in the factory to house single workers

### From Paul Girod's social legacy to fully integrated CSR governance

For over a century-and long before the term "CSR" even existed-Corporate Social Responsibility has been part of Ugitech's DNA. Paul Girod already had a strong social, regional, and environmental vision, based on improving working conditions, inclusion, and local roots and the

use of renewable energy - a legacy that is still recognized today. Over the past few years, this historical tradition has evolved into a structured CSR strategy that is managed and integrated into the company's governance.

#### - 2016: First external recognition

The request for an Ecovadis assessment made by its client, Faurecia, has set a new momentum in motion: it encourages Ugitech to formalize its commitments and structure its CSR maturity according to recognized standards.

#### - 2018: Transparency and Continuous Improvement

Ugitech publishes its first Non-Financial Performance Statement (*DPEF*), audited by Ernst & Young, marking a shift toward rigorous and verified reporting. That same year, the European Foundation for Quality Management (*EFQM*) approach further strengthened the culture of continuous improvement and the structuring of internal processes.



The steelworks and the workers' houses in 1928

#### - 2020: CSR at the heart of the strategy

With the joint development of the "CAP 2025" strategy, CSR has become one of the company's four strategic priorities: a first in our history. It is no longer merely a conviction, but a driver of performance and a key component of our future development.

#### - 2023: Establishment of a dedicated CSR governance structure

The company is taking a new step forward by establishing a CSR process and organizational structure. This framework clarifies responsibilities, establishes regular monitoring, and ensures that the approach is permanently integrated into decision-making processes.



Rolled out of the Ugine Electric Steelworks

### A revised materiality framework to meet European sustainability standards

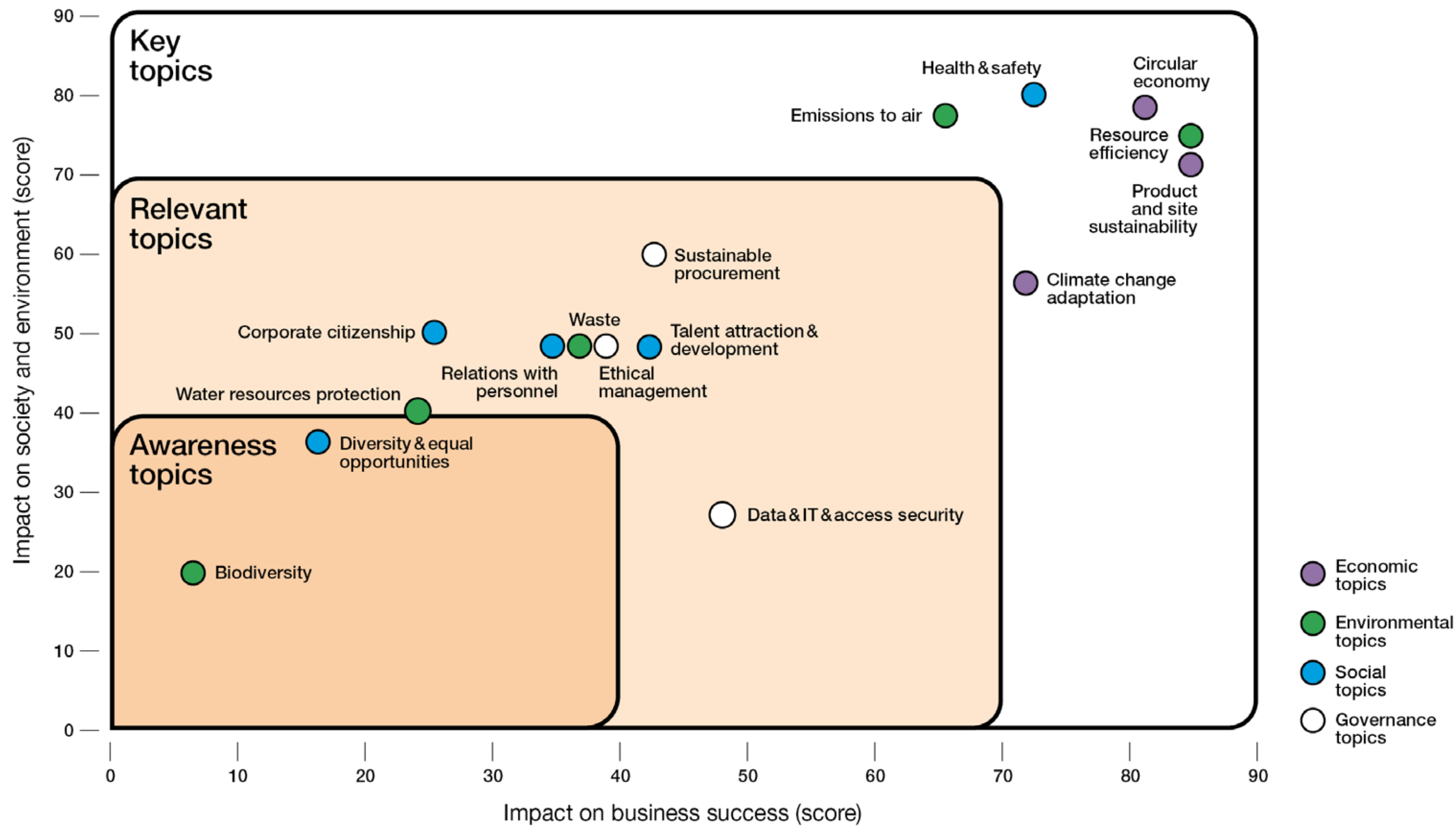
The 2022 materiality analysis was conducted in three stages: first, the identification of potentially material sustainability topics (*based on reporting standards, regulations, and competitors' reports*); second, stakeholder engagement (*structured face-to-face interviews with employees, customers, and suppliers*), and an analysis of risks and opportunities related to Environmental, Social, and Governance (ESG) factors.

In 2025, the double materiality analysis was updated by incorporating information gathered during the preparatory process for the double materiality analysis, in accordance with the European Sustainability Reporting Standards (ESRS). A 50% weighting was applied to reflect the impact of the new information. Following this update, the topic "Climate Change Adaptation" moved from a relevant topic to a key topic, while the topic "Corporate Citizenship" moved from an awareness topic to a relevant topic.



The bus collection service for workers at the Ugine Electric Steelworks

Materiality matrix



Based on the score each topic received across the two dimensions, we identified three groups:

- key topics have either a significant impact on the success of our company or a significant impact on the environment and society;
- relevant topics have a moderate impact;
- despite the lesser impact of awareness-raising topics according to our materiality analysis, we nevertheless consider them to be important topics in terms of sustainable development.

# Environment

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Climate change 17

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Pollution 31

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Water resources 34

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Biodiversity & ecosystems 37

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Resource use & circular economy 39

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# Climate change

This chapter on climate change covers three topics identified as highly material in Swiss Steel Group's double materiality matrix:

- air emissions (key topic),
- product and site sustainability (key topic),
- climate change adaptation (key topic).

## 1. Strategy

Steel production generates large amounts of CO<sub>2</sub>. Approximately 8% of global CO<sub>2</sub> emissions are generated by the steel industry. Since steel is an essential raw material for the future, we have a major responsibility in the fight against the climate crisis and are called upon to reduce CO<sub>2</sub> emissions.

In line with the Paris Agreement and the European Green Deal, Ugitech has incorporated decarbonization principles into its strategy. Stainless steel is produced exclusively using electric arc furnaces.



Ugine Steelworks

This technology has a much lower carbon footprint than any other steel-making technology, making our steel green by nature.

### Emissions (Scope 1+2)

kg CO<sub>2</sub> per ton of crude steel

The average Scope 1+2 emissions of steel producers using the blast furnace process are 2,200 kg of CO<sub>2</sub> per ton of crude steel.

### Carbon footprint of Ugitech's long stainless-steel products

Carbon footprint in t CO<sub>2</sub> eq/t of stainless steel (Scopes 1, 2, and 3)



#### Scope 1 : 0,4

All stainless-steel manufacturers use electric furnaces. Reheating furnaces are often gas-fired.



#### Scope 2 : 0,1

Ugitech primarily uses carbon-free nuclear energy.



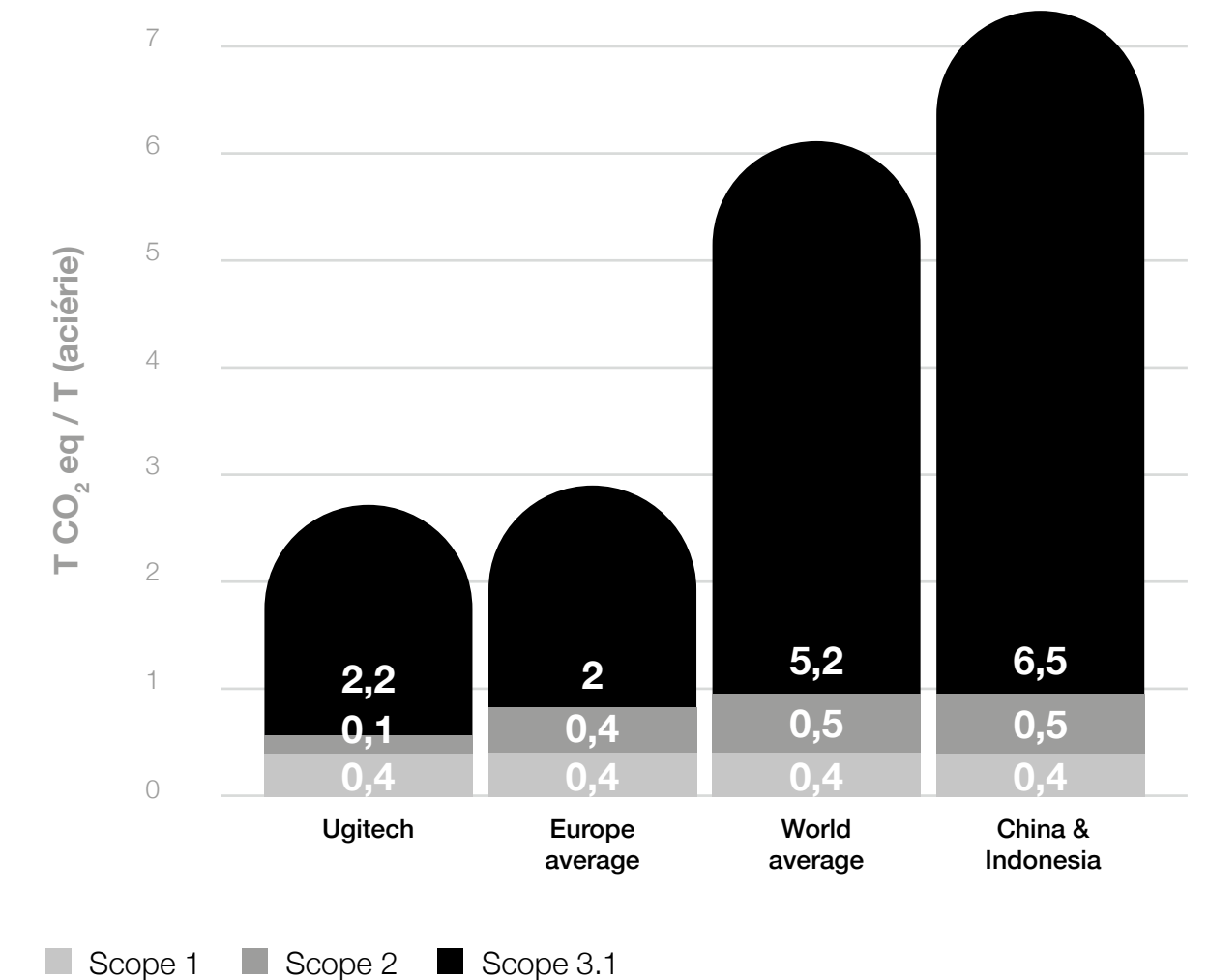
#### Scope 3 : 2,2

Heavily influenced by the percentage of recycled scrap metal.

Carbon footprint since 2020

### Ugitech's Position Among Stainless Steel Producers

(flat and long products)



Source : Roland Berger; EUROFER; www.cc.europa.eu; Institute for European Studies - Industrial Value Chain: A Bridge towards a Carbon Neutral Europe; World Steel; SSG Corporate Strategy

Ugitech is part of Swiss Steel Group, whose climate targets are validated by the Science Based Targets initiative (SBTi). The Group aims to achieve carbon neutrality by 2038.


In close alignment with the Group's strategy, Ugitech has developed its decarbonization roadmap to support the Group achieving the SBTi decarbonization targets.

 **Innovating and anticipating the low-carbon future**

- Technological breakthroughs
- Eco design
- Subsidy research
- Regulatory watch (e.g. CBAM)
- Joint venture
- Co-venture

 **Raise awareness, communicate and involve people in the challenges of decarbonizing industry**

- Customer communication
- Green Steel / Climate+ offer
- Certification of our approaches by recognized standards
- Employee awareness & involvement

 **Promote sustainable mobility for all types of travel**


- Light vehicles
- Bicycles
- Handling equipment
- Multimodal transport

 **Optimize our supply chain to reduce our carbon footprint**

- Ugi'Ring
- Suppliers and customers involvement
- Reuse of co-products from our processes

 **Consume less but better by improving our energy efficiency and our capacity to match grid capacity**

- Sobriety plan
- Waste heat recovery
- Process efficiency
- Buildings
- Green IT
- Flexibility / Interruptibility
- Rationing plan

 **Use clean energy sources with a low-carbon impact**

- H<sub>2</sub> Ecosystem
- Electrification
- Renewable energy production
- Green energy contract PPA / BPA
- Hydroelectric sourcing



## 2. Actions achieved in 2025

### Policies / Standards / Guidelines

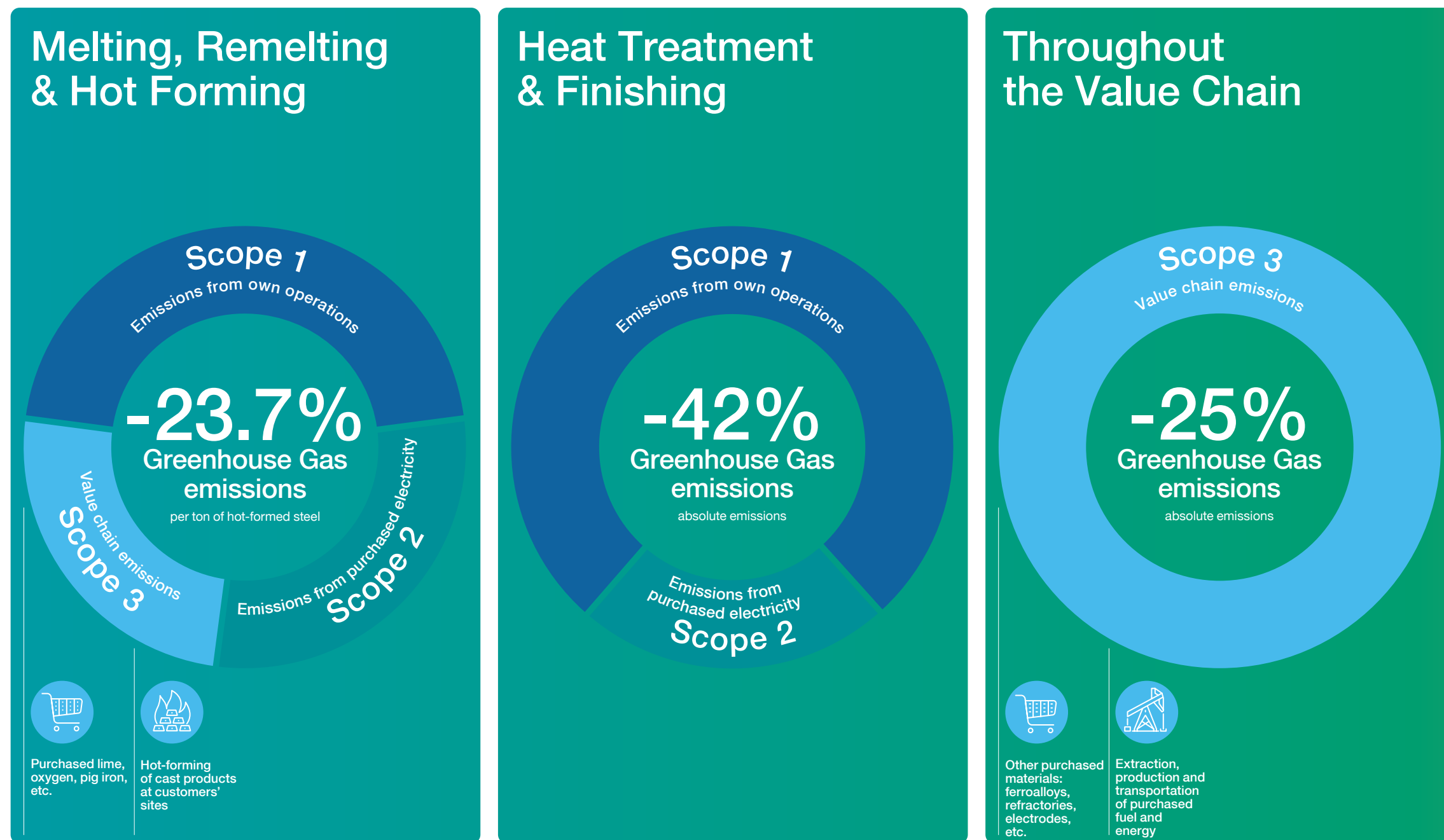
#### An SBTi-approved decarbonization commitment: 2030 targets + Net Zero by 2038

In May 2024, the Swiss Steel Group received confirmation that its decarbonization targets are aligned with the SBTi's (*Science Based Targets Initiative*) 1.5°C mitigation pathways to achieve net-zero by 2050. The SBTi has endorsed Swiss Steel Group's ability to achieve its short-term targets by 2030 and net-zero by 2038. It thus becomes the first steel producer to have decarbonization targets in line with the SBTi's sectoral guidelines for the steel industry.

# 2030

## Near-term decarbonization targets

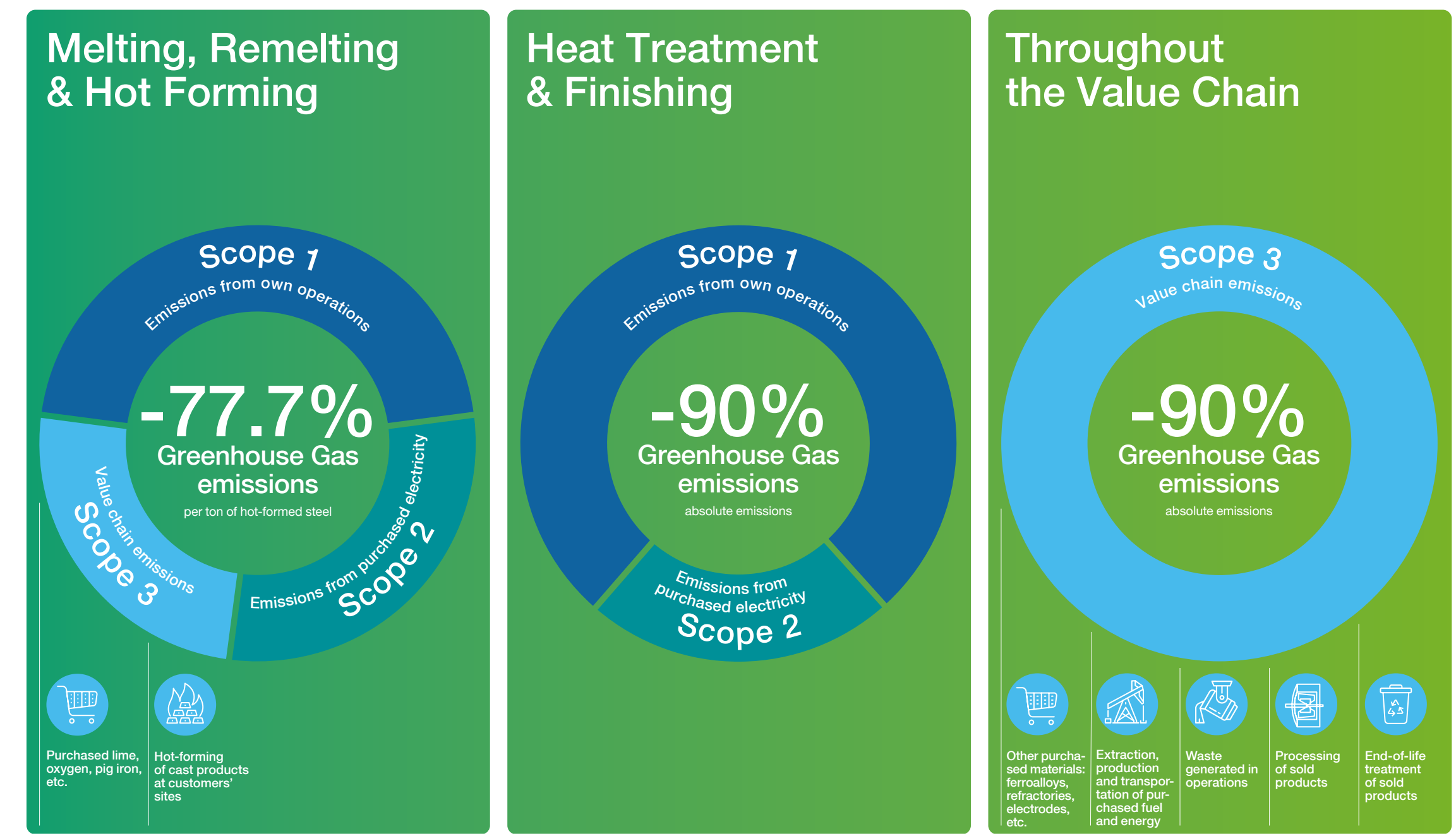
Validated by SBTi



# 2038

## Net-zero decarbonization targets

Validated by SBTi





## Swiss Steel Group Confirms Top “A” Rating in the CDP (Carbon Disclosure Project) climate change assessment.

For the second consecutive year, Swiss Steel Group has received the top “A” rating in the annual sustainability assessment on climate change conducted by the CDP.

In the fight against climate change, Swiss Steel Group has been participating in CDP reporting for several years and has steadily improved its rating, moving from a C in 2022 to a B in 2023, and then to an A in 2024 and 2025. This rating does not measure the absolute level of emissions, but rather the strategic quality of the company’s response to climate protection issues.

This year, the A rating awarded by the CDP for supplier management joins the A rating already received for climate protection.

Both ratings are based on the CDP climate questionnaire, which is completed once a year. For supplier management, four specific categories are examined separately and combined into an independent assessment. This assessment specifically recognizes the Swiss Steel Group’s strong performance in four areas:

- management assessment of the risks and opportunities associated with climate change for the company,
- systematic tracking of greenhouse gas emissions (*carbon*

*accounting*),

- management strategies for reducing greenhouse gas emissions, managing risks, and leveraging opportunities,
- corporate governance related to climate change.

This award, presented by the internationally recognized nonprofit organization CDP, highlights the Group’s ongoing commitment to climate action and sustainable business practices.

The CDP rating is one of the most influential benchmarks in today’s business world and is increasingly used by business partners, lenders, and investors to assess climate risks and ESG (*Environmental, Social, and Governance*) factors. Disclosing information through CDP is crucial for companies that want to be at the forefront of sustainability, as it helps identify risks and opportunities, improve environmental performance, and comply with regulatory requirements.



The Mottets dam on the River Arly supplies around 40% of the electricity required by the Ugine site

## CO<sub>2</sub> emissions data certified by DNV Business Assurance

For the 2024 fiscal year, Ugitech, a member of Swiss Steel Group, has successfully undergone an independent verification of its greenhouse gas emissions (Scopes 1, 2, and 3), as part of the limited assurance engagement performed over Swiss Steel’s Group-level greenhouse gas inventory by DNV Business Assurance Germany GmbH.

**[Click here to learn more :](https://urlr.me/VWJBEw)**  
**[urlr.me/VWJBEw](https://urlr.me/VWJBEw)**

This verification serves to validate our emissions data and track the progress of our decarbonization efforts. Each year, the Ugine site is audited by APAVE to verify its emissions subject to the European ETS (*Emissions Trading System*) regulations.

### ISO 50 001 and ISO 14 001

Ugitech is certified to ISO 14001 (*environmental management*) and ISO 50001 (*energy management*).

The ISO 50001 certification does not cover all sites, but it applies to a scope representing more than 90% of energy consumption, thereby ensuring effective control over the most significant energy uses. These two systems are based on a common policy, incorporating the reduction of our environmental impact and the continuous improvement of energy performance. They provide a structural framework for steering actions, ensuring performance, and contributing to decarbonization goals.

### Compliance with regulations: ETS and CBAM

Ugitech is subject to the ETS (*Emissions Trading System*) regulations for its Ugine site. These European regulations establish a pricing mechanism for CO<sub>2</sub> emissions. Ugitech complies with its legal obligations and carries out the required regulatory procedures.

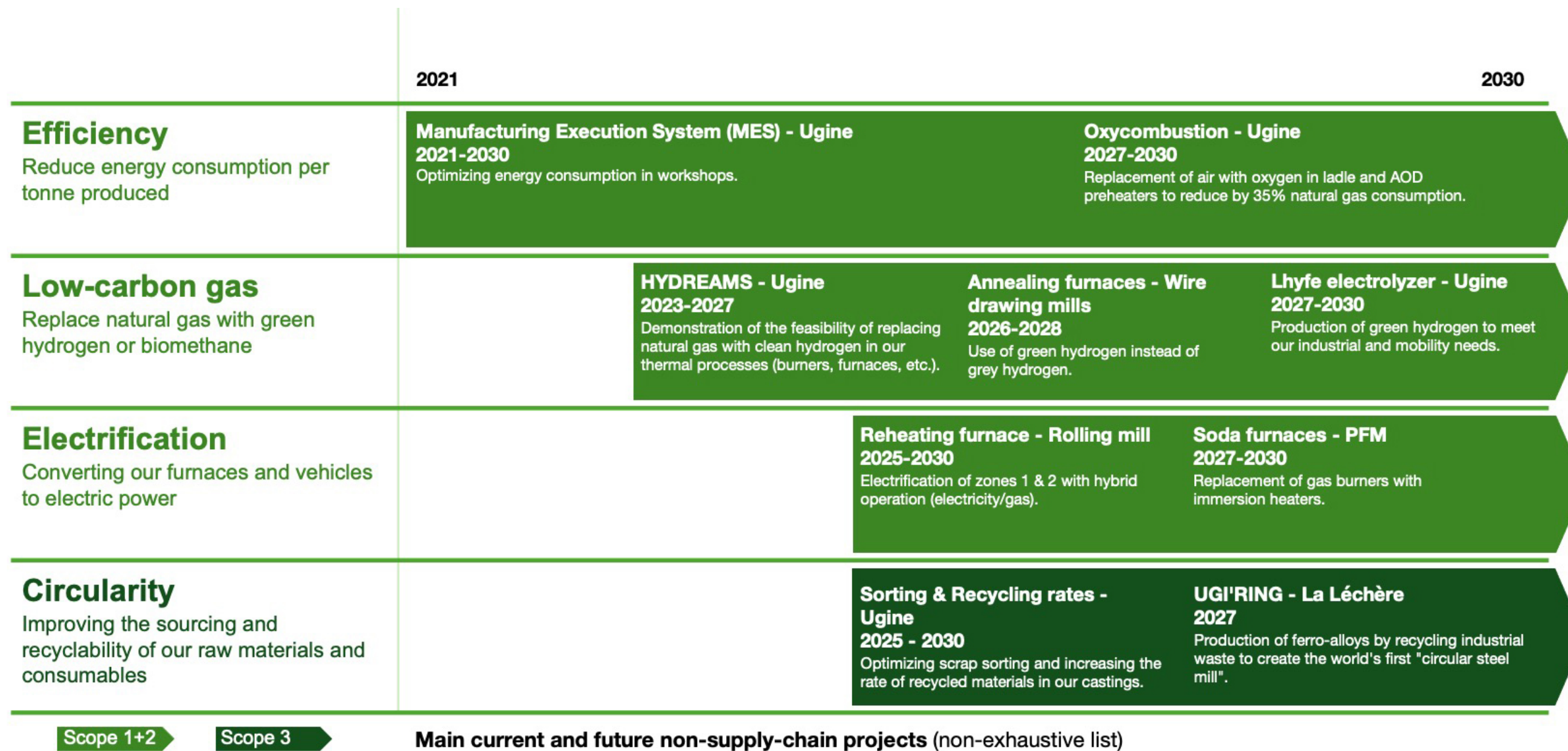
The European Carbon Border Adjustment Mechanism (*CBAM*) regulation was published in late 2025 and is set to take effect on January 1, 2026. Ugitech is registered as an importer of ferroalloys and wire rods in the CBAM registry. Ugitech has prepared to meet all of its obligations in 2026.



## 2025 Actions and Resources

### Climate Change Mitigation Measures

#### Decarbonation roadmap - Ugitech industrial activity



Several decarbonization projects are currently being rolled out at Ugitech's various sites, based on four main strategies:

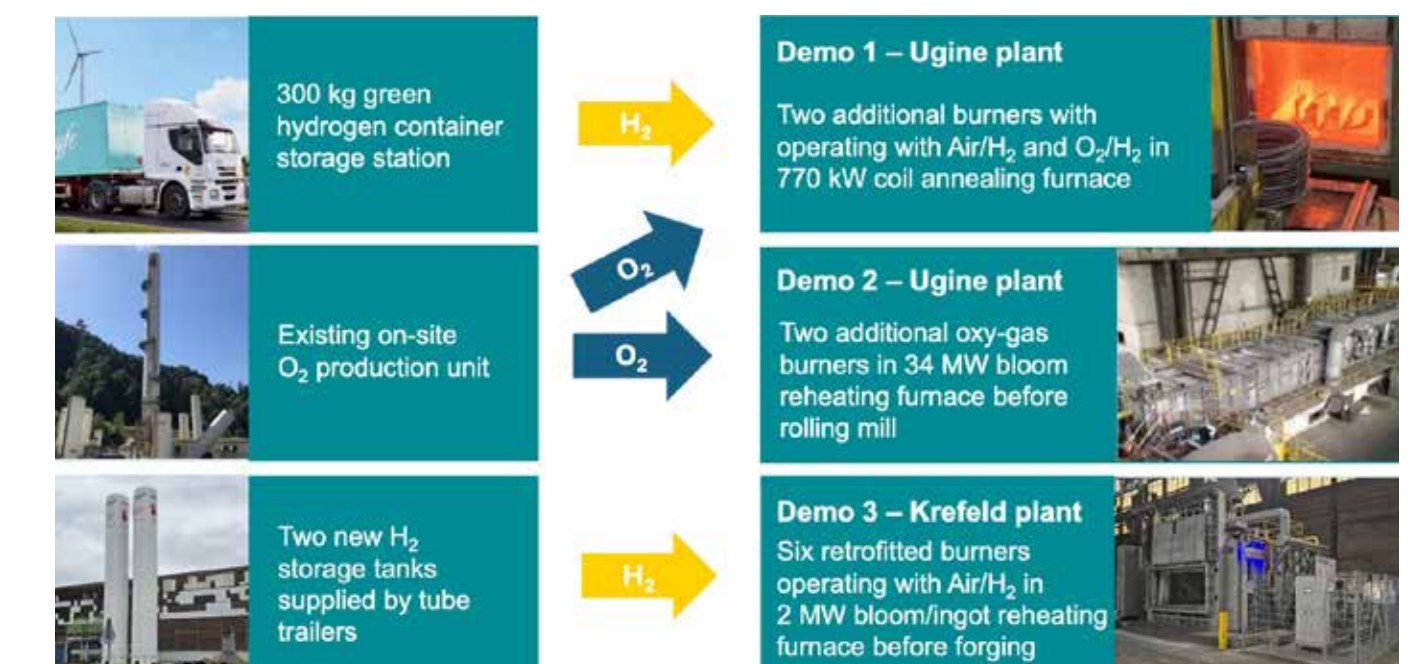
#### 1- Energy efficiency

The implementation of MES (*Manufacturing Execution System*) tools, such as those planned for the steelmaking plant in 2025, will enable better monitoring of energy consumption by production equipment (*arc furnaces, ladle preheaters, Electro Slag Remelting Rapid furnace, etc.*) and their optimization. The ongoing replacement of site lighting with LEDs, as well as the gas-fired radiant heaters used for

heating the workshops helps reduce energy consumption by approximately 50%. Finally, the switch to oxycombustion for ladle preheater burners, initiated in 2017, has reduced natural gas consumption by 35%.

#### 2- Low-carbon gases

The HYDREAMS project, which brings together eight European partners (*steelmakers, universities, hydrogen burner suppliers, refractory manufacturers, etc.*), has received a grant from the EU and aims to demonstrate the feasibility of replacing natural gas with carbon-free hydrogen in thermal processes (*reheating and heat treatment furnaces*). Following successful laboratory tests, Swiss Steel Group's Deutsche Edelstahlwerke (*DEW*) site in Krefeld commissioned the first industrial demonstrator on a pre-forging reheating furnace in 2025 (*Demo 3*). A second demonstrator on an annealing furnace will start up at the Ugine site in the summer of 2026 (*Demo 1*).



3 industrial demonstrators from the HYDREAMS project

### 3- Electrification

Six 33-kW immersion heaters were installed in late 2025 on one of the soda furnaces in our Wire Finishing Shop, which operates using gas-fired radiant tubes.

A new roof designed to house the first set of electric heating elements was installed during the 2025 summer shutdown in Zone 1 of the walking beam reheating furnace before rolling out. This project is based on a natural gas/electricity hybrid model aimed at implementing flexibility measures that promote the stability of the French power grid.



New roof in Zone 1 of the reheating furnace before the rolling mill

### 4- The Circular Economy

The UGI'RING project will help significantly reduce the Scope 3 carbon footprint (see *Circular economy chapter*).

#### A new transportation solution with XPO Logistics

In 2025, Ugitech switched to a new road transport provider that meets Ugitech's CSR requirements. Until now, the European road transport operation had relied on a transport model that was primarily multimodal (road-railroad), which helped reduce CO<sub>2</sub> emissions compared to conventional road transport.

Today, XPO Logistics is able to offer solutions other than multimodal transport to reduce CO<sub>2</sub> emissions, which will be implemented in the coming years.

For example, an electric truck was introduced at the start of the contract for trips in the Lyon area. This solution significantly reduces CO<sub>2</sub> emissions from transportation, while limiting noise pollution and improving the overall environmental impact of our operations. This electric truck has traveled 22,545 km, resulting in a reduction of 20 tons of CO<sub>2</sub> by 2025.



XPO Logistics electric truck for routes in the Lyon area

XPO Logistics outlines its decarbonization strategy below: “Building a sustainable future.” It is in this context that XPO Logistics supports its customers in their transition toward the goal of net-zero emissions by 2050.

«To achieve this, we are relying on the development and use of our alternative energy sources: as of early 2026, in France, we have surpassed 4 million kilometers traveled by electric truck. Our energy mix is complemented by our Low Emission Sustainable Solution HVO offering, through which 42,116 tons of CO<sub>2</sub> have been saved by our customers to date. Finally, as a trusted partner, our teams stand ready to support our customers in building a multimodal solution. Our commitments are reviewed annually as part of the CO<sub>2</sub>

*Target, Science-Based Targets, and recognized by the award of the Ecovadis Gold Medal at the European level.» Fernando ESTEVE, Vice President & Sales Market Leader - (Industry/Packaging & Construction) - Europe*

### Supply of raw materials via rail and bulk transport

Ugitech's Purchasing Department has a policy of prioritizing the transport of our raw materials by rail. Using rail offers a twofold advantage: it significantly reduces CO<sub>2</sub> emissions per ton transported and decreases the number of trucks on the roads. This reduction in road traffic helps to improve traffic flow.



Transportation of raw materials by train to the Ugine steel mill

Ugitech also ensures that raw materials are transported in bulk. This approach helps minimize packaging waste and optimize transport volumes, thereby reducing environmental impacts.

### Electrical flexibility

By offering flexibility, Ugitech has been contributing since 2011 to balancing the power grid in order to secure the power supply and reduce CO<sub>2</sub> emissions from the power mix (*by limiting the use of thermal power plants*). This mechanism is even more important in the context of high integration of renewable energy sources, whose output is variable. In practical terms, for Ugitech, this involves implementing a load shedding measure by temporarily shutting down energy-intensive processes. This action, which can be triggered within minutes and for a flexible duration, frees up power on the grid. RTE (*Réseau de Transport d'Electricité*) uses this flexibility to adjust the frequency and maintain the instantaneous balance between generation and consumption.

### Monitoring and managing energy consumption

To better manage its energy consumption and continuously improve its environmental performance, Ugitech relies on energy monitoring software. This tool enables automated

and centralized collection of consumption data, with real-time visualization of usage by equipment. Dynamic dashboards facilitate the analysis of trends and the detection of deviations. This system supports operational management initiatives, contributes to the reliability of data used in regulatory reporting, and serves as a key tool for tracking energy performance targets and greenhouse gas emission reduction goals.

### Heat recovery

Heat treatment furnaces for stainless steel rings emit heat in the form of flue gases. Rather than letting this heat go to waste, Ugitech recovers and utilizes it by supplying it to the District Heating Network of the municipality of Ugine. Supplying waste heat to the heating network (*2.5 GWh in 2025*) helps improve the network's energy mix and reduce the carbon footprint of the heat distributed to users. This initiative is part of a circular economic approach to energy and cooperation with local stakeholders.



### Electrification of forklifts

Ugitech is gradually replacing its fossil-fuel-powered forklift with battery-powered electric models. This transition helps reduce direct CO<sub>2</sub> emissions, improve air quality in the workshops, and reduce noise pollution. Today, 17 electric vehicles are available at the Ugine site. This electrification initiative continues by targeting equipment for which the technology is available and compatible with our operational constraints.



Electric charging stations for vehicles



Electric forklift

### Green IT

To integrate the “Green IT” approach into Ugitech’s CSR strategy, the IT department has developed a roadmap to reduce the environmental impact of digital technology. Among other initiatives, in 2023, an awareness campaign was launched for all employees, providing practical information so that everyone can adjust their behavior. This campaign is updated annually.

The equipment used at Ugitech is certified as energy-efficient, and procurement focuses on eco-designed equipment. In addition, the lifespan of equipment such as computers, servers, and smartphones is extended to reduce the impact of hardware upgrades.

In addition, energy-saving settings for workstations are implemented whenever possible directly by the IT department: putting computers to sleep, turning off monitors...

Ugitech is increasingly adopting cloud solutions, again, whenever possible, incorporating mechanisms to automatically shut down unused infrastructure (*development environments shut down at night and on weekends, production services active only when users need them, etc.*) along with tools to monitor these resources and manage them as closely as possible to actual needs.

### Renewable energy production

As part of its commitment to the energy transition and reducing its carbon footprint, Ugitech has installed solar panels on the roof of an industrial building. This system generates local green electricity.

### 50% renewable energy used at the Milan and San Vendemiano sites

To comply with Italian regulations, the Ugitech TFA and Ugitech Italia sites have met the certified quota of 50% renewable energy by purchasing certificates of origin from their energy supplier, thereby reducing the sites’ impact on CO<sub>2</sub> emissions. Thanks to the solar panels installed at the Milan site, some of the electricity is generated on-site, which reduces the purchase of guarantees of origin.

### Swiss Steel Group’s offer of sustainable and innovative products

#### - Green Steel Climate+

The Green Steel Climate+ offering embodies an approach firmly focused on carbon neutrality through the exclusive use of 100% renewable electricity, sourced from certified sources such as hydroelectricity, wind power, and solar power. This strategy ensures environmentally friendly steel production without compromising on industrial performance. By choosing Climate+, customers ensure that the steel

supplied by Swiss Steel Group is powered by clean energy, thereby contributing to the reduction of indirect emissions and compliance with European decarbonization regulations. This offering is ideal for companies seeking to strengthen their responsible corporate image and anticipate ESG requirements, while supporting a sustainable economy.

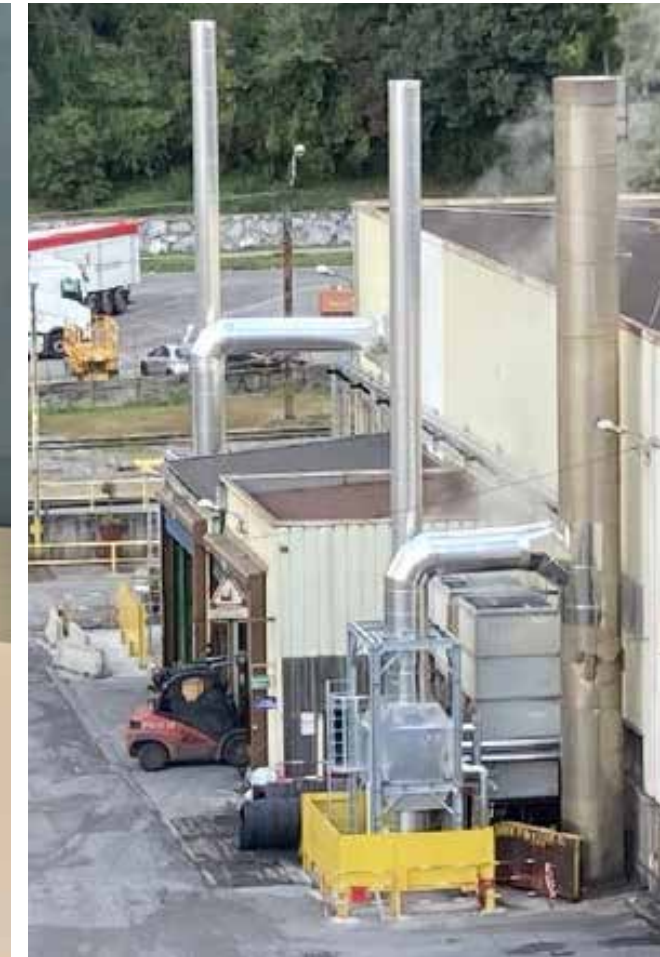
### Green Steel Stainless+

The Green Steel Stainless+ product line, available immediately and on the market for over two years, is based on a certified recycled content of over 95%, which ensures optimal use of resources and a reduction of at least 90% in CO<sub>2</sub> emissions compared to traditional standards. This environmental performance is accompanied by impeccable technical quality, tailored to the needs of the most demanding sectors. Choosing Stainless+ aligns customers with a circular economy approach, based on the reuse of materials and the preservation of natural resources. This approach strengthens their CSR commitment and their competitiveness in markets where sustainability has become an essential criterion.

Friedrich Münch GmbH, a company specializing in the manufacture of personal protective equipment, has chosen the Stainless+ offering from Swiss Steel Group: “climate-neutral steel wire” with the launch of its butcher’s glove made from Green Steel 1.4404 Stainless+.



The Niroflex glove in Green Steel 1.4404 Stainless+.



Recovery of waste heat from annealing furnaces (RC8) in the wire rod finishing shop

## Ugitech offer of sustainable and innovative products

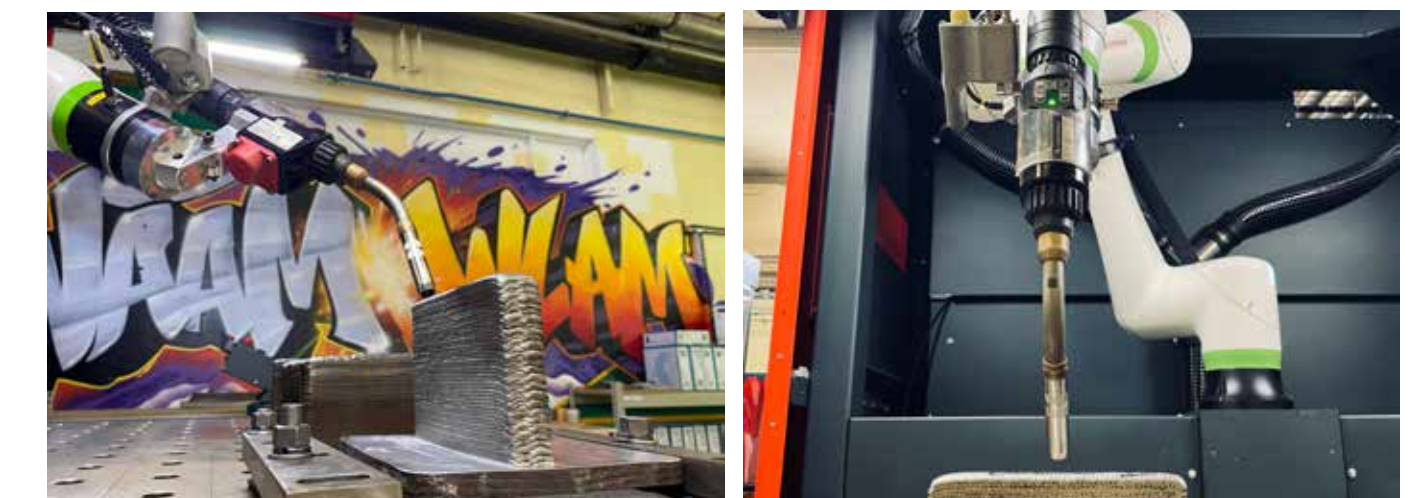
### 1- Concrete rebar

Sustainable management of civil engineering structures is an ecological necessity. It is also an economic necessity, requiring that the lifetime cost of the structure be kept as low as possible. In the parts of the structure most exposed to a corrosive environment, stainless steel reinforcement is the most effective solution for extending the service life of concrete and reducing the frequency of maintenance operations that generate high levels of CO<sub>2</sub>. Stainless steel rebar is used in both repair and new construction projects, as a partial or total replacement for carbon steel, in precast

products as well as in the construction of cast-in-place structures. For this reason, Ugitech has developed a range of stainless-steel concrete rebar called UGIGRIP® in bars or wires ranging from 6 to 25 mm in diameter.

### 2- UGIWAM® Additive Manufacturing

Additive manufacturing of metal parts is experiencing significant growth because it enables the design of new parts that were previously unattainable using conventional processes (*forging and machining*). Additive manufacturing significantly reduces the number of steps involved in producing these parts, and thereby their carbon footprint. While the production of small metal parts (<5 kg and <25 cm) is generally reserved for powder-based additive manufacturing, the production of large parts (>5 kg) is carried out using wire-based additive manufacturing: WAAM (*Wire Arc Additive Manufacturing*) or WLAM (*Wire Laser Additive Manufacturing*). To meet the needs of this rapidly expanding market, Ugitech has developed a product line: UGIWAM® wires, which offer all the stainless steel wire compositions required by this technology.





### 3- UGIMA®-X

The easier a material is to machine, the more cost-effective and low-carbon the manufacturing process becomes for companies that machine these materials. This is why Ugitech offers its bar-turning customers stainless steel bars that are easy to machine. With 30 years of experience supplying grades specifically designed for bar turning—such as UGIMA®—Ugitech has recently launched a new generation of grades with improved machinability: UGIMA®-X, which gives manufacturers of machined parts a sustainable advantage in their market, notably thanks to extended tool life and productivity gains. These benefits enable bar turners to produce parts with a reduced carbon footprint.



### 4- High-Performance Springs

In order to use as little material as possible, the industry is seeking to reduce the volume and footprint of mechanical assemblies while maintaining or even improving performance

(*downsizing*). This applies to spring manufacturers, who are supplying increasingly smaller springs while maintaining or even increasing their stiffness and current fatigue limits in order to produce parts that are less bulky and lighter. To support this trend, Ugitech has developed austenitic spring wires in the 1.4568 / 17-7PH grade with high mechanical properties, the S4586 HS spring wires. This advancement makes it possible to reduce the amount of raw material used and lower energy consumption in the context of mobility.

### 5- Green hydrogen as a substitute for fossil fuels

Green hydrogen is a powerful energy carrier that could replace fossil fuels to decarbonize both industry and transportation. To achieve this, in addition to having access to green hydrogen at a competitive cost, we must identify metallic materials that are resistant to Hydrogen Embrittlement (*HE*). Among all steels, stainless steels are the ones that best resist Hydrogen Embrittlement, even though under high-pressure conditions (> 100 bar) the risk of fracture remains.

#### - Grades for hydrogen applications

To mitigate these risks, reliable stainless steels must be available for every application (*i.e., production, storage, distribution, and use*). To this end, Ugitech works in close collaboration with major industrial clients to develop grades tailored to the various applications across the hydrogen value chain, such as:

- the development of stainless steel solutions tailored to

the requirements of hydrogen-powered engines: FCEV (*Fuel Cell Electric Vehicle*) and HICE (*Hydrogen Injection Combustion Engine*),

- participation in a European research and development project launched at the end of 2024, named Hystory, aimed at developing new low-alloy austenitic grades for the production, storage, and distribution of gaseous hydrogen,
- research on the performance of stainless steels in hydrogen environments down to -150°C, in collaboration with ARCOR (*an association managed by the Saint-Étienne Corrosion Institute*) and IFPEN (*French Institute of Petroleum and New Energies*) in Solaize (69).

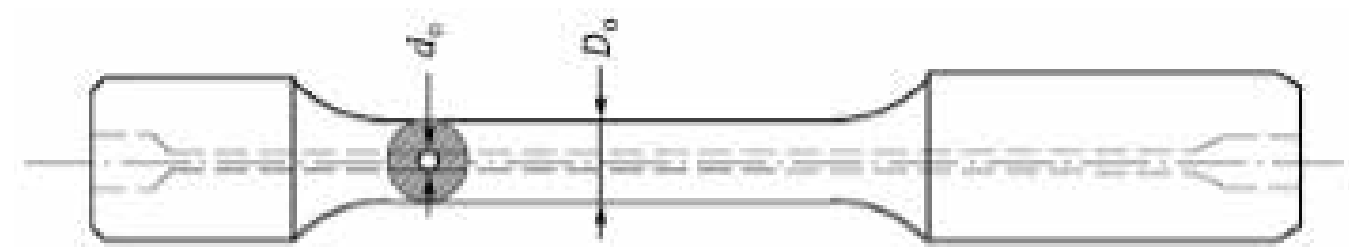


#### - Hydrogen Laboratory

To meet the requirements of various applications, the materials used must be resistant to hydrogen embrittlement. As a result, exposing them to hydrogen is essential in order to evaluate their resistance to hydrogen embrittlement.

This is why the Ugitech research center is transforming its corrosion laboratory into a hydrogen testing laboratory. This is being done in parallel with work carried out as part of the European Hystory project and of the MRCH2 (*Metal Research Consortium Hydrogen*), led by the Corrosion Institute and the French Institute of Petroleum and New Energies (*IFPEN*). The laboratory was brought up to safety standards in 2024, notably with the addition of new distribution cabinets and panels, as well as new detectors designed for hydrogen gas.

The laboratory is currently working on the in-house development of a standardized test in accordance with ISO 7039, based on the principle of a slow tensile test on hollow specimens.



Cross-sectional diagram of hollow test specimens used for slow-speed tensile testing

This test involves introducing pressurized hydrogen gas into the core of a machined test specimen with a longitudinal slot, while simultaneously applying a mechanical load. A reference test under pressurized inert gas is also planned to quantify the impact of hydrogen on the mechanical properties of stainless steel. The hydrogen laboratory is also equipped with a hydrogen analyzer and an add-on module, which enable the measurement of total hydrogen in a sample after

exposure to hydrogen, as well as the distinction between trapped hydrogen and diffusible hydrogen.



Hydrogen Laboratory: Slow-speed traction



Hydrogen Lab: slow-speed tensile testing

## Climate Change Adaptation Measures

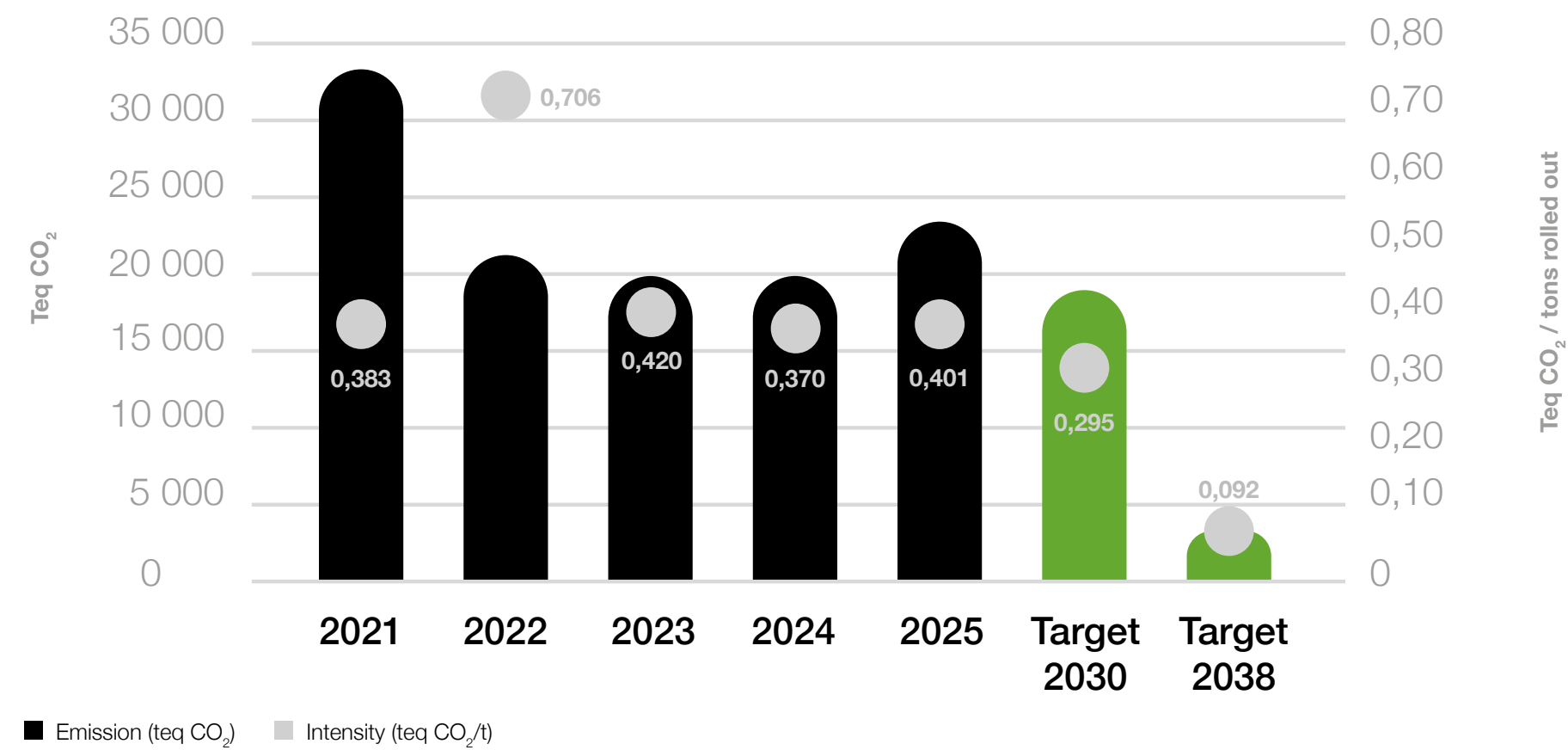
### Climate Risk Action Plan

Ugitech has conducted a climate risk assessment (*storms, droughts, floods, heat waves, etc.*) based on the RCP 8.5 (*Representative Concentration Pathway*) for the years 2030 and 2050 for all of its sites. RCP 8.5 is one of the scenarios used by the IPCC (*Intergovernmental Panel on Climate Change*) to project climate change based on different levels of greenhouse gas emissions. This scenario is the most pessimistic: it corresponds to a world where emissions continue to rise sharply, leading to significant warming. Adaptation measures (*flood management plans, groundwater extraction during droughts and low river flow periods, etc.*) have been defined based on their criticality.

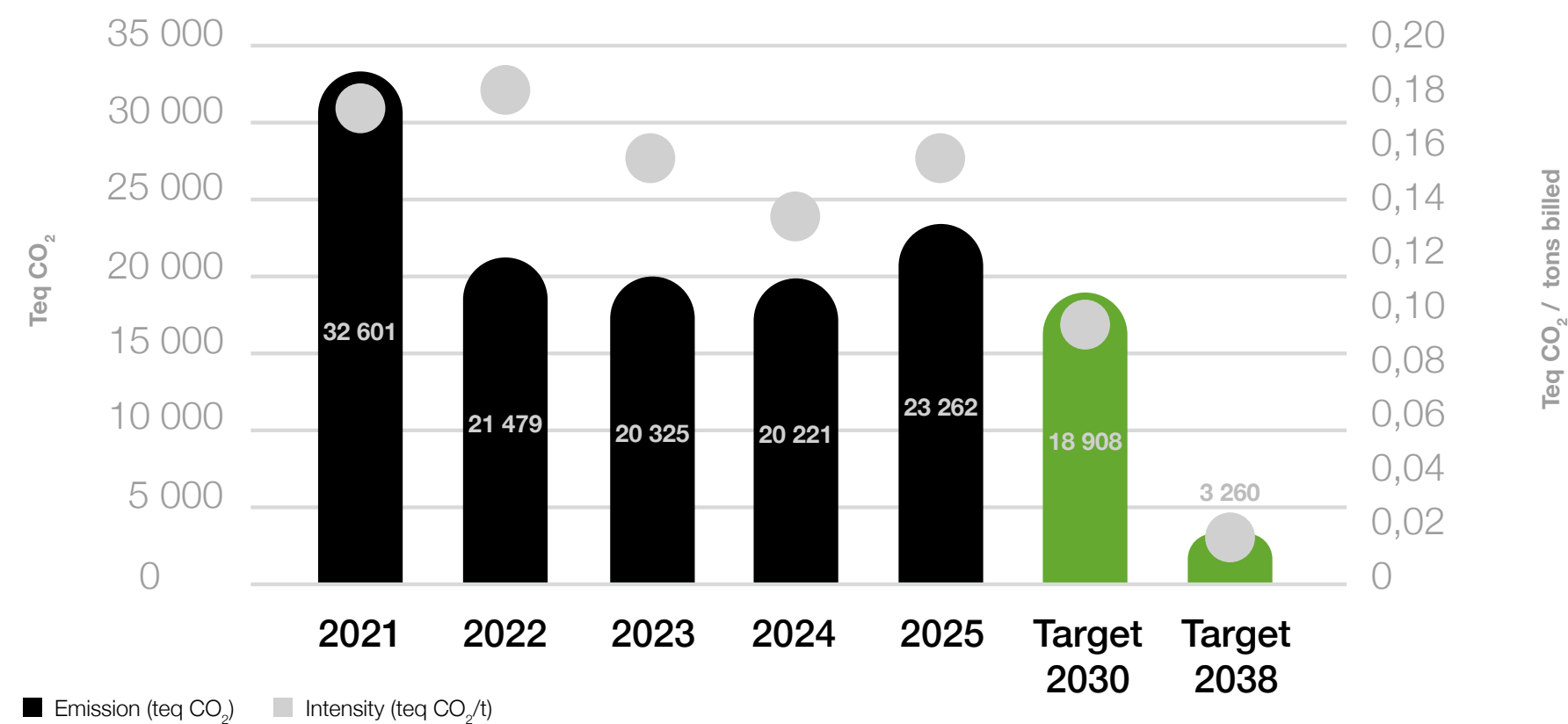
### 3. Metrics and objectives

#### Carbon footprint

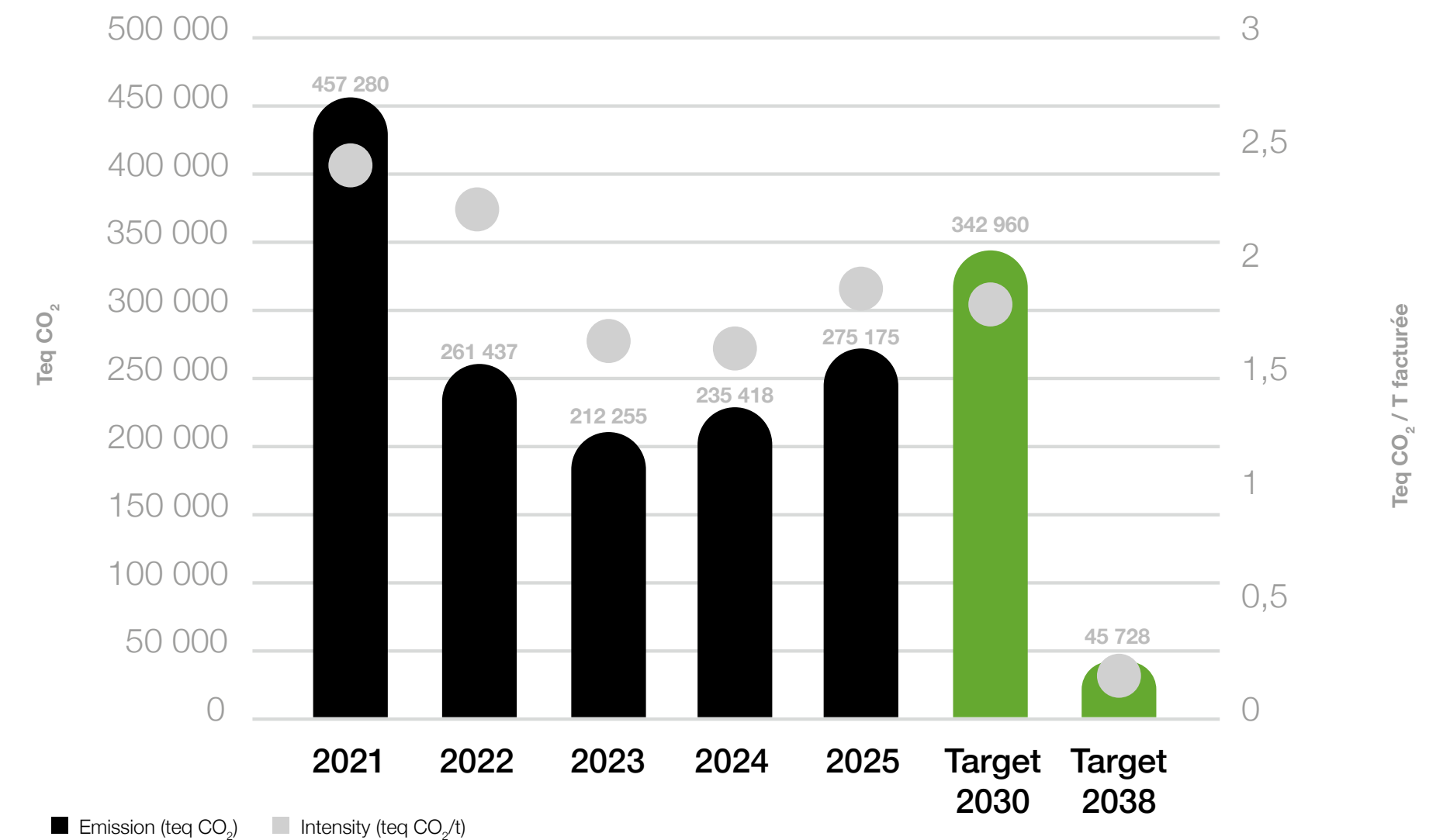
Indicator 1 - tons CO<sub>2</sub> per ton steel rolled out (steel shop, ESRR, rolling mill): Scopes 1, 2 and 3 (oxygen, lime...)



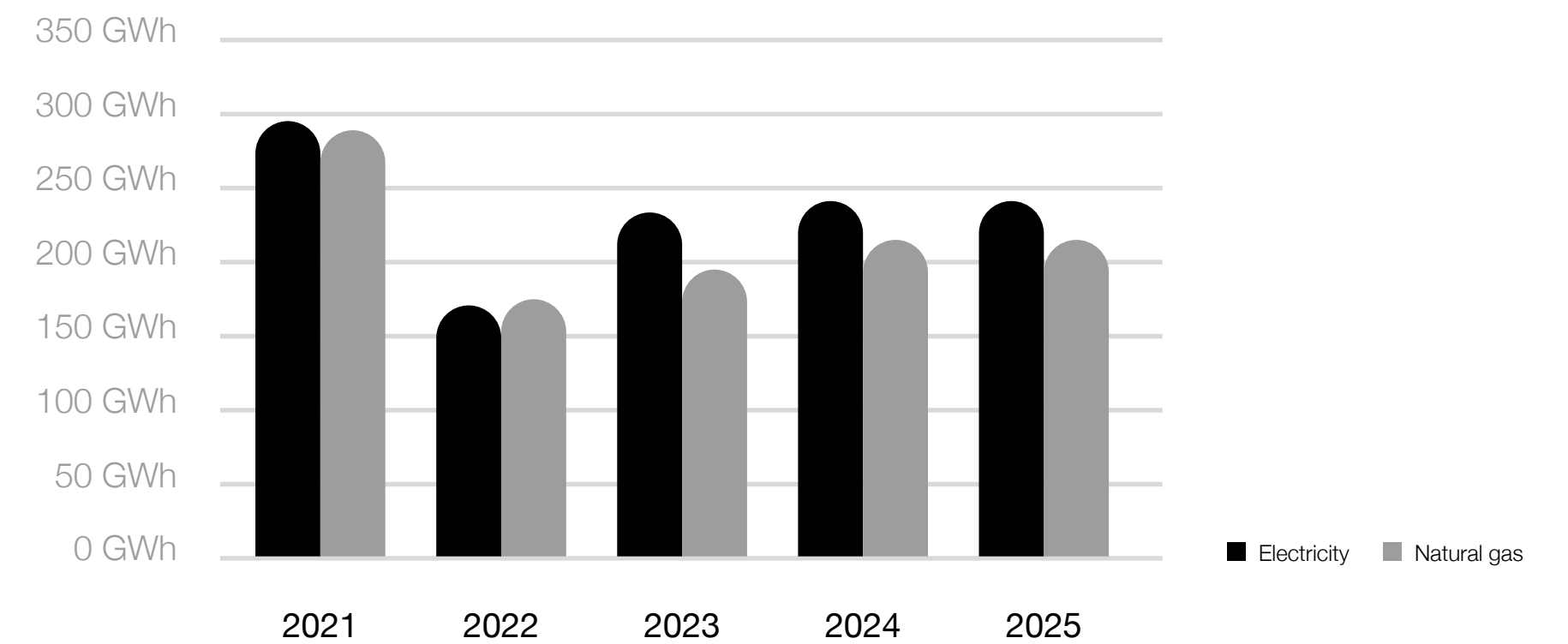
Indicator 2 - tons CO<sub>2</sub> (Finishing, pickling shops, drawn wire plants): Scopes 1 and 2



Indicator 3 - tons CO<sub>2</sub>: Scopes 3.1 and 3.3 (raw materials, energy upstream)

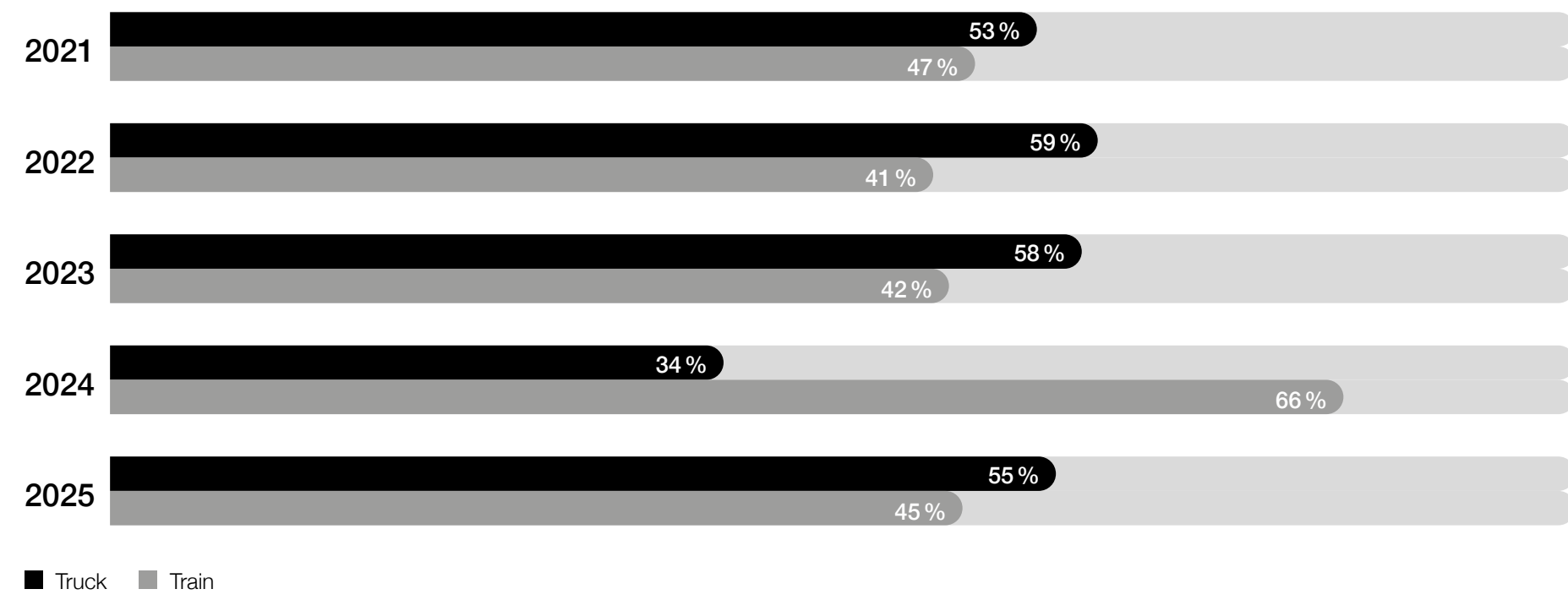


#### Energy consumption

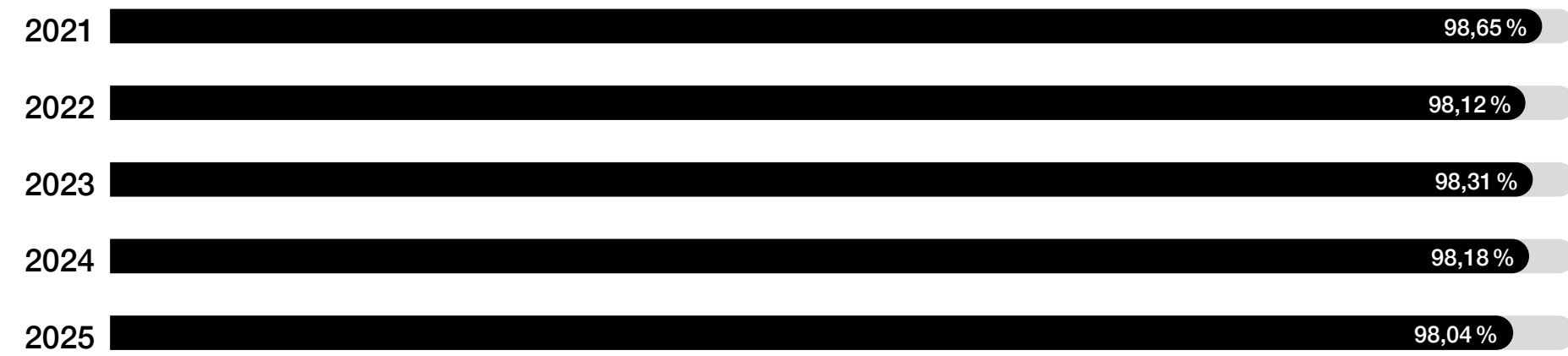


**Transport**

% of of raw materials received by lorry and train



*Hydrogen Laboratory: Low-speed traction*



# Pollution

This chapter on pollution covers two topics identified as highly material in Swiss Steel Group’s double materiality matrix:

- air emissions (key topic),
- water resource protection (material topic).

## 1. Strategy

Ugitech places regulatory compliance at the heart of its strategy. The Ugine site complies with the “Seveso high threshold” regulations and the IED (*Industrial Emissions Directive*) as a steel manufacturing facility.

The cornerstones of Ugitech’s environmental policy include reducing environmental impact, preventing critical and major accidents, and minimizing the potential effects of hazardous substances.



## 2. Actions achieved in 2025

### Policies / Standards / Guidelines

Ugitech has been ISO 14001 certified for its environmental management system since 2002. This certification ensures that all pollution risks (*air, water, soil*) are properly addressed. Ugitech Italia and TFA are registered under the European EMAS program. This European Union Environmental Management and Audit Scheme is a management tool

designed for companies and other organizations to assess, improve, and communicate their environmental performance.

### 2025 actions and resources

#### Environmental monitoring

All Ugitech sites conduct regulatory monitoring of these water and air emissions. Environmental monitoring is also conducted at Ugine. The results are reported to the relevant authorities.

As part of the UGI’RING project, enhanced air quality monitoring was conducted starting with the demolition phase in 2025. These specific checks kept government agencies and residents informed about any potential impact of the construction site. The results are shared quarterly via a newsletter sent to local residents. Starting in September 2025, several preventive measures were also implemented to limit dust, notably the use of misting systems. As in the first phase of the project, an atmospheric monitoring system remains in place, with monitoring stations located south of the site, at the Petit Coeur and at Notre-Dame de Briançon.

A weather station installed on-site also allows for linking the analyses to wind conditions, both in terms of direction and intensity.

### **Hazardous substances: PFAS**

In response to regulatory developments regarding Per- and Polyfluoroalkyl Substances (*PFAS*) and the national monitoring campaigns launched in 2024, Ugitech has progressively and systematically strengthened its strategy for monitoring these compounds in its water discharges.

In 2025, a very thorough investigation was conducted at the Ugine site to ensure that no PFAS was being used.

### **The stormwater and fire safety study**

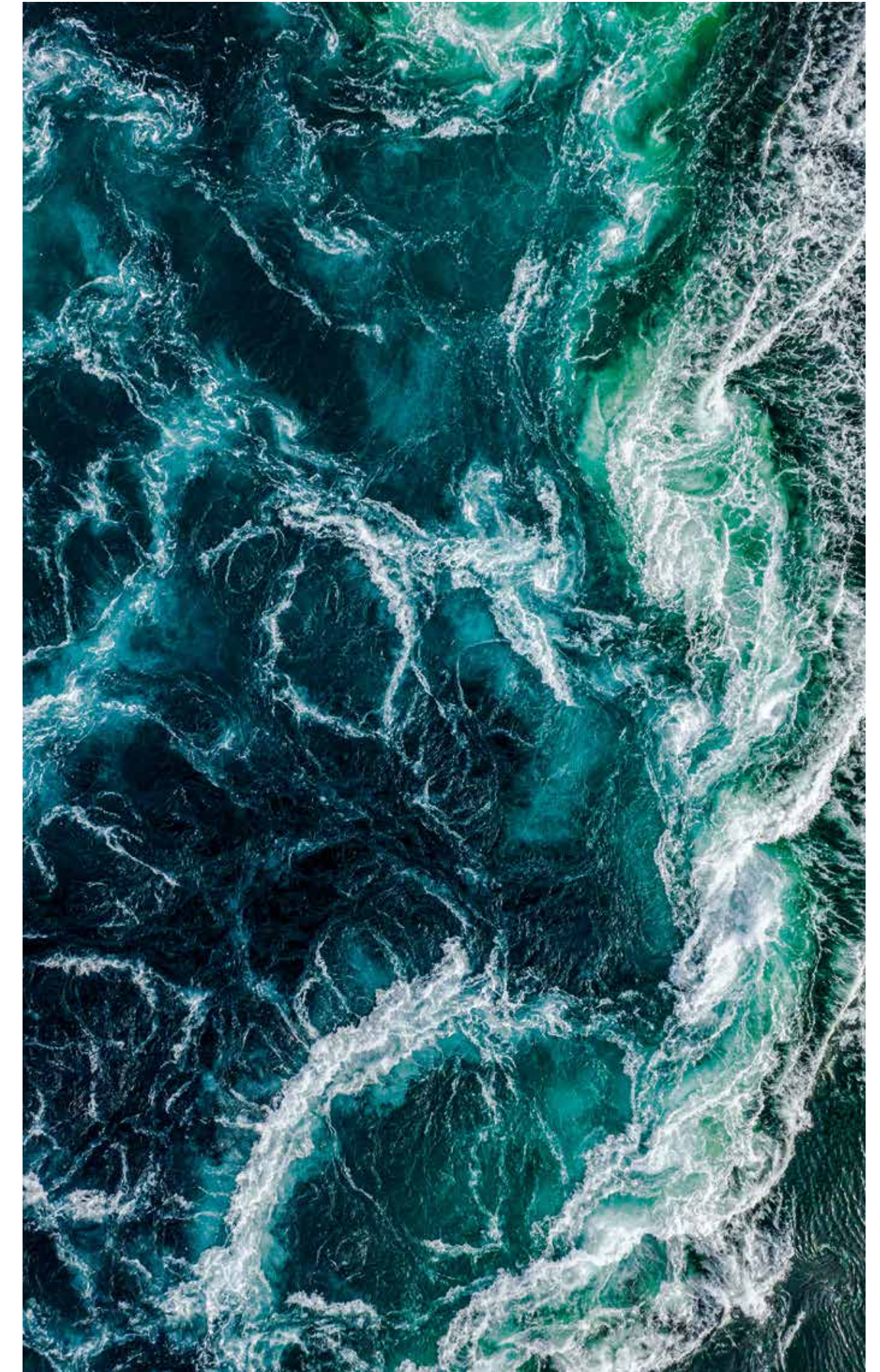
The Ugitech site in Brionne is conducting, in collaboration with the engineering firm RDSI Environnement, a feasibility study to improve stormwater and firewater management in accordance with its operating permit. The goal is to identify a technically and financially optimized solution that meets water retention requirements and takes into account the site's constraints.

RDSI Environnement must analyze the regulatory and technical constraints, propose several acceptable solutions, and conduct a technical and economic comparison of these solutions. The selected solution must enable the containment of water, the regulation of flow rates, the safeguarding of traffic in the event of a fire, and the centralized control of equipment. Technical options include the creation of a containment basin, the installation of equipment and retention barriers, the installation of overflow structures and control valves, as well as a centralized control panel.

### **Chromium VI incident at the Saint-Etienne site**

The vapor treatment system at the chrome plating shop on the Saint-Etienne site was the source of discharges of chromium-contaminated water into the urban environment. During the investigation of the incident with state authorities (*DREAL, Prefecture*), numerous analyses were conducted and demonstrated that there was no health risk to the public.

The source of this discharge was identified, and the facility was modified accordingly by the manufacturer. Furthermore, all material damages incurred by local residents were covered.

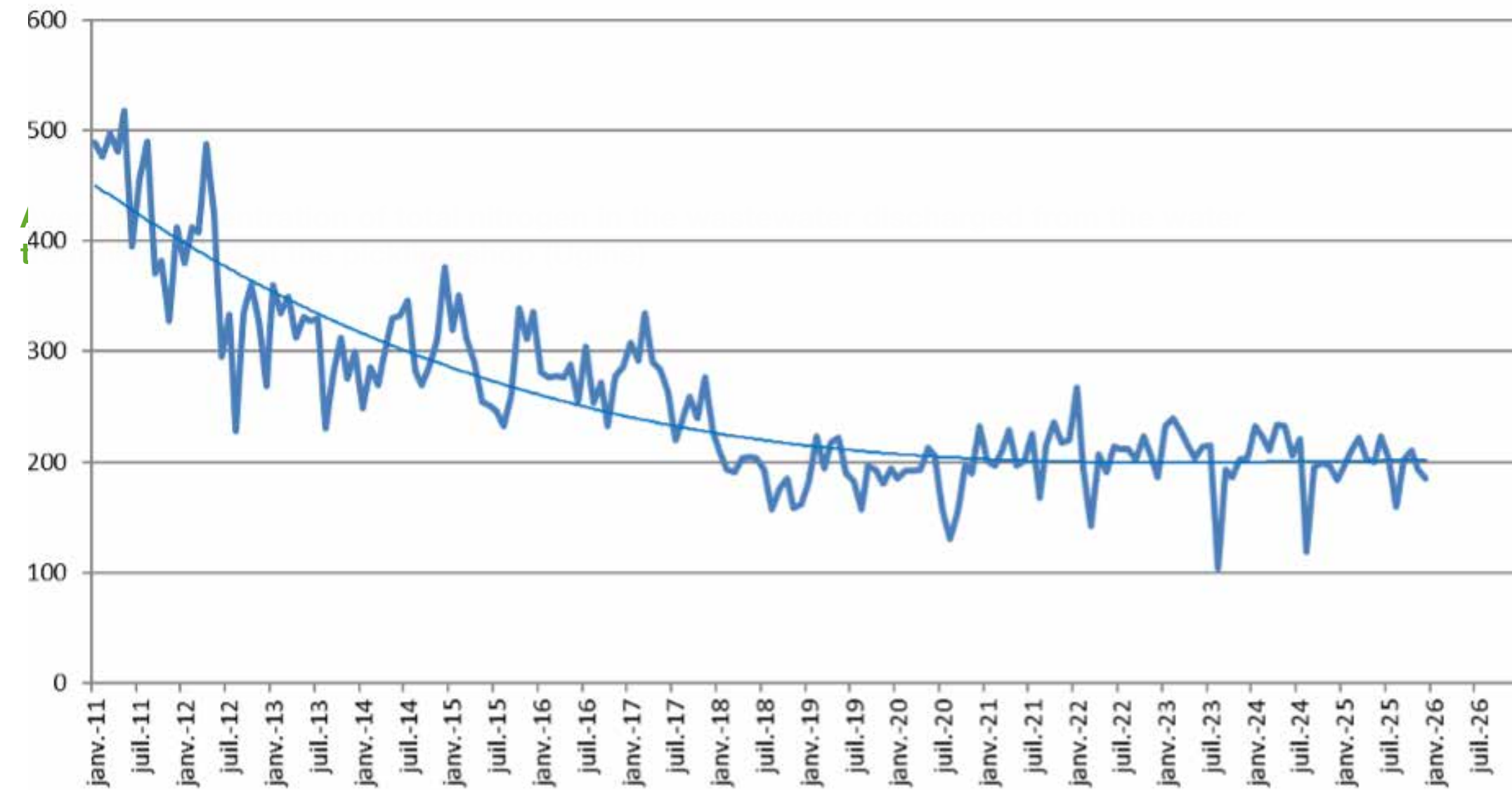


### 3. Metrics and objectives

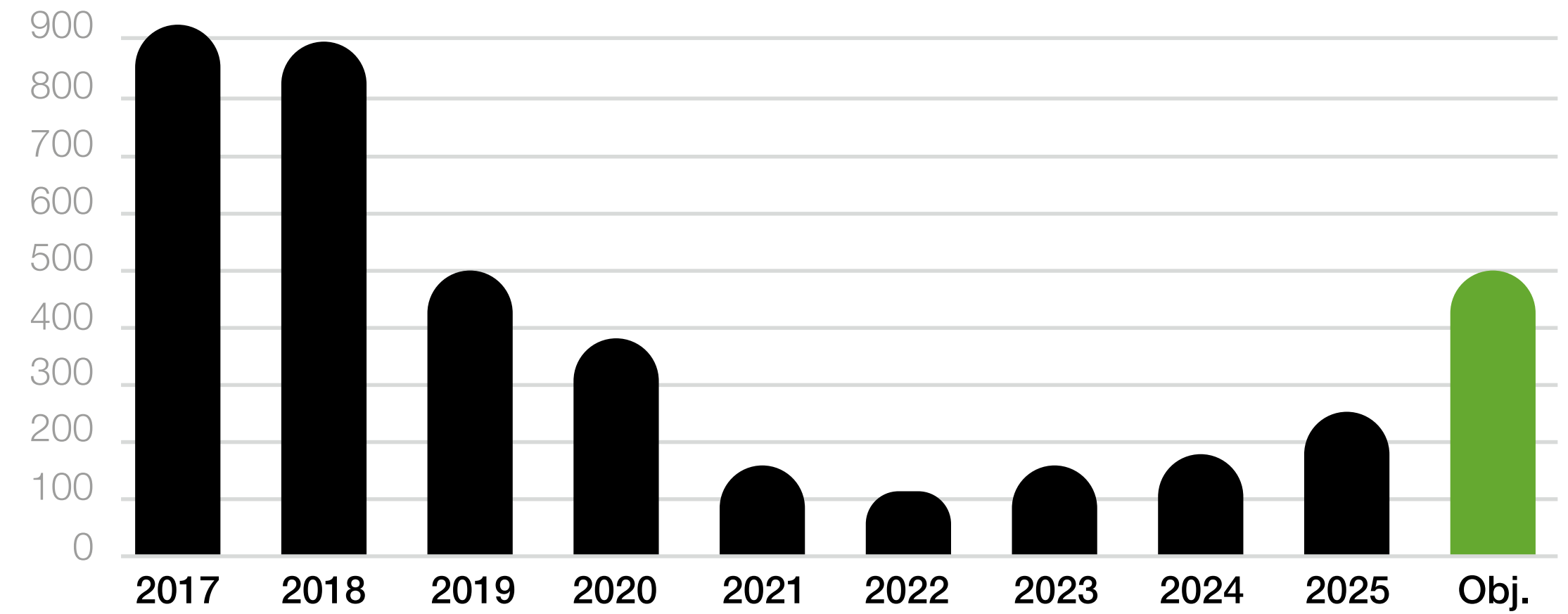
#### Number of critical incidents

1 incident at the Saint-Etienne site (see opposite).

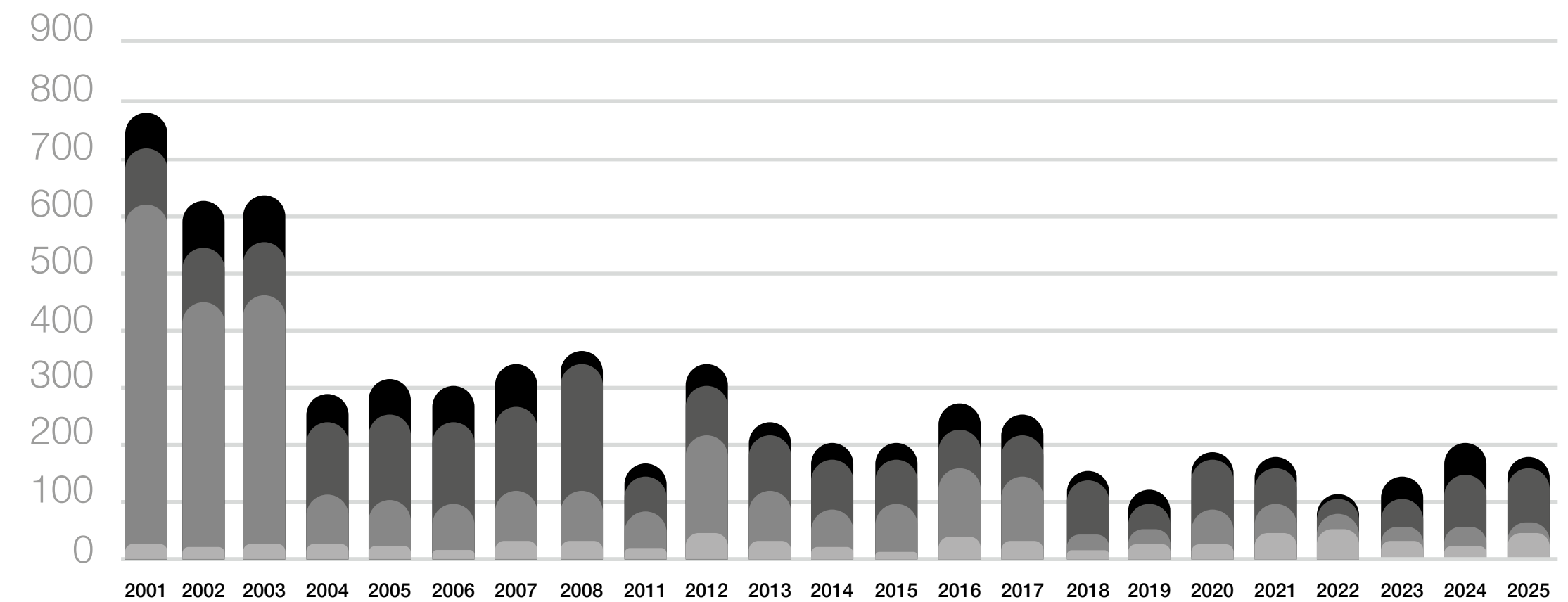
#### Average concentration of total nitrogen in the wastewater discharged from the water



#### Average phosphorus concentration in the effluent from the Bourg-en-Bresse wastewater treatment plant in g/j



#### Dust emissions in grams per ton at the steel mill - Ugine



# Water Resources

This chapter on water resources covers a topic identified as material in Swiss Steel Group's double materiality matrix:

- protection of water resources (*relevant topic*).

## 1. Strategy

Water is a precious resource that is essential to Ugitech's operations. Ugitech complies with regulations governing water withdrawal and use. The Ugine site is part of France's National Water Conservation Plan.

Preserving water resources is an essential pillar for ensuring the continuity of Ugitech's operations and constitutes a major objective of its environmental policy.



## 2. Actions achieved in 2025

### Policies / Standards / Guidelines

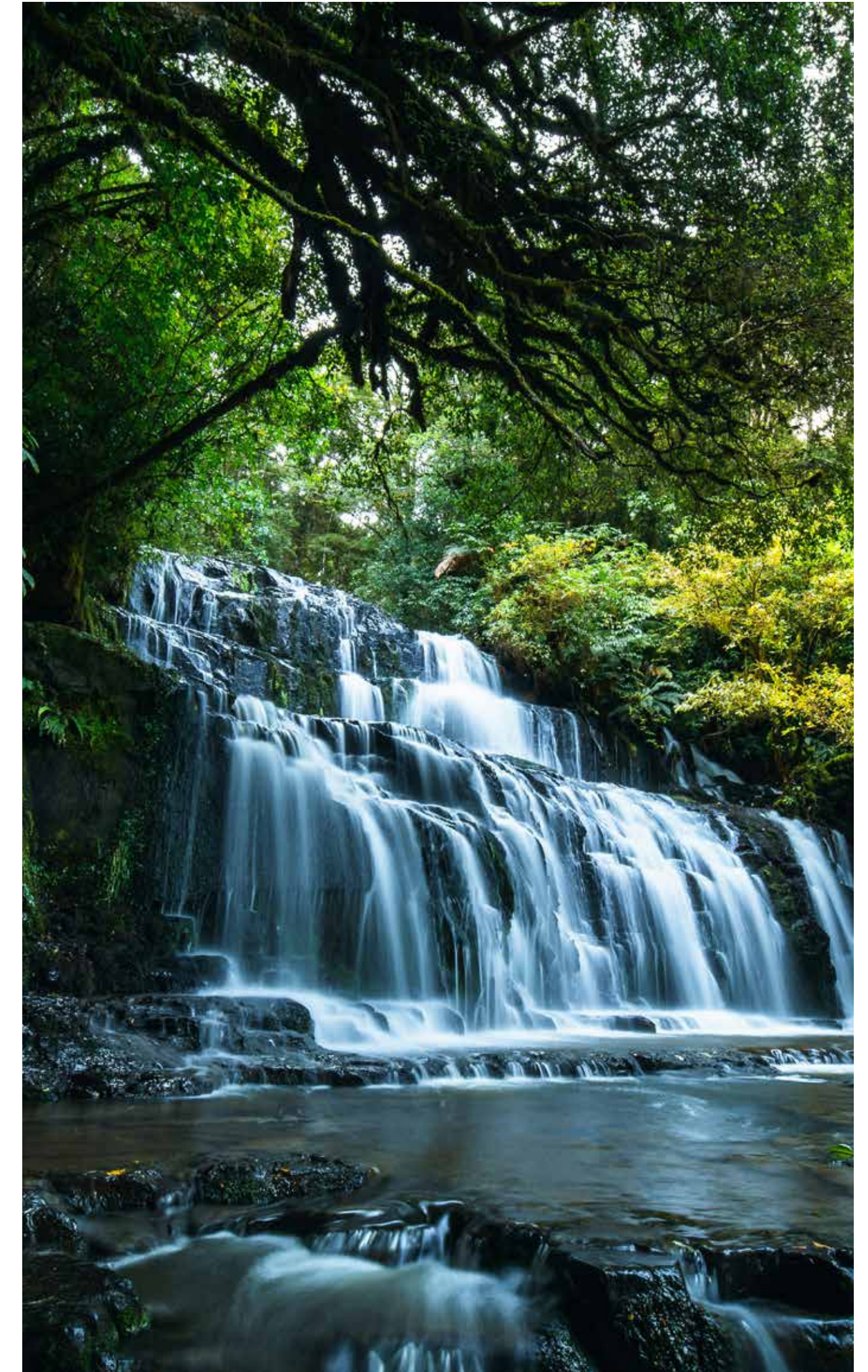
Ugitech has been ISO 14001 certified for its environmental management system since 2002. Water management is a key component of this system and a cornerstone of Ugitech's environmental policy. In France, the Water Agency requires a water management manual audited biannually by an external organization for the Ugine site.

### 2025 actions and resources

#### The water conservation plan

As part of the initiative launched by the Ugine site to reduce its impact on the natural environment and water resources, an application was submitted to the Water Agency at the end of 2024. This application outlines all the actions planned in the near future to optimize consumption and thereby reduce water withdrawal from the environment. It specifically includes projects at the Rolling Mill and Finishing shops.

Three projects have been identified and planned. Their rollout will take place in phases between now and the end of 2026, depending on the operational and technical constraints specific to the various industrial tools.



One of these projects has already been completed: it involves the installation of monitoring devices on the cooling system of a transformer in the Finishing Workshops. This measure now allows for more precise control and better management of the water flow rates used for this cooling process.

The other two projects, currently in the planning phase, will be implemented in 2026:

- a modification of the cooling system for the rollers at the rolling mill, aimed at reducing water consumption while ensuring the safe operation of the equipment,
- an optimization of the cooling system for another piece of equipment in the Finishing Shops, with the goal of improving demand regulation and limiting water consumption.

The complete dossier presents to the Water Agency and government agencies a structured and coherent overview of the site's commitments, demonstrating its commitment to sustainably reducing its water consumption and improving the environmental performance of its processes.

### **Feasibility study for the construction of wells for pumping groundwater**

To prepare for climate change and ensure a sustainable water supply, the Ugine site has launched a project to drill a well in the aquifer along the Arly River. This initiative is part of both a strategy to build resilience against potential droughts and the need to ensure the site's operational continuity.



In fact, major work planned by EDF between now and 2028 on the power supply tunnels of the current grid will result in partial or total unavailability, lasting several months, of the water source normally used by the site. In this context, having secure access to an alternative water source becomes essential to maintaining industrial operations without interruption.

Hydrogeological studies have shown that, while the surface water resources around the Ugine site are highly sensitive to fluctuations in flow and episodes of drought, the aquifer associated with the Arly River is a robust and much more stable resource. Its controlled exploitation thus offers a significantly higher level of security in the event of strain on conventional resources.

Initially, this well will be used solely as a backup resource. It will supplement the existing water supply system, which will remain, for the time being, the primary source of water for the site. The goal is therefore to have a redundancy solution available in the event of severe water shortages or prolonged unavailability of the current network, without immediately altering the usual operating procedures.

This project thus helps strengthen the resilience of the Ugine site in the face of hydrological hazards, while ensuring the continuity of industrial operations in the years to come.



Process water recycling in Bourg-en-Bresse

### Recycling process water at the Bourg-en-Bresse site

In 2025, the Ugitech site in Bourg-en-Bresse completed a feasibility, technical, and economic study on the reuse of its process water to bring it into a nearly closed-loop system. This study received funding under the “Industry of the Future” program from the Auvergne-Rhône-Alpes Region.

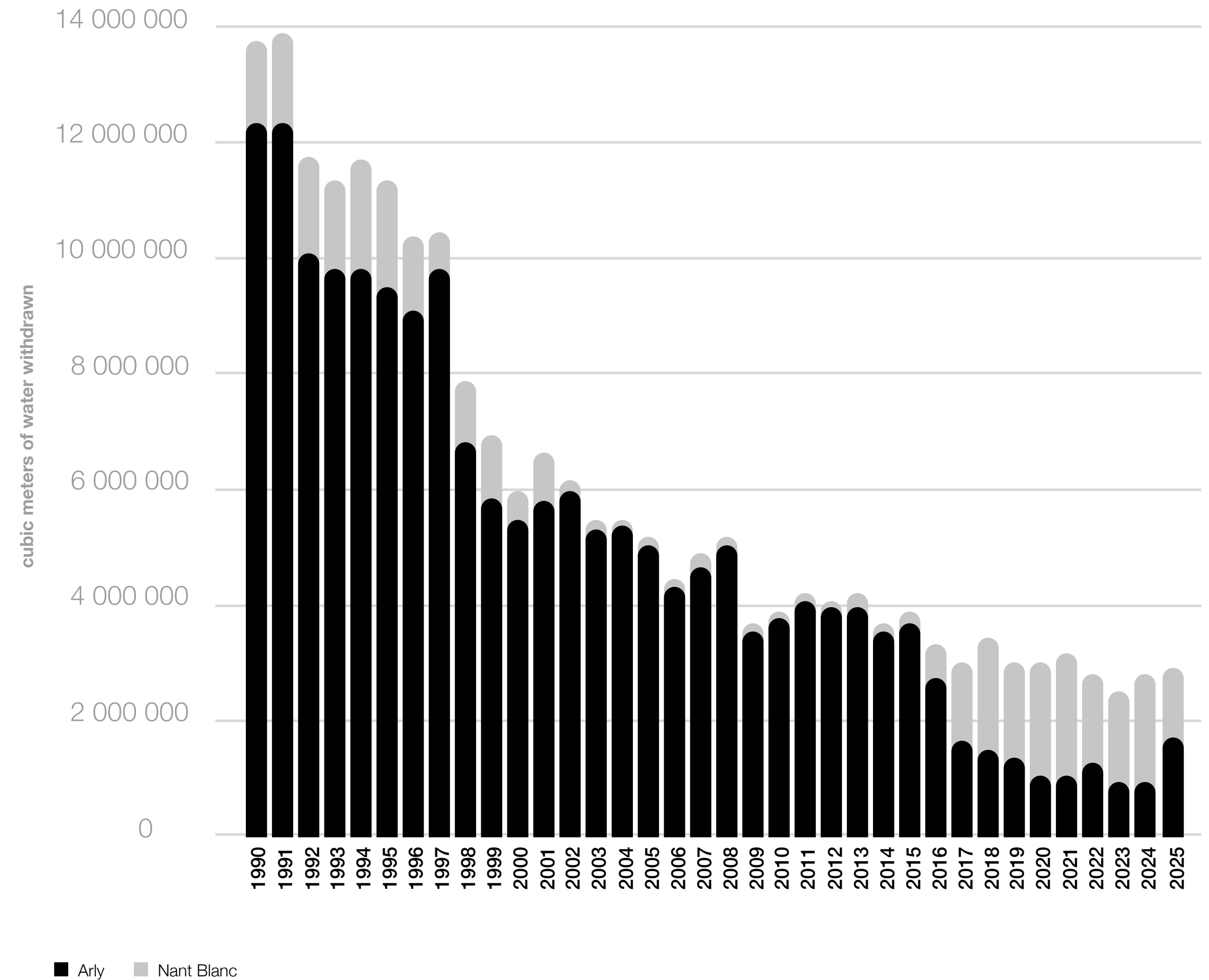
Following the conclusions of this study, the site launched an eight-week pilot project in late 2025 for the filtration, treatment, and reuse of our process water. This pilot project received financial support from the Rhône-Méditerranée-Corse Water Agency.

## 3. Metrics and Objectives

### Water consumption (in cubic meters per billed ton)

In line with the guidelines of the National Water Management Plan, Ugitech has committed to reducing its water withdrawals by approximately 10% compared to 2019 baseline year. This target represents an annual savings of approximately 300,000 m<sup>3</sup>, equivalent to 120 Olympic-sized swimming pools. As of 2025, we have achieved a 5.3% reduction in water consumption compared to 2019.

### Water abstraction at the Ugine site



# Biodiversity and Ecosystems

This chapter on biodiversity and ecosystem conservation addresses a non-material topic in Swiss Steel Group's double materiality matrix:

- biodiversity (*awareness-raising topic*).

## 1. Strategy

Biodiversity encompasses all living things: plants, and wildlife. Respecting and preserving these living things in the vicinity of Ugitech's industrial facilities is essential. Ugitech's sites are not located in protected natural areas, but respecting biodiversity remains one of our top priorities.



## 2. Actions achieved in 2025

### Policies / Standards / Guidelines

Ugitech has been certified as ISO 14001 since 2002. Biodiversity is one of the key areas of focus in the company's environmental management system.

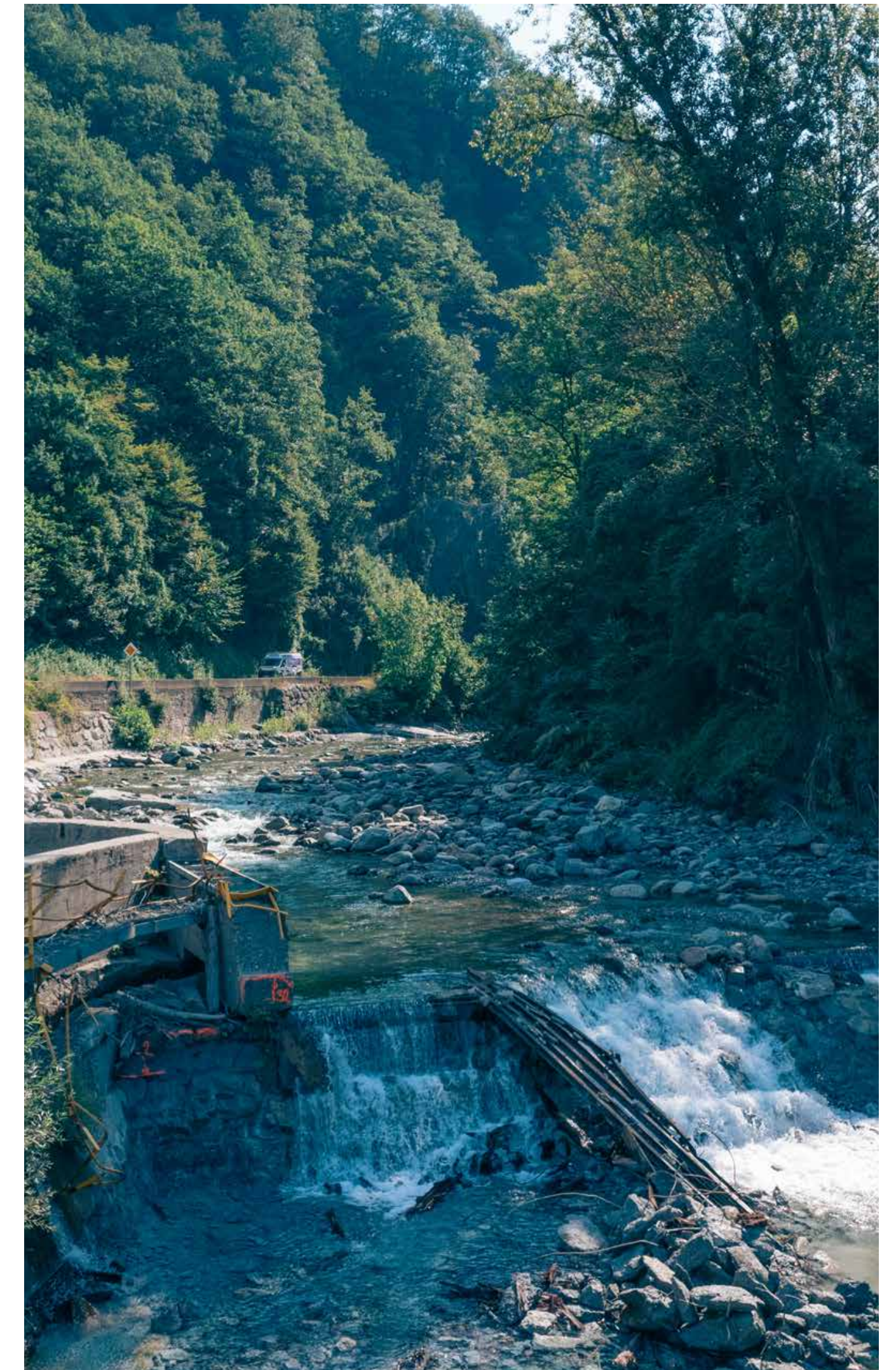
### 2025 actions and resources

#### **Fish passage at the Mollières weir: an exemplary project that balances industry and biodiversity**

Located at the entrance to the Arly Gorge, upstream from the plant in Ugine, the Mollières weir plays a key role in supplying water when other sources are unavailable (*the Nant-Blanc and the Arly via an EDF hydroelectric power plant*).

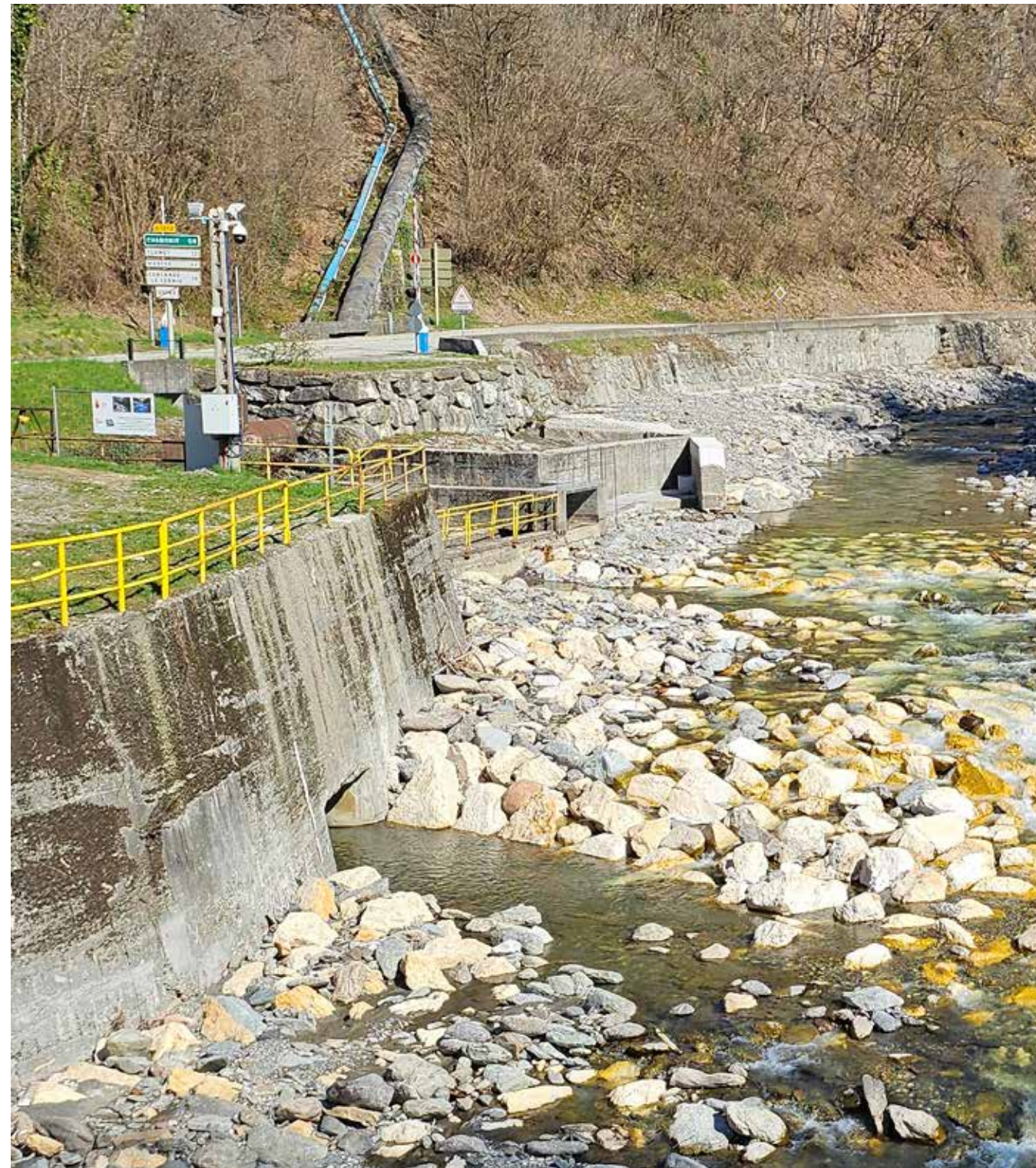
However, it constituted an obstacle to fish migration, particularly for brown trout. The project aimed to:

- restore the ecological continuity of the watercourse by removing the barrier to fish migration,
- bring the water intake into compliance with regulatory requirements, in particular to ensure the restoration of a minimum flow as defined in the Environmental Code,
- ensure the security of the water supply for the plant.



Mollières weir before construction

The work took place between July and October 2024, with a few adjustments made in 2025. It involved leveling the weir and creating a gently sloping rock-filled ramp to facilitate fish passage. The banks were also stabilized and the water intake modernized. The initial budget of EUR 723,000 was reduced to EUR 665,637, with 40% of the funding provided by the Water Agency.



Mollières weir after construction

The project was led by Ugitech’s Environment and New Construction departments, in coordination with several public agencies: the Regional Directorate for Environment, Landscaping, and Housing (*DREAL*), the Departmental Directorate for Territorial Planning (*DDT*), the French Office for Biodiversity (*OFB*), the Water Agency, the Departmental Fishing Federation (*FDP*), and the communities of Ugine and Arlysère. The service providers involved were SAFEGE for project management, MARTOIA for construction work, and SOCOTEC for safety.

The ecological results are positive. A rescue fishing operation carried out prior to the work, in July 2024, had allowed for the relocation of 41 fish. By June 2025, about thirty fish—brown trout, rainbow trout, chub, sculpin, and bullhead—had naturally returned to the river. The project thus contributes to the restoration of fish migration and the rehabilitation of spawning grounds.



To ensure the long-term sustainability of industrial operations in the face of droughts, Ugitech is exploring a project to drill into the aquifer beneath the plant, providing a fourth source of water with no impact on aquatic life. This project, which is pending approval (*DREAL, DDT, OFB, Water Agency*), is expected to enhance water resilience within two years.

### Invasive plants

Ugitech’s sites are located near waterways. Unfortunately, invasive plants have taken hold along the riverbanks, particularly Japanese knotweed. Ugitech, in collaboration with the Syndicat Mixte des Rivières, follows best practices regarding mowing. The necessary precautions are taken to prevent the spread of these plants.

### UGI’RING at the Léchère site

The UGI’RING project will be located on a brownfield site in Savoie, near the Ugine site. The demolition phase was completed in 2025. During this phase, specific measures were taken to avoid impacting wildlife:

- restricting traffic in a preserved green area,
- building shelters for birds and reptiles (*hibernaculum*),
- conducting demolition outside the nesting period for protected species from March to August 2025.

# Resource use & Circular Economy

This chapter on circular economy topics addresses two relevant topics in Swiss Steel Group's double materiality matrix:

- circular economy (*key topic*),
- waste (*relevant topic*).

## 1. Strategy

Through the development of the circular economy, Ugitech aims to preserve European sovereignty while reducing its dependence on volatile raw material prices. This approach is part of a commitment to sustainably integrate the conservation of natural resources into daily practices, to design products that address sustainability challenges, and to apply these principles across all operations at the site.

## 2. Actions achieved in 2025

### Policies / Standards / Guidelines

Ugitech has been ISO 14001 certified since 2002 for its environmental management system. Our approach to the environmental impact of our products' life cycle includes the circular economy. An environmental and energy policy, approved by the executive committee, has been published since 2002. Ugitech engages an independent third-party organization to certify the average percentage of recycled content in its annual production.

### 2025 actions and resources

#### Waste management and recycling streams

Ugitech goes beyond its legal obligations regarding traceability and waste recovery. The 5R approach is applied daily:

- refuse, by eliminating potential waste,
- reduce, by optimizing waste generation,
- reuse, by finding new uses for waste,
- recycle, by sorting materials as thoroughly as possible,
- return to the earth, by recycling through the most appropriate channels.



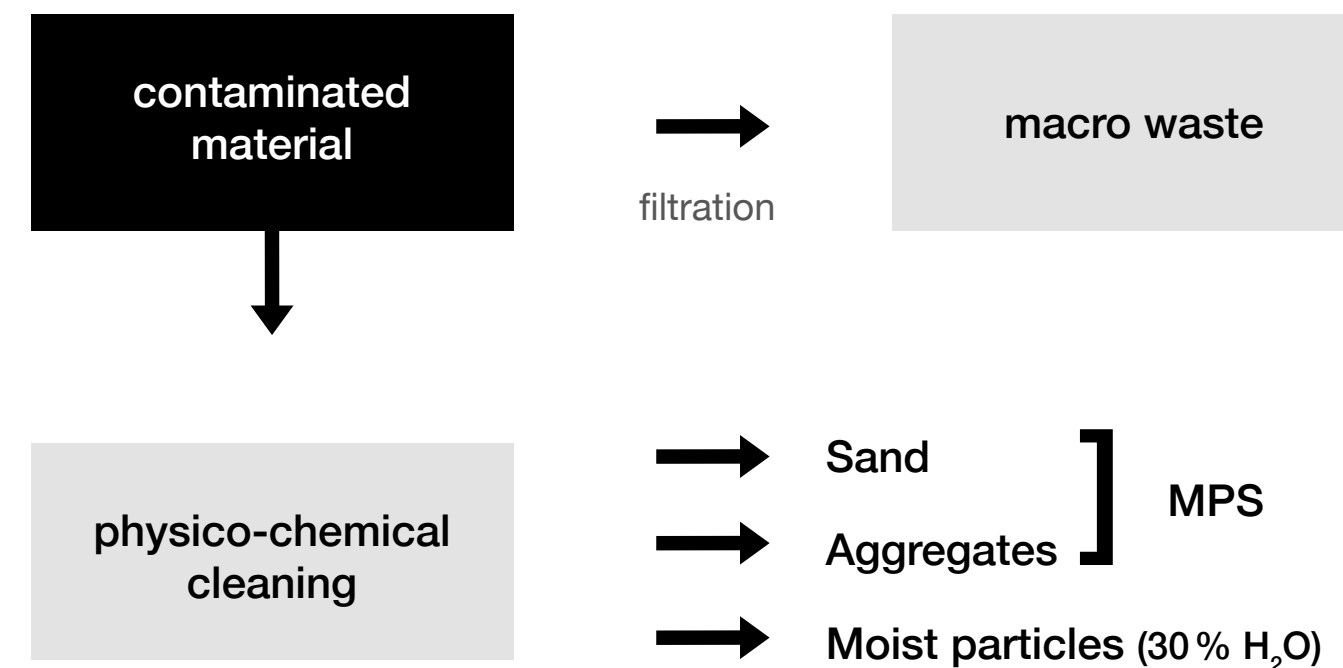
A new system for recycling construction debris has been established. Since 2024, Ugitech has been working with SOLVALOR Rhône, a major independent player in the circular economy for nearly 25 years, to collect and process our refractories, road sweepings, soil, and contaminated construction debris. This waste was previously sent to SECHE in Changé (53810) for disposal in a specially designed landfill. SOLVALOR Rhône recycles this waste, which is therefore exempt from the TGAP (*General Tax on Polluting Activities*). The change in disposal method for this waste allows us to recycle it instead of sending it to landfills.



SOLVALOR Rhône site

Physicochemical washing is at the heart of this process. When a comprehensive analysis for an Inert Waste Storage Facility (*ISDI*) reveals levels exceeding the limits for inert materials—such as heavy metals, hydrocarbons, TOC (*Total Organic Carbon*), etc.—the waste batch is considered contaminated. In response to this issue, SOLVALOR Rhône

has developed a washing solution that concentrates the contamination in the smallest possible fraction: the fines. This process enables the production of sand and gravel suitable for reuse (*in road base layers or concrete*) and filtration cakes (*fines*) that are recycled at authorized treatment centers (*cement plants*).



Schematic diagram of physicochemical cleaning

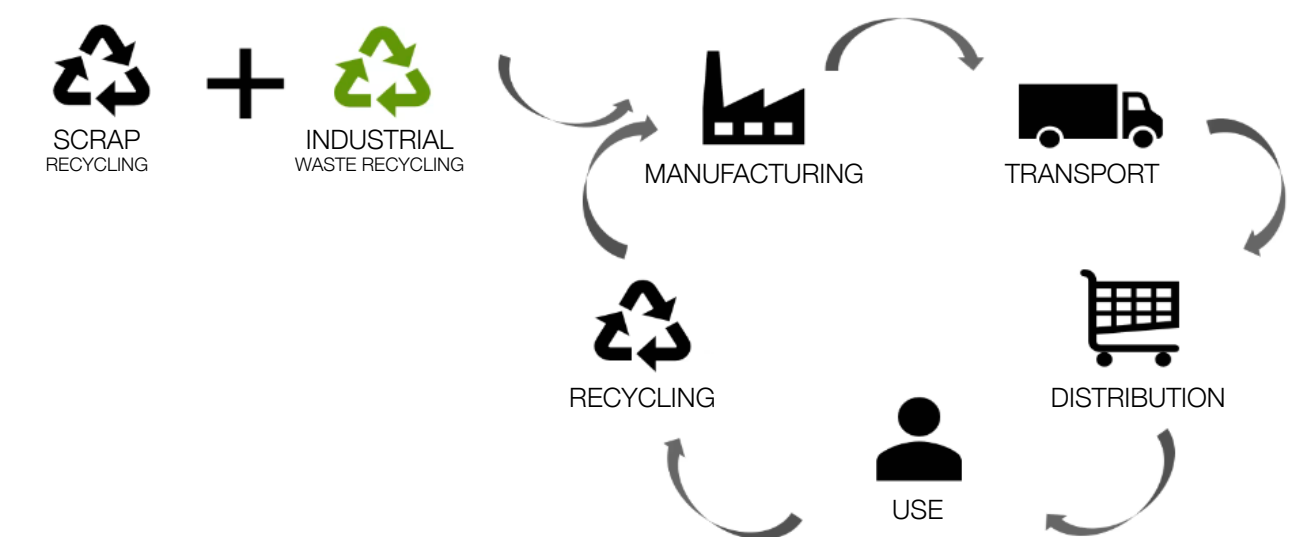


SOLVALOR Rhône site

### The UGI'RING circular steel mill project

The goal of the UGI'RING circular steelmaking project is to produce ferroalloys containing nickel and manganese from steelmaking by-products (*steelmaking dust, slag, and sludge*) and nickel-containing waste, as well as alkaline batteries.

These ferroalloys will then be used in the production of stainless steel, replacing natural resources from mines, in order to close the loop of the circular economy.



Flowchart of industrial waste recovery in the future UGI'RING process

The UGI'RING project will be located on a brownfield site in Savoie, near the Ugine site (34 km away). The demolition phase was completed in 2025.



Demolition at the Léchère site

The successful outcome of this demolition phase has enabled the recovery and recycling of approximately 4,000 tons of scrap metal in electric smelting furnaces.

The next phases of the UGI’RING project will involve the construction of facilities dedicated to recycling and the production of ferroalloys and will take place in 2026 and 2027.

### Recycled raw materials

The stainless steel manufactured in Ugine is primarily made from recycled scrap metal and offcuts. These recycled materials are supplemented by primary raw materials (*ferroalloys and pure raw materials such as nickel*). The manufacturing process allows for the maximization of recycled material content.

Raw materials from recycling come from various sources:

- Scrap and offcuts purchased externally: these materials come from circular economy channels and are fully recycled at the steel mill.

- Internal scrap: production scrap is fully recovered and recycled at the steel mill.
- Recycled waste: waste recovery routes for waste produced by Ugitech are in place on-site (*slurry from the rolling mill, steel mill dust, grinding waste, etc.*). These routes process the waste, enabling its final reuse at the steel mill.

### Recycling customer scraps

In 2025, Ugitech launched partnerships to collect scrap from its customers in the cutlery and watchmaking industries.

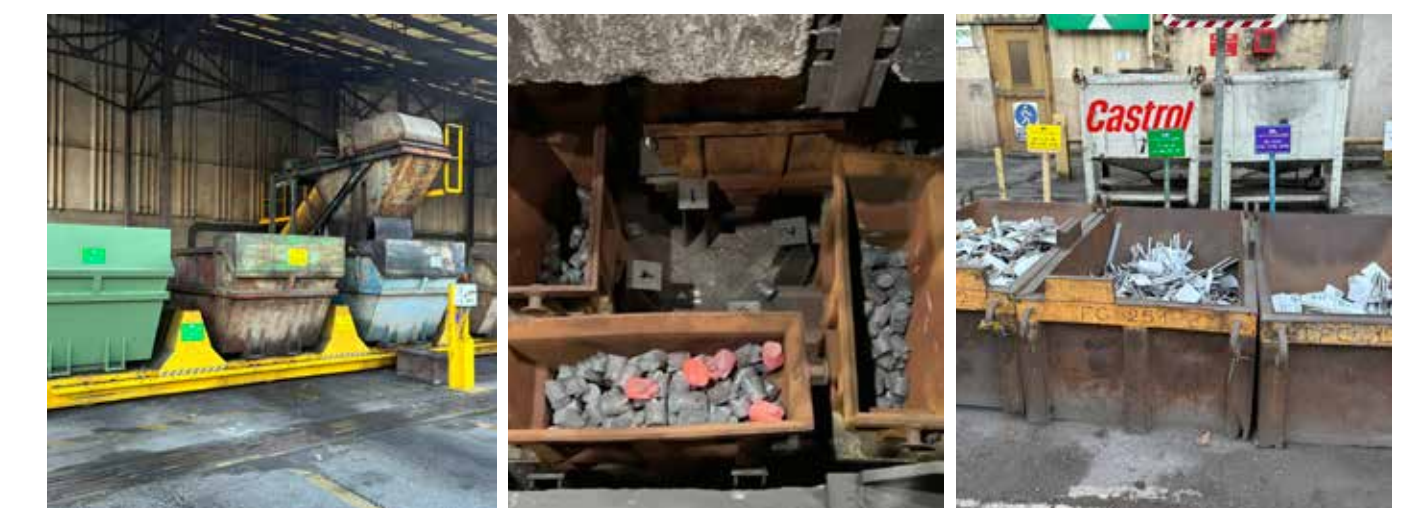
### The project to sort production scraps and waste

The scrap sorting project aims to collect all production scrap and offcuts from our stainless-steel operations across the entire Ugitech site, with the best possible understanding of their composition, in order to optimize the recovery of various metallic elements during the charging of our furnaces for casting: chromium, nickel, molybdenum, copper, and iron. The return to the steel mill of these unusable (*chips, trimmings, scraps, etc.*) or non-conforming (*blooms, bars, wire rod, drawn wire*) product residues stem from technical over-removal (*material removal*) or non-conformity in all of Ugitech’s processing shops. This requires the implementation of the most detailed local sorting possible.

This sorting relies on the identification and traceability of the scrap obtained. It also involves grouping them into analytical categories. In some cases, it involves inspecting the scrap using various methods, such as a portable X-ray fluorescence analyzer, magnetic inspection, or other techniques.

One of the first steps was to redefine the number and composition of the grouping classes, incorporating discriminating criteria based on the levels of molybdenum, nickel, chromium, and copper in order to better separate these various chemical elements that make up stainless steel.

Ugitech has also worked on scrap recovery from the first shear of the rolling mill using four types of scrap bins arranged on a controlled carousel, with tracking all the way to the steel mill’s charging area carried out using a chip-based system that identifies and locates them (*RFID: Radio Frequency Identification*).



Sorting of production scraps and waste

### 3. Metrics and objectives

#### % recycled content (pre- and post-consumer)

The recycled content of the products has been calculated for 2025 using the following formula:

$$\% \text{ recycled content} = \frac{\text{Tons of recycled raw materials}}{\text{Tons of raw materials fed into the furnace}}$$

A distinction is also made based on the origin of the scrap. When the scrap comes from Ugitech, it is classified as Internal / home scrap. Pre- and post-consumer recycled content consists of scrap purchased from sources outside Ugitech.

- Recycled content: 76.2 %
- Home recycled content: 26.6 %
- Pre- and post-consumer recycled content: 49.6 %

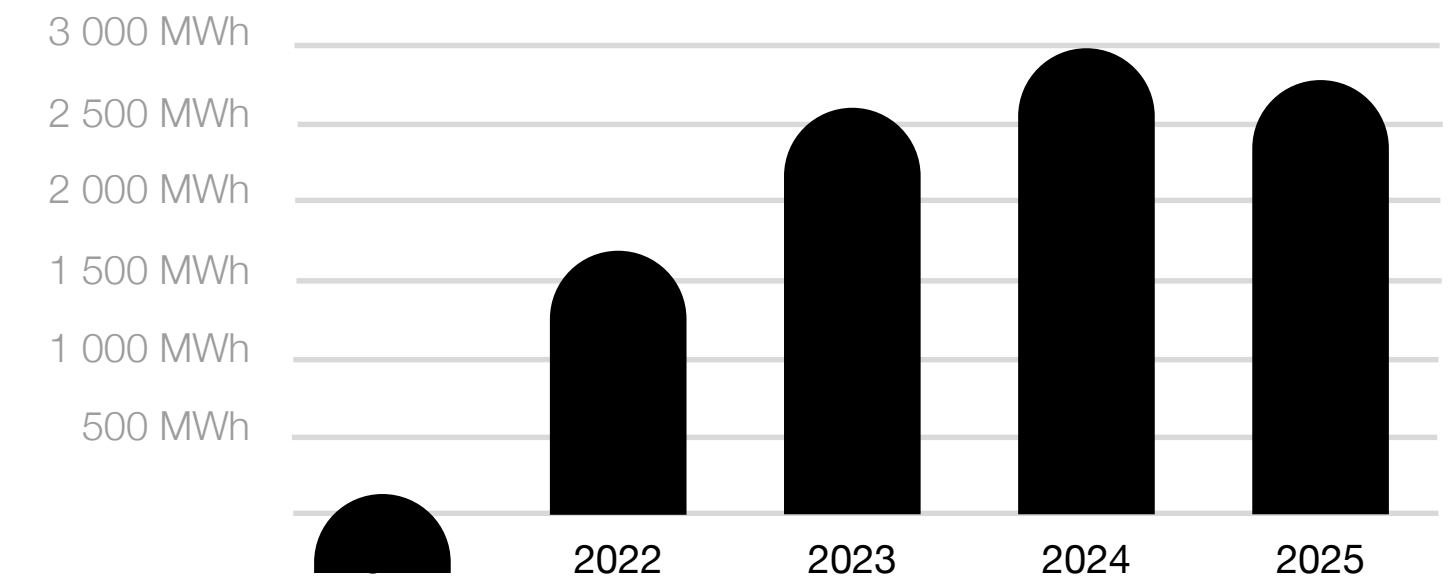
According to the taxonomy, recycled content is calculated using the following formula:

$$\% \text{ recycled content} = \frac{\text{Tons of recycled raw materials}}{\text{Tons of steel at the end of the casting process}}$$

Recycled content: 91.7 % (according to the taxonomy formula). The recycled content of our products is tracked during continuous casting by the steelmaking department.



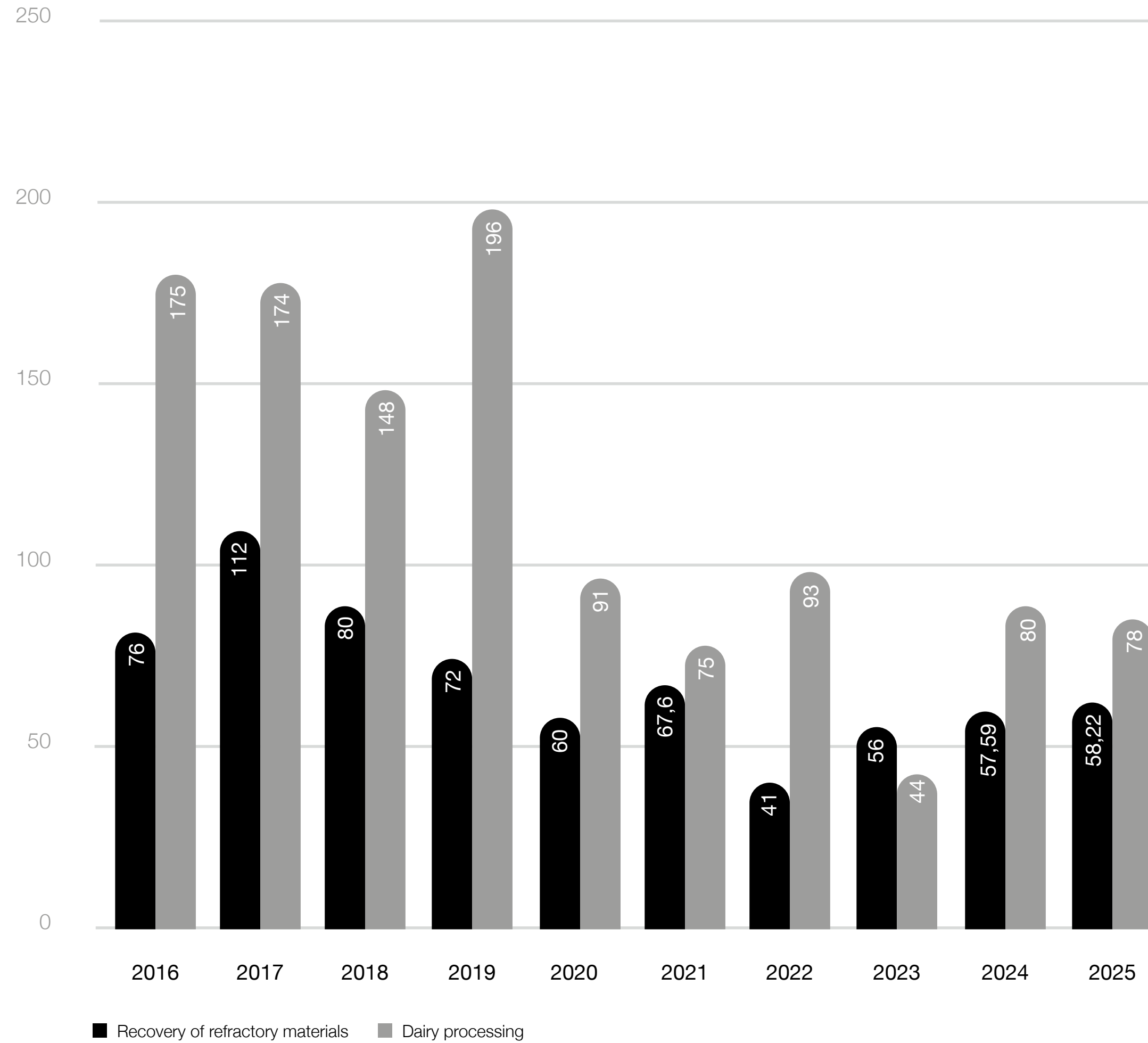
Amount of waste heat from the annealing furnaces (RC8) in the wire rod finishing shop supplied to the Ugine's District Heating Network (RCU)



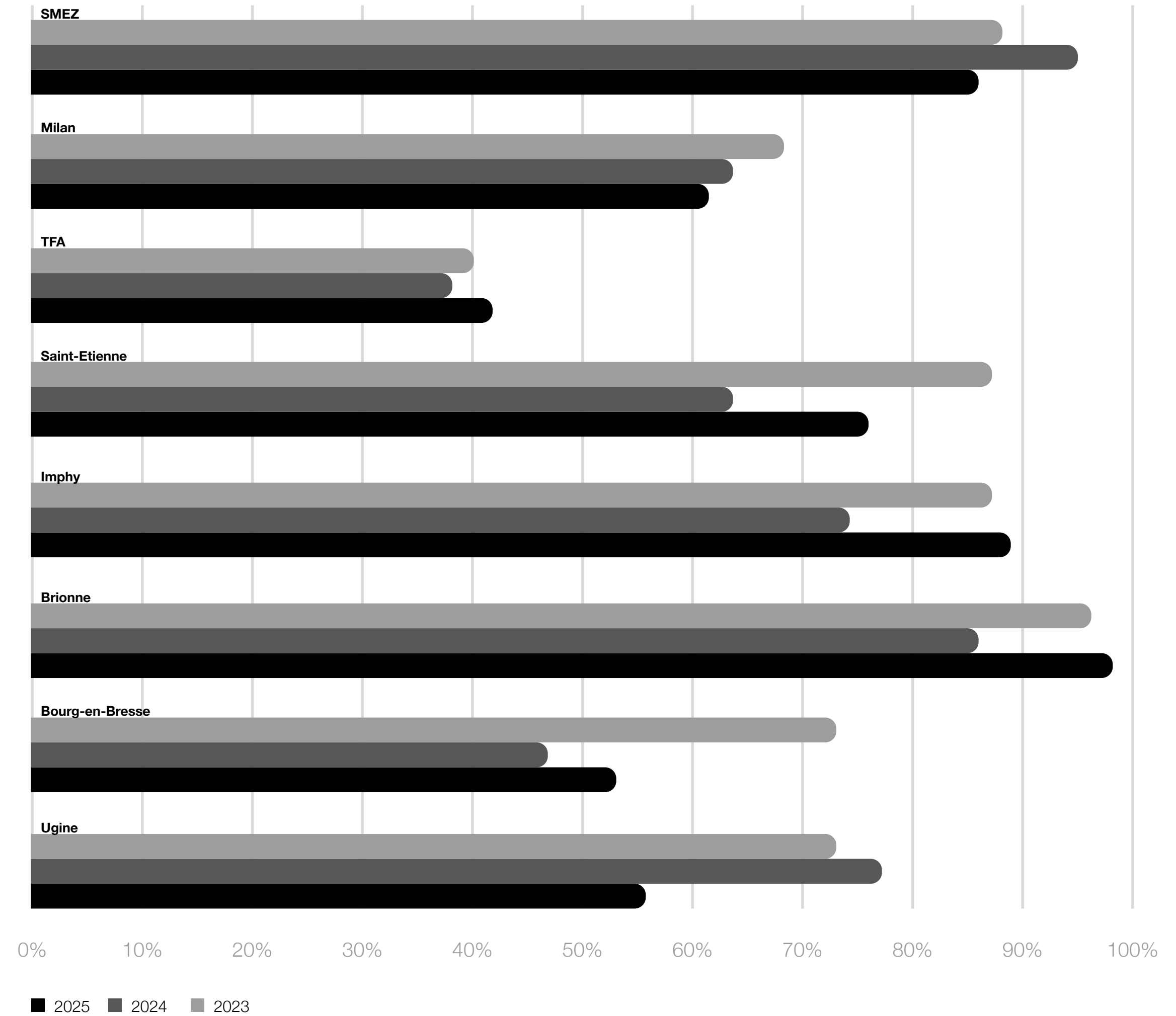
Amount of waste heat supplied to the Ugine RCU



**% recycling of slags and waste in Ugine**  
*Recovery rates for major steel mill waste*



**% of waste recycled at various Ugitech sites**  
*% of waste recycled by site*



# Social

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# Health & safety, working conditions

This chapter on the health, safety, and working conditions of employees addresses a topic deemed highly material in Swiss Steel Group's double materiality matrix:

- health and safety (key topic).

## 1. Strategy

Ugitech has long been committed to preventing occupational health and safety risks and improving working conditions. This commitment is an integral part of our operations, which involve large-scale processing and feature numerous highly technical processes.

Our goal in the area of occupational health and safety is to strive for "zero" accidents and "zero" occupational illnesses.

The associated challenges include:

- ensuring the health and safety of our employees,
- promoting quality of life and working conditions within Ugitech,
- promoting and upholding the company's values and culture.



## 2. Actions achieved in 2025

### ISO 45001 Certification

The implementation of the ISO 45001 standard at Ugitech represents a major strategic lever for strengthening occupational health and safety. It enables the establishment of a robust and consistent management system, supported by external audits that provide an independent perspective and an in-depth assessment of the organization. This approach facilitates the identification of concrete areas for improvement and the continuous optimization of internal practices, particularly in the areas of risk management, training, managerial involvement, and employee consultation.

The achievement of certification in February 2025 for the Ugine site already demonstrates the company's strong commitment to a safer work environment, as evidenced by the strengths identified during the audits:

- presence of dedicated Health, Safety, Security, and Ergonomics (HSSE) personnel,
- enhanced training for new employees,
- rigorous management of subcontractors,
- consideration of internal customer requirements and precise monitoring of confined spaces and energy use.

## Health and Safety Policy



The approach aims to involve all managers, members of the Health, Safety, and Working Conditions Committees, and every Ugitech employee as stakeholders responsible for their own safety and that of their colleagues.

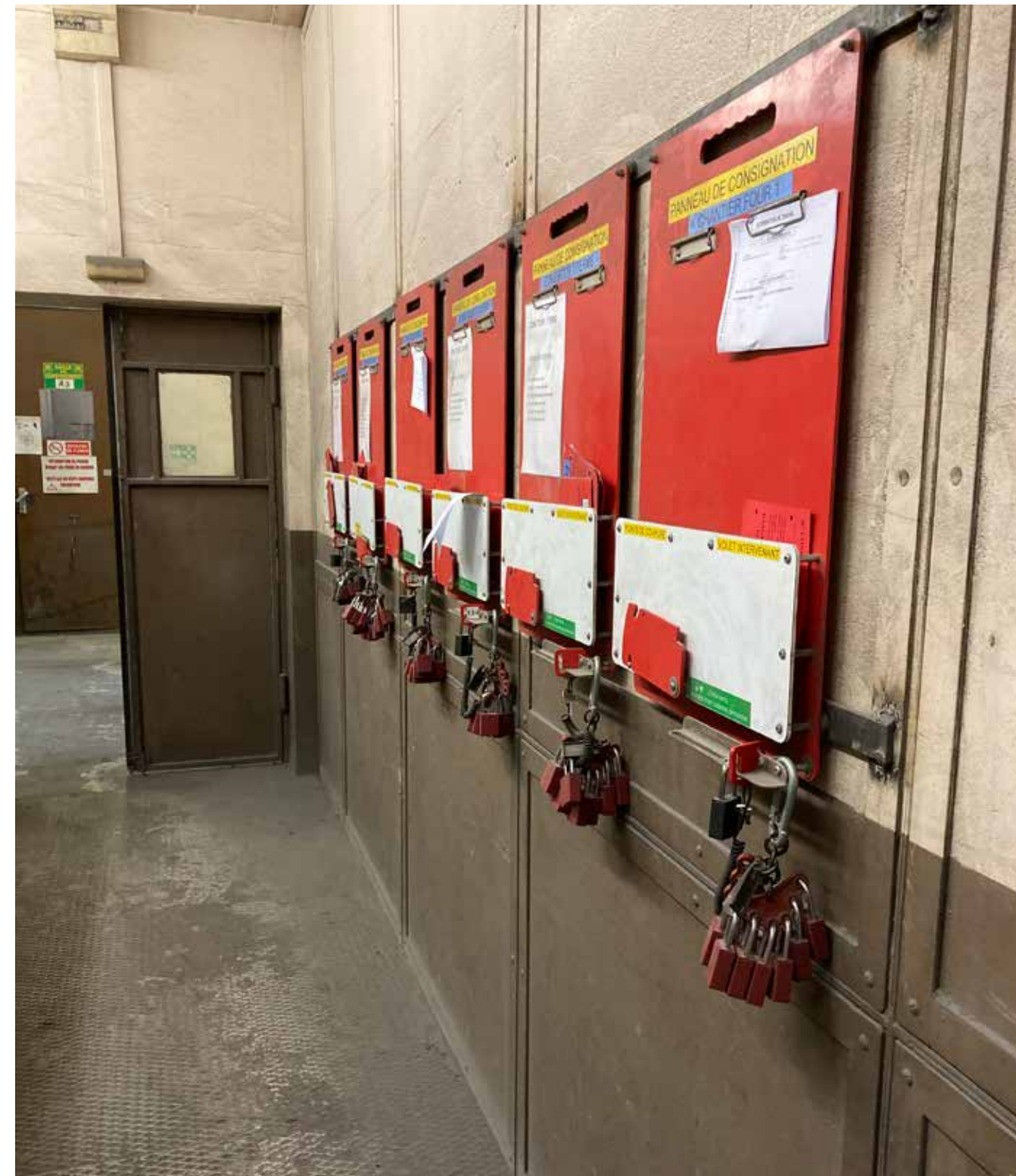
This approach applies to all company departments, wherever work is being carried out, as well as to subcontractors and visitors. Improving health and safety performance requires strengthening a culture of proactive prevention. Ugitech recognizes the importance of developing human vigilance, taking a step back, analyzing human factors, and organizational structuring to improve prevention.



## 2025 actions and resources

### The implementation of an organizational and human factors program

Ugitech is implementing a structured FOH program that combines training, error analysis, reflection, and feedback to foster cultural development and individual accountability.



Lockout/tagout signs with padlocks for personnel

By 2025, Ugitech had:

- accelerated safety-related management procedures (*reviews, site inspections, safety dialogues*),
- initiated the development of a plan to build the health and safety skills of managers and ESI teams,
- enhanced daily risk detection, as well as the ability to step back and maintain shared vigilance among all, including operators,
- strengthened the foundation of operational knowledge by supporting on-the-job learning, particularly through illustrated and interactive safety sheets,
- leveraged internal feedback to raise awareness in a context-specific manner and contribute to a shared culture of best practices.

### The ongoing effort to manage critical risks

The revised Health, Safety, and Ergonomics Policy for 2024 maintains the focus on managing critical risks (*industrial risks, chemical substances, human-machine interaction, confined spaces, work at height, etc.*) associated with Ugitech's industrial activities:

- bringing production equipment into compliance and modernizing it (*multi-year plan*),
- strengthening of expertise regarding chemical risks, work at heights, confined spaces.



Internal safety audit

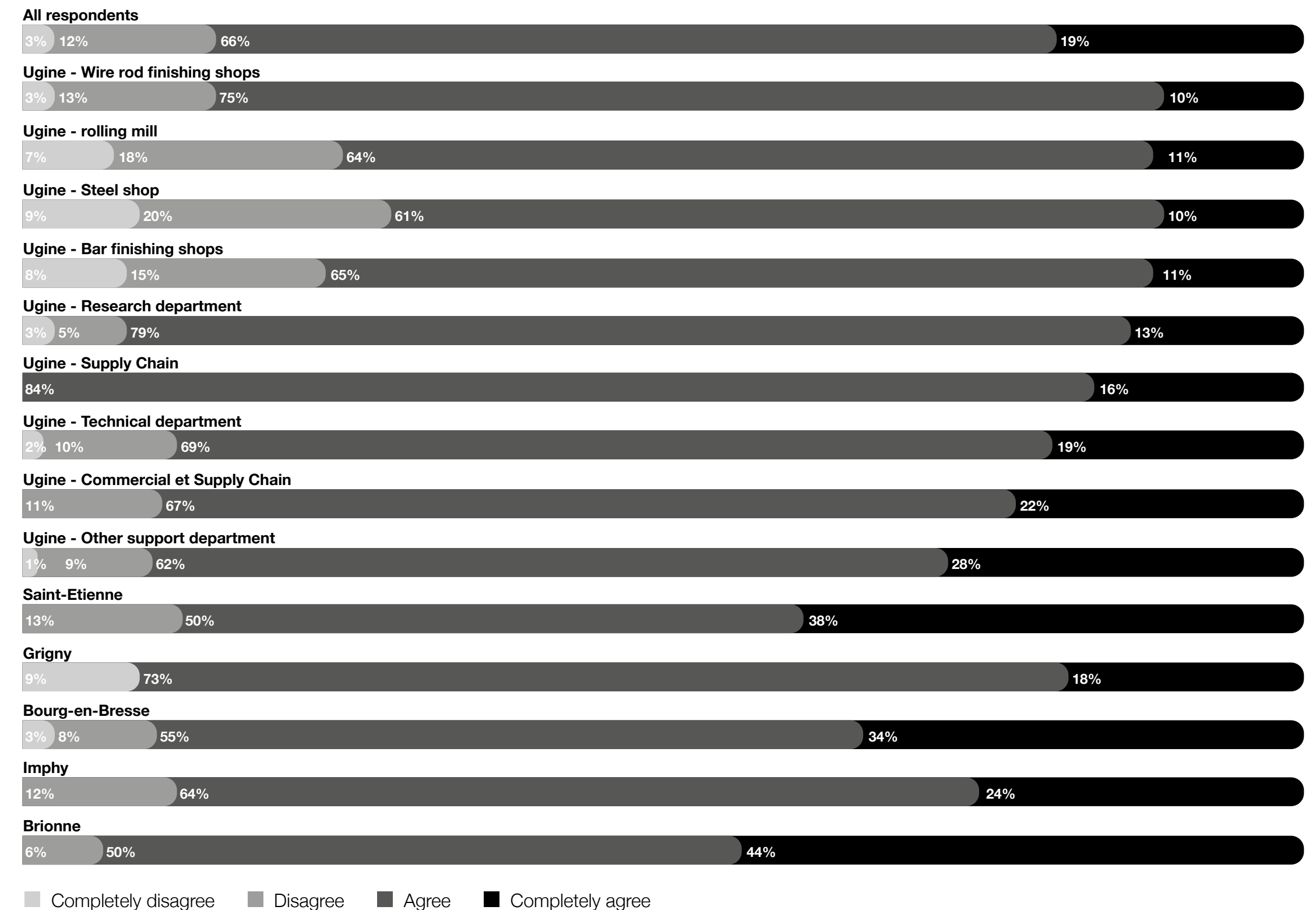
### The 2025 quality of life and working conditions survey and its action plan

The quality of life and working conditions 2025 survey, conducted from March 31 to April 18, 2025, among all Ugitech employees as part of the 2021-2026 company-wide agreement, was a key milestone in social dialogue and in understanding working conditions within the company. Conducted in partnership with Technologia, it achieved a 46% response rate, considered representative for heavy industry despite lower participation among operators (19%). The detailed analysis (nearly 140 pages) identified key trends: high expectations regarding recognition, clarity about the future, workload, and a need to strengthen autonomy and managerial support, particularly in operational sectors.

Based on these results, the quality of life and working conditions Commission-comprising management, labor unions, and Technologia-developed guidelines to build a concrete, realistic, and prioritized two-year action plan, informed by feedback workshops with management and teams. This plan will be finalized by the Executive Committee prior to the signing of an amendment to the company agreement and operational rollout beginning in 2026.

### Quality of life and working conditions Survey 2025 - A commitment that is recognized and appreciated

Do you consider Ugitech to be a company committed to corporate social and environmental responsibility?



### The approach to addiction prevention

Ugitech reaffirms its commitment to the “businesses and public services committed to action” initiative. This is a government initiative focused on engagement and accountability aimed at businesses, structured around a charter and designed to establish and facilitate a coherent approach to collective and individual prevention.

After raising awareness among all employees on this topic in 2024, Ugitech is continuing to roll out its addiction prevention program in 2025. As part of the health and safety policy, this program contributes to protecting employees’ physical and mental health and strengthening the culture of prevention. The year was marked by the operational implementation of prevention days through screening, with the organization of 14 such days held across all our sites.

Screening sessions were organized in a phased approach:

- scheduled sessions with advance notice,
- scheduled sessions without advance notice,
- and then, starting in 2026, without advance notice.

Throughout the year, information campaigns were conducted for managers and employees through communications from the Human Resources Department, the Health and Safety Committees, and internal communications.

The health department participated in these initiatives,

particularly during prevention days featuring screening, in order to provide personalized support and enhance understanding of the program.

The year 2025 marks a key milestone in the structuring and practical implementation of the addiction prevention program. The initiatives undertaken have helped to raise awareness, ensure the safety of screening practices, and firmly embed this approach in the company’s health and safety policy.

### The occupational health department’s approach

In 2025, the occupational health service, staffed by an occupational health doctor and nurses, focused its efforts on four specific areas to protect health and improve working conditions:

- helping to reduce the number of workplace accidents by strengthening the role of the occupational health nurse,
- monitoring potential exposure to chemical risks,
- addressing sleep patterns and shift work, - preventing addiction and protecting the overall health of Ugitech employees.

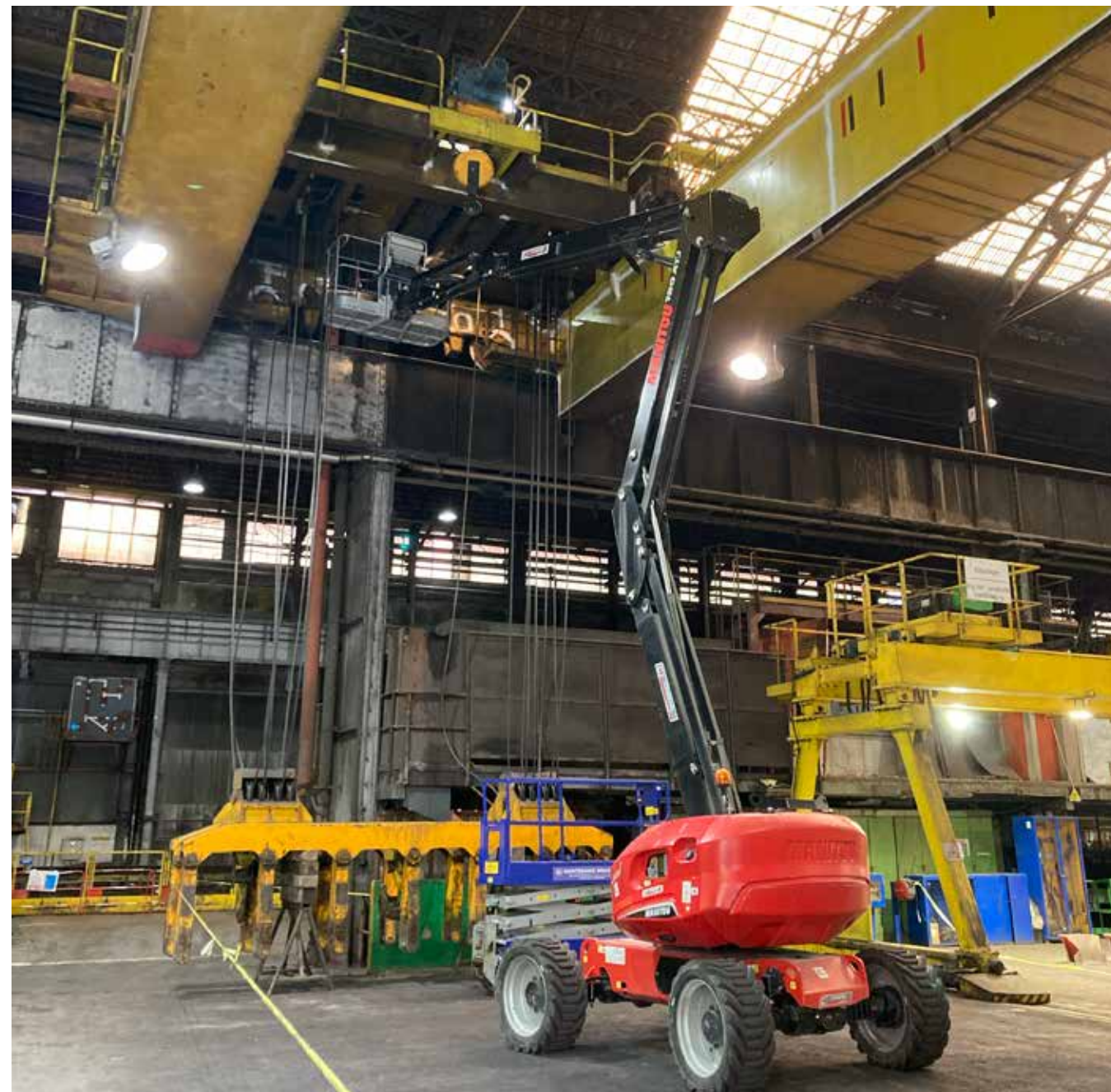
### The multi-year plan for comprehensive transformation to bring machinery into compliance

The multi-year comprehensive transformation plan focused

on machine compliance is a cornerstone of Ugitech’s health and safety policy. This long-term initiative addresses the need to manage equipment obsolescence, reduce the risk of serious accidents, and ensure the long-term safety of facilities. It is based on:

- a phased strategy combining short-, medium-, and long-term goals, initiated several years ago and incorporating pilot projects,
- regular training for a team of skilled personnel,
- a work equipment assessment program launched in 2018 at the wire drawing plants and currently being expanded to the Ugine site starting in 2025, beginning with the rolling mill,
- a multi-year investment program based on a dual assessment of compliance and obsolescence; the planned replacement of lifting equipment (*overhead cranes, jib cranes*) is continuing, involving teams from the overhead crane, production, and new construction departments,
- reviews of modifications to machinery (*multidisciplinary compliance review regarding modifications to machinery and work equipment*), implemented in most departments; the aim of this system is to manage equipment upgrades in compliance with safety requirements while incorporating ergonomic principles at the workstation.

This long-term program is now essential for preventing major incidents, ensuring regulatory compliance, supporting productivity, and facilitating the site's overall transformation.



Work on an overhead crane using a boom lift

### Health and safety challenge at the steel mill tundish project site in 2024-2025

Cross-functional technical projects spearheaded by the Groupement des Entreprises Sidérurgiques et Métallurgiques (GESiM), particularly the tundish project in 2024–2025, are

helping to modernize equipment while improving working conditions and operational performance. This project, identified as one of the priority components of the overall compliance and continuous improvement program, has mobilized technical teams and Health, Safety, Security, and Ergonomics (HSSE) personnel, supported by the GESiM initiative.



The layout of this workshop, which is essential to the smooth operation of the steel mill's continuous casting line, has been revised to streamline its operations. Practical considerations were prioritized by leveling the access to the equipment with heavy-duty decking. The installation of pneumatic handling assistance and custom-made accessories allows us to meet the specific needs of the operators and facilitate daily operations.

This state-of-the-art equipment was also eligible for a grant from two public associations CARSAT (*Caisse d'Assurance Retraite et de Santé au Travail*) - FIPU (*Fonds d'Investissement pour la Prévention de l'Usure professionnelle*) as an ergonomic improvement.



GESiM team of tundish project

The GESiM 2025-2026 plan focuses on the drawing section of the finishing shops. The wire coil winders have been identified as a priority area for redesign in terms of safety and for more ergonomic layout.



GESiM 2025-2026: wire coil unwinding area - drawing shop in Ugine

## Initiatives that promote cohesion and corporate culture

### - From September to November 2025, health and safety days at all Ugitech sites

This “Safety Day - Ugitech 2025” event was part of a renewed focus on prevention, centered on human factors and the management of operational risks. The workshops organized blind spots on machinery, attention & distraction, safe use of grinders, management of sleep and shift schedules, accident testimonials, as well as a fun workshop led by JOKRACE - made for a rich and engaging day, designed to test the ability to work as a team and integrate concrete, immediately applicable safety practices.

This initiative was implemented across all sites, taking into account local constraints, with booths, activities, and dedicated time slots to encourage maximum participation from all teams, including temporary staff and contractors.



JOKRACE workshop during Safety Day

### - Sustainable Development Day

On June 5, 2025, at the Ugitech site in Ugine, in celebration of World Environment Day, the 3<sup>rd</sup> annual Sustainable Development Day was held for employees at the Ugine site. This year’s event focused on the circular economy, with a spotlight on the strategic UGI’RING project.

It was also enriched by testimonials from three of our clients- Friedrich MÜNCH GmbH, PANERAÏ (*RICHEMONT Group*), and SETFORGE - who came to present their Corporate Social Responsibility (CSR) initiatives as well as their interest in our Green Steel Stainless+ and Climate+ offerings.

In addition to a dozen presentations, the event was designed to be even more interactive, collaborative, and engaging, thanks to a variety of activities:

- quizzes on Ugitech’s CSR and compliance,
- educational murals on the challenges of the circular economy and the causes and effects of climate change,
- escape games aimed at raising awareness about invisible disabilities.

This year, for the first time, several of Ugitech’s wire drawing plants - Imphy, Brionne, and Ugitech Italia - incorporated sustainability-related topics into their Safety Day.



The Climate Mural at the Sustainable Development Day

### - Ugitech’s sixth participation in the charity run Odyssée

In 2025, Ugitech employees participated for the sixth time in the Odyssée charity sports event in Chambéry, held in May.

Nearly 80 participants, including employees and their family members, registered to take part, either in person or remotely, in the charity runs and walks in support of the fight against breast cancer.

To support this initiative, Ugitech matched the registration fees with a donation of €1,100 to the association.

**- An updated Internal Operations Plan and firemen teams that continue to undergo training to ensure employee safety**

Forecasting is essential for preparing ahead of an incident. The classification of the Ugine site as a “Seveso high-threshold” site-like approximately 700 other facilities in France - subjects Ugitech to strict regulations. In this context, in 2025, Ugitech updated its Internal Operations Plan, which must be updated every three years. More than just a mandatory and official administrative document, this operational decision-support document outlines the internal and external emergency response actions that must be implemented on-site depending on a given situation. These efforts aim to ensure a rapid, effective, and coordinated response in the event of an emergency. The organization operates on multiple levels, ranging from team members deployed and directed in the field, through an Operational Command Post led by a manager from the Internal Operations Plan, up to the executive suite with the Director of Internal Operations.



Ludovic Deville-Duc

*“In 2025, as in every year, the 25 members of the firemen team underwent training with the goal of keeping their knowledge and reflexes up to date regarding fire safety, chemical hazards, and first aid. This involved eight days of training, and an unannounced drill spread out over the past year. Even though the team possesses a solid foundation of general knowledge—with firemen team drawn from all sectors of the plant and many who have extensive experience as volunteer firefighters—we supplement this with specialized training, such as our current focus on hydrogen hazards. In this way, we adapt our skills to the demands and evolving nature of our industrial operations.”*  
**Ludovic Deville-Duc, Fire Safety and Security Manager**

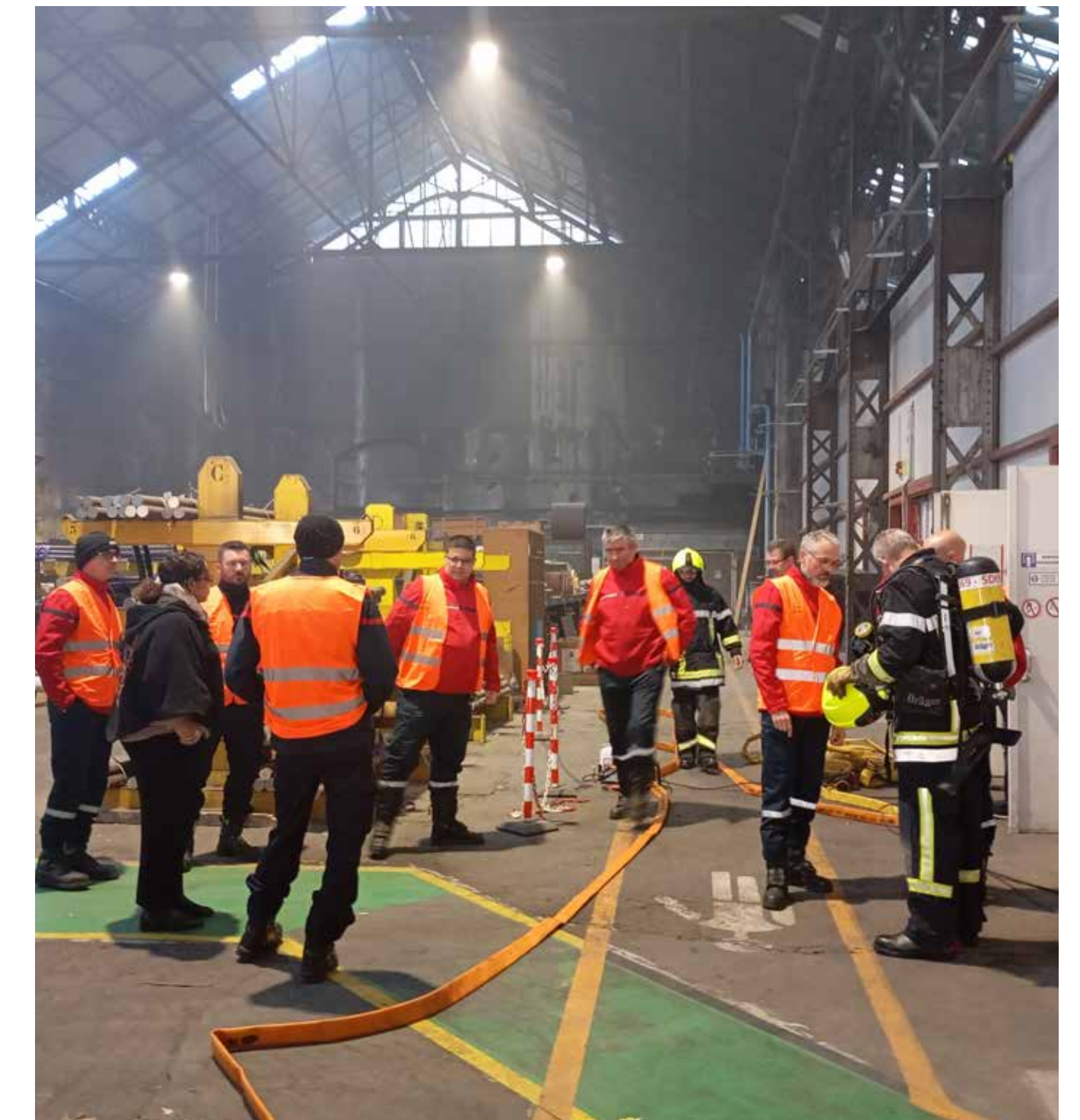
**- The appointment of a sexual harassment and sexist behavior contact person**

In November 2025, a sexual harassment and sexist behavior contact person was appointed at Ugitech SA. The role of this liaison is to guide, inform, and support employees in the fight against sexual harassment and sexist behavior.

Their responsibilities include both primary and secondary prevention efforts. As such, the liaison serves as a valuable resource within the company to help implement its prevention policy, not only to identify risky situations but also to work on raising awareness. The liaison is a key point of contact for employees who witness or are victims of such incidents, in

order to help them take action. In addition, every employee who is a victim of or witnesses incidents of sexual harassment or sexist behavior must also inform their direct supervisor or management.

They may also speak to their human resources manager, the occupational physician, a staff representative, or even a colleague.

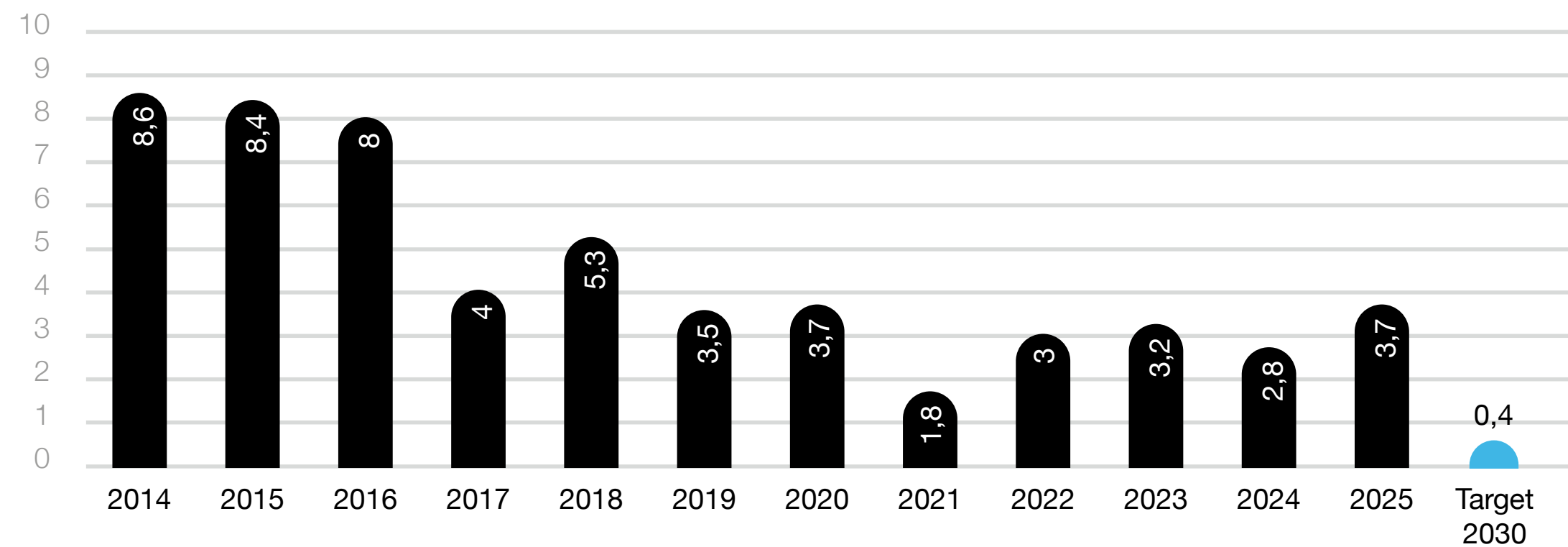


Practical training for firemen team at the Ugine Plant

### 3. Metrics and objectives

#### Lost-time injury frequency rate (LTIFR)

Across Ugitech's nine sites, the key performance indicator is the LTIFR. The LTIFR is the number of accidents resulting in lost time occurring at a worksite per 1 million hours worked. An LTIFR of 7, for example, indicates that 7 accidents resulting in lost time occur on a worksite for every 1 million hours worked.



The Ugine safety officer team

# Attractiveness & equal opportunities

This chapter on Employees - covering attractiveness and equal opportunity, social dialogue, as well as skills development and training - is structured around two topics considered materially relevant and one awareness-raising topic in Swiss Steel Group's double materiality matrix:

- attractiveness and skills development (relevant topic),
- employee relations (relevant topic),
- diversity and equal opportunity (awareness topic)

## 1. Strategy

In a global economic climate that remains challenging, with markets down 20% to 25% from their peak levels, the Human Resources strategy focuses on four key priorities designed to enable the Ugitech organization to adapt and undertake the necessary structural transformations:

- maintaining a constant and constructive dialogue with all stakeholders,
- continuing the cyclical and structural adaptation of organizations and jobs,
- supporting internal and external transformations through skills adaptation and development,
- strengthening the robustness of personnel management, administration, and compliance processes.



## 2. Actions achieved in 2025

### Policies / Standards / Guidelines

The Human Resources policy implements the strategy along four main lines:



Its operations and Human Resources processes are built around two key pillars:

- Centers of Expertise,

- Human Resources Operations, responsible for the operational implementation of the Human Resources Management policy across all of Ugitech's business activities to support operational performance.

There are five Centers of Expertise:

- Labor Relations, closely linked to Human Resources Operations: a true cornerstone, the labor relations policy aims to develop three key areas: operational social dialogue, collective bargaining, and employee representative bodies.
- Compensation, Benefits, and Compliance: its purpose is to strengthen processes for payroll management, personnel administration, and legal, regulatory, and ethical compliance, as well as to define an attractive compensation and benefits policy.
- Human Resources Development through "Ecole 2908" (Ugitech's in-house training school): This department designs and implements policies and processes related to school partnerships (*work-study programs and internships*), recruitment, and onboarding, as well as skills development and training to support the needs of the company and its business units in the short, medium, and long term.
- Social Management Control: It ensures the management and reporting of HR data across all Ugitech operations as well as all Swiss Steel France entities. It guarantees a high level of reliability, robustness, and streamlining.
- Occupational Health and Safety: As part of its accreditation

for the Ugitech Ugine and Ugitech Bourg-en-Bresse sites, it is responsible for promoting occupational health and supporting management, employees, and their representatives in the area of occupational risk prevention.

### 2025 actions and resources

#### Maintain an ongoing and constructive dialogue with all stakeholders

When it comes to social dialogue, Ugitech is committed to promoting responsible social dialogue in order to ensure an optimal balance between social issues and progress on the one hand, and economic activity and performance on the other.



**- Employee health: implementation of a comprehensive program to prevent addictive behaviors across our French operations.**

The company sought to develop a prevention program on this topic because the workplace is not immune to the use of psychoactive substances and certain problematic behaviors that may result from such use. This issue was reaffirmed in the Interministerial Strategy for Mobilization Against Addictive Behaviours 2023–2027, coordinated by the Interministerial Mission to Combat Drugs and Addictive Behaviors. The main idea is to encourage a collective approach to prevention and to develop a shared health strategy for employees. The goal is both to make the workplace a protective environment by promoting the prevention of addictive behaviors as a tool for social responsibility and ensuring the smooth operation of organizations, and to raise employee awareness of addictive behaviors and the risks they entail.

*You can find more details in the chapter Health & Safety, Working Conditions.*

**- Quality of life and working conditions**

Since November 30, 2021, Ugitech has been committed to a procedural agreement regarding an initiative to understand and improve quality of life and working conditions across its entire Ugitech S.A. entity. This majority agreement, signed by the trade unions CFDT, CFE-CGC, and FO, includes several objectives:

- to lead a joint committee with the signatory trade unions,
- to prepare with the committee and implement every two years a quality of life and working conditions survey in the form of an employee questionnaire,
- to analyze and communicate the survey results,
- to define, jointly validate, and implement a two-year action plan.

*The 2025 survey is mentioned in the chapter Health & Safety, Working Conditions.*

**- Absenteeism reduction programme**

In 2025, the company rolled out a comprehensive action plan to reduce absenteeism due to illness and workplace accidents, which has worsened significantly in workshops and production sites: an average increase of 3 to 4 percentage points compared to the pre-COVID-19 period. This plan addresses major operational, economic, and social challenges: absenteeism undermines organizational

effectiveness, productivity, and quality, and affects the work environment within teams. The costs for the company are very significant. The direct costs of maintaining salaries amount to €1.8 million per year, to which the indirect costs of replacement, productivity, and quality must be added.

A comprehensive assessment based on quantitative and qualitative analyses, including interviews with employees and managers, was conducted in late 2024 by a multidisciplinary working group. This assessment led to the development of a structured, planned, and managed action plan for 2025. The action plan is structured around four key areas:

- Rethinking HR policies, rules, and processes to support managers and employees in reducing absences and facilitating a smooth return to work: such as the implementation of liaison interviews and return-to-work interviews.
- Training and equipping managers to enable them to better prevent, manage, and support situations of absenteeism: creation of a training module that is both contextual and operational, delivered entirely in-house by the Human Resources teams; formalization of related obligations, HR protocols, flowcharts, and return-to-work interview tools.
- Raise employee awareness and strengthen the culture of prevention to foster a shared understanding of the issues at stake and encourage behaviors that support long-term employment: creation of an employee awareness resource, rollout across all workshops and production

sites, distribution of communications and a flyer.

- Define a monthly communication plan to make this a priority topic within the company's workforce and management routines, while making the information accessible to all.



### - **Developments in employee savings plans and supplemental retirement plans**

Ugitech is updating its employee savings and retirement plans to meet the company's requirements for attractiveness, transparency, and responsible investing. In 2025, the company selected Epsor, a mission-driven firm committed to sustainable finance, as its new sole service provider. This change comes amid a regulatory environment strengthened by the PACTE Act (*Action Plan for Business Growth and Transformation*) and reflects a commitment to offering employees more responsible and transparent solutions.

The selection process, conducted with the social partners, identified six key priorities: restoring meaning to the programs, offering innovative investments, optimizing costs, capitalizing on regulatory changes, providing enhanced digital support, and revitalizing communication.

With Epsor, starting in March 2026, Ugitech will offer a more educational and personalized experience, a more sustainable range of investments, and greater transparency regarding the real impact of employee savings.

The launch is scheduled for March 2026!

### **Developing employees' long-term employability**

#### - **"Skills Development" action plan**

The implementation of this policy is based on structured workforce and skills planning, enabling the organization to anticipate changes, support career transitions, and strengthen the skills needed to modernize processes and equipment. It also aims to ensure that all employees have access to training, whether in technical, behavioral, or managerial skills, or those related to the digital and environmental transition.

In 2025, Ugitech consolidated its approach through several initiatives:

- Strengthening professional skills by prioritizing the operational needs of production, quality, maintenance, and technical functions; Rolling out modules dedicated to change management, digital transformation, and new industrial processes.
- Developing support for managers through programs dedicated to team management, collective performance, and skill development (managerial culture, communication). Ugitech also supported the development of individual performance through the implementation of a coaching platform.
- Support onboarding and internal mobility pathways to accelerate the operational readiness of new hires and support career development. Provision of open-access courses to develop technological skills.
- Deliver training as close to the front lines as possible, through the mobilization of internal trainers and a better structuring of educational programs.

These initiatives have helped maintain a high level of engagement among employees, in-house trainers, and managers alike. They demonstrate a commitment to preserving and developing skills in a challenging environment, while reaffirming the company's social responsibility and its key role as an industrial player in the region.

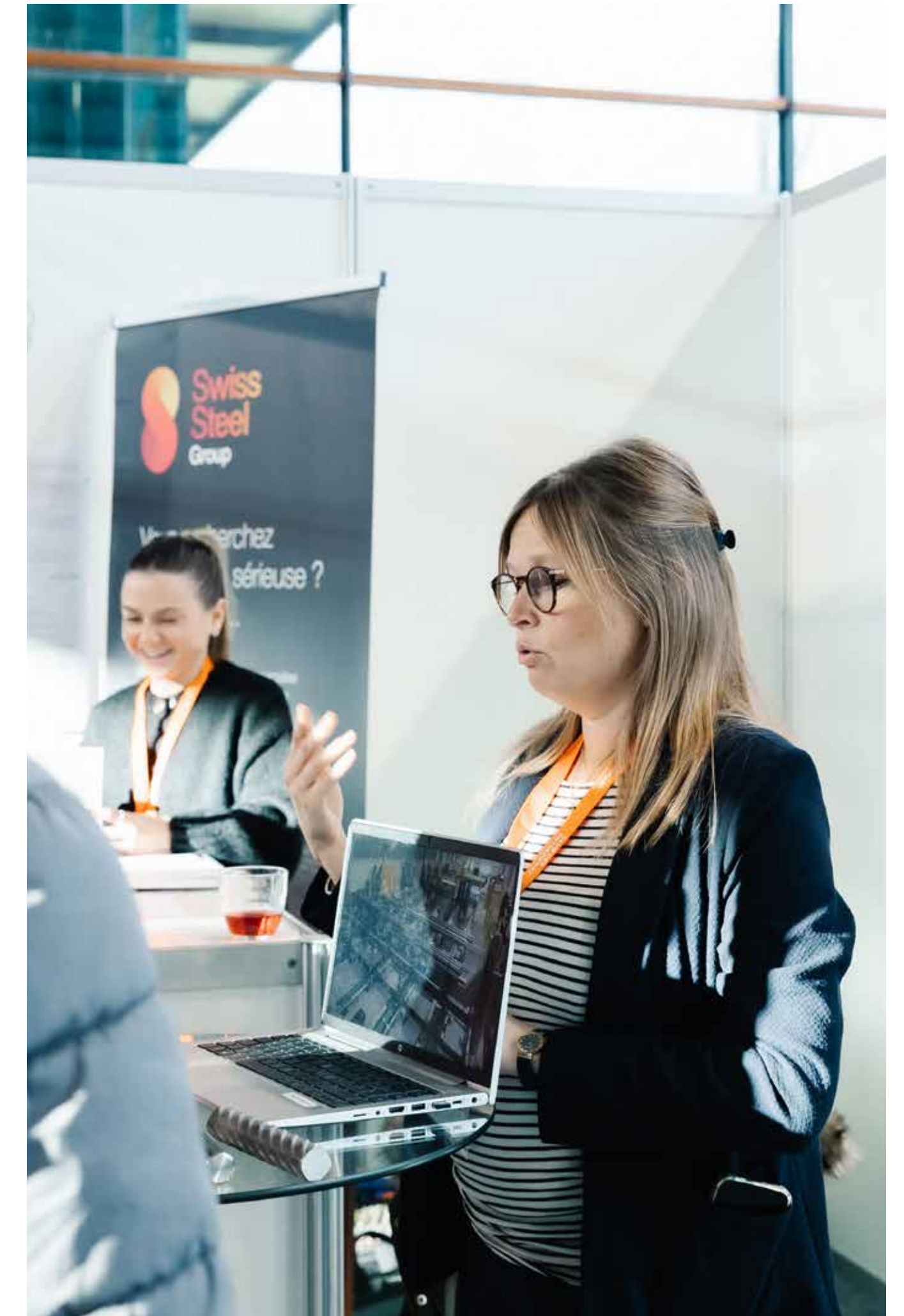
### - "Recruitment" action plan

Despite the ongoing economic uncertainty, Ugitech has been able to maintain its operational structure and has continued its efforts to enhance its employer brand visibility among potential candidates in order to maintain a talent pool for in-demand roles and to meet customer needs.



Job dating at Ugitech for the recruitment of production staff

To meet these needs and given the tight labor market in the employment areas near its sites, Ugitech is implementing a range of diverse recruitment solutions.



Ugitech's Participation in "Career Week" at the University of Savoie Mont-Blanc in Annecy

On-site temporary staffing assignments ensure operational responsiveness in non-critical industrial roles. Hiring for permanent positions (*permanent contract*) ensures long-term coverage of critical roles, which are essential to maintaining internal expertise. Apprenticeship recruitment serves as a lever for attracting talent, fostering retention, and building talent pools, thereby reinforcing equal opportunity. Certification programs promote inclusion and career transition, while securing future recruitment volumes (*a new program launched in 2025 to train 8 production operators*).



Joint qualification certificate in the metalworking industry for maintenance technicians

### - Initiatives for young people and school partnerships

The success of these recruitment solutions also depends on outreach efforts targeting various audiences.



2025 apprentice students orientation session

Various initiatives have been carried out with schoolchildren and students. Despite the economic climate, Ugitech is committed to upholding the commitments set forth in its youth policy regarding the acceptance of interns and work-study students. In 2025, Ugitech welcomed 41 long-term interns (*2 to 6 months*) and 35 introductory interns (*1 to 2 weeks*). Behind these figures lies a strong commitment from employees to mentor and train these young people in the careers they aspire to. These internships offer young people the opportunity to carry out meaningful assignments that benefit the company, while developing skills they can apply after graduating. Interns also serve as a recruitment pool for apprentice students. At the start of the 2025 school year, Ugitech welcomed 30 apprentice students into various roles,

assigning tasks carefully designed by managers to support the teams and their professional training.



Hosting students for internships in 2025

To ensure the quality of the experiences it offers, Ugitech has been participating since 2021 in the “Best Trainee Experience” certification program established by an independent firm, Speak and Act. Interns and apprentice students who worked at Ugitech during the 2024–2025 academic year gave an average satisfaction rating of 4.1 out of 4. This result ranks Ugitech 8th among the companies offering the best internship and work-study experience, out of 170 companies evaluated. This certification also allows the company to highlight the opportunities offered during promotional activities at partner schools.



In fact, another aspect of the youth policy involves **strengthening partnerships with schools and long-standing organizations** as well as developing new partnerships.

This commitment is reflected in the signing of partnership agreements and participation in representative bodies:

- signing letters of commitment regarding the hosting of interns and apprentice students with the René Perrin High School in Ugine, and participation on its Board of Directors,
- membership and seat on the Board of Directors of the Business Club at the University of Savoie Mont-Blanc,
- membership of the Alptitude association, which aims to help students in the preparatory classes at Berthollet High School prepare for their professional careers and develop relationships between students and businesses,
- service on the Board of Directors of the Industrial Apprenticeship Training Center in La Motte-Servolex,

- membership of the executive committee of the Albertville Local Youth Mission,
- involvement as a member of the Board of Directors of the Association for Vocational Training in Industry of the Ain department,
- partnership with the C’Génial Foundation, whose mission is to promote science, technology, and related professions. It also works to bridge the gap between the business world and the education sector to address the challenges of today and tomorrow.

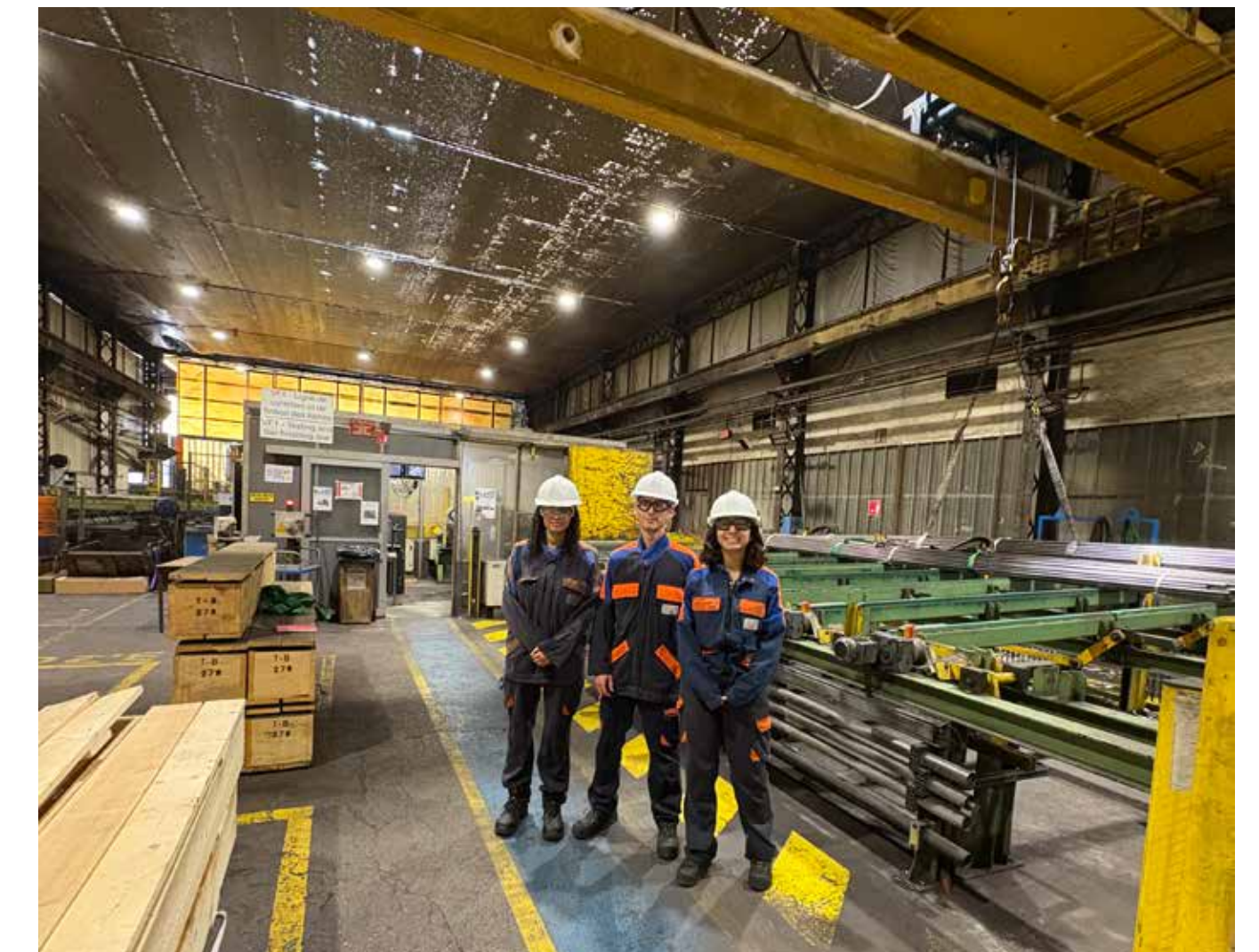
**In total this year, 49 employees got involved in 29 initiatives in partnership with local schools and organizations near Ugitech sites.**

These initiatives include a variety of activities: lectures, career talks, mock interviews, recruitment fairs, classroom activities, and business project proposals.

As part of its partnership with the University of Savoie Mont-Blanc and its Business Club, Ugitech decided to renew its participation in the PITON projects, which began in 2024. These projects offer an alternative approach to driving performance initiatives within Ugitech. Indeed, this program brings together several students from different academic backgrounds to work on a project defined by a company. This second edition involved three students specializing in logistics, industrial performance improvement, and

management information, all working on a common challenge: eliminating bottlenecks in a bar inspection line located within the finishing shops. The students worked for three months on this challenge, collaborating both with operational staff in the workshops and with their professors at the university. They were able to propose the implementation of concrete solutions aimed at achieving a 9% increase in production line productivity.

This project was a success, recognized notably by winning two of the three prizes at the PITON Awards, the ceremony where projects were presented to all the professionals and students who participated in the program that year.



Students in the PITON program at the finishing shops



PITON students and Ugitech staff at the PITON Awards in June 2025

In 2025, Ugitech also created new communities to support its initiatives within schools and associations. “Campus Managers” are employees who volunteer to engage in relationships with partner schools; they can be asked to speak at schools in connection with their degree or expertise. Indeed, the perspective of someone working in the field always has a greater impact on students, especially if he or she is an alumnus or alumna of the school. By the end of 2025, 15 employees had signed up to be part of this community.

In addition, thanks to an initiative by the Union of Metallurgical Industries and Trades (*IUMM*) aimed at **promoting women in the industry**, Ugitech has also developed a community

of female ambassadors. To contribute to the increased representation of women in the workforce, one of the initiatives aims to promote technical and scientific careers among young girls in middle and high school, so that they may choose these fields of study. Thus, the UIMM has reached out to its members to bring in local female professionals to share their experiences and discuss potential career paths for women in these fields and in the industry. To date, six female employees working in technical or scientific fields have volunteered to join this community. They have been involved in seven initiatives targeting middle and high school girls throughout the year.

In partnership with UIMM Savoie, Ugitech also participated this year in the first “Osez l’industrie” career fair, held in Chambéry on November 21 and 22, 2025. This fair brought together a large audience around a common goal: to introduce industrial careers and their many opportunities for the future. The event fostered numerous exchanges with middle and high school students from the region as well as job seekers. The day was also marked by a visit from Sébastien MARTIN, Minister Delegate for Industry, who emphasized the importance of these fairs in ensuring the long-term success of reindustrialization and maintaining interest in professions undergoing major transformation. A space was also dedicated to women in industry, in partnership with the association “Elles Bougent.” About twenty female

professionals, including two employees, shared their career paths and their passion, highlighting the essential role of women in industry.



Ugitech's participation in the first “Osez l’industrie” trade fair in Chambéry

In addition to these initiatives led by employees, the Ambassadors Association continued its work this year. The Ugitech Ambassadors Association has been in existence for about ten years. It brings together some twenty young retirees from the company who wish to stay connected to the working world and share their passion for industry with young people. Their role is to represent Ugitech at various events in schools, but also and above all to lead tours of the Ugine industrial site when requested. This helps open Ugitech’s doors more widely, not only to schools but also to

economic and institutional organizations... Their dedication to this initiative also helps reveal to future generations the realities of the industry and the diversity of careers and professional paths it offers.



Visit by students from the Bachelor University Technology - Materials Science and Engineering program at the Chambéry University Institute of Technology in June 2025

**In 2025, nearly 224 visitors were welcomed during 13 tours. This represents more than 14 half-days of volunteer work for the ambassadors, who are dedicated to their mission.**

#### **- School 2908 - Training during reduced activities**

In 2025, Ugitech made the strategic decision to turn a period of reduced activity into an opportunity for social investment. This decision reflects a strong commitment to anticipating economic and organizational changes while sustainably enhancing employees' employability.

Rather than facing a slowdown in business, the company implemented a proactive strategy aimed at training, professionalizing, and upskilling all affected employees, while maintaining 100% pay during training periods.

Through rigorous planning involving HR teams, around 50 in-house trainers, and managers, Ugitech has designed a customized training program structured around dedicated weeks and clearly identified business needs. The modules offered cover key sustainability issues: change management, quality, compliance, safety, industrial techniques, digitalization, and Artificial Intelligence (AI). This portfolio of skills directly addresses the company's expectations regarding adaptation to technological and environmental transitions.

The scale of the initiative underscores the depth of the commitment: nearly 8,000 hours of training provided, 533 employees trained, and 175 sessions conducted. These figures reflect a systematic approach aimed at enhancing the organization's appeal, competence, and resilience.

Overall, this initiative serves as a concrete example of the implementation of the requirements of our School 2908 (*including the Training Division*), by enhancing skills development, securing career paths, improving the quality of labor-management dialogue, and strengthening Ugitech's ability to support sector-wide transformations.



#### **Promoting employment for people with disabilities**

The role of disability inclusion in the workplace is essential for ensuring equal opportunity and promoting inclusion. Beyond legal obligations, it serves as a powerful driver of cohesion and collective performance. To raise awareness among all employees, the Human Resources Department organized an immersive activity that allows participants to experience what it's like to have a disability through simulation. This hands-on experience aims to raise awareness of the challenges faced by people with disabilities in their daily work lives, in order to foster empathy, adaptability, and solidarity within teams. By better understanding these realities, everyone can contribute to creating a more accessible and inclusive work environment. This is a new step that Ugitech has chosen to take this year.

In 2025, an external service provider, “Benethik,” worked with the company to help employees change their perspective on disability through a fun challenge.



Benethik disability activities

### Striving for a better work-life balance

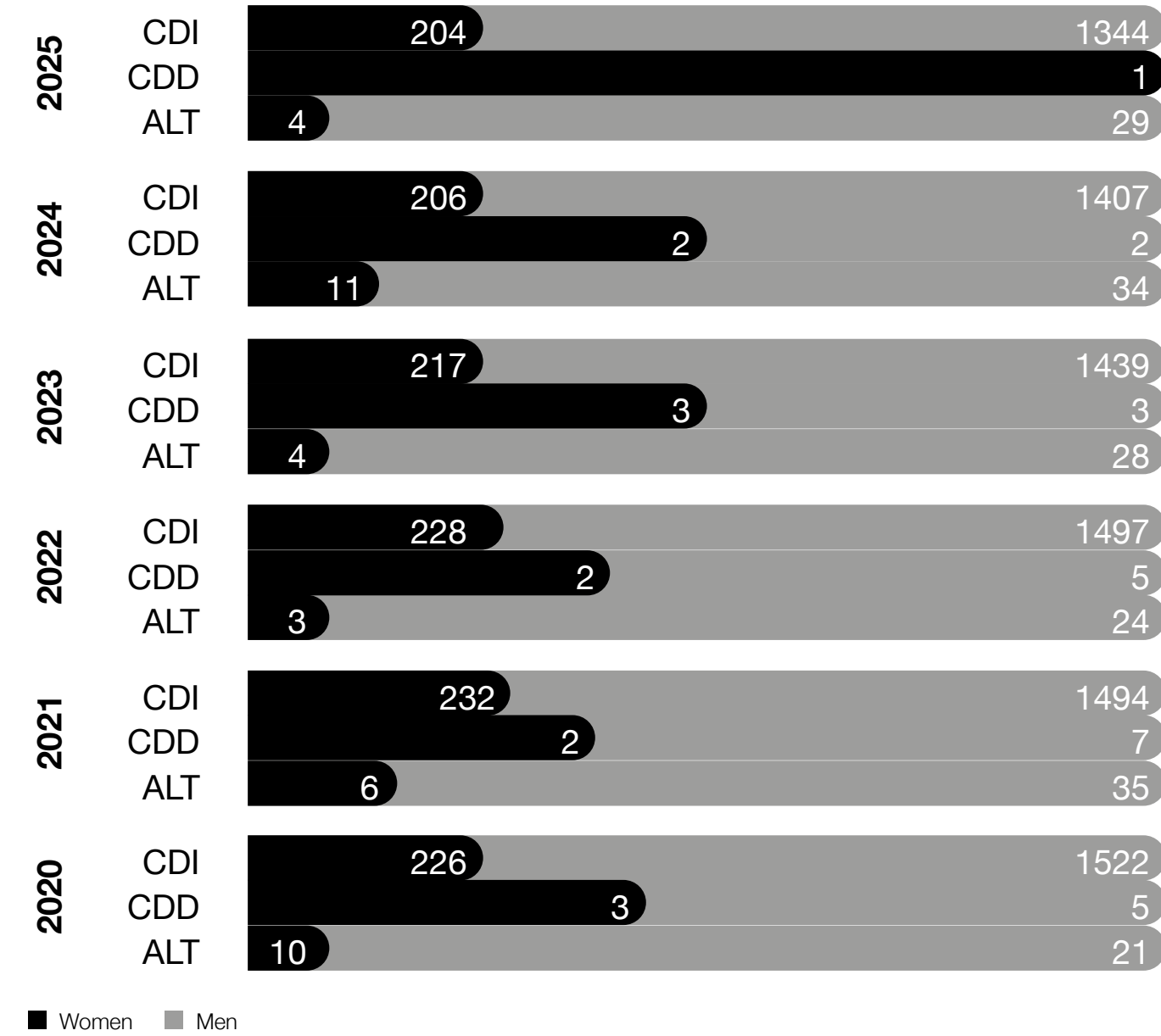
The agreement on the organization and scheduling of working hours dated January 29, 2024, established new procedures for using the flexible work schedule system applied by all day-shift employees at Ugitech.

The company has developed a new tool for tracking hours worked to provide greater transparency in time management for both employees and managers.

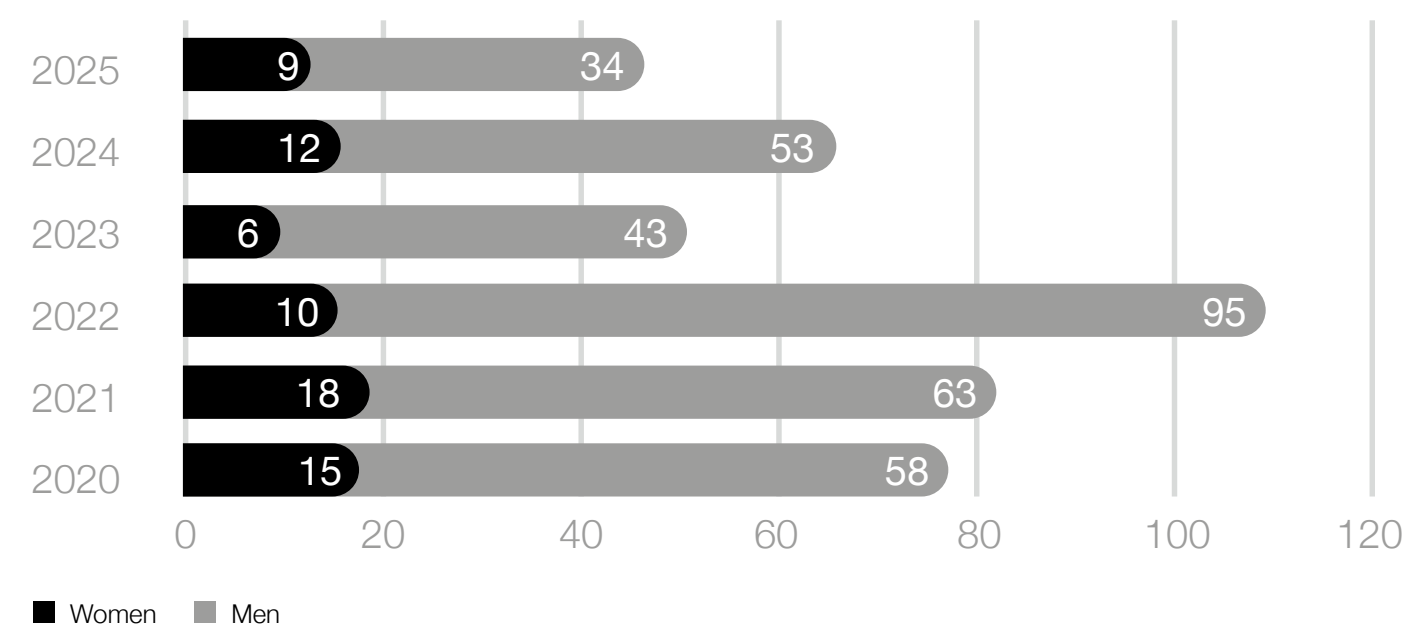
This new system provides a more secure framework for the company and facilitates a better work-life balance for employees by enabling them to better anticipate their workload.

## 3. Metrics and objectives

### Ugitech Workforce: permanent employees, fixed-term employees, and apprentice students



### Permanent contract hires



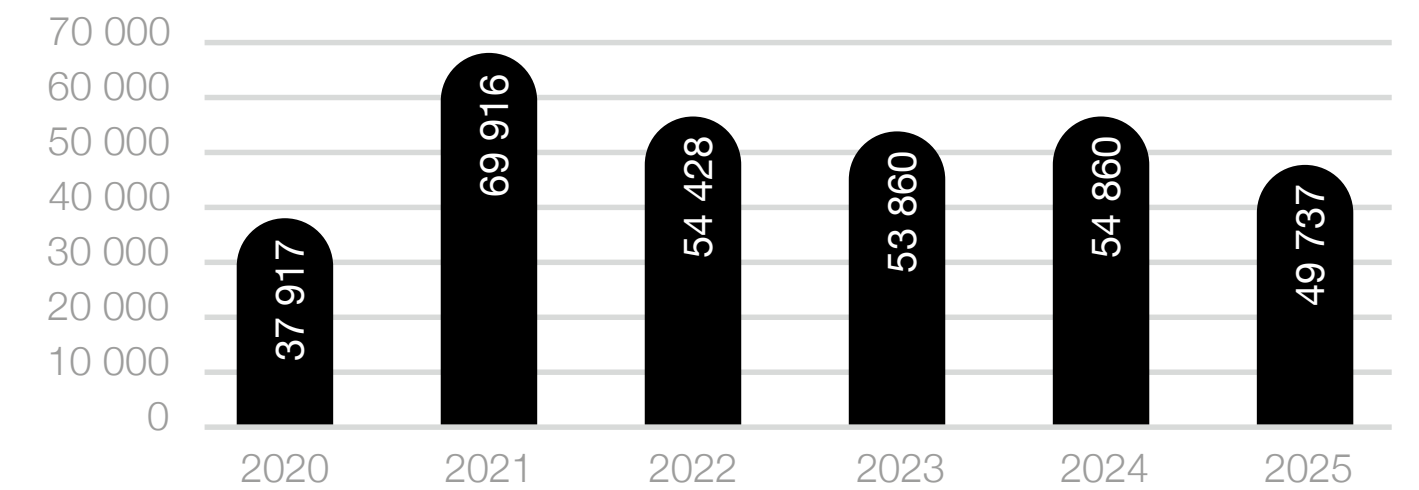
% breakdown: Women / Men - (Ugitech consolidated)						
	2025	2024	2023	2022	2021	2020
Women	13%	13%	13%	13%	14%	13%
Men	87%	87%	87%	87%	86%	87%

Average number of work-study students over the year (Ugitech consolidated)						
	2025	2024	2023	2022	2021	2020
Women	8	7	3	5	8	8
Men	32	30	25	30	26	30

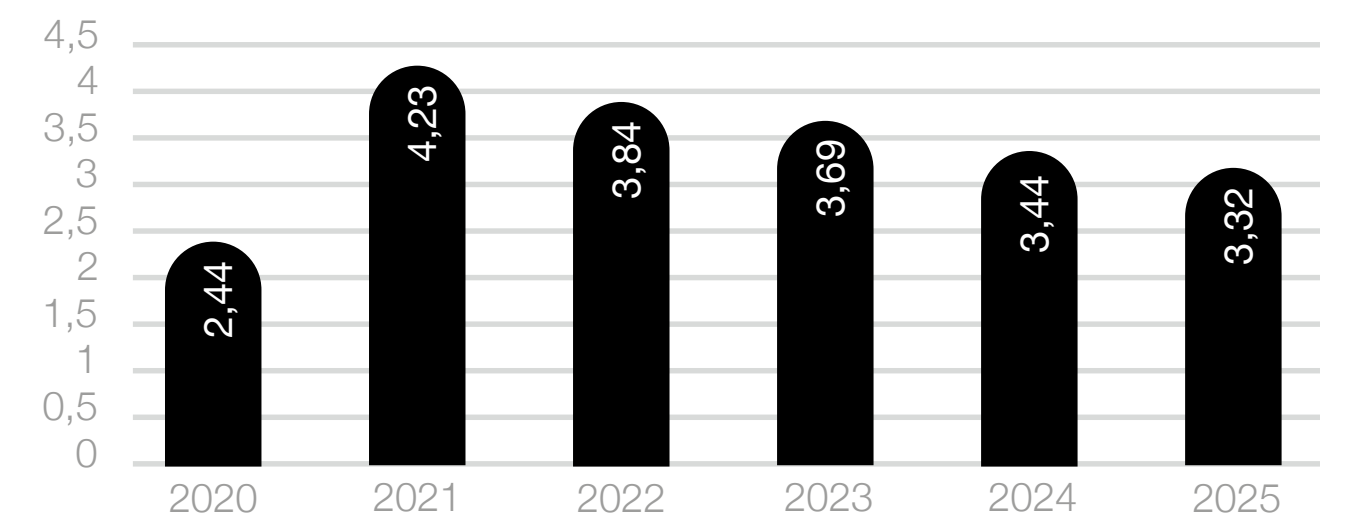
Staff turnover due to resignations - (Ugitech consolidated)						
2025	2024	2023	2022	2021	2020	
3,4%	3%	3,3%	2,7%	1,6%	1,8%	

Number of employees with disabilities - (Ugitech France)	
2025	2024
82	82

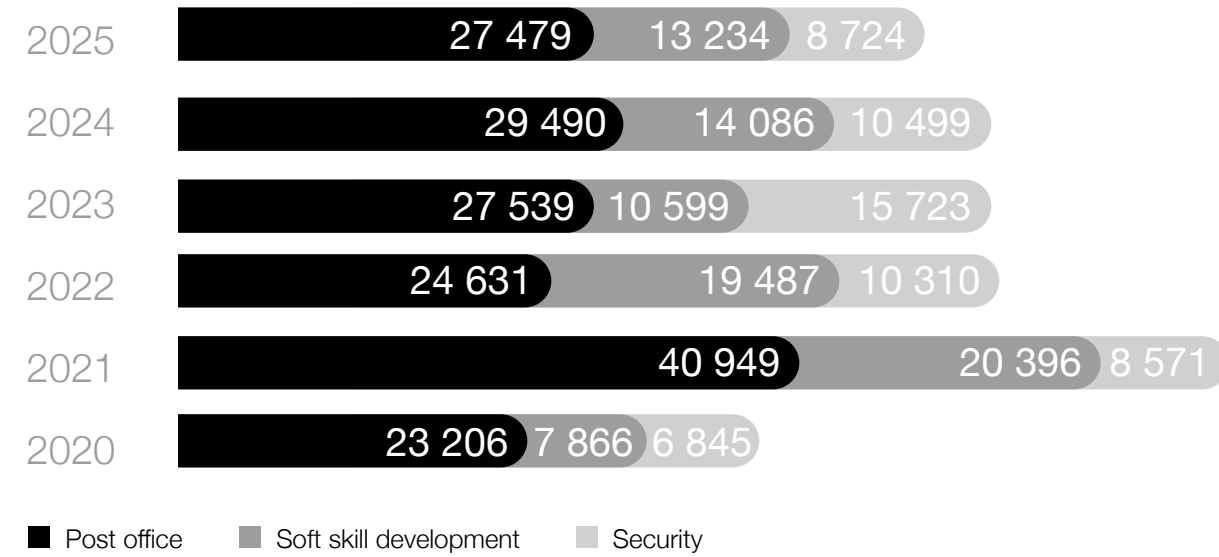
### Total training hours



### Average number of training days per employee

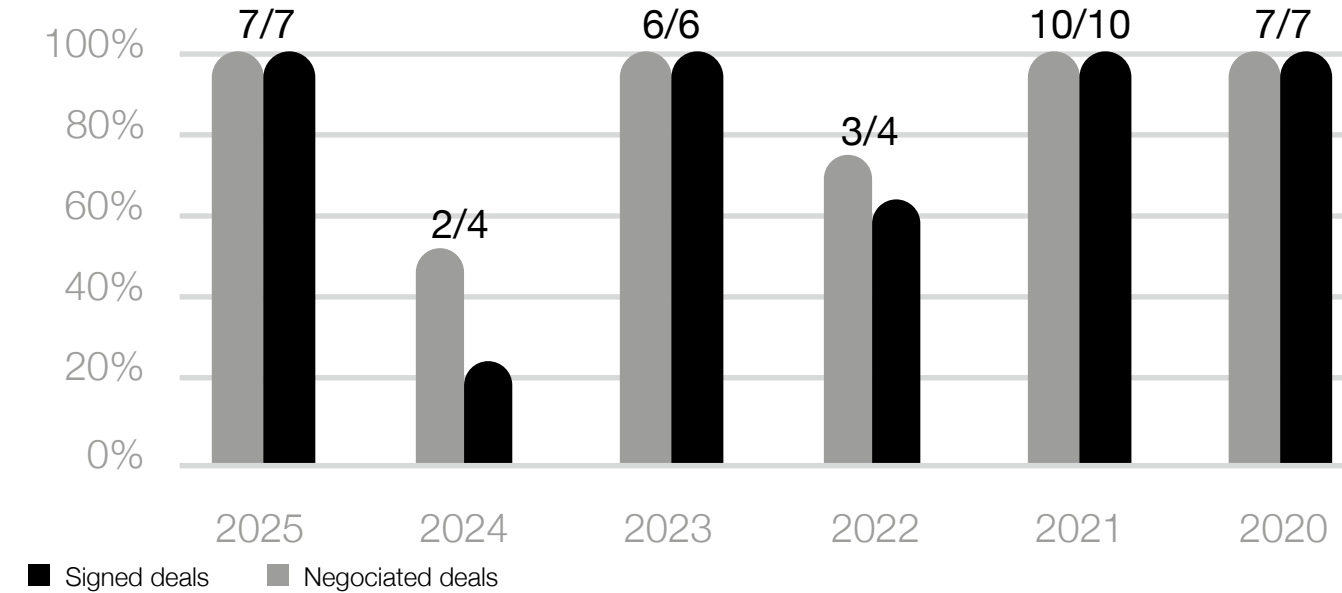


### Breakdown of training hours by type



Sickness and work-related accident absence rates (Ugitech consolidated)	
2025	2024
6,1%	6,2%

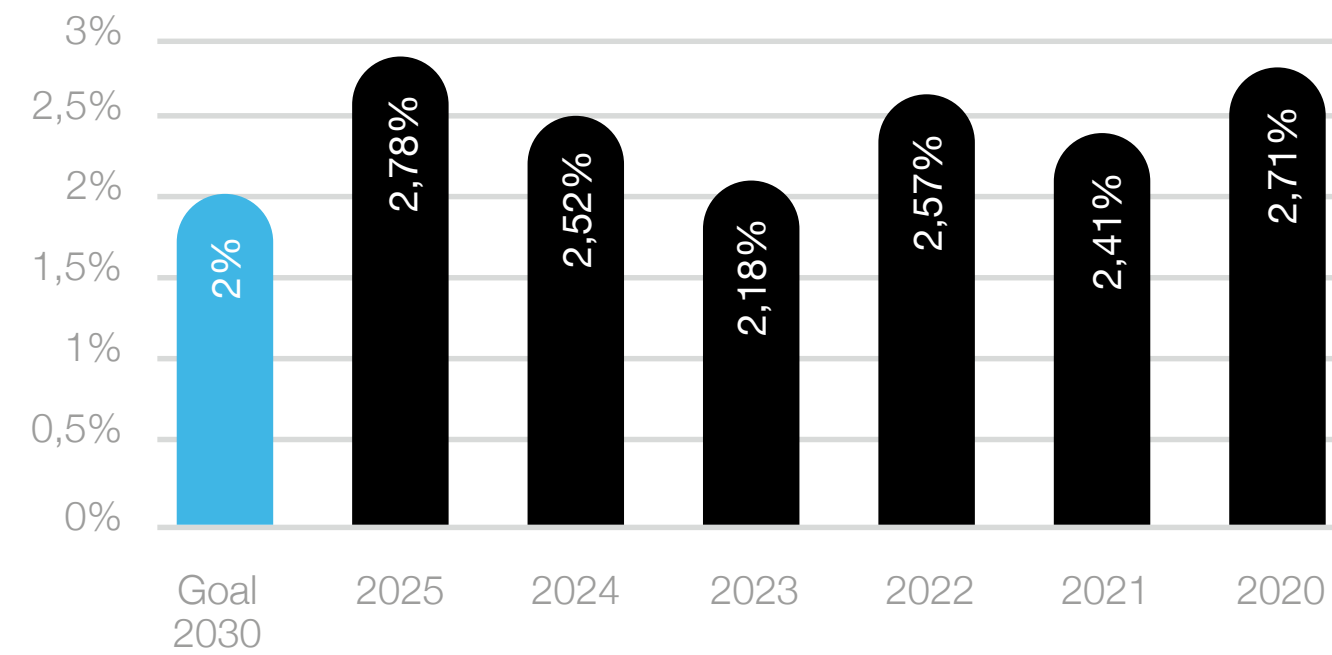
### Number of agreements signed / negotiated (Ugitech S.A.)



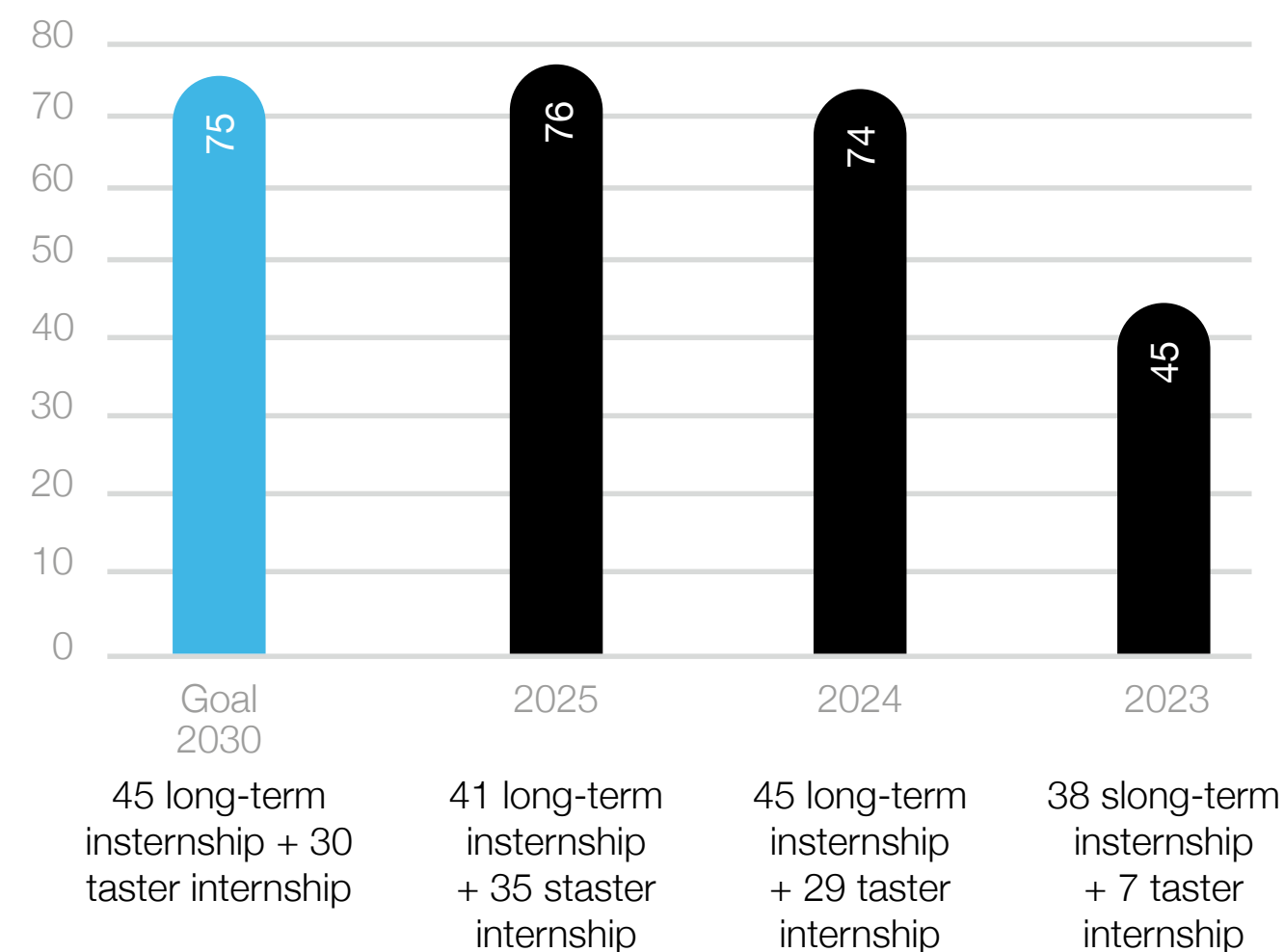
Gender Equality Index Score – Ugitech SA (France)	
Result 2025	Result 2024
Non calculable*	88/100
	84/100

\*This index cannot be calculated as there was no individual increase during the reference period.

### Number of apprentice students as of December 31, 2025 - Ugitech Group France / Italy / Germany

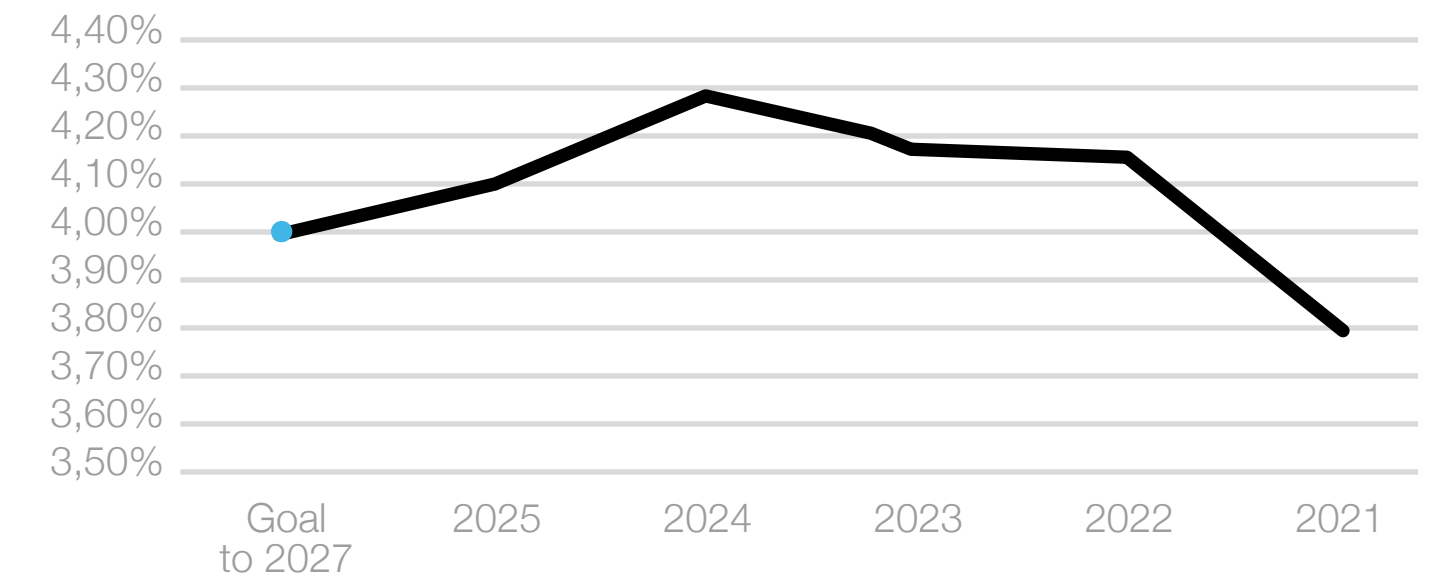


### Number of interns hosted during the year Scope: Ugitech France

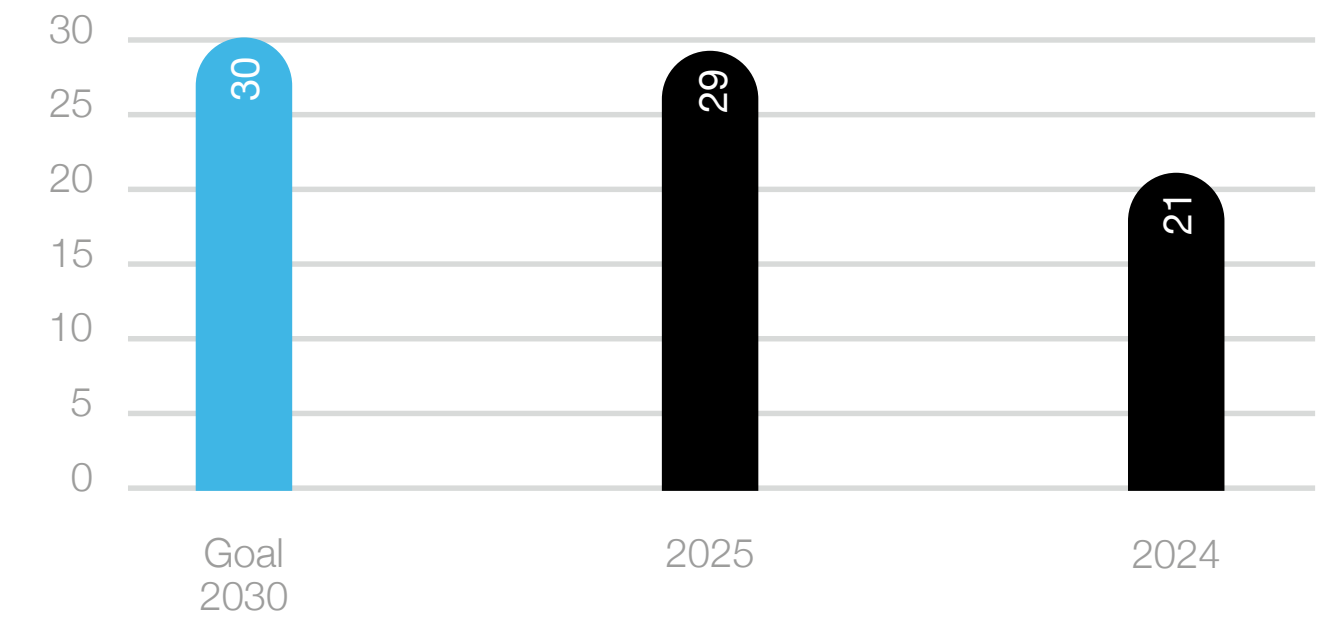


### Overall satisfaction rating of interns and work-study students awarded by the Best Trainee Experience label (out of 5)

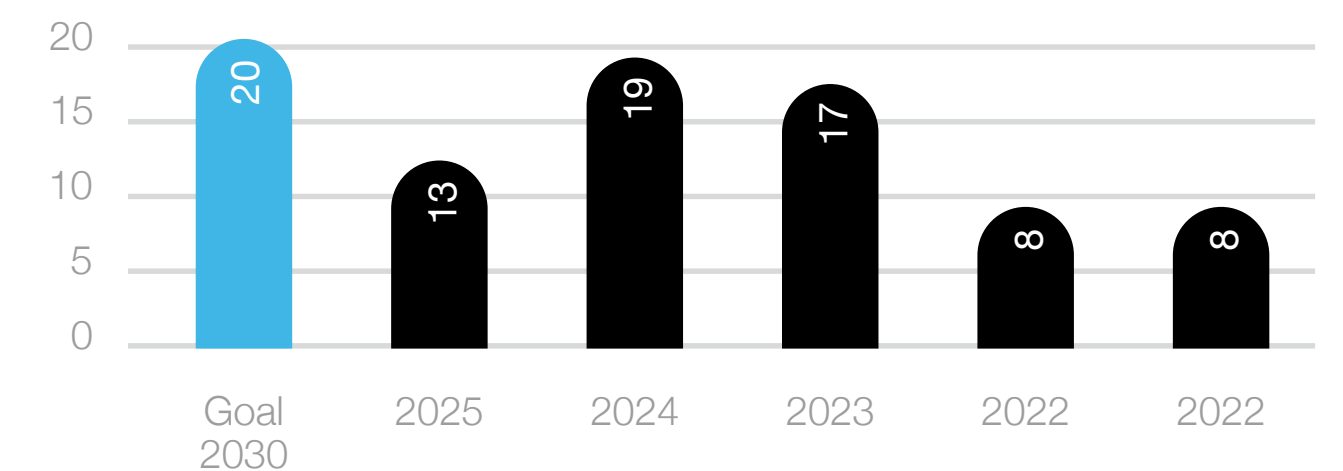
A change of label is planned for 2027



### Number of initiatives carried out with schools



### Number of visits to the Ugine site by schools, high schools, and universities



# Workers in the value chain

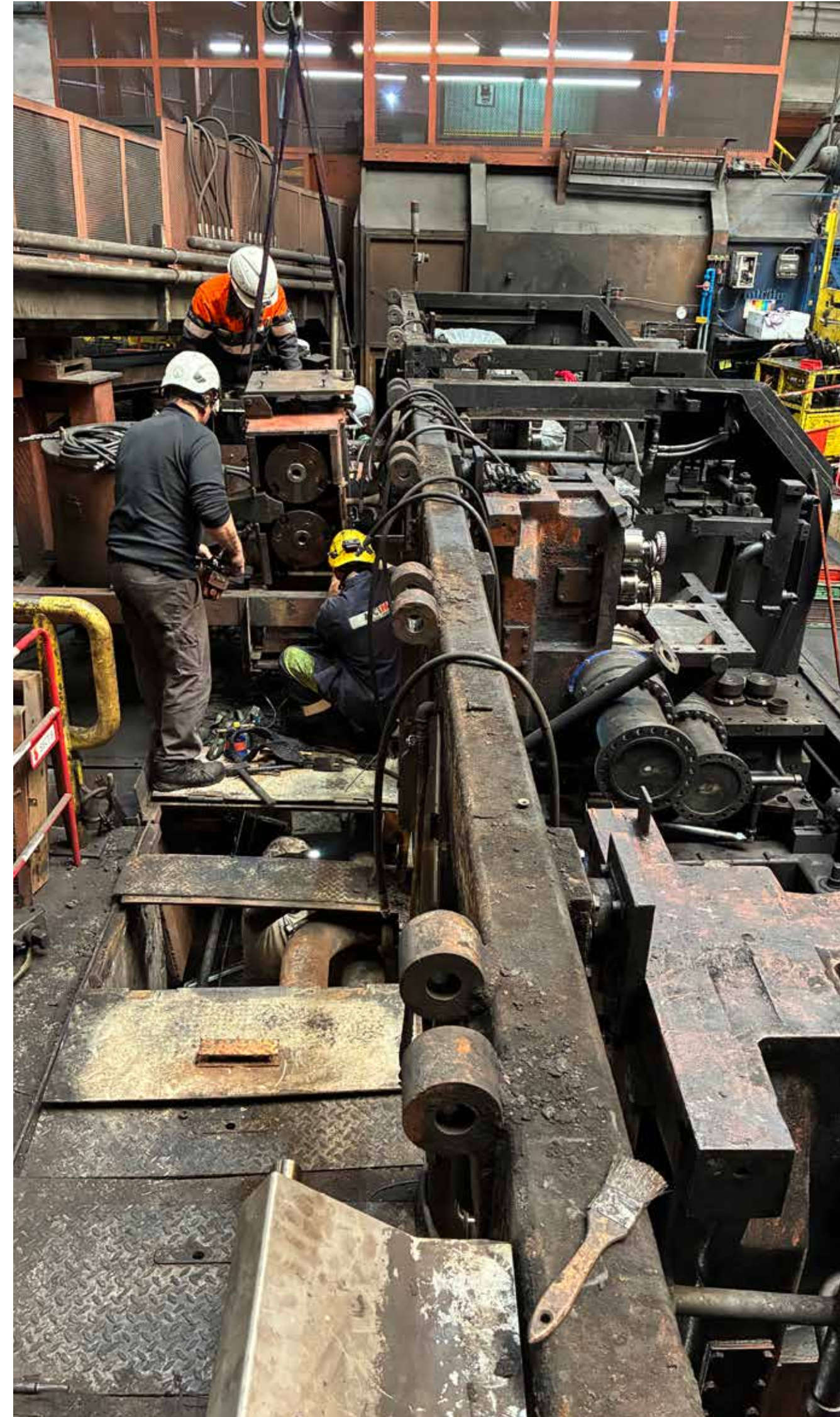
This chapter standard on the health, safety, and working conditions of employees addresses a topic deemed highly material in Swiss Steel Group's double materiality matrix:

- health and safety (key topic).

## 1. Strategy

Ugitech's health and safety strategy applies to both subcontractors and company personnel. It aims to improve the overall performance of operations and ensure effective management of working conditions for all personnel, in particular through the identification of risks, staff training, preparation for operations, and the implementation of appropriate control measures.

Coordinating subcontractors with Ugitech teams and monitoring construction sites (*on-site health and safety audits, contract reviews, and reports from the Health, Safety, and Working Conditions Committee*) are key elements in managing risks. These measures also aim to ensure mutual satisfaction among all parties and contribute to continuous improvement.



## 2. Actions achieved in 2025

### Policies / Standards / Guidelines

Recognizing that to achieve its occupational health and safety objectives, these goals must be shared by all, Ugitech involves its subcontractors in its health and safety requirements, as clearly stated in its HSSE policy. This grants them the same rights as Ugitech employees and also the same responsibilities.

Ugitech has certified three sites (*Ugitech Italia, TFA, and Ugine*) to ISO 45001 (*health and safety*), ensuring the presence of a controlled system for subcontractor management.

Ugitech enforces legal requirements regarding service providers, with these aspects being verified during on-site audits and ISO 45001 audits (*system and documentation*), whether conducted internally or by external parties.

### 2025 actions and resources

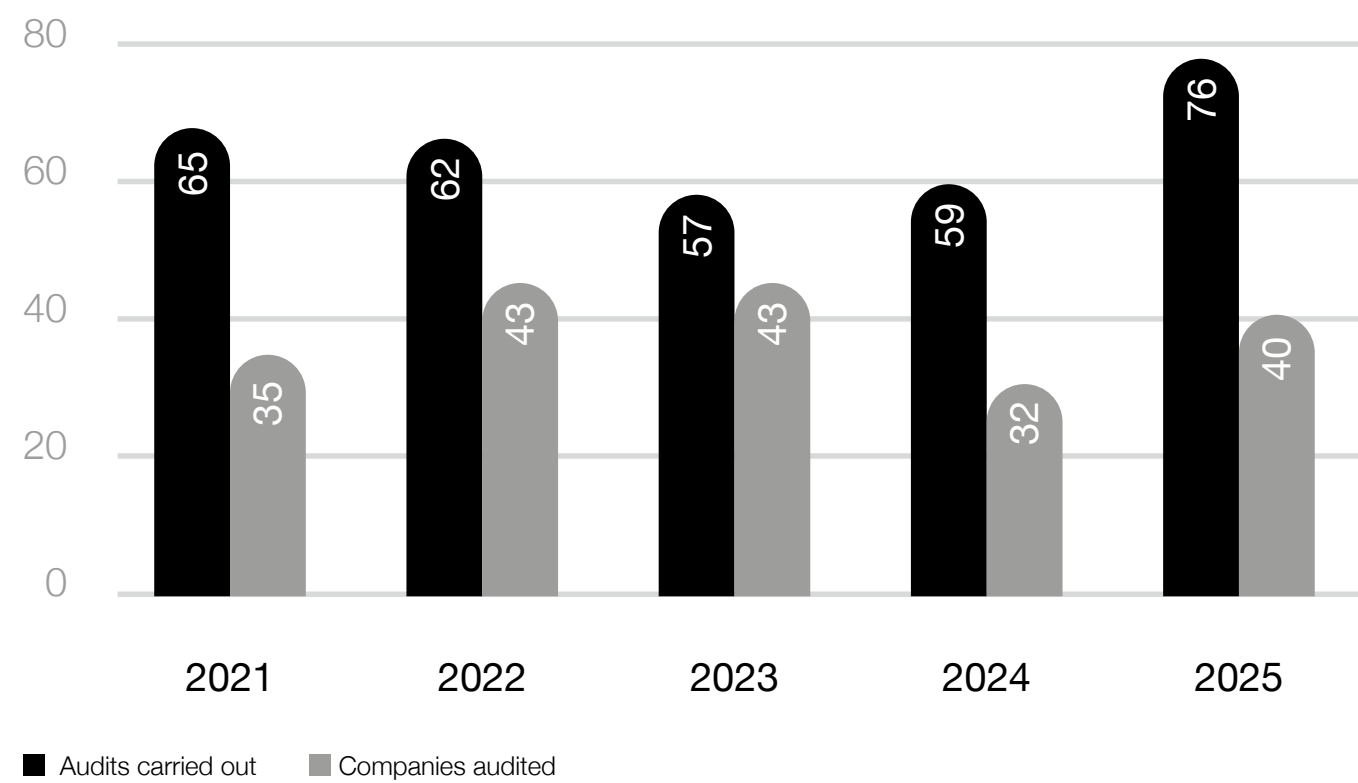
Ugitech conducts regular contract reviews, inter-company coordination meetings during the summer and winter shutdowns, as well as on-site audits throughout the year to ensure the necessary oversight of subcontractor work in our industrial facilities. As a result of these efforts, we had no workplace accidents involving subcontractors during the summer and winter work periods in 2025.

In 2025, our efforts focused particularly on two main areas:  
- the need for more explicit operating procedures and closer coordination to better account for the multiple constraints involved in construction site management,  
- increased vigilance regarding work at heights.

Our on-site audits contribute to a strong drive to ensure compliance with standards and continuous improvement.

### 3. Metrics and objectives

Number of safety audits and subcontractors audited from 2021 to 2025



Replacement of a bridge at the steel mill in collaboration with SECAL

# Affected communities

This chapter standard on affected communities covers a topic deemed highly material in Swiss Steel Group’s double materiality matrix:  
- corporate citizenship (key topic).

## Actions and resources 2025

Given the potential impacts of Ugitech’s activities on local communities, particularly with regard to environmental risks and human rights, Ugitech has established regular engagement and ongoing communication with local stakeholders.

### Notice to the Ugine Residents’ Association

Every year, Ugitech’s environmental manager actively participates in the general meeting of the residents’ association of the hamlet of L’Isle in Ugine. This event provides a valuable opportunity for dialogue, allowing us to transparently present the company’s progress in environmental performance and the actions we have taken to reduce our environmental impact.

This meeting also provides an opportunity to listen to any concerns or new complaints from residents, in order to address them constructively. By maintaining this open and regular dialogue, Ugitech reaffirms its commitment to fostering a lasting relationship of trust with its neighbors and to pursuing a process of continuous improvement.

### Acoustic measurements

In accordance with regulatory requirements, Ugitech conducts acoustic measurements at property lines every three years to verify compliance with authorized noise thresholds.

The most recent measurements, taken in 2024, confirm that the measured levels comply with standards for each period. For ease of reference, the measurement tables from the last two campaigns in 2024 and 2021 (*for the nighttime period only*) are presented in this section. The measurements are also properly conducted during daytime and intermediate periods as required by regulations. Despite these positive results, the company remains fully attentive to the concerns of local residents and remains available in the event of occasional nuisances.

### Atmospheric measurements

Ugitech carries out regular monitoring of air quality in the natural environment in partnership with ATMO Auvergne-Rhône-Alpes, an accredited organization for atmospheric monitoring. This monitoring provides objective and independent data on changes in pollutant concentrations

around the site and enables us to assess the effectiveness of the measures taken to reduce our emissions.

Thanks to this collaboration, Ugitech benefits from recognized expertise and a reliable monitoring system, ensuring complete transparency towards the public. This approach demonstrates our commitment to gaining a detailed understanding of our environmental impact and to engaging in a process of continuous improvement.

### Watercourse management

Ugitech’s environmental manager also occasionally participates in consultation meetings organized by the SMBVA (*Syndicat mixte du bassin versant de l’Arly*) as part of the update of the Arly watercourse management documents. These discussions enable the site to contribute its expertise on the interactions between our activities and the aquatic environment, whilst helping to foster a shared vision for the preservation and sustainable management of the river. This involvement promotes constructive coordination among local stakeholders and demonstrates Ugitech’s commitment to responsible and collaborative management of natural environments.

### Safety at the Ugine site

The Ugitech Ugine site complies with the “Seveso upper tier” regulations. As part of this, it participates in communication campaigns aimed at providing the public with information on the risks of major accidents and the correct actions to take in the event of a crisis.

A meeting is also held regularly by the Prefecture with local residents as part of a Site Monitoring Committee.

### The UGI'RING project and local residents

The Léchère site is classified as 'Seveso upper tier', not because of an immediate risk to the public, but because it will store by-products in regulated quantities.

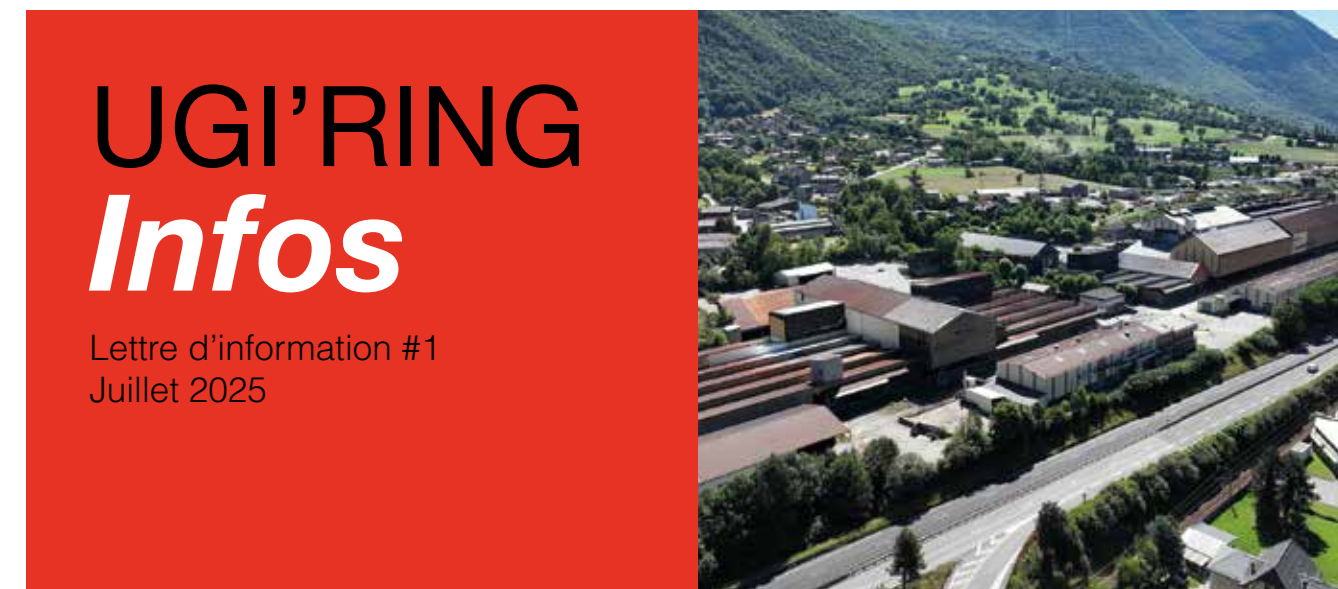
This classification, governed by the European Seveso 3 Directive, is above all a guarantee of enhanced safety and ensures that the facilities comply with the strictest requirements regarding industrial accidents.

Environmental and health studies conducted by independent experts have confirmed the absence of risk to residents, including vulnerable groups (*children, schools, public-access facilities*).

Transparency, equal access to information and dialogue are among UGI'RING's core commitments.

This is reflected in:

- regular newsletters to residents of La Léchère (*July and November 2025*),
- continuous monitoring of nuisances (*noise, air quality*),
- active collaboration with local associations and stakeholders in the area.



### Pourquoi ce rendez-vous d'information ?

La société UGI'RING porte un ambitieux projet de réindustrialisation du site de Château-Feuillet. En publiant cette lettre *UGI'RING Infos*, l'entreprise se dote d'un outil essentiel pour renforcer son engagement en faveur de la transparence et du partage d'informations.

L'objectif de cette lettre est d'offrir à chaque foyer de la communauté de communes de la Vallée d'Aigueblanche un accès égal aux sujets liés à la reconquête d'un site industriel historique de la vallée.

#### Les engagements d'UGI'RING :

- **Transparence**  
Partager toutes les informations utiles.
- **Égalité d'accès à l'information**  
Garantir à chacun la compréhension des enjeux et des avancées.

- **Cohérence entre parole et action**  
Dire ce que l'on fait et faire ce que l'on dit pour bâtir la confiance.
- **Vision claire du projet**  
Tenir informés tous les habitants des étapes, défis et réussites du projet.
- **Communication régulière**  
Une newsletter trimestrielle pour relayer les actualités importantes.
- **Dialogue**  
Répondre aux questions pour apporter des éclaircissements utiles.

En espérant qu'*UGI'RING Infos* deviendra un outil précieux pour tous.

N'hésitez pas à poser vos questions, par mail : [contact.ugiring@swisssteelgroup.com](mailto:contact.ugiring@swisssteelgroup.com)



[www.swisssteel-group.com/ugiring](http://www.swisssteel-group.com/ugiring)



### L'aménagement du site continue

Les opérations d'aménagement du site UGI'RING ont repris au mois de septembre, avec le démontage d'infrastructures légères telles que la conciergerie et l'infirmierie. La déconstruction de structures, dont les derniers filtres situés au sud du site, est en cours.

Après une première phase de déconstruction menée fin 2024 et début 2025, UGI'RING a suspendu ses travaux en mars 2025, conformément à ses engagements en faveur de la biodiversité. Cette pause visait à éviter toute perturbation durant la période de nidification des oiseaux.

Depuis septembre, pour limiter les poussières, des mesures préventives ont été mises en place, dont l'utilisation de brumisateur.

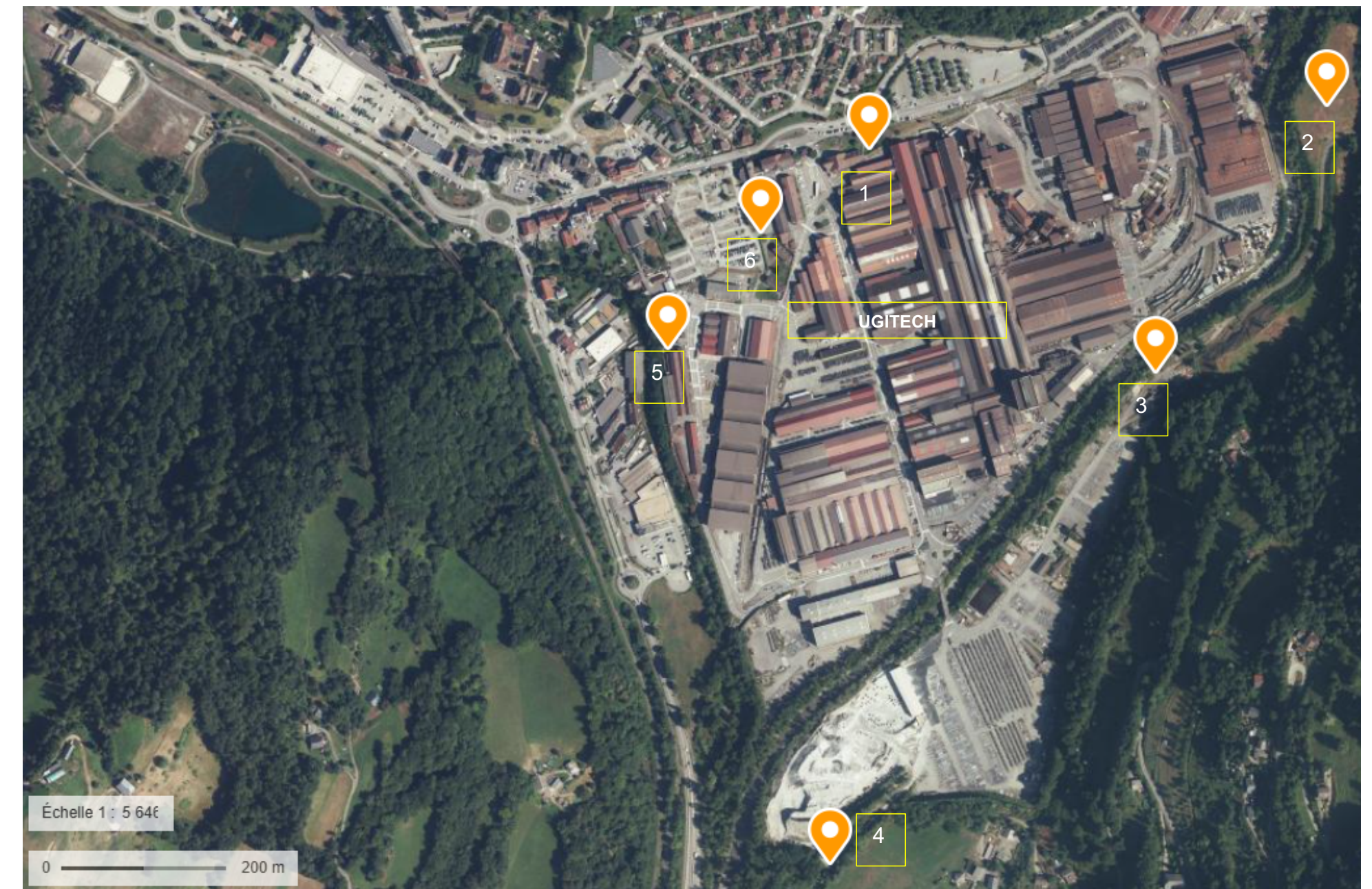
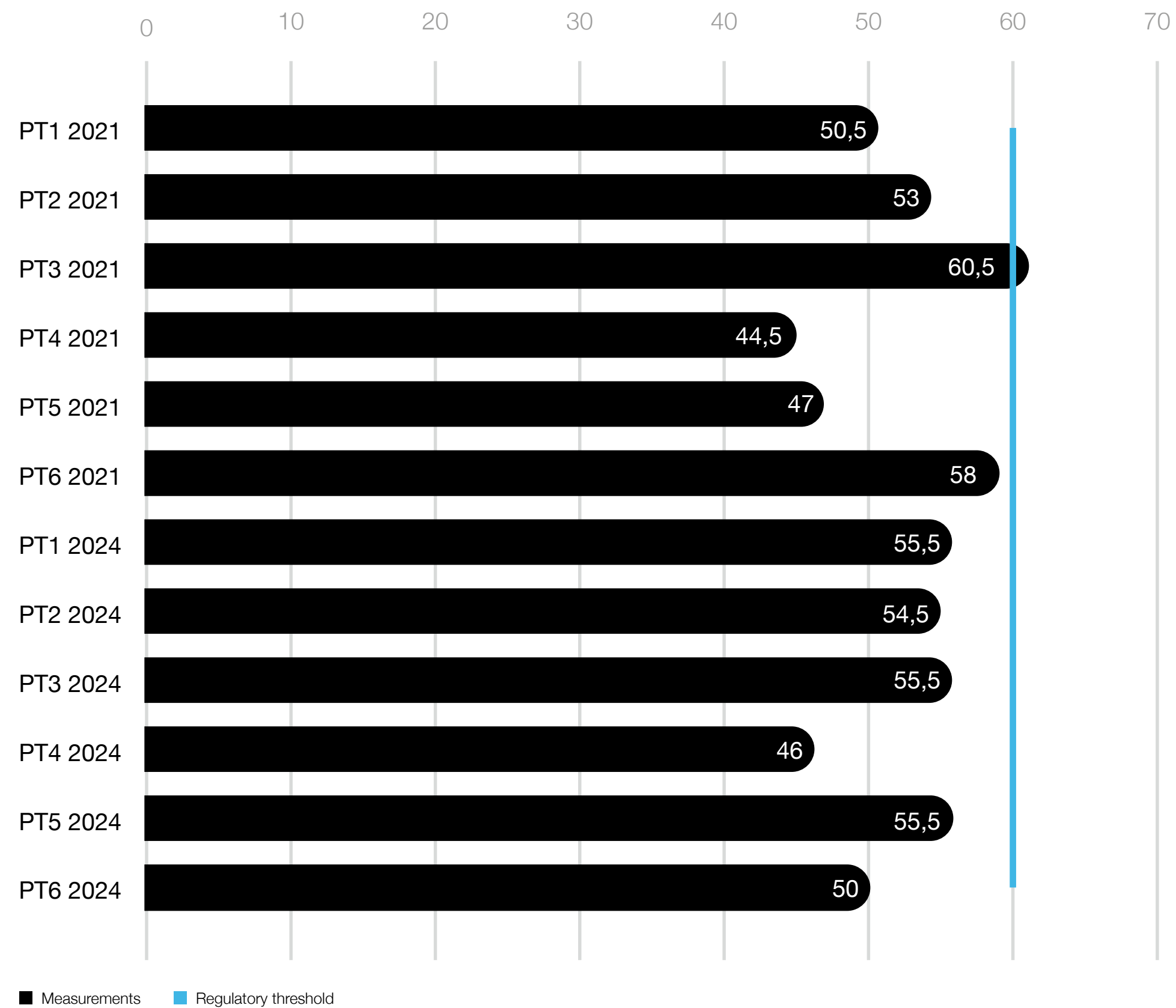
Comme lors de la première phase, une surveillance atmosphérique est assurée, avec des mesures effectuées au sud du site, à l'école de Petit Cœur et à Notre-Dame de Briançon. Une station météo installée sur le site permet par ailleurs de corréler les analyses aux directions et à la force du vent.



[www.swisssteel-group.com/ugiring](http://www.swisssteel-group.com/ugiring)

## Metrics and objectives

### Acoustic measurements at the UGINE site During night-time hours in 2021 and 2024



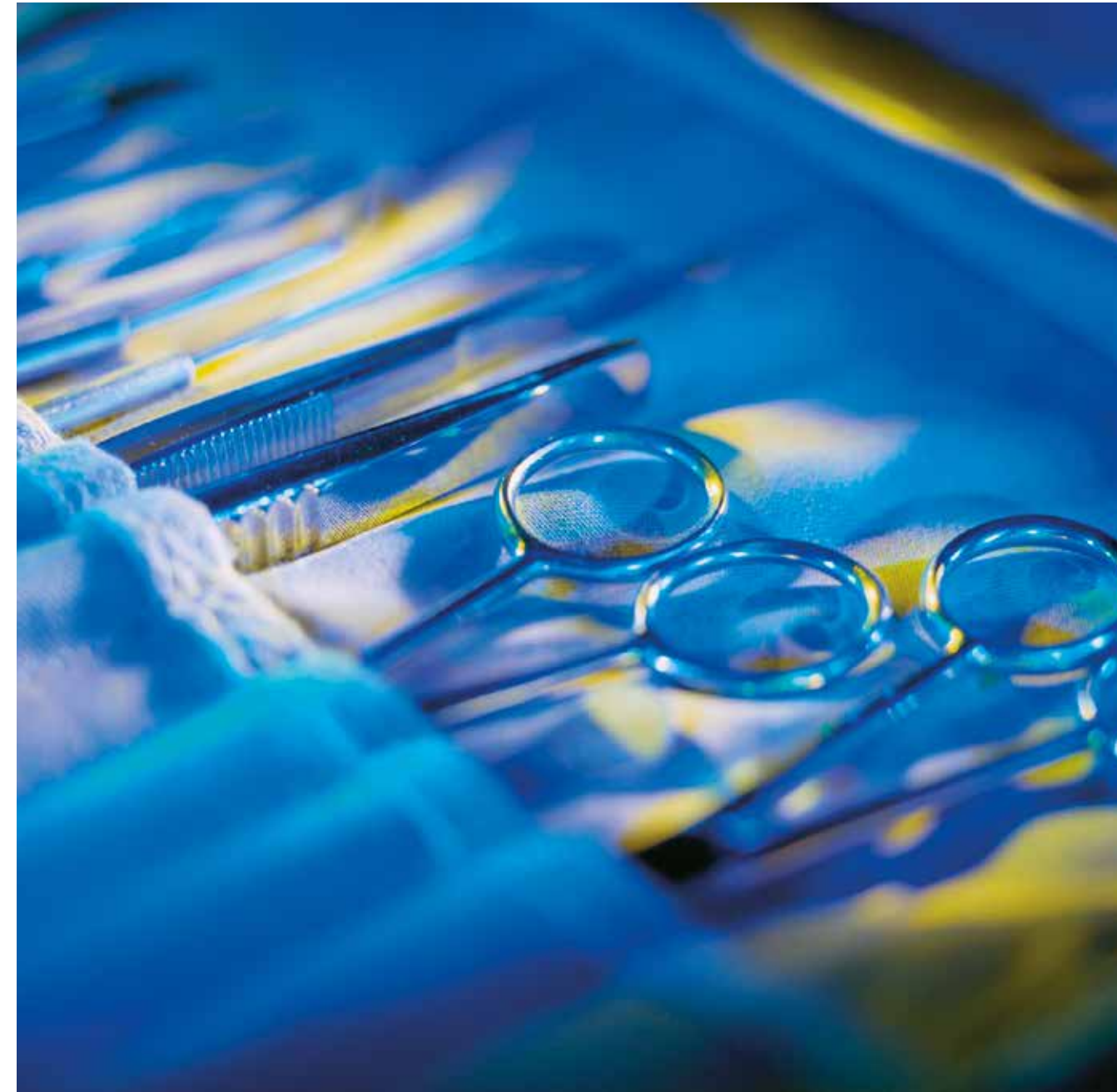
Acoustic measurement points at the UGINE site

# Customers and end users

## Policies / Standards / Frameworks

Cobalt is a metal frequently used in medical devices (*knee replacements, lumbar supports, etc.*). This material was recently classified by the European Commission as a CMR 1B substance: Carcinogenic, Mutagenic, Reprotoxic, with effect from October 2021 (*CLP Regulation No 1272/2008/EC*).

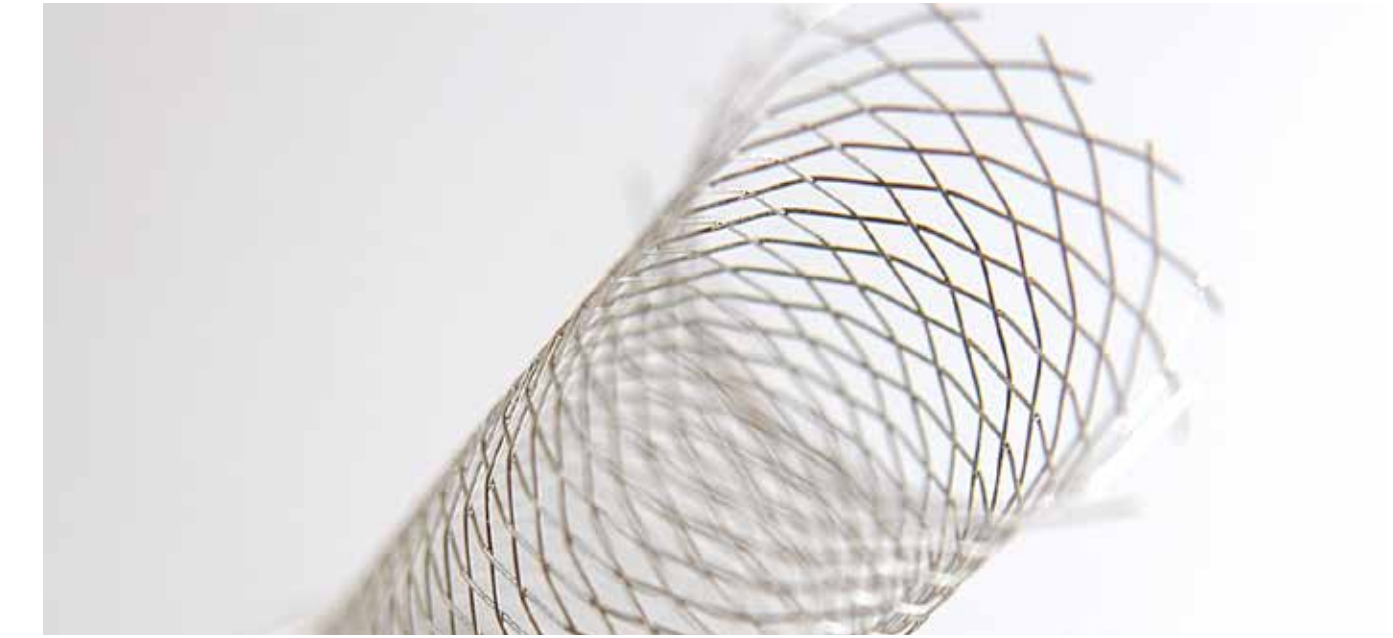
In order to comply with this European regulation, medical device manufacturers have been asked to cease manufacturing, except in specific cases, medical devices containing materials with more than 0.1 % cobalt (*EU MDR Regulation 2017/745 of May 2021*).



## Actions and resources for 2025

### Low-cobalt grades for medical devices

To support this change required of the medical device industry, Ugitech has developed stainless steel grades with a cobalt content of less than 0.1 %. These are the UGI 4\*\*\* LR grades; the suffix “LR” stands for “Low Residual”, i.e. grades with a guaranteed and controlled residual cobalt content.



Stents



Laparoscopic surgical instruments (minimally invasive surgery)



Hip prostheses and orthopedic plates

# Governance

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Business conduct 71

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# Business conduct

This chapter on business conduct covers three topics deemed particularly relevant and material in Swiss Steel Group's double materiality matrix:

- ethical governance (relevant topic),
- sustainable procurement (relevant topic),
- data security, information technology and access (material topic).

## 1. Strategy

Ugitech aims to make its mark as a key player in the economic region. Ugitech wishes to be involved, from the local to the international level, in working groups that aim to create a legislative and regulatory framework safeguarding the sustainability of the European steel industry.

Ugitech is committed to operating ethically across its network, adhering to the values and rules set out in the Swiss Steel Group Code of Conduct. Ugitech intends to support its suppliers in achieving excellence and CSR performance,

and to ensure they adhere to its ethical values. Ugitech aims to implement best cybersecurity practices to guarantee the confidentiality, availability, integrity and traceability of its data, as well as that of its partners.

Ugitech upholds a digital sovereignty strategy based on responsibility, data protection and technological independence, prioritizing European or French solutions whenever possible to build a resilient and sustainable digital ecosystem.

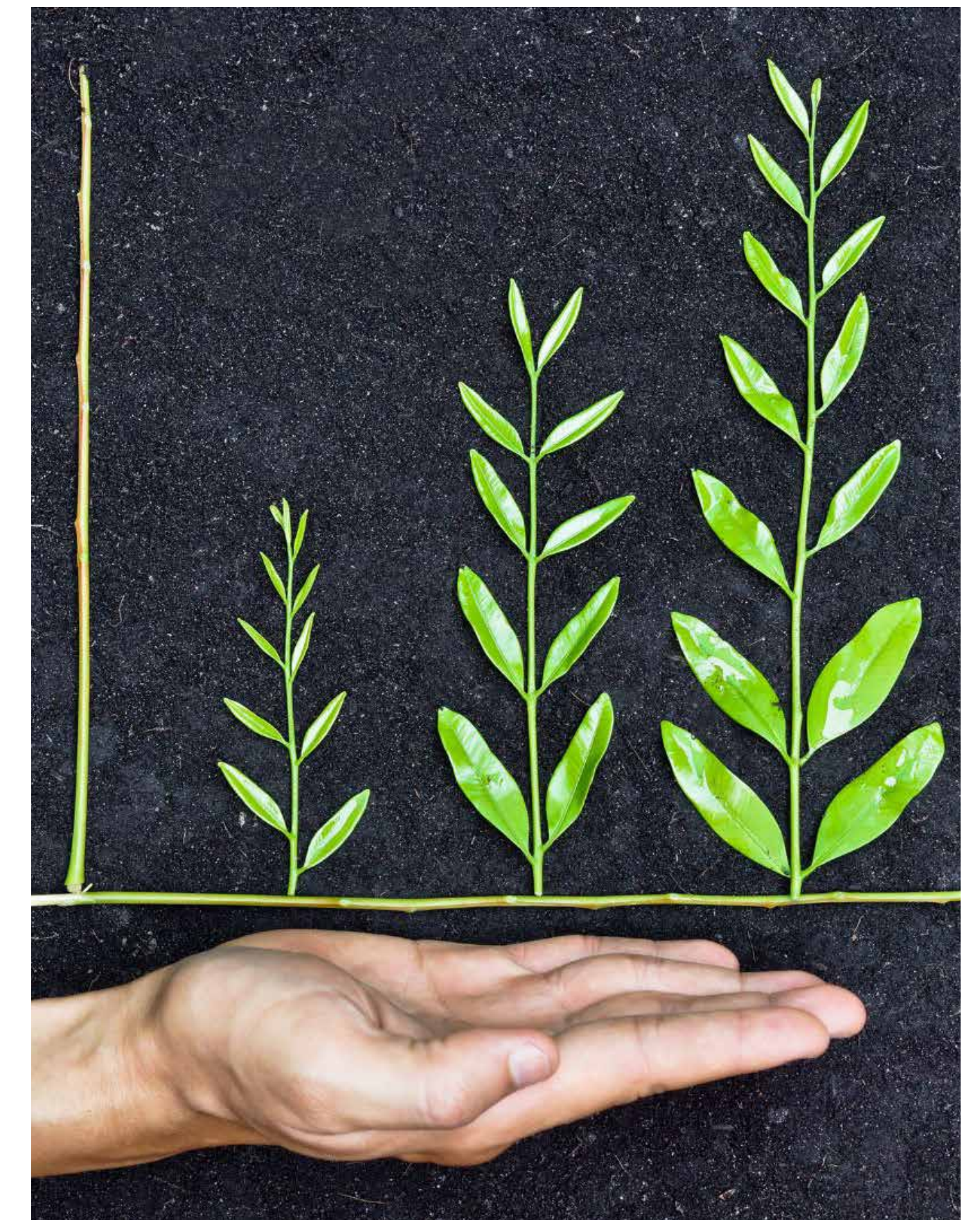
## 2. Actions achieved in 2025

### Policies / Standards / Frameworks

#### Cybersecurity Policy and preparation for ISO 27001 certification by 2027

Cybersecurity is an essential element of the governance of our information system. Ugitech's frameworks for information system security are based on international standards (*ISO 27000*) for information security management in the broadest sense. The information system is regularly assessed by audit firms against the ISO standards and frameworks for which Ugitech is certified.

As a French company belonging to a European group, Ugitech is required to comply fully with the relevant French and European regulations governing the IT and telecommunications sectors.





These include, in particular, obligations relating to:

- intellectual property and the protection of sources (*copyright, intellectual property law, the APP procedure - Agency for the Protection of Programs, etc.*),
- maintaining the confidentiality of commercially and technically sensitive information (*customer data, HR data, customer technical configuration data, etc.*),
- obligations regarding financial and accounting regulations (*tax and accounting traceability and auditability requirements*),
- obligations regarding the protection of personal data as set out in the General Data Protection Regulation (*GDPR*).



### Policies relating to ethical values

- Compliance Organization Policy
- Code of Conduct
- Supplier Code of Conduct
- Anti-Corruption Policy
- Duty of Care Policy - Due Diligence (*Due Diligence*)
- Conflict of Interest Policy
- Human Rights Policy
- Data Protection Policy
- Competition Policy (*Antitrust*)
- Whistleblower Policy
- Policy on Cooperation with Professional Associations
- Anti-Money Laundering Policy
- Procedure for Managing CFSI (*Counterfeit, Fraudulent and Suspicious Items*)
- Policy on foreign trade and compliance with export control laws

### Tax policies

- Audit & financial statement reviews
- Computerized accounting
- Electronic invoicing
- Compliance with transfer pricing policies
- Compliance with the global minimum tax (*Pillar 2*)
- Compliance with French and international standards:

- IFRS accounting
- Publication of financial statements in accordance with French standards.

### Procurement Policy

#### 2025 actions and resources

#### Ugitech's influence and contributions to local communities

Ugitech actively participates in various working groups aimed at protecting the European Union's against unfair competition from third countries with overcapacity, notably:

- the validation of new safeguard measures planned for July 2026 in line with the commitments set out in the European Union Action Plan for Steel and Metals,
- the introduction of mandatory traceability via the 'Melt and Pour' system to ensure that imported steel does indeed originate from the exporting country,
- the assurance of a secure and affordable energy supply for the sector,
- the prevention of carbon leakage via the Carbon Border Adjustment Mechanism (CBAM).



Ugitech is heavily involved in various bodies to define the essential conditions guaranteeing the sustainability of our business and that of the European steel industry:

- the Union of Energy-Using Industries (*UNIDEN*),
- the Alliance for Minerals, Materials and Metals (*A3M*),
- the Union of Mechanical and Metallurgical Industries (*UIMM*),
- the European Steel Association (*EUROFER*),
- the Movement of Medium-Sized Enterprises (*METI*),
- the Banque de France (*Savoie branch*).

In 2025, the construction of a shared energy infrastructure scaled to meet current natural gas needs, immediately compatible with biogas and technically compatible with hydrogen in the long term, was approved. TOKAI COBEX Savoie (*250 employees*) and UGI'RING will benefit from this thanks to an investment of EUR 15.2 million, funded by industrial and public partners, committed to competitiveness, energy transition and regional development.

A partnership with FRAMATOME has been established. It takes the form of land transactions and medium -to long-term contracts to ensure the development of FRAMATOME's strategic activities, pooling resources to co-develop steels for Ugitech's markets and ensuring the decarbonization of our respective activities.

Ugitech is forging long-term partnerships with the Departmental Fire and Rescue Services (*SDIS*) of Savoie (73) and Haute-Savoie (74) to support the commitment of its employees who are volunteer firefighters. A partnership agreement with SDIS 73 has been in place for many years. It regulates the availability of Ugitech's employee volunteer firefighters (*SPV*) for voluntary work at their respective fire stations. A similar agreement was signed more recently with SDIS 74. Nearly 20 employees at Ugitech Ugine benefit from this partnership.

In 2025, SDIS 73 launched an 'Employers' Club' initiative to encourage, through the sharing of experiences, the creation of new corporate agreements. Ugitech took part in the launch event to share its experience and help overcome obstacles for other employers who do not benefit from an agreement.



Firemen Team in Ugine



From left to right: Raphaël Rey, Managing Director of Ugitech (second person), Virginie Corbic, Head of Fire Safety and Environment at Ugitech (third person)

## Information Systems

### - Cybersecurity

- Confidentiality: the system's ability to restrict access to information to authorized people only.
- Availability: the system's ability to be accessible and usable when necessary and by authorized users.

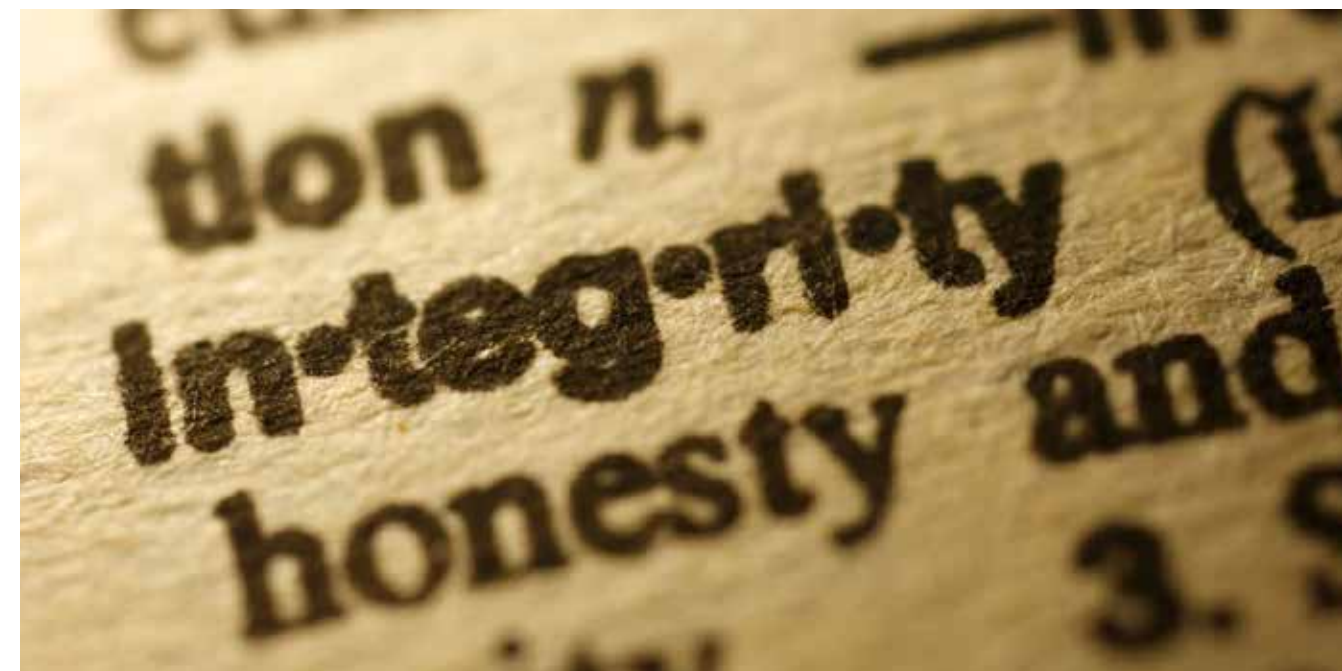


- Integrity: the system's ability to remain intact, accurate, uncorrupted and unaltered. This criterion may also be extended to the system's ability to provide proof of this integrity (*traceability, authenticity of the sender and the content, etc.*);
- Traceability: the system's ability to provide proof of this integrity by retaining records of the status and movements of information.

Ugitech is committed to a process of continuous improvement of the security of its Information System. Risks are multiplying and threats are evolving very rapidly. Strengthening protective measures is vital for the company. For this reason, Ugitech draws up an annual cybersecurity roadmap outlining the projects required to strengthen protections, as well as the processes that need to be implemented or optimized. Ugitech also relies on the support of cybersecurity experts who assist the company daily with sensitive and complex issues. Risk assessments are carried out regularly when new systems are implemented ("*cybersecurity by design*") or on legacy systems to identify risks and evaluate the measures to be put in place to better protect them.

Ugitech employees regularly attend sessions to raise awareness of IT risks and threats and the correct behavior to adopt. The effectiveness of these campaigns is measured

by the numerous reports made by users when they suspect threats, particularly phishing. These initiatives are vital because people are in the first line of defence against cyberattacks. Good IT security practices are learned through repetition.



**- Digital sovereignty**

In line with its commitment to responsibility and technological independence, Ugitech is strengthening its commitment to digital sovereignty.

This approach is reflected in particular through the systematic evaluation and, where relevant and possible, the prioritization of European or French technological solutions.

By incorporating these criteria into its choices regarding architecture, applications and digital services, Ugitech contributes to the development of a digital ecosystem

that is more resilient, transparent and respectful of data protection values. This approach is fully in line with a vision of sustainable digital technology, serving the performance of the company and the trust of Ugitech's stakeholders.

**Business Ethics**

**- Code of Conduct**

It is aligned with the principles of the United Nations Global Compact and the OECD guidelines. It sets out the expectations of Ugitech and Swiss Steel Group to ensure compliance with local and international laws: child labor, forced labor, freedom of association, discrimination (*gender, political, religion*), health and safety in the workplace. It also addresses the management of conflicts of interest, corruption prevention (*bribes, gifts, hospitality, sponsorships, donations, etc.*), antitrust law and environmental considerations.

It is regularly updated, communicated to employees and available on Swiss Steel Group's website and intranet for optimal accessibility to all staff as well as to external stakeholders. It has been incorporated in its entirety into the new internal regulations in force since 1 January 2025.

The Supplier Code of Conduct was updated in 2024. Its distribution to direct suppliers and the entire supply chain



has been underway since 2025. The new Supplier Code of Conduct is not limited to meeting legal obligations but also includes clear expectations. It has also been published on the Swiss Steel Group website in the languages most relevant to our suppliers.

**- Anti-Corruption Policy**

Ugitech and Swiss Steel Group conduct their business worldwide in an ethical manner and in accordance with local and international laws. They do not tolerate corruption or bribery and are committed to promoting integrity across all their activities.

The excellence of the Group’s staff, the quality of its products and services, and operations conducted with respect for ethics and integrity, strengthen confidence in the Group and will enable it to achieve sustainable success. Corruption can harm companies, business partners and employees. It can damage reputation, lead to financial penalties, or even result in prison sentences, as it is considered a criminal offence under most jurisdictions, such as in North America and Europe.

Swiss Steel Group’s anti-corruption policy enables the identification and detection of any corruption within

everyone’s area of expertise. It sets out the basic rules that should always be kept in mind to help everyone carry out their daily tasks and duties. It was also highlighted in all the training sessions we delivered in 2025.



**- Conflict of interest**

The Conflict-of-Interest Policy was updated at the end of 2024 and will be communicated to all employees in 2026. Support functions received training in 2025 so that they can declare any conflicts of interest in accordance with our procedure. A questionnaire on conflicts of interest aimed at the most exposed groups (*Management, Sales and Purchasing*) will be distributed during the first half of 2026.

**- Human rights**

To complement the Supplier Code of Conduct, a new human rights policy was also published in 2024 and updated in 2025, with a particular focus on child labor, forced labor, modern slavery and community rights. All these topics were also covered in the training sessions the Group conducted internally in 2025, reminding our employees of our key objectives.

**- The internal whistleblowing system**

The internal whistleblowing system allows employees to report concerns anonymously regarding breaches of the Code of Conduct via a highly secure process. Managed by Swiss Steel Group and in place for many years, it is regularly communicated to employees.



It is accessible to all staff as well as to external stakeholders (suppliers, customers, etc.) via the Group's website and intranet. It was also mentioned in all the training sessions we delivered in 2025.

The Ethics Steering Committee, established in 2021, is composed of managers at Swiss Steel Group from the Human Resources, Legal, Internal Audit and Compliance departments. It is responsible for reviewing the reports received and deciding on the actions to be taken.

In 2025, the Chief Executive Officer of Swiss Steel Group communicated the annual activity of the whistleblowing scheme to all Group employees. This initiative will be repeated in 2026.

**- Compliance risk assessment**

2022 marked the launch of the first dedicated compliance risk assessment, covering risks related to anti-corruption, sanctions, antitrust, conflicts of interest, human rights and certain specific environmental regulations. In 2025, this process was carried out again.

To complement the compliance risk assessment, a compliance declaration is signed twice a year by all Ugitech's operational legal entities to confirm their alignment with

the Code of Conduct, Swiss Steel Group's policies, the whistleblowing scheme, and the key expectations regarding anti-corruption, antitrust, sanctions, human rights and environmental matters.

**- Internal control system**

Every year since 2008, Ugitech's internal control system has been fully updated and audited by a team of external auditors during the annual closing of accounts.



**- Compliance training**

Face-to-face and video training courses have been launched since 2022. They are renewed every three years. These training courses covered several topics (*code of conduct, anti-corruption, human rights, the environment, the whistleblowing system and protection of whistleblowers, sanctions and embargoes*), and the level of detail has been tailored:

- to the risks associated with the roles held by employees,
- to the departments concerned: finance, operations, sales, human resources, etc.,
- to hierarchical levels: management, employees with or without an email address.

Employees are divided into three categories:

- for managers and the most exposed employees (*in direct contact with customers, suppliers and public authorities*), face-to-face training is required,
- employees with limited exposure to risks will be trained using an e-learning module,
- to complement the training program, a 10-minute video has been prepared for employees without an email address and with lower exposure to risks.



With the 2022–2024 cycle now complete, the new 2025–2027 cycle began this year with the following features:

- As the e-learning module is not yet available, staff with limited exposure were trained in person alongside staff with high exposure.
- The face-to-face training module took place over a full day (7 hours) covering the usual topics, plus new topics such as competition (*antitrust*), trade associations, conflicts of interest, security and counterfeiting, a focus on donations, sponsorship, gifts and invitations, the due diligence system, health and safety, drugs, alcohol and weapons, etc.
- Only staff at French sites were trained in 2025. In 2026, staff at Italian and German sites will be trained.
- As the video was rolled out gradually during the previous cycle, it will not be shown again until 2026.

## Tax and accounting compliance

### - Audit and review of accounts

The audit engagement covers the audit of Ugitech’s annual accounts, prepared in accordance with French accounting rules and principles. It also includes the performance of additional procedures on the financial information provided to the parent company, Swiss Steel Holding AG, as part of the preparation of its consolidated accounts, as well as

the provision to its auditor of the information necessary for the performance of its consolidated accounts certification engagement.

In this context, the Chief Executive Officer and the Chief Financial Officer of Ugitech sign a letter of representation in which they assume responsibility and certify the quality, accuracy and completeness of the information provided to the auditors. This letter relates to the systems put in place regarding fraud prevention and compliance with regulatory requirements.

### - Computerized accounting

Article L. 47 A-I of the Book of Tax Procedures (*LPF*) provides that taxpayers who maintain their accounts using computerized systems must present them in the form of electronic files during an audit by the tax authorities. The FEC (*File of Accounting Entries*) must be generated at the end of each financial year and be available upon request from the DGFIP (*Directorate General of Public Finances*). This accounting entries file must comply with codified standards.

95 % of supplier invoices relate to orders placed in advance in the information system, for which each line item is cross-checked three times against the order, receipt and invoice.

For the remaining 5% of invoices, the invoice must be expressly validated by the manager of the relevant cost center in accordance with the authorization delegations in force.

### - Electronic invoicing

The implementation of electronic invoicing significantly strengthens corporate governance by securing invoicing processes and improving the quality of financial and tax data.

Thanks to the automated transmission and processing of invoices, it ensures full traceability of transactions, reduces the risk of errors and fraud, and standardized controls throughout the purchase-to-sale cycle.





### - Compliance with transfer pricing policies

The business of Ugitech SA and its subsidiaries is conducted largely outside France and in part through Swiss Steel Group's distribution network. In this context, compliance with international rules on the setting of transfer prices between associated companies addresses the potential risk of profit shifting from one country to another. In compliance with international regulatory obligations and recommendations arising from the work of the OECD (*Organization for Economic Co-operation and Development*), and in accordance with French legislation, Ugitech SA has, since 2010, been preparing documentation in line with the OECD Principles and has been preparing declarations relating to transfer pricing policy in accordance with French legislation.

### - Compliance with the global minimum tax (Pillar 2)

The application of the OECD's (*Organization for Economic Co-operation and Development*) Pillar 2 rules improves governance by enhancing the quality and reliability of tax data by jurisdiction.

It requires greater transparency regarding the effective tax rate, reduces the risks associated with aggressive tax optimization and contributes to greater transparency towards stakeholders.



### Compliance with French and international standards

Ugitech prepares its accounts within Swiss Steel Group in accordance with IFRS (*International Financial Reporting Standards*), ensuring the transparency and comparability of its financial statements worldwide. Compliance with this regulatory framework ensures that information is accurate, consistent and compliant with national and international regulatory requirements.

These financial statements are then restated to comply with French accounting and tax rules to determine the taxable

profit in accordance with French rules by neutralizing differences between accounting frameworks and applying the provisions of the CGI (*General Tax Code*). These adjustments ensure the consistency of taxable bases and compliance with French regulatory obligations.

### Responsible procurement

The mission of Ugitech's procurement department is to promote ethical standards by encouraging all its suppliers to comply with its code of conduct. The principles of Corporate Social Responsibility (*CSR*) are also incorporated into the specifications as well as into the supplier evaluation processes.

Ugitech strictly ensures compliance with current standards and regulations, particularly those relating to conflict minerals, REACH (*the regulation concerning the registration, evaluation and authorization of chemical substances, as well as the restrictions applicable to these substances*), Safety Data Sheets (*SDSs*), and safety protocols and prevention plans to ensure the safety and protection of all stakeholders. Ugitech also encourages collaboration with local partners, to strengthen its regional presence and support the responsible economic development of its region, particularly with regard to maintenance and on-site service providers.



To reduce dependence on mineral raw materials and minimize its environmental impact, Ugitech recycles its own waste and prioritizes recycling channels, thereby contributing to a more responsible and circular use of resources. The UGI’RING project is also part of this approach.

**Due Diligence**

Swiss Steel Group has implemented a due diligence tool to limit risks associated with third parties. This approach is based on two key stages tailored to the level of risk.

**- Reputation and sanctions screening**

A systematic review is carried out for all business partners (*suppliers, customers, managers, major transactions, sponsorships, donations, mergers and acquisitions*).

This tool identifies potential risks such as:

- sanctions and embargoes,
- public legal decisions (convictions, indictments, etc.),
- adverse media reports (*corruption, human rights, environment, etc.*).

**- Enhanced risk assessment**

This in-depth analysis applies to partners with a high-risk profile and considers:

- for suppliers: the services/materials supplied, their location,

- their strategic importance, etc.,
- for customers: their sector of activity, their location, their impact on the company, etc.

The result of this assessment determines the risk level and the actions to be taken. To ensure a consistent approach across subsidiaries, Swiss Steel Group has defined a common procedure and an escalation process in the event of an issue, also enabling Ugitech’s sister companies to contribute to these analyses.

**3. Metrics and targets**

**Percentage of staff trained in the code of conduct (new 3-year cycle starting in 2025)**

Entities	Population	Cycle 2022-2024	Cycle 2025-2027	Target 2030
Ugitech SA	Indirect workforce	71 %	100 %	100 %

**Number of alerts submitted by internal whistleblowers**

Ugitech (all companies in France, Italy, Germany)	2022	2023	2024	2025
Alerts issued	2	3	2	20
Alerts resolved	2	3	2	15
Alerts in progress	-	-	-	5

In 2025, the main issues giving rise to these alerts are conflicts of interest, asset security or human resources (*salaries, harassment, discrimination, etc.*).

**Number of people made aware of cybersecurity**

Year	2023	2024	2025
Percentage of employees trained in cybersecurity	71 %	75 %	88,7 %

**Data storage rate in Europe**

100 % of the applications used by Ugitech have been hosted in data centers located in Europe for over 5 years.

# Accelerate forward.

Make steel  
matter.



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