



Ugitech Europe

Extra Financial Performance Statement

2024 Report



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Despite many headwinds, our values are keeping us on course, more than ever, together, for a future that matters!

In an economic context marked by growing uncertainties and challenges, our determination to fully integrate the principles of Corporate Social Responsibility (CSR) into our activities has never been more essential. These turbulent economic times remind us that only a responsible, sustainable and collaborative approach can ensure our long-term resilience and prosperity.

This Extra-Financial Performance Statement and the many examples of achievement it contains reflect our commitment to continuing to make progress, even in a challenging environment. It bears witness to our constant efforts to reduce our environmental impact, strengthen our social contribution and maintain exemplary corporate governance, while navigating through a period of intense economic pressure.

The past year has required us to make choices and priorities, but we are still guided by our desire to protect what is essential: our employees, all our stakeholder partners, our values and our eco-responsible approach. All of this is achieved through day-to-day management that enables us to stay afloat economically and seize existing opportunities.

Our resilience plan, launched in 2024, and the pragmatism and discipline we have shown in implementing the action have been decisive.

I would like to take this opportunity to thank all our employees and partners for their unwavering commitment over the past year. Our collective hard work and determination to rise to the challenges and propose solutions are the key to this resilience. This resilience has enabled us to maintain a medium to long-term vision, particularly with regard to our development projects, and to remain committed to implementing our Cap 2025 plan, which is integrated into the SSG2025 Group plan.

We know, however, that we still have a great deal of work to do. Faced with an unstable economic environment and pressing social issues, our ambition is clear: to continue act responsibly, to strengthen our capacity to innovate and to mobilize all our stakeholders to meet these challenges.

Despite the unforeseen circumstances and the prevailing political uncertainty, we are continuing to implement major projects to limit our ecological footprint and differentiate ourselves by providing sustainable solutions for our customers within a safe, ethical and fair operating model.

Raphaël Rey

Chief Operating Officer - Ugitech Production Assets

Managing Director - Ugitech SA

Ugitech, a Swiss Steel Group production asset

Today, Swiss Steel Group is one of the world's leading suppliers of customized solutions for long products in special steels. The Group is one of the world's leading manufacturers of tool steel and long stainless steel, and one of Europe's largest suppliers of alloyed and high-alloyed structural steels.

With almost 7,500 employees and its own production and distribution companies in more than 25 countries on five continents, the company provides its customers with global sourcing and support, offers them a complete portfolio of products and services worldwide.

A strong brand.

Following the reorganization of the Group, the former brands of the entities have been merged into a single strong brand: Swiss Steel Group. We are now united under a single flag that encompasses all our entities. Our logo continues to combine the colors of glowing steel with the shape of infinity, symbolizing our commitment to a sustainable value chain and circular economy.

Strengthening our market presence

This strategic initiative represents a major realignment, consolidating our market presence and paving the way for the future - a future marked by closer collaboration between the former Business Units to better meet the specific needs of each customer. From January 2023, the Swiss Steel Group companies undertook a systematic brand alignment, a process which was completed by the end of that year.

The new organizational structure and unified brand identity, while transformational, do not change the existing legal framework. Swiss Steel Group has set up a corporate structure based on the needs of its customers, with three Divisions: Engineering Steels, Stainless Steels and Tool Steels. This organization adopts a global approach to the market, enabling more personalized support for our customers. Each Division relies on its own sales and distribution networks and has access to the Group's entire production network.



Deutsche Edelstahlwerke production entities:
DEW Witten/Krefeld - DEW Siegen/Hagen

Ugitech production entities

Steeltec production entities

Finkl Steel production entities

8 melting shops

25 production sites

> 60 locations

> 25 countries

> 7 500 employees

> 20 000 customers

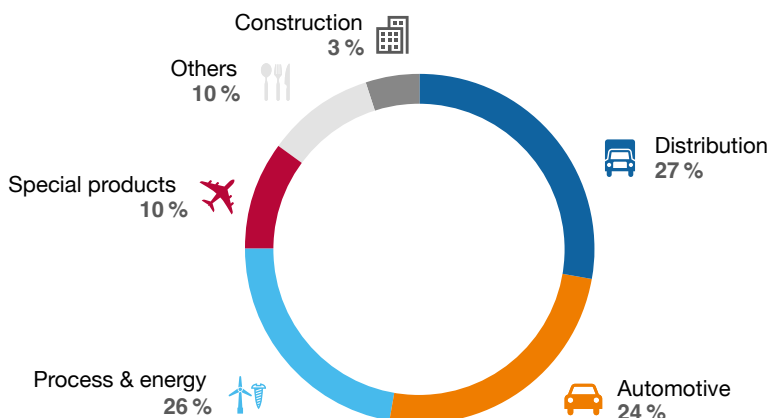
Ugitech, serving the Stainless Steel Division

Ugitech is one of the world's leading manufacturers of long stainless steel products..

The company's main products are billets, bars, wire rod and drawn wire, which it manufactures in its own melting shop and processes in its hot-rolling mill, finishing shops and wire drawing mills.

Stainless steels are characterized by their high mechanical properties and resistance to corrosion. They used to manufacture a wide range of parts, including valves, turbine components, welding rods, automotive injectors and surgical equipment.

With over 115 years' experience in steel manufacturing and ongoing research in the field of metallurgy, the company guarantees optimum steel solutions for the demanding applications of its customers in the automotive, construction and process industries, as well as the aerospace, nuclear and medical sectors.



Together. For a better future that matters.

Figures for 2024

143,9 kt invoiced

1 662 employees

Sales of **611,4 M€**



Our vision

Ugitech, a leading producer of long stainless steels, aims to:

- develop customer intimacy,
- promote employee fulfillment,
- meeting the challenges and integrating the societal issues of tomorrow's world in its ecosystem,
- be profitable and create value in the long term.

2024

143,9 kt invoiced

Our strategic priorities



Anchoring our **Corporate Social Responsibility** to support a sustainable world



Innovating for our customers through collective intelligence



Ensuring **competitive advantage** permanent



Accelerating our **digital transformation**

Business model: a new Swiss Steel Group operating model



GROUP FUNCTIONS

Consolidated at Group level, with close integration of activities to enhance efficiency and synergies



DIVISIONS

Account-based steering
integrated income statement



PRODUCTION ASSETS / SITES

Focused on quality, service levels
and cost efficiency



Under this operating model, Ugitech is integrated into the production assets.



Continuous casting at Ugine melting shop

Swiss Steel Group's commitment

A commitment to decarbonization approved by SBTi

In May 2024, Swiss Steel Group received confirmation that its decarbonization targets are aligned with the SBTi (Science Based Target Initiative) 1.5°C mitigation pathways to achieve Net-Zero by 2050.

SBTi has endorsed the fact that Swiss Steel Group will be able 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 sectoral guidelines for the steel industry.



CO₂ emissions data guaranteed by DNV Business Assurance and the Carbon Disclosure Project

For the 2023 financial year, Swiss Steel Group has successfully undergone independent verification of its greenhouse gas emissions (scopes 1, 2 and 3) by DNV Business Assurance!

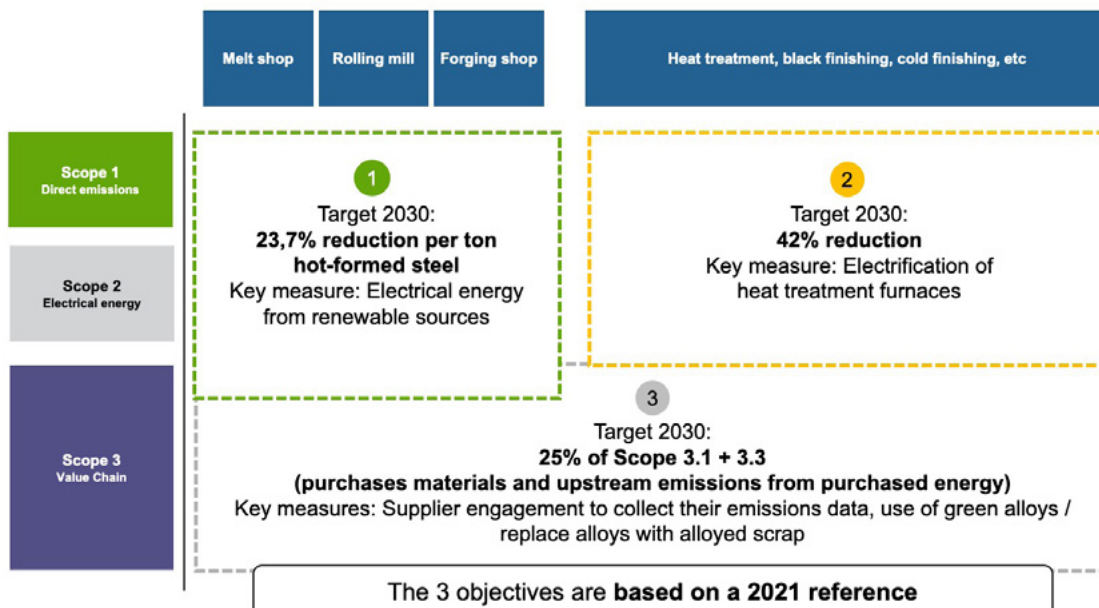
In 2024, the reporting scope has been extended to other Scope 3 categories (3.10 and 3.12) in line with our SBTi objectives of zero net emissions.



Swiss Steel Group achieves top "A" rating in CDP climate change assessment:

In April 2025, Swiss Steel Group has been awarded the maximum grade of "A - Leadership" (up from a B score in 2023) in this year's sustainability ratings by the international non-profit organization CDP (Carbon Disclosure Project) in the area of climate change. This is the best result ever achieved by the Group. This makes the company one of only four steel manufacturers assessed worldwide to achieve the highest rating in 2024.

Short-term decarbonation targets by 2030 validated by the SBTi



Net-Zero 2038 objectives

Base year: 2021



SCIENCE
BASED
TARGETS

DRIVING AMBITIOUS CORPORATE CLIMATE ACTION

-77,7%
GHG emissions
Per ton of hot-formed steel

Melt shops,
rolling mills and
forge shops

Scope 1, 2, 3.1 &
3.10

-90%
GHG emissions
Absolute emissions

Heat treatment
and finishing
processes

Scope 1 & 2

-90%
GHG emissions
Absolute emissions

Indirect
emissions from
the value chain

Scope 3.1, 3.3,
3.5, 3.10, 3.12

Roadmap for decarbonation Ugitech's industrial activity on scopes 1, 2 and 3 to meet SBTi targets.

	t of CO ₂ avoided per year	2021	2030
Efficiency Reduce energy consumption per tonne produced	1 800 t	Manufacturing Execution System (MES) - Ugine 2021-2030 Optimizing energy consumption in workshops.	Oxycombustion - Ugine 2027-2030 Replacement of air with oxygen in ladle and AOD preheaters to reduce by 35% natural gas consumption.
Low-carbon gas Replace natural gas with green hydrogen or biomethane	6 400 t	HYDREAMS - Ugine 2023-2027 Demonstration of the feasibility of replacing natural gas with clean hydrogen in our thermal processes (burners, furnaces, etc.).	Annealing furnaces - Wire drawing mills 2026-2028 Use of green hydrogen instead of grey hydrogen. Lhyfe electrolyzer - Ugine 2027-2030 Production of green hydrogen to meet our industrial and mobility needs.
Electrification Converting our furnaces and vehicles to electric power	16 000 t		Reheating furnace - Rolling mill 2025-2030 Electrification of zones 1 & 2 with hybrid operation (electricity/gas). Soda furnaces - PFM 2027-2030 Replacement of gas burners with immersion heaters.
Circularity Improving the sourcing and recyclability of our raw materials and consumables	72 700 t		Sorting & Recycling rates - Ugine 2025 - 2030 Optimizing scrap sorting and increasing the rate of recycled materials in our castings. UGI'RING - La Léchère 2027 Production of ferro-alloys by recycling industrial waste to create the world's first "circular steel mill".
	Scope 1+2 Scope 3 86 900 t	Main current and future non-supply-chain projects (non-exhaustive list)	

Our risk management

Risk management is an important issue in our economy and one of the central aspects of our concerns. As an integral part of Group policy, risk management is one of the components of corporate strategy. It helps to inform budgetary choices.

Swiss Steel Group brings its Risk Management approach to life thanks to a dedicated organization. A dedicated team and a Group Risk Manager are tasked improving the risk resilience of the Group and its subsidiaries and are involved in operations and decision-making throughout the organization. They support the Group's ability to achieve its operational and strategic objectives. They report functionally to the Group Audit Committee and to Group Management. The roles of each have been formalized in a Charter.

Ugitech works on its risks by process

and more generally in collaboration with the Group.

An initial identification of potential hazards (threats, weaknesses) is based on an in-depth analysis of the 23 processes, in relation to the strategic directions, challenges and objectives to be achieved. It is carried out by each Process Manager and includes:

- a study of the 'strategic' risks in relation to the issues and objectives at stake, using a SWOT (Strength, Weaknesses, Opportunities, Threats) analysis,
- an analysis of the operational risks relating to the tasks to be carried out by sub-process.

This results in the actions and projects to be implemented by process. The rating of these processes is validated by our Management Committee.

A Ugitech Risk Management correspondent identifies risks in order to draw up a risk map. He incorporates potential hazards and action plans drawn from analyses carried out by process. He prioritizes them using a rating system (FMEA type) and monitors the progress of action plans.

An extract of this map, comprising strategic, operational, reporting and compliance risks, is also updated once a year with the support of the Group, and is supplemented by a quantified estimate of the impact of each risk.

This work gives us an overall view of the main potential risks facing the company and enables us to monitor action plans aimed at controlling or reducing these risks, particularly in areas related to our corporate social responsibility.

In 2024, risk mapping was updated as part of the annual review.

In addition to these risk analysis, quality, environmental and energy management systems require detailed risk analysis of production operations and the entire value chain.

All production sites are analyzed to identify the most significant potential impacts, which feed into the mapping of strategic risks.

Societal risks

Mapping extract

Risk mapping highlights our Corporate Social Responsibility concerns in areas such as ethics, the environment and our resources, regulatory compliance, social dialogue, our partnerships, etc.

In all processes, CSR risks are identified individually.

The table below is an extract of our company's main societal risks.

Danger/Opportunity (SWOT)

Description	Impact description	Project
<p>Risk fatal workplace accident.</p> <p>Serious injuries caused by a lack of safety in the tool area (measures to be for each type of machine).</p> <p>Machine conformity.</p> <p>Serious injuries linked to transport risks: pedestrian and forklift.</p> <p>Compliance with local regulations to provide a suitable working environment for employees working at height.</p> <p>Confined spaces: access to confined workspaces and potentially hazardous atmospheres.</p>	<p>Civil and criminal convictions (compensation). Company image/employer brand. Impact on staff.</p> <p>Production shutdown ordered by the courts. Increase in occupational injury and disease contributions.</p>	<p>Security strategy with multi-year action plan for compliance... Focus of the security strategy.</p> <p>Confined spaces: working group underway to ensure compliance and appropriate training.</p> <p>Updating and revision of the DUER (Document Unique d'Evaluation des Risques).</p> <p>Water sobriety plan.</p>
<p>Lack of water, electricity, ...</p>	<p>Production disruption due to a shortage of natural resources.</p>	<p>Water-saving WG and all prevention initiatives: Water sobriety plan.</p> <p>All prevention initiatives.</p>
<p>Climate change.</p>	<p>Increase in extreme events (drought, storms, hail, etc.).</p> <p>Projects to be carried out to adapt our industry to water shortages or risks of material damage (roofing, etc.).</p>	<p>Specialized risk analysis on climate change with construction of an action.</p>
<p>Serious environmental incident (discharge of polluted water, leakage of hazardous products, toxic cloud).</p>	<p>Pollution and damage Ugitech's image (discharge water contaminated by dust from plant into the environment, soil pollution, etc.).</p>	<p>Rainwater treatment project in the 2026 investment plan.</p> <p>Improved treatment of certain discharges at Ugine (2022-2027).</p> <p>Complete the site's retention systems.</p>
<p>Risk of litigation and illness due to exposure chemical substances (chromium and cobalt).</p>	<p>Assessment based on the cost of treating serious illnesses (cancer).</p>	<p>Follow-up on current initiatives.</p>
<p>Rise in the price of high-grade raw materials, poor balance between high-grade and low-grade raw.</p>	<p>Return of non-recoverable internal scraps - Process impact: rate not analyzed.</p> <p>Impact on the CSR rate of recycled raw materials.</p> <p>Increased risk on residual elements.</p>	<p>Expanding sources supply. Sobriety plan: sorting internal offcuts.</p> <p>Recovery of customer offcuts. Metal doping residue treatment.</p>
<p>"Dusty" / negative image of the steel industry. Deterioration in external relations (local residents and journalists, institutions).</p>	<p>Degraded employer brand, lack appeal. Bad image.</p>	<p>Intensify the corporate communication plan.</p> <p>Communication plan in place and relations with local residents and the DREAL maintained on a regular basis.</p>

Increased transport costs in the medium term (diesel, carbon tax, etc.).	Price increases.	Development of intermodal flows.
Employer brand damaged and discredited following accidental events 2022 and 2023. Loss of pride belonging.	Deterioration in pride belonging and commitment. Difficulties in attracting staff, unfilled posts. Resignation rate on the rise. Conveying a poor image of the company via disengaged staff. Not enough expression of pride Staff to work for Ugitech.	In-house school. Employer branding project. Communicate regularly on the positive aspects. Recruitment action. Study to understand and improve QWL, which is a strategic project (Working Conditions Survey, etc.). Inaugurations, newsletters, internal events, meetings in the field...
Damage to company's image and reputation if fundamental rights and regulations are not respected.	Stakeholder expectations (decline in stock market listing), recruitment difficulties, decline in customer/supplier confidence/Administration and political organizations/poor media communication.	Deployment of compliance procedures/online training. Raising awareness of non-discrimination and harassment in services. Anti-discriminatory recruitment policy based solely on candidates' skills: French law. Discrimination alert procedure. Implementation of a company-wide agreement equality, disability and arduous work.
Use products from a disrespectful company.	Engaging with a third party who does not respect the rules of compliance and who does not correspond the culture of our company.	Due diligence program (Navex). Supplier code of conduct. Purchasing policy.
Compliance management: corruption/ commercial agreement/conflict of interest/... Fraud and cyber-crime. Dissemination of personal data or other information.	Impact of the purchasing/sales process Generate financial losses, reputation, penalties/ fines.	In-house and group e-learning, video and face-to-face training. Communications and awareness-raising. Speak-up alert system. Internal control system (ICS). Compliance and GDPR risk analysis. Procedures in place.
Disengagement of suppliers vis-à-vis rail transport/Lack of rail transport.	CSR impact+ transport costs (truck vs railcar).	Freight agreement: Ugitech/ Savoie/ SNCF. Sourcing new sources of supply France+ border countries. Development of multimodal transport (rail/road) and intermodal flows.
Our HR leadership in ecological transition.	Risk terms of image, competitive or regulatory advantage.	Deployment of awareness-raising and training initiatives.
The percentage of women in the blue-collar category.	Image, deteriorating gender equality index, recruitment difficulties by depriving ourselves of a potential pool of candidates.	Action plan defined as part of our company agreement professional equality.
Green washing: announcing commitments /Green perspectives that are not concretely reflected in the improvement of our CSR indicators (e.g. deterioration of emissions from Scope 3 for reasons of economic competitiveness).	Fines/ penalties for accusations "green washing". Deteriorating public image.	Implementation of a system to measure our CSR results (DNV audits) for CO ₂ . Case-by-case arbitration of decisions in collaboration with Corporate. 2022 capex= €19.3m of which €200k in green projects, i.e. 1%. 2023 capex= €21.1m of which €2.1m in green projects, i.e. 10%. 2024 capex= €23.9m of which €2.9m in green projects, i.e. 12%. The green projects correspond to those in the taxonomy.
Personal security in the event of a terrorist attack (excluding cyber-attacks).	Damage to people, danger of death or injury.	Analysis of terrorist attack. Improving checks on incoming lorries. Continued improvement of video surveillance equipment.

Ugitech's biggest risks are therefore an integral part of the CSR policy and are included in its themes. Other CSR concerns may appear in the overall mapping of risks, but the stakes are lower.

Our CSR policy

Based on:

- the 4 pillars of our strategy
- our business model
- our dynamic risk management
- our customers' requests increasingly sensitive to this issue
- of the Ecovadis assessment organization, with which we have a review at mid-2024.

We have structured our global CSR approach around the following pillars:

ECORESPONSIBILITY

- ① Sustainability of natural resources:
sustainable products and markets - circular economy
- ① Energy and Climate
- ☆ Responsible logistics
- ① Protecting the local environment

SOCIAL DEVELOPMENT & QUALITY OF LIFE AT WORK

- ① Health, safety and working conditions
- ① Attractiveness, equal opportunities and equal pay
- ☆ Social dialogue
- ① Skills development and access to training sustainable
- ☆ Partnership with secondary schools and universities

BUSINESS RELATIONS & TERRITORY

- ① Ethics and internal control
- ① Responsible purchasing
- ☆ Employee commitment
- ① Territorial contributions
- ☆ Tax: compliance with accounting and tax regulations

① Major risk ☆ Important element

Given the nature of our activities, we consider that the following themes: the fight against food insecurity, respect animal welfare, responsible, fair and sustainable food, food wastage, physical exercise and sport, cultural and sporting issues, as well as actions aimed at promoting the nation / army bond and supporting commitment to the reserves, do not constitute major CSR risks and do not warrant a discussion in this management report.

Our CSR commitment

CSR is a central pillar of our business, and the actions we have taken and will take in the future will enable everyone to understand their role in this approach on a day-to-day basis and to measure its importance.

EcoVadis assessment

In 2024, the EcoVadis assessment was carried out at Swiss Steel Group level, including the parameters of its Ugitech production unit. Swiss Steel Group has been selected by this global standard to assess its Corporate Social Responsibility. The aim is to improve the sustainability practices and/or performance (environmental, social and ethical) of the supply chain in order to reduce risks and costs.

In March 2025, Swiss Steel Group was awarded the Gold Medal by EcoVadis. With this award, Swiss Steel Group ranks among the top 5% of all companies assessed by EcoVadis worldwide and is among the top 2% in the iron and steel industry. This is the best result Swiss Steel Group has ever achieved in this internationally recognized sustainability rating.

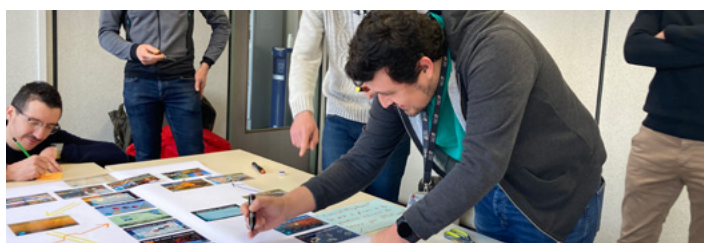


In 2024, this determination to act was once again expressed by the organization of our second "Sustainable Development Day".

On the program, some fifteen booths and a dozen conferences open to all employees to talk about:

- decarbonization, green energies, hydrogen, eco-mobility, carbon footprint of stainless steel,
- disability and job retention, safety, security, employer brand and school relations,
- responsible purchasing and compliance,
- recovery of raw materials, circular economy,
- digital responsibility, European CSRD reporting, etc.
- raising awareness of climate change (an in-house trainer runs a Climate Fresco).

This year, each employee had one and a half hour of working time to take part in the day, which involved 400 people, i.e. half the available workforce.



Participants: **400 employees**

More than **50** internal (including Ugitech's French and foreign downstream sites) and external **STAKEHOLDERS**

13 partners present: 2 SAVOIES, AGENCE ECO-MOBILITE, API, BENETHIK, CHIMIREC, EDF-HYDRO, FENWICK-LINDE, LHYFE, LYCEE RENE PERRIN, MOXBA-FERTRADE, SDIS 73, SPRINT METAL, TRAM.

3 Climate Days were organized to raise employees' awareness of the causes and consequences of climate change, with a "Climate Fresco" workshop, as well as the challenges and resulting action plans for Ugitech in terms of the environment and energy.

4 Meeting Days raised awareness of safety and customer culture among production staff: preventing addictions, presenting the decarbonization road map, explaining our commitment to "green" hydrogen, to reduce CO₂ emissions, and carrying out a crane evacuation exercise in a workshop.

Objective

To raise awareness and demonstrate to employees, through concrete actions, the contribution of our ecosystem to CSR issues. The ultimate goal is to turn each individual into an agent of change, nourished by this knowledge.

Taxonomy

Swiss Steel Group considers its subsidiary Ugitech to be subject to the Taxonomy regulation from 2021 financial year. For this reason, Ugitech is already publishing taxonomic information in this CSR report.



A new European regulation, Taxonomy 2020/852 of June, 18th 2020, on the establishment of a framework to encourage sustainable investment in the European Union, has come into being (Corporate Sustainability Reporting Directive).

We see it as an opportunity to promote the sustainable nature of our activities and the investments we have made in this area.

To meet this regulatory requirement, set up a dedicated internal committee comprising members of the Finance, Environment/Energy and CSR Departments. This committee worked for analyze eligibility and alignment of our company's activities with the taxonomy based on:

- the Climate Delegated Regulation of June, 4th 2021 and its annexes supplementing EU Regulation 2020/852, by specifying the technical criteria for determining the conditions under which an economic activity may be considered to contribute substantially to climate change mitigation or adaptation,
- he delegated act of July, 6th 2021 and its annexes supplementing EU Regulation 2020 / 852 by specifying how to calculate the KPIs and the narrative information to be published,
- financial information to be extracted from the company's information systems (monitoring of investments, consolidation) at the close of the annual accounts, which has been analyzed and checked to ensure consistency with consolidated sales, OpEX and CapEX for 2024.

Following the updating of the Taxonomy regulations by Commission Delegated Regulations (EU) 2023/2486 and (EU) 2023/2485 of June, 27th 2023, Ugitech has reviewed its entire production process in parallel with the economic activities identified by the Taxonomy. The activities carried out by Ugitech in 2024 which include:

- 4.15. Heating/cooling networks
- 2.3 Collection and transport of non-hazardous and hazardous waste
- 2.7. Sorting and recovery of non-hazardous waste materials are an integral part of sustainable steel production and, in our case, generate no material income / revenue.

KPIs Taxonomy

As part of the first two climate objectives (mitigating the effects of climate change and adapting to climate change), the European Commission has prioritized sectors of activity that make a major contribution to greenhouse gas emissions in the European Union.

According to Annex 1 of Regulation (EU) 2020/852, the activity 3.9. steel manufacturing is eligible for the taxonomy. Ugitech's activity in this category constitutes a transitional activity as referred to in Article 10(2) of Regulation (EU) 2020/852 as long it meets the technical review criteria set out. Ugitech's business consists of manufacturing steels as described in section (b)-(i) of paragraph 3.9. of the annex to regulation 2020/852.

The 6 objectives of the taxonomy are covered on the following pages:

-  Circular economy: [see p.21](#)
 -  Mitigating climate change: [see p.26](#)
 -  Adapting to climate change: [see p.26](#)
 -  Pollution prevention: [see p.35](#)
 -  Biodiversity: [see p.35](#)
 -  Preserving water resources: [see p.35](#)
-

In 2024, a detailed analysis of its 3 indicators (turnover, OPEX and CAPEX) was carried out to assess their percentage alignment with the taxonomy.

Sales in line with taxonomy:

Revenue presented in accordance with IAS 1.82(a) includes IFRS 15 revenue.

Financial year 2023	Year		Substantial contribution criteria							Does Not Significant Harm (DNSH) criteria (h)							Share of figure business aligned with the taxonomy, year N-1 (18)	Enabling activity category (19)	Transitional activity category (20)		
	Code (a) (2)	Sales (3)	Share of 1 year N (4)	Climate change mitigation (5)	Adapting to climate change (6)	Aquatic and marine resources (7)	Pollution (8)	Circular economy (9)	Biodiversity (10)	Mitigating climate change (11)	Adapting to climate change (12)	Water (13)	Pollution(14)	Circulation economy (15)	Biodiversity (16)	Garanties mini males (17)					
																				M€	%
A.1. Environmentally sustainable activities (aligned with taxonomy)																					
A.1. Activités durables sur le plan environnemental (alignées sur la taxonomie)																					
Activity 1	3.9	601,3	100,00%																100,00%		
Sales of environmentally aligned activities (A.1.)		601,3	100,00%	100,00%	0,00%	0,00%	0,00%	0,00%	0,00%										100,00%		
A.2. Activities eligible for the taxonomy but not environmentally sustainable (not aligned with the taxonomy)																					
A.2. Activités éligibles pour la taxonomie mais pas durablement (non alignées avec la taxonomie)																					
Activity 1 (e)		0,00	0,00%	EL; N/EL (f) EL	EL; N/EL (f) EL	EL; N/EL (f) EL	EL; N/EL (f) EL	EL; N/EL (f) EL	EL; N/EL (f) EL										%		
Turnover from activities eligible under the Taxonomy but not environmentally sustainable (activities not aligned with the Taxonomy) (A.2)		0,00	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%										%		
A. Turnover from activities eligible for the taxonomy (A.1+A.2)		601,3	100,00%	100,00%	0,00%	0,00%	0,00%	0,00%	0,00%												
B. ACTIVITIES NOT ELIGIBLE FOR THE TAXONOMY																					
Turnover from ineligible activities		0,00	0,00%																		
TOTAL		601,3	100%																		

Business 3.9, steel, is 100% eligible for the taxonomy for sales.

In addition, Ugitech uses an electrical process (arc furnaces) to produce its steel and the raw materials content is over 70%. Sales are 100% in line with the taxonomy insofar as Ugitech complies with the criteria of no significant harm (DNSH) and minimum guarantees (see below).

Operating expenses (OpEx) aligned with taxonomy:

Financial year 2023	Year		Substantial contribution criteria							Does Not Significant Harm (DNSH) criteria (h)							Share of OpEx aligned with taxonomy, year N-1 (18)	Enabling activity category (19)	Transitional activity category (20)		
	Code (a) (2)	OpEx (3)	Share of OpEx, year N (4)	Climate change mitigation (5)	Adapting to climate change (6)	Aquatic and marine resources (7)	Pollution (8)	Circular economy (9)	Biodiversity (10)	Mitigating climate change (11)	Adapting to climate change (12)	Water (13)	Pollution(14)	Circulation economy (15)	Biodiversity (16)	Minimum guarantees (17)					
																				M€	%
A. Activities eligible for the taxonomy																					
A.1. Environmentally sustainable activities (aligned with taxonomy)																					
Activity 1		36,00	100,00%																100,00%		
OpEx environmentally sustainable activities (aligned with taxonomy) (A.1)		36,00	100,00%	100,00%	0,00%	0,00%	0,00%	0,00%	0,00%										100,00%		
A.2. Activities eligible for the taxonomy but not environmentally sustainable (not aligned with the taxonomy)																					
A.2. Activités éligibles pour la taxonomie mais pas durablement (non alignées avec la taxonomie)																					
Activity 1		0,00	0,00%	EL; N/EL (f)	EL; N/EL (f)	EL; N/EL (f)	EL; N/EL (f)	EL; N/EL (f)	EL; N/EL (f)												
OpEx activities eligible for the Taxonomy but not environmentally sustainable (activities not aligned with the Taxonomy) (A.2)		0,00	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%										0,00%		
Total (A.1+A.2)		36,00	100,00%	100,00%	100,00%	100,00%	100,00%	100,00%	100,00%												
B. ACTIVITIES NOT ELIGIBLE FOR THE TAXONOMY																					
OpEx activities not eligible taxonomy(B)		0,00	0,00%																		
TOTAL		36,00	100%																		

OpEx as defined by the taxonomy is limited to the following direct non-capitalized costs: research and development costs, equipment renovation costs, rental contracts, maintenance and repair costs. This represents an amount of approximately 36 M€ out of a total OpEx amount of 708 M€ (i.e. 5.1%), which are 100% eligible and aligned.

Capital expenditure (CapEx) aligned with taxonomy:

Financial year 2023	Year		Substantial contribution criteria							Does Not Significant Harm (DNSH) criteria (h)							Minimum guarantees (17)	Share of CapEx aligned on the taxonomy, year N-1 (18)	Enabling activity category (19)	Transitional activity category (20)
	Code (a) (2)	OpEx (3)	Share of OpEx, year N (4)	Climate change mitigation (5)(v)	Adapting to climate change (6)	Aquatic and marine resources (7)	Pollution (8)	Circular economy (9)	Biodiversity (10)	Mitigating climate change (11)	Adapting to climate change (12)	Water (13)	Pollution (14)	Circular economy (15)	Biodiversity (16)					
Economic activities (1)		ME	%	O; N; N/EL (b) (c)	O; N; N/EL (b) (c)	O; N; N/EL (b) (c)	O; N; N/EL (b) (c)	O; N; N/EL (b) (c)	O; N; N/EL (b) (c)	O/N	O/N	O/N	O/N	O/N	O/N	O/N	%	E	T	
A. Activities eligible for the taxonomy																				
A.1. Environmentally sustainable activities (aligned with taxonomy)																				
Activity 1	3.9	13,5	100,00%							O	O	O	O	O	O	O	100,00%			
CapEx of environmentally sustainable activities (aligned with taxonomy) (A.1)		13,5	100,00%	100,00%	0,00%	0,00%	0,00%	0,00%	0,00%	O	O	O	O	O	O	O	100,00%			
A.2. Activities eligible for the taxonomy but not environmentally sustainable (not aligned with the taxonomy)																				
Activity 1 (e)		0,00	0,00%	EL; N/EL (f)	EL; N/EL (f)	EL; N/EL (f)	EL; N/EL (f)	EL; N/EL (f)	EL; N/EL (f)										%	
CapEx of activities eligible for the taxonomy but not environmentally sustainable (activities not aligned with the taxonomy) (A.2)		0,00	0,00%	%	%	%	%	%	%										%	
CapEx of activities eligible for the taxonomy (A.1+A.2)		13,5	100,00%	%	%	%	%	%	%										%	
B. ACTIVITIES NOT ELIGIBLE FOR THE TAXONOMY																				
CapEx for activities not eligible for taxonomy(B)		0,00	0,00%																	
TOTAL		13,5	100%																	

CapEx as presented includes the cost of property, plant and equipment and intangible assets: IAS 13, IAS 38, IFRS 16, IAS 40 and IAS 39.

41. CapEx aligned with the taxonomy correspond to investments directly linked to production tools (€10.6m) as well as investments contributing to improving our environmental footprint. The latter include the continuation of the HYDREAMS project and the Ugi'Ring project with dismantling and preparation work at the Chateau Feuillet site, the restoration of ecological continuity on the Arly river at Ugine, the order for a new 220/42 kV transformer to support our decarbonization projects at the Ugine site and the replacement of neon lighting with LEDs for Ugine wire-finishing workshop. As a result, the proportion of investments contributing to improving our environmental footprint has risen significantly, from 200k€ in 2022, to 2.1 M€ in 2023 and 2.9 M€ in 2024.

Only 56 % of CapEx reported under IFRS are considered applicable in the Taxonomy because the IFRS definition differs from that of the Taxonomy.



Criteria for the absence of significant harm (DNSH)



Adapting to climate change

Ugitech has carried out a climate risk analysis for its sites based on data provided by an insurance company. Two IPCC (Intergovernmental Panel on Climate Change) scenarios were taken into account: RCP 8.5 (Representative Concentration Pathway) to 2030 and, to reflect the lifespan of our equipment, RCP 8.5 to 2050. The RCP 8.5 scenario is the most pessimistic of the scenarios proposed by the IPCC in terms of climate change mitigation.

Each of the climatic risks (flooding, storms, drought, heatwave, etc.) has been assessed by integrating existing protection measures, and the implementation of new measures has been defined based on an assessment of their criticality (probability and impact).



Preventing and reducing pollution

Ugitech's activities do not involve the manufacture, marketing or use of substances listed in Appendix C of Commission Delegated Regulation (EU) 2021/2039. We have a monitoring system in place to ensure that all production processes strictly comply with national and European regulations, such as REACH or RoHS.

Our emissions comply with the limits set by best available technology and French regulations.



Sustainable use and protection of aquatic and marine resources:

In line with the requirements of the French Water Agency, Ugitech has developed a water resource management procedure. New projects are systematically assessed to check whether an environmental impact study is necessary. In this case, the impact study identifies the corrective and preventive actions to be implemented in accordance with the regulations.



Protecting and restoring biodiversity and ecosystems:

New projects are also assessed to determine whether an environmental impact assessment is required. This impact assessment will consider any protected natural areas located near the sites concerned.

Minimum guarantees

Ugitech complies with the minimum guarantees, which are broken down into the various themes covered in the following pages:

SOCIAL DEVELOPMENT AND QUALITY OF LIFE AT WORK

- Health, safety and working conditions p.48
- Equal opportunities p.60
- Social dialogue p.70
- Skills development p.75

ECORESPONSIBILITY

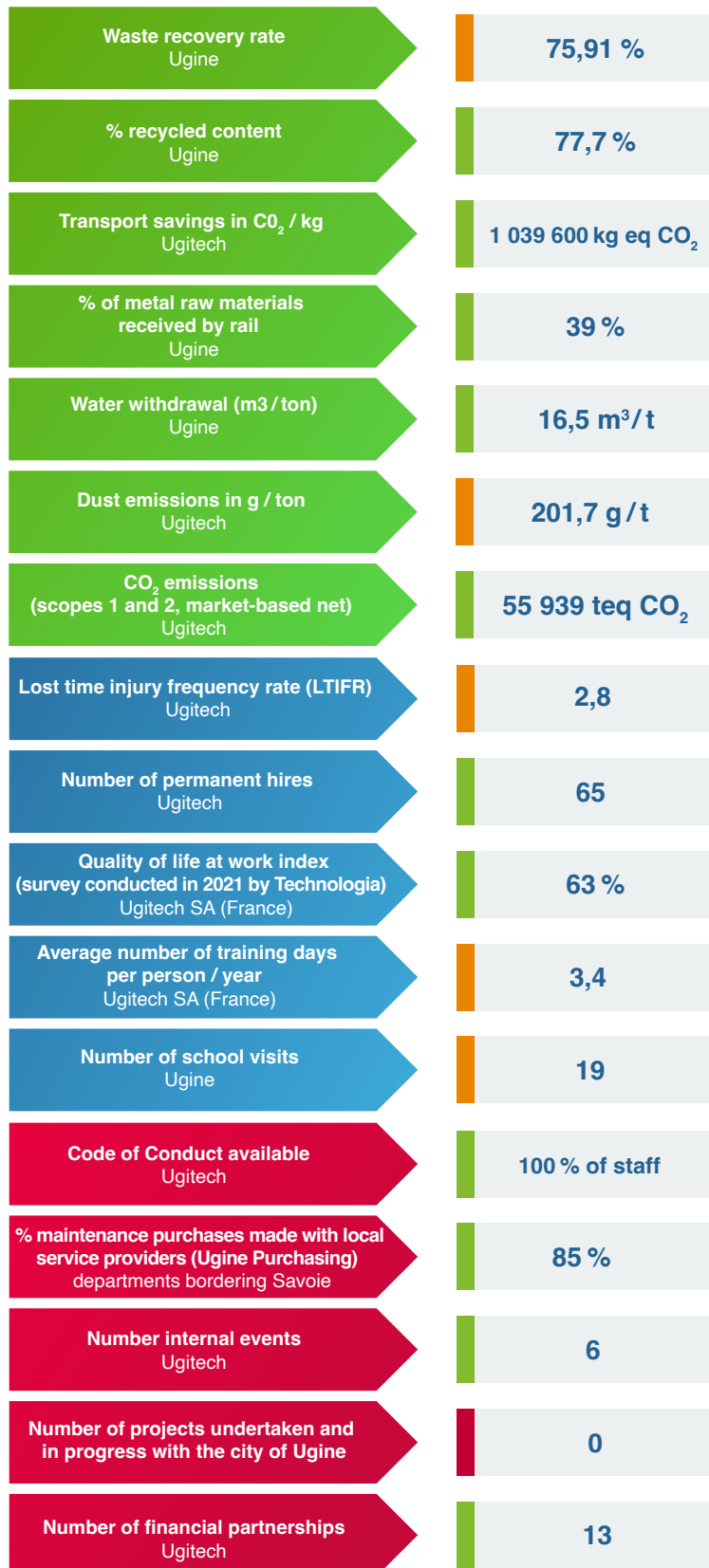
- Decarbonization roadmap p.27
- Waste management p.39

BUSINESS RELATIONS & TERRITORY

- Anti-corruption policy, anti-competitive standards, Code of Conduct and whistleblowing system p.90
- Supplier Code of Conduct p.95
- Governance and tax compliance p.98

2024

Key indicators



■ In line with the objective
 ■ Objective partially met
 ■ Objective not met



Ecoresponsibility

Sustainability of natural resources: sustainable products and markets

- circular economy

Defining the issue

- Integrate the sustainability of natural resources into our daily concerns.
- Designing products that meet the durability needs that are at the heart of the concerns of designers using metallic materials.
- Develop the principles of the circular economy in all our activities.

Recurring annual targets /
KPIs

20 % **renewal**
of our product portfolio (Ugitech)

85 % **recycled content**
in our products *to 2030*

Quality objectives

To offer the markets we serve products adapted to more sustainable lifestyles:

- help our automotive customers optimize existing solutions and work with them on the powertrains of tomorrow.

- to offer the construction industry products that reduce the energy consumption of buildings,
- support players in the aeronautics market developing "materials" solutions that reduce greenhouse gas emissions,
- support the CSR policies of our customers, who have ambitious decarbonization itineraries and ask us to significantly reduce their scope 3, i.e. the carbon footprint of the products we deliver to them. This is we have created two offers: "Green Steel Climate+" and "Green Steel Stainless+",
- assess and improve the environmental impact of our products and processes, by developing their Life Cycle Analysis.



Develop the principles of the circular economy:

- give priority to the purchase of recycled materials for the production of our metal,
- create "UGI'RING", an industrial unit for recycling industrial metal waste and by-products to produce ferro-alloys.



Industrial waste recovery scheme for the future UGI'RING process

Existing shares

Circular economy - Raw materials

The stainless steel manufactured at Ugine is essentially made from scrap and offcuts from recycling. These recycled materials are supplemented by primary carriers (ferroalloys and pure raw materials such as nickel). The manufacturing process maximizes the contribution of recycled materials.

The raw materials used for recycling come from a variety of sources:

- Scrap and scrap metal purchased externally: these materials come from circular economy channels and are fully recycled at the steel mill.
- Internal scrap: all production scrap is recovered and recycled at the steelworks.
- Recycled waste: Ugitech has its own waste recovery facilities (rolling mill sludge, steel mill dust, grindings, etc.). These processes shape the waste, enabling it to be reused in the steel mill.

Figures for these raw materials, drawn up in accordance with GRI standards, are presented in the appendix.

The recycled content of products has been calculated for 2024 using the following formula:

$$\% \text{ content recycled} = \frac{\text{Tons of raw materials from recycling}}{\text{Tons raw materials loaded}}$$

A distinction is also made according to origin of the scraps, in order to establish pre- and post-consumer recycled content.

Pre-consumer recycled content is made up of internal scraps and recycled waste, while post-consumer content is made up of scraps purchased from outside Ugitech.

- Recycled content: 77,7 %
- Consumer PRE recycled content: 26,5 %
- POST-consumer recycled content: 51,2 %

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

$$\% \text{ content recycled} = \frac{\text{Tons of raw materials from recycling}}{\text{Tons good casting output}}$$

Recycled content: 93,4 %

(according to the taxonomy formula). The recycled content of our products is monitored at the continuous casting stage by the steelworks department.

In 2024, the 2023 values were validated by an external body, DNV.

Offers with high recycled content and/or 100% renewable electricity

We have a "Green Steel Stainless+" offer that guarantees our customers products with over 95 % recycled content. This offer has the advantage of reducing scope 3 CO₂ emissions by over . The products offered have a carbon footprint of less than 1.0 teqCO₂/t delivered.



Salon Wire Green steel

We also have a "Green Steel Climate +" offer which guarantees that the electrical energy used in the production of these products comes from 100 % renewable energy sources (certificates origin), means that the Scope 2 emissions of our products are zero.

Whatever the product ordered, we are able to provide our customers with the carbon footprint of our products, broken down into scope 1, scope 2 and scope 3.1

UGI'RING project

This ambitious project aims to create the first Ugitech is the world's first "circular steel mill". Most of Ugitech's steel is made from recycled scrap, with addition of ferro-alloys.

UGI'RING's aim is to replace these ferroalloys mining with materials from recycling.

To achieve this, the project aims to transform end-of-life waste (catalysts, batteries, etc.) into raw materials.

In 2023, Ugitech acquired the Château-Feuillet site to set up UGI'RING's activities. The operating permit was issued by the authorities in October 2024. Among other things, the application file includes an assessment of the project's potential impact on biodiversity. This will contribute to the revitalization of this industrial wasteland located less than 30 km from the Ugine steelworks.

The creation of this European virtuous loop would make it possible to:

- reduce our CO₂ emissions by at least 63 kt (minimum net impact),
- reduce our dependence on critical metals in the kiln by 90%,
- improve Life Cycle Assessment indicators (of factors concerned),
- create local jobs.

Stainless steel is **100%** recyclable

Products for a sustainable world

The world market for stainless steels remains buoyant, partly because these products are the perfect answer to the need for greater durability and corrosion resistance than more conventional, less alloyed steels.

Automotive market

Ugitech works closely with major automotive industry contractors to reduce the ecological footprint of conventional internal combustion engines and develop hydrogen-powered engines:

- improved engine combustion with gas pressures of up to 3,000 bar,
- increasing turbo operating temperatures to improve efficiency,
- development of stainless steel solutions tailored to the requirements of hydrogen-powered engines: FCEV (Fuel Cell Electric Vehicle) and HICE (Hydrogen Injection Combustion Engine).



From carbon energy to green hydrogen energy

To support the deployment of solutions using hydrogen as the energy carrier of the future, Ugitech has set up a multidisciplinary team whose objectives are to:

- check that the use of decarbonated hydrogen as a substitute for fossil fuels is compatible with our production processes and products,
- integrate Ugitech into a regional hydrogen ecosystem (heavy mobility, Zero Emission Valley, Espace Montagne, etc.),
- develop new stainless steel grades adapted to hydrogen embrittlement.



In concrete terms, this translates into a project called HYDREAMS to study the technical and economic feasibility of substituting natural gas with decarbonated hydrogen in our thermal processes. *The progress of this project is detailed in the Energy and Climate section of this document.*

Ugitech has also initiated projects such as:

- participation in a European R&D project called Hystory, aimed at developing new austenitic lean grades for the production, storage and distribution of hydrogen gas. This project has been accepted by the European Union and officially started on October 08th, 2024.
- The organization of a hydrogen event on November 13th and 14th, 2024. During these "Hydrogen Tech Days", a session was dedicated to the resistance of stainless steel to pressurized hydrogen.
- Research into the resistance of stainless steels to hydrogen down to -150°C, in collaboration with the Saint-Etienne Corrosion Institute.

- Participation in the drafting of the ISO 7039 standard for a tensile test on hollow specimens, which characterizes the behavior of steels under high hydrogen pressure.
- In 2025, the hydrogen laboratory will continue to be set up, notably with the development of tests under different pressure and temperature conditions.

Construction market

Ugitech is developing a range of products that significantly increase the durability of structures as well as their energy consumption.

In France, Ugitech is working with the research laboratory of the Gustave Eiffel University (formerly the research laboratory of the Ecole des Ponts et Chaussées) and Germany's DIBt (Deutschen Institut für Bautechnik) to promote a stainless steel grade that limits energy loss in housing. This new grade has a guaranteed thermal conductivity of less than $12.5 \text{ W/m}\cdot\text{K}$, whereas the standard for stainless steel reinforcing bars is between 15 and $16 \text{ W}\cdot\text{m}\cdot\text{K}^{-1}$, and carbon steel reinforcing bars have a thermal conductivity of $45 \text{ W}\cdot\text{m}\cdot\text{K}^{-1}$. This new stainless steel grade was introduced as 1.4670 in EN 10088-1 and 10088-3, the reference standards for stainless steels in Europe, published in the 1st quarter of 2024. Ugitech markets this product under the name UGITHERM® 4670.

Medical market

Ugitech helps its customers deploy the new MDR 2017 / 745 and CLP (Classification Labelling Packaging) regulations. To meet this requirement, Ugitech has developed a wide range of grades containing less than 0.1% Cobalt. These grades are marketed under the name UGI® XXXX LR (Low Residual).

Ugitech has introduced a particularly hard, abrasion-resistant grade to ASTM F899 (Specification for Wrought Stainless Steels for Surgical Instruments): UNS S44027.



Expansion and improvement of the Princess Grace of Monaco: Ugitech stainless steel concrete reinforcement equipment

Assessing the environmental impact of our products and processes

Ugitech has the skills to carry out Life Cycle Analyses (LCA). These analyses enable us to quantify the environmental impact of our products. Beyond manufacturing, for example, we can measure the impact of raw materials as well as upstream and downstream transport. This forms the basis of our eco-design, enabling us to reduce environmental impacts throughout the product life cycle. The results of an LCA for two grades of concrete reinforcing bar are available in an Environmental Product Declaration (EPD). In 2023, an LCA was carried out on drawn products.

Ugitech is now closely monitoring developments in the new European Ecodesign for Sustainable Product Regulation (ESPR). This regulation will provide a framework for the eco-design of products.

With the aim using manufacturing processes that are not harmful to our operators, we have initiated a process aimed at replacing the electrolytic hard chromium plating process for bars, which currently uses hexavalent chromium, a carcinogenic product classified in Annex XIV of the Reach Directive and subject to an operating , with a non-harmful trivalent chromium plating process.

This development project also involves major companies in the French automotive and aerospace industries, and is coordinated IRT M2P, a public technology research institute. Work is progressing and is at the stage of bringing a new bath to maturity.

If these lines of research are successful, "semi-industrial" trials on 3m-long bars could be envisaged in mid-2026 for the electrolytic route. At the same time, the Ugine Research Center is working on the development a breakthrough plasma chromium deposition (PVD) technology.

Future actions

- Continuing our work on hydrogen embrittlement of stainless steel, with a focus on start-up, continuation of H2 slow tensile tests after cathodic loading in 2024, and start of H2 slow tensile tests under pressure in 2025.
- Develop 3D printing partnerships to adapt UGIWAM® yarn to the use values expected by users.
- Participate in the deployment of ESPR regulations.
- Start recovering production offcuts from nearby customers to initiate short recycling channels.
- Extend beyond 1.4404 stainless steel grades our "Green Steel Stainless+" offer to produce stainless steels made with material baskets containing over 95% recycled content.
- Start up our continuous plasma chromium metal deposition line.
- Continue deployment of the UGI'RING project.
- Launch a new range of UGIMA® -X with improved machinability for our bar turning customers in martensitic grades UGIMA® -X 4021, UGIMA® -X 4028.
- Launch our range of hot-rolled stainless steel reinforcing bars, which will have a lower carbon footprint than our cold-rolled reinforcing bars.

Performance monitoring

Product portfolio renewal rate (Ugitech scope)

2024

21,7 %

2023

22,9 %

% recycled content - Ugine

2024

77,7 %

2023

76,8 %



UGIMA® -X with improved machinability

■ On target

■ Partially met target

■ Target not met

Energy and climate

Defining the issue

- Support climate change issues and major international policies, including international carbon neutrality targets.
- Control our consumption by taking into account its direct and indirect impact on the environment.
- Making energy efficiency and climate impact a permanent concern for Ugitech staff.

Target figures / KPI

CO₂ emissions

Net-zéro

SBTi targets to 2038

Quality objectives

- improve our resilience to climate change by limiting our CO₂ emissions, notably through energy-saving actions,
- enhance the value of all our actions to reduce carbon footprint,
- participate in national effort to control consumption peaks and power grid disruptions,
- valorize our waste heat,
- energy efficiency in our projects,
- raise our staff's awareness Climate Energy

Existing shares

Low-carbon policy. evaluations

Within the Development Department, the Sustainable Development Division is responsible for steering the CSR strategy, as well as the Fire Security Environment and Energy Transition processes. The latter steers the company's decarbonization roadmap and energy efficiency initiatives



During 2024, Ugitech, as part of Swiss Steel Group, obtained a limited assurance opinion from DNV on quantification of 2023 emissions using a "cradle-to-gate" approach. A common quantification methodology was validated during these audits. The figures are presented in the appendix.

The Ugine site is subject to European ETS (Emission Trading System) regulations. Each year, CO₂ emissions are validated by an external agency.

Ugitech is also impacted by the Carbon Border Adjustment Mechanism (CBAM), a European regulation. The 2024 declarations have been made, and the European standard document is available to customers on request.

Decarbonization plan

Swiss Steel Group has signed up to SBTi (Science Based Targets initiatives). The targets have been validated by SBTi. The objective of Swiss Steel Group, of which Ugitech is an integral part, is to reduce CO₂ emissions by 2030 of:

- 23,7% per ton of hot-rolled steel for greenhouse gas emissions covered by the SBTi definition of steelmaking in the steel mill and rolling mill (scope 1 + 2 and part of scope 3.1),
- 42% for the rest of Scope 1 + 2,
- 25% for scope 3.1 and 3.3.

The definition of scopes comes from the GHG protocol:

- Scope 1 accounts for direct emissions,
- Scope 2 accounts for indirect emissions linked to use of electricity, heat or steam,
- Scope 3.1 accounts for indirect emissions linked to procurement of goods and services,
- Scope 3.3 accounts for indirect emissions linked to energy use.

Net-zero emissions is planned for 2038.

Ugitech has drawn up a decarbonization roadmap to achieve these objectives.

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

- H₂ Ecosystem
- Electrification
- Renewable energy production
- Green energy contract PPA / BPA
- Hydroelectric sourcing

Adapting to climate change

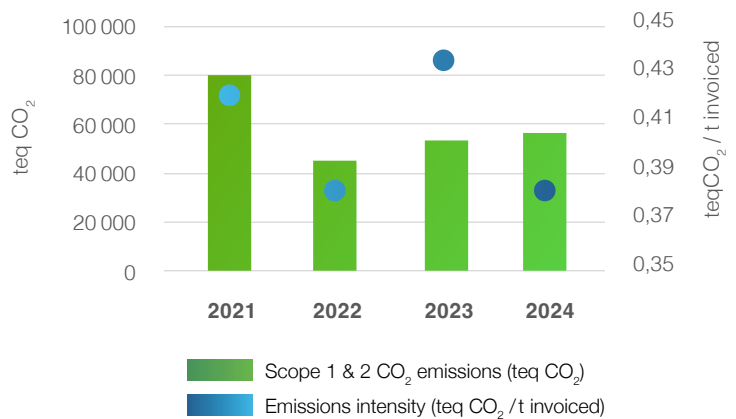
Ugitech has carried out an assessment of climate risks (storms, drought, floods, heatwaves, etc.) in the perspective of a RCP (Representative Concentration Pathway) 8.5 scenario by 2030 and 2050 for all its sites. Adaptation measures have been defined according to their criticality. This assessment enables us to respond to changing standards in terms of taking climate change into account.

Reducing carbon footprint

Scopes 1 and 2 - Direct and indirect emissions linked to the use of electricity.

Ugitech's scopes 1 and 2, market based net, represent 55,939 equivalent tons of CO₂, i.e. an average of 0.39 teq CO₂/t invoiced.

Ugitech CO₂ emissions - Scope 1 and 2 market based net including guarantee of origin



For 2024, the Ugine site has benefited from government aid to offset the cost of CO₂ in the price of electricity.

In order to reduce its CO₂ emissions, Ugitech is working primarily on its energy efficiency, seeking to reduce its natural gas and electricity consumption. In fact, over 70% of direct emissions declared under the ETS (Emission Trading System) come from the combustion of natural gas.

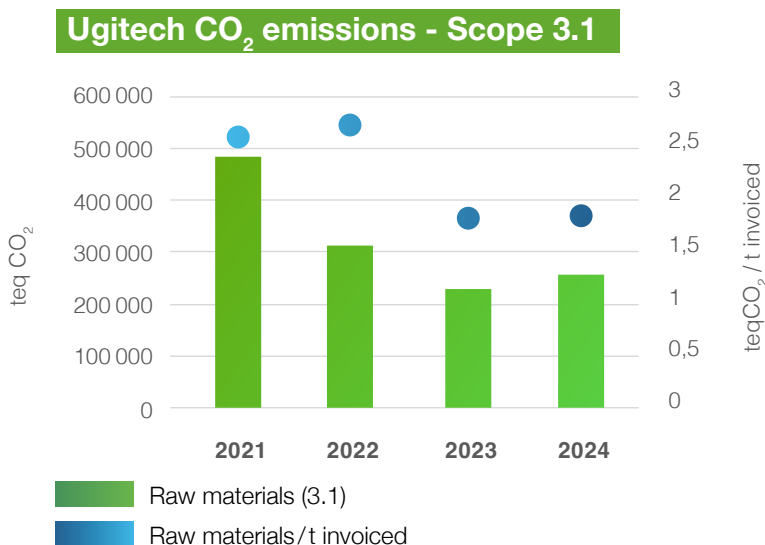


In addition, through its Green Steel Climate+ offer, Ugitech provides Guarantees of Origin enabling the electricity used to manufacture a Climate+ product to be offset by 100% renewable electricity, non-nuclear origin. The Milan and TFA sites in Italy have contracted Guarantees of Origin for 50% of their 2024 consumption.

Scope 3 - Other indirect emissions

Incoming raw materials - Scope 3.1

This indirect emissions item accounts for the bulk of Ugitech's impact. An assessment of this item is presented below.



The objectives of developing the circular economy are as ambitious as those of reducing CO₂ emissions. Thus, the development of recycled content in our products contributes to the reduction of CO₂ emissions on this scope.

The involvement of our raw materials suppliers is also essential. In 2024, Ugitech's carbon footprint, validated by DNV, takes account of suppliers' emission factors.

Cradle-To-Gate approach

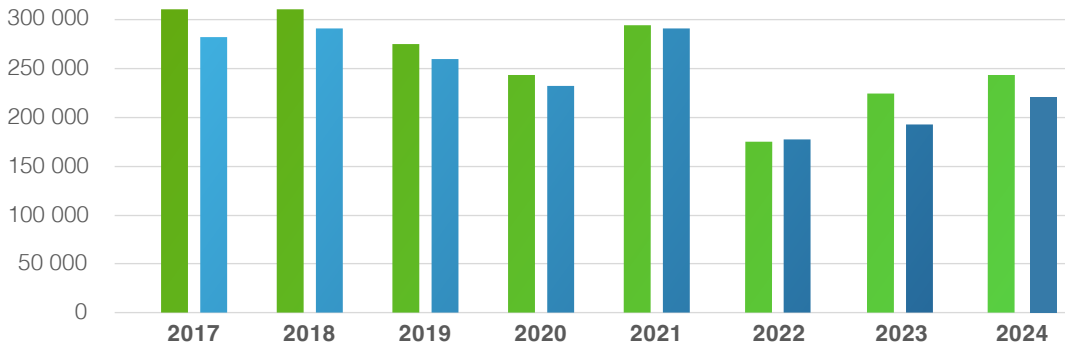
According to the manual for quantifying CO₂ emissions, validated by DNV, Ugitech quantifies its emissions using the "Cradle-To-Gate" approach. This approach makes it possible to quantify a product's carbon footprint scope 1, scope 2, market based net, and a defined part of scope 3, including:

- indirect emissions linked to the procurement of raw materials and consumables (scope 3.1),
- indirect emissions linked to energy supply (scope 3.3),

In 2024, the average 'Cradle-To-Gate' CO₂ footprint of Ugitech products was 2.19 teqCO₂/t.

Since 2024, the 3.1 certification of our products has included information on the CO₂ emissions of the product ordered.

Ugitech SA energy consumption in MWh



■ MWh electricity
 ■ MWh NG

The difference in energy consumption between 2021 and 2022 is due to the shutdown of our steel mill during the 6 months following the accident on January 3rd.

CO₂ emissions linked to the upstream or downstream transport of our goods are included in the Responsible Logistics chapter.

The years 2023/2024 are not representative of our traditional business. Business has been severely slowed by the international context, inflation and rising interest rates.

Energy Management System

Ugitech Ugine and SMEZ have been ISO 50001 certified since 2015, and TFA obtained certification at the end of 2022. The Milan site obtained its certification in 2024.

An appropriate organization, with energy correspondents and regular exchanges, enables us to control our scope.

Our energy management systems are integrated with Ugitech's ISO 14001 environmental management system, to ensure that climate issues are considered.

The Ugine site accounts for over 90% of Ugitech France's energy consumption. This is why the main focus is on this site. The other French entities are not included in the energy management system, but they consider the energy efficiency of their perimeter.

Energy consumption

Ugitech uses two main energy sources: electricity and natural gas (NG). Diesel and LPG are marginally used to power handling equipment. When replacing our vehicles, we investigate electric or hydrogen solutions. On the Ugine site, the supply of gases such as oxygen, argon and nitrogen for the operation of our installations has been entrusted to a subcontractor since the 2000s. The same applies to our compressed air supply.

Ugitech's new investments are analyzed in terms of energy and environment. Their impact is identified through studies that enable us to reflect on the best available technologies.

Energy improvement

In 2024, our team continued its investigations into innovative pre-projects such as:

- oxycombustion and hydrogen,
- electrification,
- recovery of waste heat,
- photovoltaics.

Hydrogen project: HYDREAMS

This project began on April 1st, 2023, and will run until the end of 2027. Coordinated by Ugitech, it brings together nine European partners who have benefited from a European grant.

The aim of the project is to demonstrate the technical and economic feasibility of substituting natural gas with decarbonated hydrogen in the burners of our reheating and heat treatment, in oxycombustion mode, in order to limit NOx emissions.

It takes place in several stages:

1. Sample testing in a pilot furnace at the University of Graz (Austria) to test the impact of a hydrogen-fed flame on our products. This stage has now been completed, and the results of the sample characterizations are encouraging for the rest of the project.
2. The implementation of two demonstrators (one on the furnace for reheating blooms at the rolling mill entrance, and the other on a furnace for heat-treating our wire coils).

Electrification

As mentioned above, the Imphy site has electrified a heat treatment furnace that previously ran on natural gas.

At our Ugine site, tests on our reheating furnace prior to hot rolling continued in 2023/2024. We tested electrical resistors to validate the equipment before proceeding with industrial-scale electrification in the coming years.

Increasing our electrical connection capacity is an essential first step in realizing these projects.

Heat recovery

Our industrial facilities have the potential to recover waste heat, which is currently being studied.

Several installations are in operation on our industrial tools, for equipment upgrading, with combustion air preheating.

Since the end of 2021, part of our waste heat has been feeding the Urban Heat Network (Réseau de Chaleur Urbain - RCU) of the town Ugine.

We are regularly asked to share our experience with industry and elected representatives. This partnership model is often highlighted in new projects.

Photovoltaic

A photovoltaic shading project for a parking lot the Ugine site is currently under consideration, as are studies of rooftop installations on Ugine and UGI'RING.



Demonstrator during the HYDREAMS General Meeting at DEW's Krefeld site

Electrical flexibility

Ugitech has been involved for many years in balancing the French power grid. We work alongside RTE via various electricity market mechanisms contracted with a partner (aggregator).

Load shedding makes it possible to avoid electricity by fossil-fired power plants (gas or coal), which emit high levels of CO₂. This mechanism also reduces the risk blackouts on the French and even European grids.

DataLab

Ugitech is pursuing an energy monitoring project that will enable us to forecast our consumption at the Ugine site.

This project will provide us with more relevant indicators to help us manage our equipment.

In 2024, we extended remote reading to certain gas metering points.

Digital Responsibility

Integrate the green IT approach into Ugitech's CSR strategy, the information systems department has developed a roadmap to reduce the environmental impact of digital technology.

Among other actions, in 2023, an awareness-raising campaign was rolled out to all employees, with practical information to help everyone adapt their behavior.

This campaign is updated every year.

The equipment used at Ugitech is energy-saving labelled, and purchases are concentrated on eco-designed equipment. In addition, the lifespan of equipment such as computers, servers and smartphones is extended to reduce the impact of hardware changes. Finally, whenever possible, energy-saving options for workstations are deployed directly by the IT department: standby mode, screen shutdown, etc.

We are also making increasing use of cloud solutions, with, once again where possible, automatic shutdown mechanisms for unused infrastructures (development environments switched off at nights and weekends, production services active only when users need them, etc.), with monitoring tools for these resources to control them as closely as possible to needs.

Awareness-raising and staff involvement

Some ten energy correspondents have benefited from training based on PROREFEI (training dedicated to energy referents in industry), adjusted to suit the audience of correspondents.

Workshop heating

Optimizing the heating system in one of our workshops has enabled us to halve the building's consumption. We still need to improve the location of heating at workstations.





Future actions

- Market our Green Steel Climate + product offering.
- Improve the energy performance of our installations and buildings.
- Continue our commitment to electrical flexibility with a vision of forecasting our consumption.
- Study the installation of photovoltaic panels in Ugine, Bourg-en-Bresse, TFA and UGI'RING.
- Evolution of our diesel and LPG vehicles towards electrification.
- Prepare the implementation of the two HYDREAMS demonstrators.
- Renovate the photovoltaic panels on the Milan roof and consume the energy generated.
- Continued renovation of heating systems, improvements to lighting and energy monitoring.
- Continue to involve our suppliers in our decarbonization process.

Performance monitoring

	CO ₂ emissions (scopes 1 & 2, market based net, including guarantee of origin) Ugitech	CO ₂ footprint (scopes 1 & 2, market based net, including guarantee origin) / ton invoiced Ugitech	Consumption energy consumption / ton invoiced * Ugitech	% electricity in the energy mix Ugitech
2024	55 939 teq CO ₂	0,39 teq CO ₂ / t	3,17 MWh/t	52,7 %
2023	55 474 teq CO ₂	0,43 teq CO ₂ / t	3,25 MWh/t	53,2 %

* Energy consumption includes electricity and natural gas consumption.

■ On target
 ■ Partially met target
 ■ Target not met

Responsible logistics

Defining the issue

As part of our strategic ambition to help reduce our carbon footprint, we want to contribute to the ecological transition by promoting environmentally friendly transport for the purchase of our raw materials and the delivery of our products to our customers.

Numerical and qualitative targets

We look at all possible destinations, and our aim is to maximize the use of rail for transporting our materials, both upstream and downstream. For the transport of our products to our customers, our objective is to use road-rail to save over 1,000 tons of CO₂ per year.

Existing shares

The transport department has continued work to increase the tonnage shipped by road-rail and to develop other transport solutions. This year, we exceeded 1,000 tons of CO₂ savings by road-rail. In fact, we have further increased shipments to Germany using this type of transport.

Conversely, the Aiton-Orbassano link to Italy is still in jeopardy. On August 27th, 2023, a landslide in the commune of Saint-André (73) led to the temporary closure of the line, bringing our shipments to a halt.

Every opportunity to promote environmentally friendly transport is studied. Whenever possible, we use rail transport to receive bulk materials and to deliver to our end customers.

In a first, in 2024 the distribution network acquired a electric truck on long-term lease to supply our bar-turning customers with Swiss Steel Group products in the Arve Valley in Haute-Savoie. By contributing to a saving around 10 tons of CO₂ emissions per year over a 30 km perimeter, i.e. 15,000 km travelled, the electric truck clearly demonstrates its positive impact on the local environment and offers a guarantee of service to customers, regardless of the traffic restrictions regularly imposed by the Authorities in this region faced with pollution problems due to transport and housing.

The overall result is a saving of over 1,000 tons of CO₂.

Below are the volumes for the Macon - Calais route:

	t transported	CO ₂ saved
2024	2 713	65 000 kg
2023	2 088	44 580 kg

Diversification of our road-rail shipments to Germany:

	t transported	CO ₂ saved
2024	34 855	661 864 kg
2023	19 014	326 056 kg

Use of the Lyon - Le Boulou line doubled this year to deliver to our customers in Spain:

	t transported	CO ₂ saved
2024	853	15 182 kg
2023	414	7 500 kg

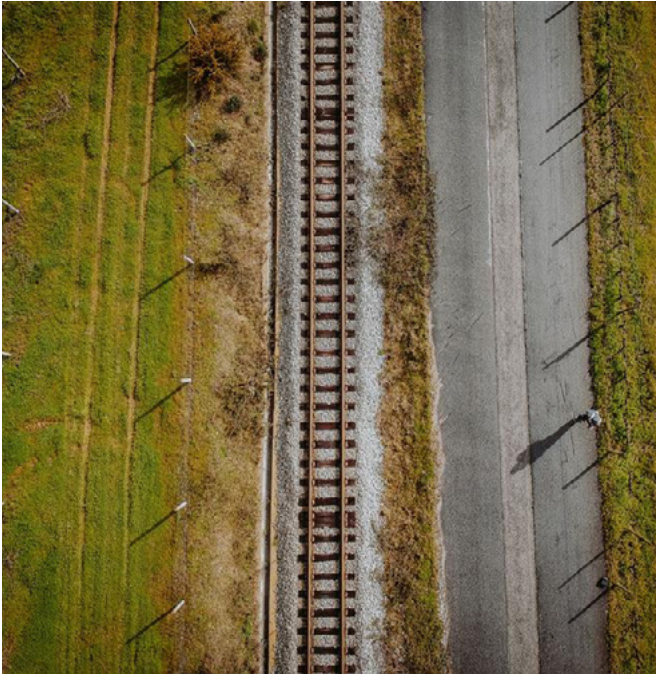


100% electric truck

On target

Partially met target

Target not met



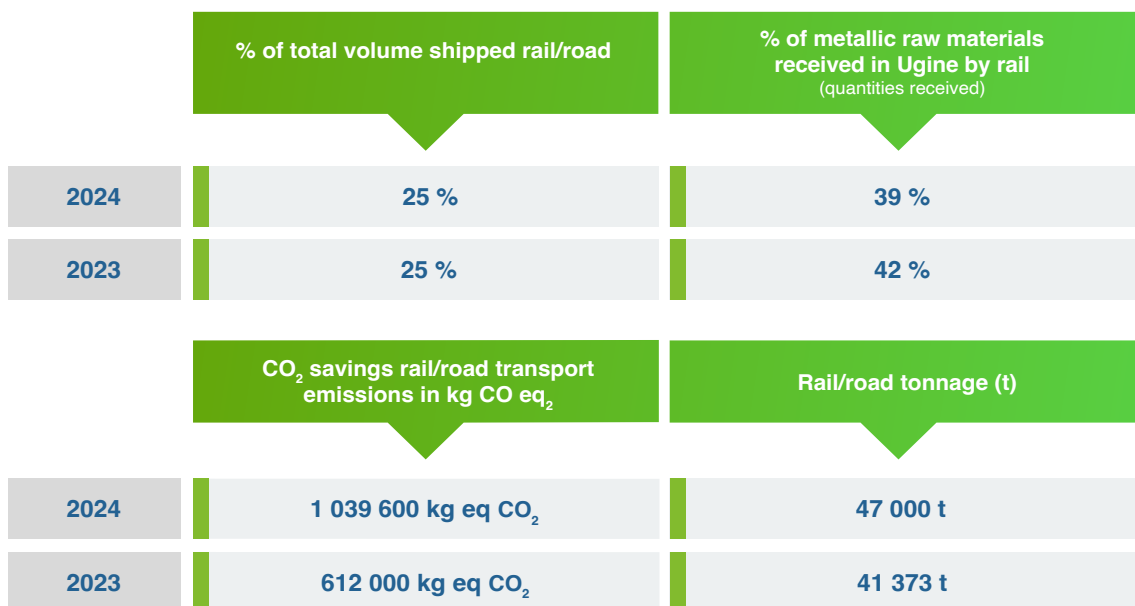
This year we managed to save over 1,000 tons of CO₂.

We have also used the barge or the train to transport containers loaded with our products from the Lyon region to the port of Fos-sur-Mer.

Future actions

- Explore all possible alternative transport solutions.
- Develop other ways of saving CO₂ than road-rail.
- Maintain the use of rail transport for part of the replenishment of raw materials.

Performance monitoring



* This indicator is now based on quantities received instead of quantities invoiced. The previous data has been recalculated to make the results comparable.

■ On target
 ■ Partially met target
 ■ Target not met

Protection of the local environment

Defining the issue

Understand and reduce the impact of Ugitech's activities on the environment: in the areas of water and air emissions, soil pollution prevention, noise, waste management, biodiversity preservation, in order to preserve the environment and adapt to the realities of climate change.

For the Ugine site, which is classified as a SEVESO site, work on preventing major accidents and minimizing the presence of hazardous substances on the site.

Quality objectives

- Comply with the regulations and participate in their development.
- Raising Ugitech staff's environmental awareness.
- Reduce our impact on the local environment by lowering our water, air and noise emissions.
- Integrate biodiversity issues into our processes.
- Prevent critical or major accidents and reduce the potential effects of hazardous substances.
- Continue progress on waste recovery and reduction.



Target figures
and qualitative criteria

UGITECH

0 critical incidents

≥ 80%
waste recovery rate

≤ 18 m³/t
Water withdrawal

UGITECH UGINE SITE

100%
Slag recovery rate

≤ 260 mg/l
total nitrogen concentration
in the water at Wire rod
workshop

≤ 200 g/t
dust emissions
the melting shop

UGITECH BOURG-EN-BRESSE SITE

≤ 2 mg/l
discharge concentration
in phosphorus



Existing shares

Environmental Management System

To meet our environmental challenges, our industrial sites have an environmental management system and are ISO 14001 version 2015 certified. The Saint-Étienne and Grigny sites are due to join the scope of ISO 14001 certification in 2025. The TFA and Milan sites in Italy are also EMAS-certified.

All the plant's staff and the surrounding population were also informed of the measures to be taken in the event of a major accident at the Ugine site. A regional communication campaign was rolled out in 2023, with the publication of new brochures, posters and an updated. Regional communication initiatives are continuing, including the national resilience day (stands, conference, etc.), theatre sessions, etc.

For a number of years now, our specialized Environment Department has had strong skills in managing and reducing environmental risks. This department monitors regulations and is in close contact with the Direction Régionale de l'Environnement, de l'Aménagement et du Logement (DREAL). Each Ugitech site has set up an environmental organization in conjunction with the Ugine site to manage the approach and improvement projects. Each site manager is responsible for the environment in his or her area. Environmental risk prevention is part of the induction program for all new recruits to Ugitech.

A SEVESO-type major accident prevention organization has also been set up at the Ugine site. It is based on the Safety Management System, the Internal Operations, the Fire Safety and Environment Department and a team of regularly volunteer firefighters.

Environmental impact management

Pollution prevention

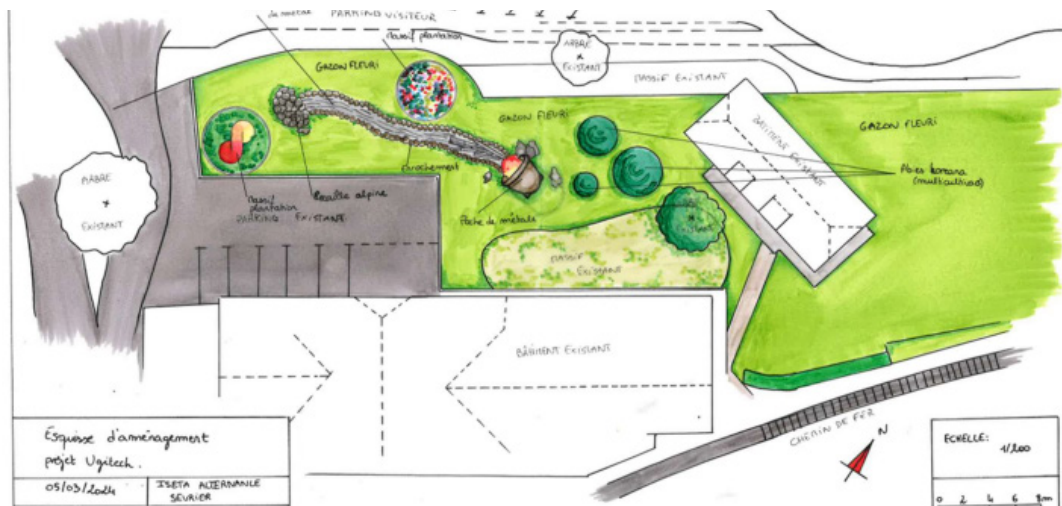
The Ugine site is subject to IED (Industrial Emissions Directive) regulations. The site's main activity is steel manufacturing, so the applicable European document on Best Available Technologies (BATs) is the BREF I&S. Compliance with this document and with the BATs has been studied and taken into account in the review file. The prefectural operating decree for the Ugine site complies with IED regulations. Ugitech's other sites are not subject to the IED directive.

Following the publication of version 2 of the IED regulations, the Ugine site is preparing for the revision of the I&S BREF.

Emergency preparedness

Each Ugitech site identifies potential environmental emergencies. An organization is put in place to respond to them with a view to minimizing the actual potential impact.

The Ugine site is subject an Internal Operations Plan (IOP). In 2023, following an update of the site's hazard study, the IOP will be overhauled. It will also incorporate regulatory updates relating to the identification, monitoring and treatment of the potential environmental consequences of an incident.



Landscaping project by ISETA - ECA students

Aqueous discharges into the natural environment

Water discharges from the various industrial sites are monitored in accordance with current regulations. The results are sent to the authorities. In accordance with our ISO 14001 management system, the monitoring of our impact on water is documented: a water management system has been set up. Figures are provided in the appendix.

All industrial effluent is treated before discharge into the natural environment. Treatments are adapted to each effluent: de-oiling, physico-chemical treatment, decantation, etc.

Reducing overall nitrogen emissions at Ugine

Since 2011, the Ugine site has been working on the industrialization of a pilot acid regeneration plant to reduce the overall amount nitrogen in the water. The project is now complete and the results are visible. (Appendix)

Improving discharge at Ugine

A 3-phase project is continuing at the Ugine site. The aim of the project is to eliminate a discharge into the natural environment, to enable the treatment of accidental pollution and to improve the reliability of current effluent treatment. Following the installation a new treatment system (decanter), the next phases involve optimizing the networks.

Educing phosphorus discharges in Bourg-en-Bresse

The Bourg-en-Bresse plant discharges its effluent into the river Reyssouze, which is sensitive to phosphorus, which can lead to eutrophication of the river. Since 2019, the site has been working on improving its water treatment plant before discharge. The results obtained are within the target set by the authorities. (Appendix)

POP and PFAS hazardous substances

Ugitech sites do not emit Persistent Organic Pollutants (POPs). In 2023, the subject of perfluoroalkylates (PFAS) emerged. Ugitech sites do not use PFAS. At the Ugine site, an inventory of products likely be PFAS precursors has been drawn up. Thus, in accordance with

to the Order of 20th June 2023, three measurement campaigns were carried out between January and March 2024 on all the site's aqueous discharges (excluding rainwater discharges). The results of these three analysis campaigns show that there are no PFAS-related problems in our aqueous discharges. In, of all the compounds tested, only one PFOA compound on one of our discharges during the last campaign was measured at a level slightly above the quantification limit. These results were automatically transmitted to the authorities using the GIDAF tool.

Atmospheric emissions

Air emissions from industrial sites are regularly monitored and are generally in line with regulations. Atmospheric emissions are treated by appropriate facilities (e.g. dust collector, smoke scrubber, PX installation to prevent the formation of Nox, etc.)

Ambient air measurements have also been carried out around the Ugine site by the Auvergne-Rhône-Alpes air quality association for several years. In 2024, fallout measurements were taken at two points: near the plant to the north and to the south. Of the eight parameters measured, one exceeded the benchmark values.

The others are in line with the benchmark values.

In 2024, the level of dust emissions from the steel mill is falling and is in line with the values required by the prefectural decree (44.89 g/t for the maximum 150g/t required for the "furnaces" zone) and by European regulations (current efficiency rate = 98.97% for a minimum rate of required by the regulations). (Appendix)

Managing local impact

Protecting biodiversity

All Ugitech sites in France have been the subject of an impact assessment under the regulations governing environmentally classified facilities. These impact studies include a section identifying biodiversity interests and ensuring that industrial activity is compatible with local ecosystems.



Ugitech and ISETA-ECA partnership

Ugitech site is located in a Natura 2000 area or an area of particular interest for biodiversity. In addition, to complete this impact study, a bibliographic inventory of biodiversity interests was carried out in 2017 for each of the French ISO 14001-certified sites. Reviewed regularly, no major biodiversity risks were identified. An approach that takes greater account of the identification of biodiversity-related issues is underway, as well as an extension to all Ugitech sites.

The main problem currently identified is the presence of invasive species, in particular Japanese knotweed on the Brionne and Ugine sites. This plant requires special measures to prevent its proliferation. The Ugine site has also undertaken work to restore the ecological continuity of the Mollières weir, starting in the summer of 2024. The Mollières weir is located to the north-east of Ugine on the river Arly, at the end of the Val d'Arly. It was created to supply water to the Ugitech factory. The weir was a concrete structure with no means of ensuring ecological continuity. The primary objective of this project was to re-establish ecological continuity by enabling the target fish species to swim upstream of our weir, thus improving their spawning grounds. To achieve this, the weir was levelled and a rough ramp installed. The work was carried out with the support of the Rhône Méditerranée Corse water agency.

Landscaping

In partnership with ISETA-ECA (Sciences de l'Environnement et du Territoire d'Annecy), students have been working on two landscaping projects for the Ugine site. At the beginning of January 2024, 5 BTS students scouted the site and took note of Ugitech's specifications: low-maintenance landscaping with no plant protection products and a Ugitech identity (logo color, stainless steel, production tools, etc.). One of the projects was selected and will be launched in 2025 over a period of one to two years, with other students taking over from there.

Preventing soil pollution

A program for the installation of containment facilities for the storage of hazardous products has been rolled out at all our industrial sites in order to prevent any accidental pollution, particularly of the soil. These containments are regularly checked and maintained. Groundwater quality is also regularly monitored.

Noise pollution

Noise emissions at the sites are monitored in accordance with current regulations, and the results are compliant. The last acoustic emissions measurement campaign was carried out at the Ugine site in 2024. All the points measured were compliant during the day, at night and in between.

External communication

The Ugine site has regular discussions with local residents. The aim of these discussions is to focus improvements on their specific expectations. An annual meeting is organized and telephone calls are made throughout the year. Ugitech's other sites meet their local stakeholders according to the needs of each.



New ramp at the Mollières weir

Waste management

Waste is sorted at all Ugitech industrial sites. Whenever possible, materials are recycled.

In 2024, almost 67,900 tons of waste were generated, 22.6% which was hazardous waste.

Figures are provided in the appendix..

Steelworks slag accounts for the bulk of the waste produced by Ugitech (39,519 tons in 2024). It is recycled in road-building techniques in collaboration with a specialist service provider. By 2024, the recovery rate risen to 80%. There are also refractory materials, particularly from the steelworks. Some of these materials are recycled internally or externally. (Appendix)

A new service provider, Excoffier, has been in charge of recovering our internal waste since the beginning of 2023. Cutting-edge optical sorting and air separator techniques have been put in place to ensure optimum sorting of our waste.

Excoffier is also developing the solid recovered fuel sector using our waste.

Our ageing furniture is sent to Valdelia, which carries out repairs and donates these second-hand items to charities.

A project by recovery of refractories and site sweepings is also underway.

The Brionne site has succeeded in reducing its hazardous alkaline waste by shutting down one piece of equipment.

Environmental information on packaging

Environmental information on the materials and recyclability of Ugitech product packaging was made available in 2023. This makes it possible to meet regulatory requirements in Spain and Italy, and encourages waste sorting by customers in other countries.

Dematerialising the traceability of hazardous waste

All our French sites use the Trackdéchets application. This application makes it possible to track hazardous waste electronically.

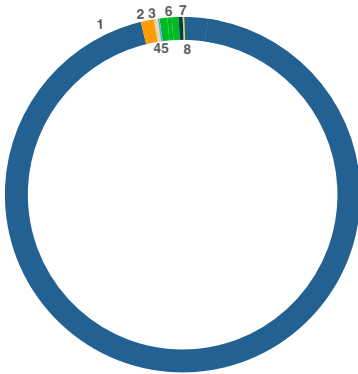
Use of hazardous substances

According to taxonomy regulations, Ugitech is not concerned by use of persistent organic pollutants (POPs). The transformers have been cleaned of polychlorinated biphenyls (PCBs) in accordance with regulations. The sites do not use the other substances concerned.

Finally, Ugitech still has cooling systems running on the refrigerant gas R22 (HCFC-22). This equipment is maintained and does not leak. In the event of a leak, this equipment would be shut down immediately and replaced by new equipment running on a new gas.

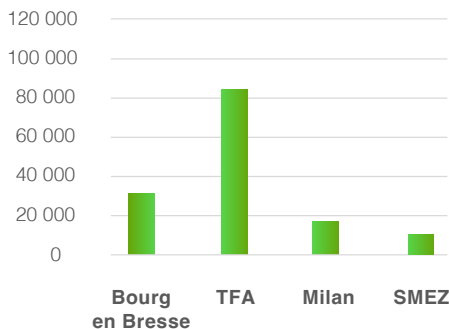
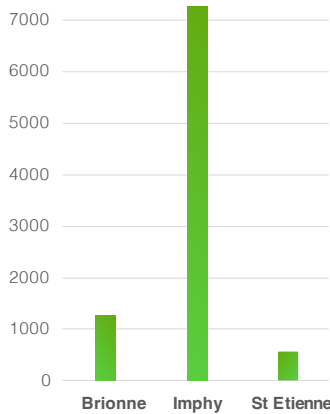
Natural resources management

Water withdrawal



1	Ugine	93,75 %
2	Bourg-en-Bresse	1,31 %
3	Brionne	0,04 %
4	Imphy	0,04 %
5	Saint-Étienne	0,03 %
6	TFA	3,42 %
7	Milan	0,85 %
8	SMEZ	0,56 %

Water withdrawal



In 2023, Ugitech, along with 11 other manufacturers, joined the French national water plan. This plan aims to reduce water abstraction and consumption. It is based on the development of a Water Sobriety Plan (PSH). Given the impact of the Ugine site on Ugitech data, it has been detailed for this site only.

This plan details the water consumption of the various tools, the progress already made and areas for improvement. The PSH shows that 53% of water is already recycled/reused.

Ugitech aims reduce its water consumption by 10% by 2030.

To this end, the Ugine site has responded to the Water Agency's 2024 call for projects "Supporting water sobriety", which is available to economic players, by submitting a file presenting new projects planned for 2025 to optimize cooling water consumption in the Rolling Mill and Finisher workshops.

Over the course of 2024, staff working to reduce water use on the site put together a file containing the actions identified to achieve the objective of reducing water abstraction by 10% by 2030. These actions include modernizing certain equipment by adding flow control devices or replacing them with equipment that consumes less water.

With no major impact on water abstraction results, rainwater is used whenever possible for watering or cleaning operations.

Water stress, drought

The Ugine site is the main consumer of water resources. It is not located in an area identified as suffering from water stress. However, some Ugitech sites are at risk of drought. As a result, restrictions on water abstraction have been imposed, without any impact on production at these sites

At the Ugine site a number of measures have been taken since 1995 to significantly reduce the amount of water taken from the natural environment. For example, to ensure the cooling of our tools, closed circuits are operated with air-cooling towers. Water recycling systems have been installed in our supply circuits. As a result, the quantity water taken in has been divided by 3 (Appendix). Reducing water consumption remains a major challenge and is a strategic project for Ugitech.





Future actions

- Setting up an ISO 14001 environmental management system at Saint-Étienne and Grigny.
- Carrying out the investment aimed at optimizing discharges from the Ugine site.
- Pursue research into innovative technologies for treating nickel in water.
- Implement the actions included in the Water Sobriety Plan.
- Launch of the landscaping project for the ISETA-ECA school on the Ugine site.

Performance monitoring

	Number of critical incidents Ugitech France	Average concentration in the finishing shop water discharge in total nitrogen Ugine site	Average concentration of Phosphorus in the WWTP discharge Bourg-en-Bresse site	Dust emission in the melting shop (in g/t) Ugine site
2024	0	209,6 mg/l	1,81 mg/l	201,7 g/t
2023	0	202,9 mg/l	1,89 mg/l	126,3 g/t

	Water consumption (m³/ton invoiced) Ugitech Europe	Waste recovery rate Ugine	Refractory recovery rate in the melting shop Ugine	Slag recovery rate Ugine
2024	21,2 m³/t	75,72 %	58 %	80 %
2023	22,4 m³/t	56,37 %	56 %	44 %

■ On target
 ■ Partially met target
 ■ Target not met

Appendix

Figures - The indicators meet the definitions of the GRI (Global Reporting Initiative) protocol indicators.

Raw materials (GRI 301-1, GRI 301-2)	Unit	2021	2022	2023	2024
Internal and external scrap materials	t	213 128	69 947	138 079	161 575
Ferrous alloys and deoxidisers	t	69 002	24 120	47 368	52 496
Auxiliary materials (lime, dolomitic lime, others)	t	25 845	9 012	17 736	20 100
Refractories	t	11 379	5 020	4 445	2 814

Energy consumption (GRI 302-1) Locations: Ugine, Bourg-en-Bresse, Imphy, Brionne, Saint-Étienne, Milan, TFA, SMEZ Reichshof	Unit	2021	2022	2023	2024
Electricity	GWh	295,77	169,50	223,49	238,24
Of which electricity from renewable sources	GWh	45,52	28,76	39,60	32,71
Of which nuclear-generated electricity	GWh	216,62	120,58	170,06	196,09
Of which electricity from fossil fuels	GWh	33,63	20,17	13,83	9,44
Natural gas	GWh	290,39	170,29	192,07	215,33
Diesel	Mwh	4 680,99	2 939,85	3 364,89	3 290,78

Water withdrawal and discharge (GRI 303-3, GRI 303-4) Locations: Ugine, Bourg-en-Bresse, Imphy, Brionne, Saint-Étienne, Milan, TFA, SMEZ Reichshof	Unit	2021	2022	2023	2024
In surface water	m ³	3 201 655	2 938 358	2 681 698	2 901 826
In groundwater	m ³	244 087	191 386	168 488	131 861
In municipal waters	m ³	10 909	8 708	9 122	10 677
Other sources	m ³	2 390	3 113	1 110	7 358
Discharges	Unit	2021	2022	2023	2024
In surface water	m ³	2 952 998	2 665 855	2 428 369	2 586 744
In the municipal collector	m ³	12 088	11 053	11 506	8 527
Other	m ³	5 693	3 055	2 707	8 427

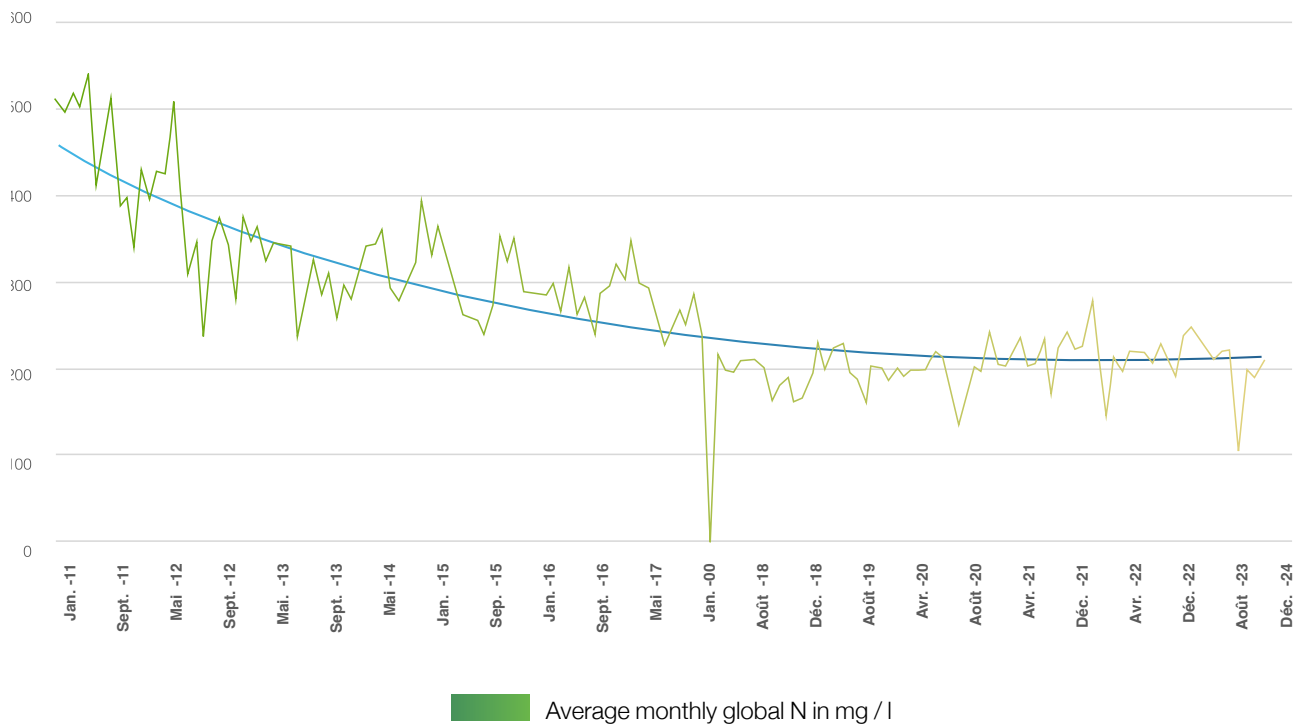
Water emissions (GRI 303-4) Locations: Ugine, Bourg-en-Bresse, Imphy, Brionne, Saint-Étienne, Milan, TFA, SMEZ Reichshof	Unit	2021	2022	2023	2024
Chrome	kg	92	75	100	89
Iron	kg	815	201	295	248
Suspended matter	kg	7 253	10 767	13 290	14 447
Nitrates	kg	190 954	124 936	123 414	136 574
Phosphates	kg	244	150	135	139

Air emissions (GRI 305-7) Locations: Ugine (non applicable pour les autres sites)	Unit	2021	2022	2023	2024
Dust emitted by the steelworks	t	41,1	13,3	18,1	37,7
Poussières captées à l'aciérie	t	5 137	1 662	3 319	3 804
No _x	t	117	47,3	64,5	82

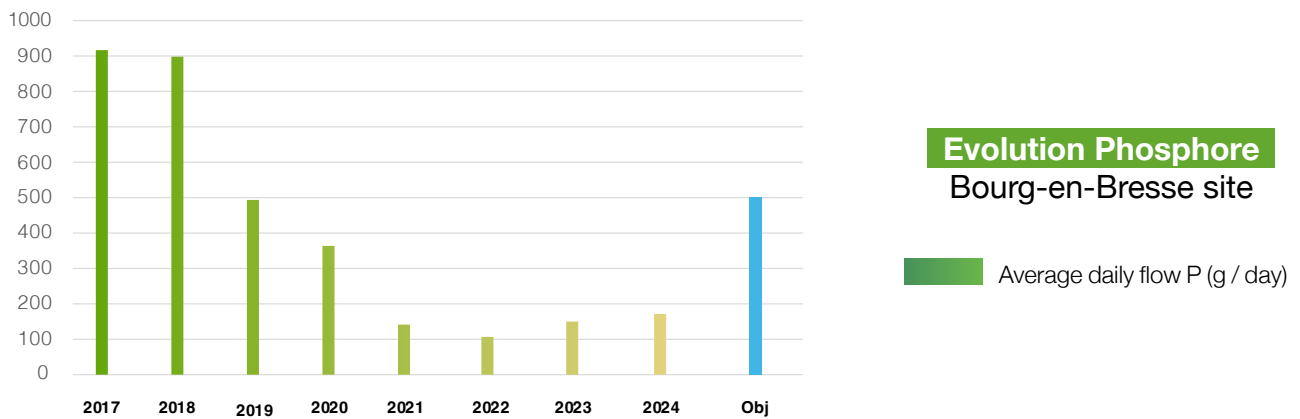
Waste (GRI 306-3, 306-4, 306-5) Locations: Ugine, Bourg-en-Bresse, Imphy, Brionne, Saint-Étienne, Milan, TFA, SMEZ Reichshof	Unit	2021	2022	2023	2024
Hazardous waste generated	t	23 284	14 998	16 523	15 344
Of which hazardous waste recycled / recovered	t	16 606	11 228	8 748	6 786
Of which hazardous waste disposed of	t	6 678	3 770	7 774	8 570
Non-hazardous waste generated	t	58 353	29 937	46 930	52 524
Of which non-hazardous waste recycled / recovered	t	58 263	29 615	27 148	44 323
Of which non-hazardous waste disposed of	t	90	321	262	529

CO₂e emissions according to the GHG protocol, validated by DNV for 2021, 2022, 2023 Locations: Ugine, Bourg-en-Bresse, Imphy, Brionne, Saint-Étienne, Milan, TFA, SMEZ Reichshof	Unit	2021	2022	2023	2024
Scope 1	tCO ₂ e	71 581	38 537	48 152	51 737
Scope 2, market based net incl Guarantees origin	tCO ₂ e	11 174	8 738	6 322	4 202
Scope 3, 3.1 + 3.3 + 3.5	tCO ₂ e	494 928	323 617	245 565	264 429

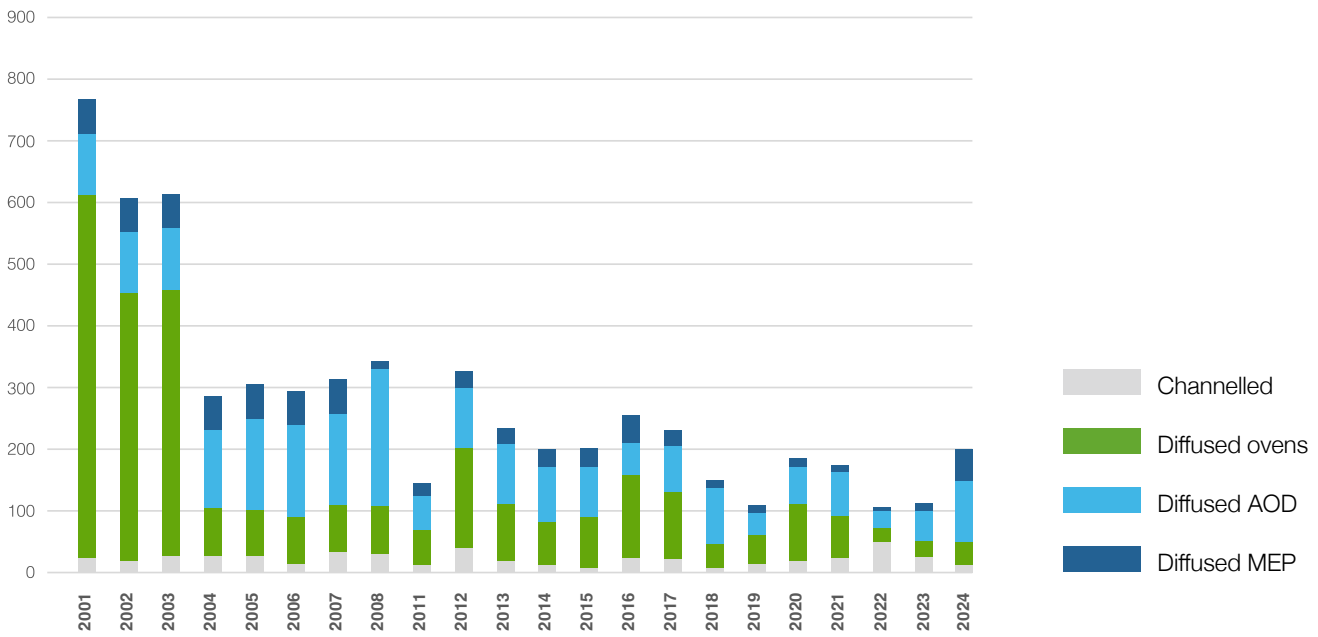
Total nitrogen concentration in mg/l



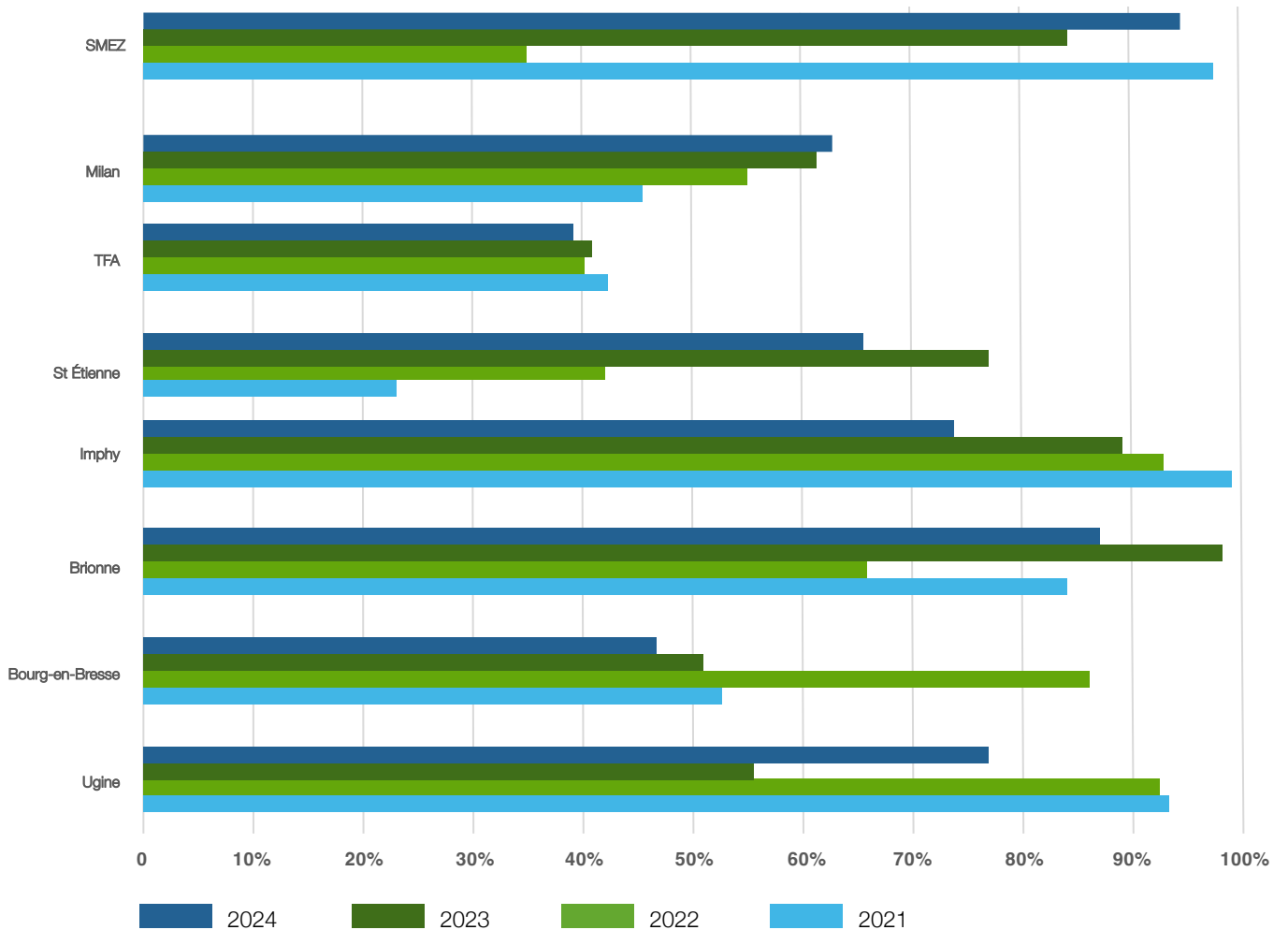
Evolution Phosphore Bourg-en-Bresse site



Steel mill dust emissions (g/t) Ugine site

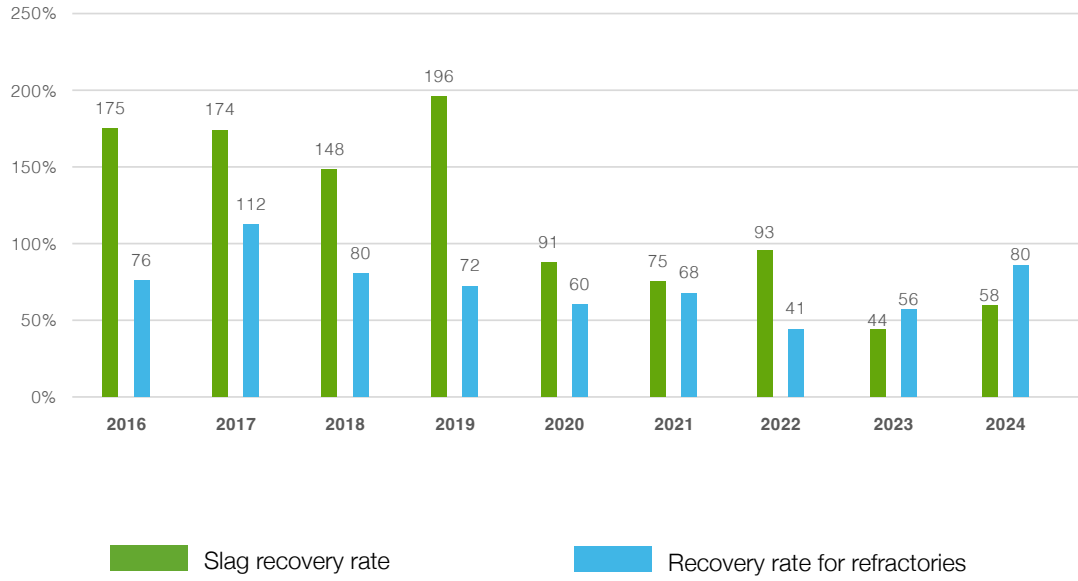


Recovery rate



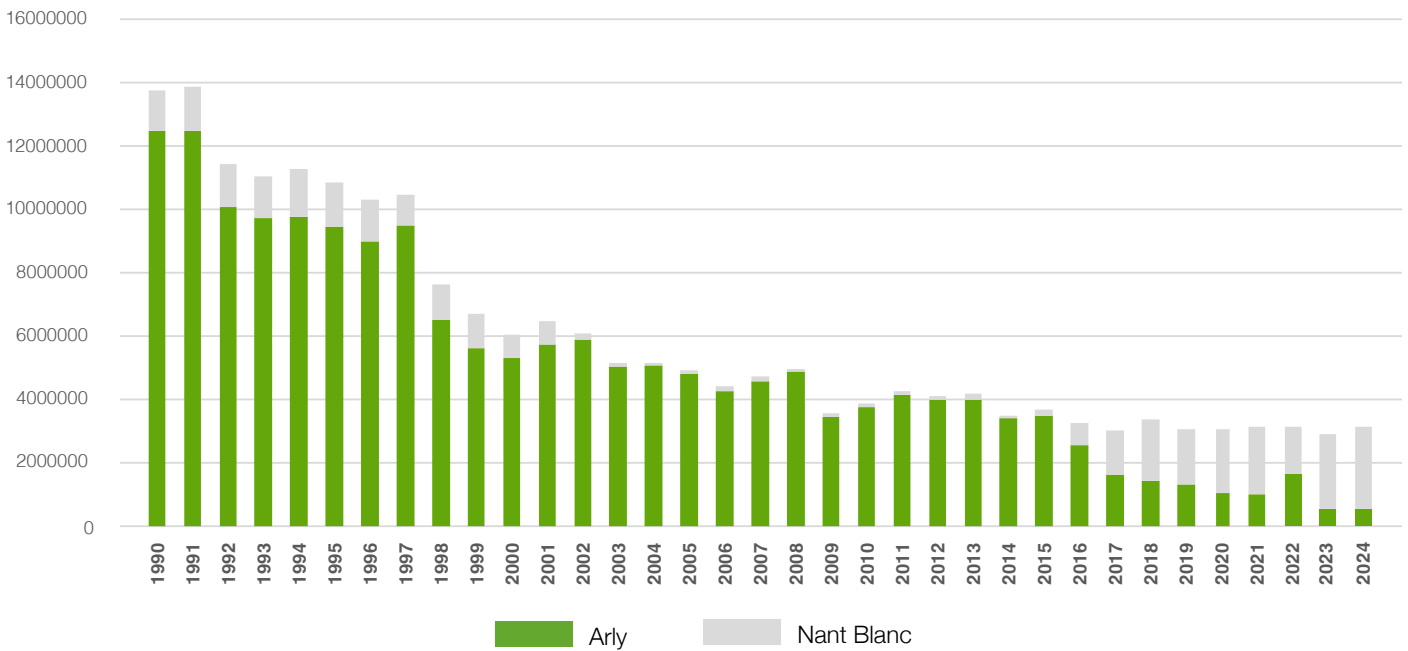
Recovery rate for the steel mill's main waste products (%)

Ugine site



Water withdrawal (m³)

by Ugitech





Social development & Quality of life and working conditions

Health, safety and working conditions

Defining the issue

Our priority is to ensure health and safety of our employees and, more broadly, to promote Quality of Life and Working Conditions (QLWC) within Ugitech.

Recurring annual
targets / KPIs

Our ultimate goal is to achieve “zero” accidents and “zero” occupational illnesses.

Quality objectives

Our approach aims to involve all managers, members of the CSSCT (Health, Safety and Working Conditions Committee) and every Ugitech employee as players responsible for their own safety and that of their colleagues or associates.

This approach concerns all functions, wherever we operate, as well as our subcontractors and visitors.

Existing shares

We base our approach on the long term, covering technical, organizational and behavioral aspects, with gradual implementation to support the changes and anchor them for the long term.

We proceed to:

- the definition of prevention policy and an appropriate strategy aimed at defining priorities action based on an assessment of our risks,
- setting up and deploying an appropriate organization and financial resources,
- steering our health-safety-ergonomics initiatives by deploying an integrated management system to encourage continuous improvement.
- developing a shared health and safety culture.

We are pursuing a multi-year global transformation plan based on five priorities:

- bringing our work equipment into line with the latest ergonomic standards,
- managing the fleet of lifting equipment: overhead cranes and jib cranes,
- traffic and the management of pedestrian-vehicle co-activity,
- dealing with industrial risks such as falls from height, working in confined spaces, isolated workers, etc,
- the prevention of Psychosocial Risks (PSR) and, more broadly, the development of Quality of Life and Working Conditions (QLWC),
- the behavioral approach to risk and the development of organizational measures (training, communication).

This plan is supplemented by local plans specific to each site. They are reviewed annually with the stakeholders, in particular the CSSCT (Health, Safety and Working Conditions Commission).



Tundish workshop - Continuous casting in the melting shop (Ugine)

A standardized approach

The roles and responsibilities of the Health, Safety and Ergonomics (HSSE) players are now better known and recognized through local discussions and working groups. Cross-functional projects and sharing between departments and sites have helped to develop a standardized approach to dealing with our needs.

We have continued to develop this cross-functional HSSE approach based on:

- A stronger organization: within each department, there is a dedicated member of the HSSE team (Hygiene, Health, Safety, Ergonomics). Risk prevention engineers been recruited in various workshops and sites.
- Harmonization of practices between departments: minimum standards to be achieved continue to be established, theme by theme, structuring our working practices. The best practices are adopted and shared, enabling us to regularly raise our standards. This enables everyone to benefit from the most effective feedback. Regular operational HSSE reviews enable us to organize exchanges and coordinate actions.

- The introduction of a safety management system based on ISO 45001: a new stage has been reached; while our Italian sites have already been certified for several years, the certification audit for the Ugine site took place in December 2024.

This standard is part of an expectation of continuous progress, so our working groups are continuing to improve our performance and develop more of the strong points highlighted during audit. All these remarkable actions are specific to our company and that are driving our momentum forward. We are planning to apply this certification to our other sites in the years to come, aware of the progress this approach will bring.

- Developing our safety culture in line with day-to-day operational management. Management at all levels must be at the heart of our approach. Our strong conviction is shared internationally by the most advanced companies in this field. This calls for greater support for managers in their day-to-day practices and to encourage them to take ownership of the approach.

Major news

The ISO 45001 certification process as a means of progress

Ugitech's health and safety risk management is a key component of the company's strategic priorities. Our ambition in this area is to provide a healthy and safe working environment for all employees and other external parties involved in our production sites.

In a world where challenges are increasingly cross-functional and shared by many players, we must also meet the expectations of our customers, suppliers and other stakeholders such as public authorities, local communities and, of course, our employees. In line with applicable legal requirements, organization, resources, methods and shared responsibilities have been put in place to coordinate all activity. The key tasks of the process are as follow:

- provide a vision and settle the right organization to achieve our objectives,
- keep a technical and regulatory watch on health and safety,
- ensure assessment of the premises and compliance with regulations and other requirements,
- detect and assess risks at workstations,
- organize health and safety records and documentation,
- monitor indicators and action and improve working conditions,
- manage incidents or accidents in the workplace, including emergencies and crisis situations,
- ensure the reporting, investigation and analysis of accidents and occupational illnesses,
- manage health and safety risks on a day-to-day basis,
- involve staff and manage relations with internal and external bodies,

- more generally, to develop a health and safety culture among the various players at all levels of the company, in order to achieve lasting improvements in overall performance.

We are taking both corrective and preventive action in these different areas, striving to further develop risk anticipation in order to prevent risks more effectively.

Ugitech continues its technical approach to health and safety in the workplace and is developing its Organizational and Human Factors (OHF) approach in stages

On a large scale, in the classic transformation of its health and safety culture, the company goes through several successive phases of a technical, organizational and behavioral nature. The technical foundations need to be regularly improved, leading to a rethink of how work is organized and a corresponding change in behavior. This process is iterative; as it evolves, so do the requirements. The development of a health and safety culture is therefore a continuous improvement process that requires change management.

Commitment and participation

The individual and collective mindset is key to the approach. It's a question of mobilizing everyone to drive forward a health and safety approach in which everyone is involved and participates. This mindset evolves over time. As we build on our achievements and feedback, we develop our own culture along the classic path from reactive to interdependent operations driven team spirit and shared, safe and well-thought-out working practices.

The first step is to clearly set out our requirements and our working standards. This means that everyone must play their part in building the system and to the life of the approach through their participation and even leadership. On a day-to-day basis, everyone is encouraged to: adapt their behavior to the company's requirements; participate in creation or revision of training materials, in work safety instructions sheets, as relevant standards for safe working for new arrivals; participate in the early detection of risks through the implementation of dedicated tools; and make risky situations safe.

The aim is to empower everyone. As well as reporting an event to

highlight a risk, all employees must take action to protect themselves from the risk or by practicing shared vigilance.

Organizational and human factors

This approach consists of identifying the conditions that encourage safe behavior at all levels of the organization, because the human dimension is a key component in the reliability of health and safety systems. It is based on concrete actions to develop a sense of perspective, an understanding of human limitations and the integration of the most appropriate practices for developing health and safety performance. New local initiatives were launched in 2024 to develop operator participation and information on a daily basis, raise awareness of health and safety issues and identify risks.

Risk prevention and the Health, Safety and Ergonomics (HSSE) team

The year 2024 marks the creation of a solid HSSE team, sharing their specific skills across the company and supporting the operational teams on a day-to-day basis.

Risk prevention engineers provide support and advice to health and safety management. Their role is to contribute to the business with their expertise, which can cover a large range of topics, their ability to analyze events and take a step back from accident-prone situations, as well as monitor and steer action. They also lead working groups and manage cross-functional health and safety projects.

Their role is also to apply the principle of leadership, to develop the health and safety skills of managers and to act as day-to-day reference points, as specified in the RACI (Responsible, Approver, Consulted, Informed) matrix of roles and responsibilities. More generally, they support commitment and participation of the teams in the sectors to which they are assigned.



Health

Ugitech's addictions prevention programme rolled out across the board

Addictive behaviour is a societal problem. They extend beyond the world of work, but do not stop at the company gates.

Ugitech is committed to the ESPER (Entreprises et Services Publics Engagent Résolument) initiative.

ESPER is a commitment and responsibility initiative on the part of the French government aimed at companies. It is structured around a charter and provides for the implementation and management a coherent approach to collective and individual prevention.

This charter, supported by the MILDECA (Interministerial Mission for the Fight against Drugs and Addictive Behaviors), is based on 4 key requirements:

- the company's commitment,
- awareness-raising and empowerment to raise awareness of the risks and understand the social and physiological reality of addictive practices,
- support medical and social to prevent people from losing their jobs,
- guaranteeing safety to protect the physical and mental health of our employees.

Ugitech has been providing support for employees who need it for many years. In 2024, we carried out a wide-ranging employee awareness campaign, starting with management and staff representatives. Safe Up helped us to raise awareness at all our sites, involving all our staff. These sessions stimulated in-depth discussions on the subject. We identified the concerns and obstacles to be overcome in order to put in place a successful prevention approach and facilitate the implementation of screening campaigns.

Feedback from participants confirmed their interest in the subject and their motivation.

Ugitech Safety Day: mobility at the heart of prevention

Following on from the initiatives launched in 2017, Safety Day (otherwise known as Safety Day within Swiss Steel Group) took the theme of "safe mobility, inside and outside the company" to each industrial site.

This action is part of our Corporate Social Responsibility, one of the main thrusts of Ugitech's strategy: "Anchoring our social

responsibilities to support a sustainable world".

This Safety Day, which geared exchanges and staff participation, features workshops and presentations by external partners such as:

- a workshop on reflexes and physiology, including reaction time and braking distances,
- dexterity contests,
- a car driving shock experiment,
- a conference on road safety,
- spot workshops,
- tests and quizzes.

This is a subject that concerns us all on a daily basis, both in and out of the workplace. This event is an opportunity to find out more, and to discover or reiterate the principles of road safety, both at the wheel and on foot, through discussions, conferences and immersive experiences.

Our Italian sites chose to focus their awareness-raising on the personal and social consequences of accidents in the workplace by having an outside speaker who is a major civil invalid, injured and disabled in the course of his work. The highly emotional exchange that followed was complemented by training workshops in life-saving techniques and good work practices.

A crane evacuation exercise was organized in collaboration with the in-house fire brigade for the steel mill's crane operators. The driver of one of our subcontractor partner's loaders also made the operators aware of the risks associated with coactivity between machines and pedestrians, in particular because of the extremely large blind spots on this machine.

We naturally invited our external stakeholders, institutional representatives from State and local authorities, as well as our subcontracting partners, some of whom even hosted stands.

All these events were a success, attracting the interest of everyone and promoting a better understanding of health and safety issues.

Safety challenges



The GESiM 2023-2024 challenge organised by the steel industry focused on improving working conditions in Imphy's wire drawing plant 450 pass annealing furnace. The employee volunteers are part of a dynamic approach in the field, which we are actively communicating.

The collective, involving two members of the CSSCT, dealt with:

- access to the reels used to unwind the ovens and to the capstans. This is as much about safety as it is about practicality. The reel area at the entrance to the installation has been reorganized and the reels repositioned,
- new means access, taking into account the movements of operators, should enable them to access capstans located at height more easily and to access the machine without energy,
- the evacuation of baskets using electrical-propelled trolleys, making them easier to handle and avoiding the need to use forklift trucks in confined spaces,
- digitization of training courses and assessment of knowledge,
- making pallet removal operations on platforms safer.

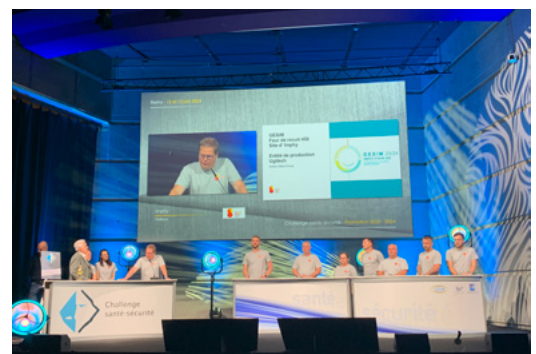
In the end, the tests carried out were conclusive, marking a significant change in usual working practices.

On June 13th 2024, our teams met in Reims to present their work to the companies taking part in this challenge.

The GESiM at the tundish workshop in the melting shop

As part of the GESiM 2024-2025 project, work is being carried out in the tundish maintenance workshop. This workshop, which is attached to the Continuous Casting department, maintains and prepares the assemblies required for pouring molten metal. Working conditions have been reviewed with the teams to facilitate their work. The layout of the workshop and the safety of the assembly stand for nozzles and cattails are at the heart of the working groups.

The objectives are to make the layout of the equipment more practical on a day-to-day basis and to find a solution for installing the cattails in the distribution frame without having to climb on top of them. To achieve this, the team is looking to equip itself with a bracket and suitable gripping tools.



GESiM 2023-2024 ceremony in Reims



Facilities: Compliance and ergonomics

Lifting equipment

Ugitech has developed an in-depth analysis and assessment procedure for its overhead travelling cranes and jib cranes. This is strategic equipment for our business. The company has planned to replace or modernize some of them as part of a multi-year plan. In the summer of 2024, the second bridge on the steelworks load area - the place where scrap to be recycled is delivered and handled before it is melted down - was replaced by new equipment in line with the technological modernization planned. This major new project has been the focus of a great deal of attention in terms of both ergonomics and safety in work. It has benefited from feedback from the previous year to ensure that it is carried out in the best possible way. This teamwork brought together a wide range of skills, always within a tight timeframe. In three weeks, it was installed and restarted during our annual summer shutdown. Despite the complexity of the project and the scale of the work, the Ugitech team and its subcontractor rose to the challenge brilliantly.

Machine conformity

New machines

Our approach to new machines and major modifications is to design them upstream with maintainers, operators and designers/manufacturers. We have drawn up a general procedure covering the various phases required for successful compliance. This approach, which goes beyond European regulatory requirements, aims to raise the level of safety in the design of new or reconditioned equipment. Particular attention is even paid to minor modifications to existing machines.

Handling obsolescence

For Ugitech, it is clear that equipment compliance goes hand in hand with obsolescence management. Following the major projects carried out since 2020, a number of analyses have been launched in preparation for future investments. This is an opportunity to develop workstations for both production operators and maintenance staff, with an approach that takes into account safety and ergonomics.

The momentum around the bridges, reinforced following the accident on January 3rd 2022, itself incorporates a co-construction approach with operators and takes into account workplace ergonomics as well as carefully considered operational safety. We work with the manufacturer to optimise the design of our lifting equipment.

This dynamic is planned over a number of years, with the implementation of changes requiring rigorous deployment of the working method and the appropriate resources.

Equipment developments

Several projects have been undertaken to modernise or improve the safety of production equipment in 2024. In the Finishing Workshops, the VF1 bar inspection line had its outlet replaced and access to its strapping machine secured. The compliance of the DR4 straightening machine was reviewed following an accident in the workplace, which fortunately was not serious, but which showed that it was possible to bypass the hazard-avoidance devices. This project provided an opportunity to work on operating procedures with the personnel to try to reduce the danger at source and improve the reliability of the equipment. This is part of the machine's safety performance and must be taken into account in the same way as other aspects.

As well as effectiveness of the protectors installed. The general approach adopted is that the work of operators and maintainers should be analyzed in order to put in place the appropriate protective devices, but also that technical malfunctions should be identified and dealt with.

Ugitech uses normative EN 12100 method as a benchmark to assess the compliance of its equipment and rank risk levels. This assessment framework, which is shared with staff, is used to develop appropriate protection and solutions in proportion to need. Other major projects are worth mentioning, such as those carried out on the CC2 automatic compactor and the Neutral of the pickling shop.



Downstream site actions

UGIWELD project in Bourg-en-Bresse

This industrial project on welding wire is a technological leap forward. The general approach aims to rationalize the process thanks to a technological breakthrough that has a positive impact on working conditions, particularly in terms of health and safety. The number of load handling and retrieval operations has been greatly reduced, thereby reducing the risk of musculoskeletal disorders (MSDs).

A number of machines have been upgraded to meet the need for modernization, with a focus on ergonomics and compliance. This program was established over several years.

The aim is to develop the practical aspects of the workstation for operators, while also avoiding mechanical risks during manual operations.

Dynamique ORP (Order Tidying Cleanliness) in Brionne

It is a well-known fact that any high-quality industrial activity can only be carried out in an organized and tidy environment. From this point of view, Brionne site has given itself the means to review its workshop layout thanks to discontinuation of a line and the withdrawal of the installation. The space thus made available has enabled the reorganization of the premises and the transit flows of coils and staff by physically separating them from the flow machinery. The workshop provides greater clarity and raises the standard of cleanliness of the premises.

This concern has prompted us to create a dedicated Flash Shopfloor Audit format. The aim is to make this requirement part of everyday life. Shopfloor audits have enabled us to highlight deviations, monitor corrections and help maintain standards over time.

Controlling chemical risks

At the wire rod finishing shop, routine operations such as cutting and cleaning the radiators of the soda furnaces are now carried out by a robot. Validation tests and investment on the part of our subcontractor were necessary, but in the end made it possible to significantly change working conditions.

Also in this sector, a new model of ventilated helmet with enhanced filtration performance has been introduced to meet the need for protection in certain highly exposed one-off maintenance operations.

At lower levels but on a more continuous basis, the exposure of certain bridge operators has been managed by means of new on-board filtering systems on the air-conditioning units of the crane cabins.

As part of our general approach, we make every effort in our processes to remove personnel from areas potential exposure to hazards. We also assess exposures in certain plant control cabins in our melting shop to ensure that diffuse exposures do occur or, if they do, that we treat them. This methodical and fastidious process, carried out in several stages, continues, giving rise at each campaign to studies to understand the phenomena with our certified and approved partner laboratory before implementing permanent solutions.

Over the last few years, Saint-Etienne site has implemented solutions for renewing and treating the air in the workshop where the chromium-plating baths are located. The priority principle is to avoid risk at source. Ugitech is studying solutions to replace the substances used chromium plating, but all these developments will only come to fruition after the research phase and at the end of the industrial validation phase. The effectiveness of air treatment equipment is assessed through measurement campaigns and has shown significant gains in terms exposure.

In the Wire Finishing department, the work carried out in the workshop to manage employee escape in the event of gaseous release of caustic chemicals used in the wire rod treatment processes has been completed. The escape masks and the new alarm system installed in the potential vapor release perimeter were tested in 2024 as planned evacuation. The staff remained calm and carried out the exercise effectively.

Substitution of chemicals in wire drawing

As the European Union's classification of chemical substances evolves, imposing more restrictions, changes have been made to drawing soaps in certain manufacturing processes to bring us into compliance. We have worked across the board on the presence of boron in our wire surface treatment processes. This substance was recently classified as CMR class 2 under REACH. This is a complex

exercise, as it implies not to modify the performance of transformation processes and to avoid penalizing the end customer. Cross-functional trials were carried out in the wire-drawing mills, with each experiment leading to the identification of new, suitable products. The Finishing Workshops were the last to make this transition, marking the completion of this approach. This dynamic has been shared between the various Ugitech workshops and sites, marking an effective and aligned collaboration.

Working at height

Our industrial risk management strategy includes a comprehensive approach to preventing falls from height. Industrial accidents have shown that this an ongoing concern on a European scale.

Our approach is to modernize access to overhead travelling cranes, involving new methods of controlled technical security as well as, in an organizational and behavioral approach, an analysis of the work done by our subcontractors, an examination of the means of protection in place and their suitability to the need. Among projects carried out in 2024, we also finished modernizing the means of access to the wire rod finishing shop stacker crane.

This approach covers a wide range of work situations and equipment. In addition to regulatory training and standard equipment for working at height, it is our responsibility to review each operation requiring work at height to ensure that it is carried out in the most appropriate way, even if this means changing practices.

This theme will be developed as part of a project led by one of our risk prevention engineers, who will be responsible for the method and cross-functional monitoring.

Safety culture

In 2024, at all Ugitech sites, around 330 near-misses were reported via our reporting system, 10% more than in 2023.

More than 1,200 detections / actions were also carried out, the same number as in 2023, i.e. 20% more than in 2022.

There is a strong sense of ownership among staff of this declaration system, marking a degree of maturity that is gradually being acquired. In most cases, reports are now accompanied with meaningful photos, which can easily be shared during in-depth analyses when they are deemed necessary in view of their importance. The declarants quite often provide an analysis of the causes of the malfunction and very often put in place or have put in place protection until the deviation is corrected in order to avoid an accident.

The early risk detection base of Bird pyramid was further expanded in 2024, marking a greater commitment.

Operational control with daily field audits

We carry out field audits on a daily basis on a variety of topics related to our business: company traffic, crane lifting, but also on the proper safety training of new arrivals, etc. New audit topics have been developed with the user operational departments. We have now reached our twentieth template.

This tool has been developed to facilitate exchanges between operators and management on safety issues. It also serves as a reminder of work standards, enabling them to be shared and encouraging reflection and commitment on the part of everyone involved in day-to-day work situations.

Our target is for each operational player to have been audited at least once during the year on any given topic.

We have now developed a digital version that can be accessed from a smartphone, enabling an audit to be carried out in a practical way at any time. Photos can be easily integrated, making observations more eloquent, and comments can be captured vocally by the device, allowing the auditor to concentrate on the exchange with the auditee. What's more, once the audit has been captured and sent, it is immediately available for distribution and sharing.

Our subcontracting partners and health and safety

These audits have enabled us to improve the safety level of the services provided by our external contractors. They identify gaps, but also highlight the strengths of our projects. The results of these audits are used on a daily basis at site meetings during shutdown to provide the factual information needed for corrective action.

Prior to our summer projects, we organize an amphitheater meeting with our subcontractor partners, and issue them with a letter of orientation before the winter work begins. These communications are an opportunity to insist on the preparation of the work and the reminder of the safety work instructions, illustrated by our permanent feedback.

Once a year, we hold an extended Health, Safety and Working Conditions Committee (CSSCT) meeting with external contractors to review the progress of our work. For several years, this ritual has enabled us to take a step back: at the end of a working meeting, future directions and priorities for the worksites are defined jointly. This allows us develop together with our partner subcontractors. While summer maintenance and end-of-year site closure activities are critical points, the quality of services provided throughout the year requires more regular and more operational monitoring. As a result, subcontractor service monitoring and coordination rituals are organized throughout the year by the client departments. They enable Ugitech's requirements to be applied on a daily basis in a concrete way, with a global performance approach.

Over time, we have seen a positive trend in the maturity of external contractors; in both 2024 and 2022, we had no accidents with or without lost time involving contractors on their sites during the summer shutdown.

Our stakeholders

A night at factory

In 2024 we continued our discussions local stakeholders. At our Ugine site we met with 19 representatives of the local medical profession, in particular general practitioners. They are part of an ongoing training program, and it seemed to us, along with the occupational physician from Ugitech's Occupational Health department in Ugine, that this would be a good opportunity for everyone to have an open discussion about our professional realities, as well as an extended site visit. Until midnight, all the participants were able to discuss the workshop layouts and the prevention dynamics work. The meeting was a success, enabling everyone to become a little more familiar with each 's operational reality.

External prevention players

Ugitech makes a point of establishing a transparent and trusting relationship with external bodies. We involve the Labor Inspectorate and CARSAT in commissions analyzing serious accidents or important issues, as we did for the implementation of COVID management measures in 2020, inviting them to attend and take part in the work of the CSSCT and to meet the players concerned.

Internal prevention players

The ISO 45001 audit highlighted the quality of the discussions and work carried out by the Ugine-Saint-Etienne-Grigny CSSCT. In 2025, the members will be involved in the roll-out of a modernized format for our Single Risk Assessment Document.

Ugitech's Occupational health department has opted for an independent occupational health service for its Ugine and Bourg-en-Bresse sites. This dedicated presence provides a different approach to that a more traditional inter-company occupational health service, with the health team having a better understanding of the risks and issues specific to our industrial processes and our sites. This is particularly important for temporary workers, whose follow-up is more personalized and undoubtedly better adapted to their needs. It also helps to improve the quality and frequency of employee monitoring.

Our customers

Listening to our customers is at heart of Ugitech's DNA, and this is no less true when it comes to their health and safety expectations. We scrupulously monitor each customer's requests and the responses given to their requirements, whether they concern Reach or any other specific regulations applicable to their markets in the medical, automotive, aeronautical sectors, etc. or to the countries in which our products are used. Ugitech provides solutions tailored to the end applications, ensuring the traceability of the substances used and complying with ever more stringent standards and regulations.

Ugitech staff

Our stakeholders naturally include Ugitech staff. In very concrete terms, the ISO 45001 certification audit highlighted the staff training process as a strong point, notable in comparison with other companies. Safety-oriented training materials include photos and brief descriptions of risks and prevention methods. They are combined with mentoring workbooks that describe step-by-step the skills required for the job and enable the progress of newcomers to be assessed.

According to the same audit, the company has, on the whole, demonstrated a good level of consultation and participation of stakeholders. In particular, the company has involved them in projects to change working hours (put to a vote by employees) following health impact study. Employees are also actively involved in reporting dangerous situations and suggesting areas for improvement.

For 2025, Ugitech has decided to overhaul its workwear. A new collection of standardized protective clothing featuring advanced high-visibility facings that can also be seen at night has tested staff in a variety of working conditions. Several materials and cuts were tried on by both men and women. Different evaluation criteria were used, including practicality, comfort and protection. 108 multi-site and multi-department tests were carried out in order to provide the most representative assessment possible and to make the best possible choice of new equipment. The final say was given to the staff, who voted overwhelmingly in favour of one of the proposed clothing ranges. Suggestions made during the trials were also taken into account by the future supplier.

Future actions

For this new year, we want to:

- Continue our action plan on lifting equipments.
- Continue our in-depth approach to safety culture and behavior, to mobilize stakeholders and anchor better practices.
- Organize a Safety Day on the theme of human factors.
- Involve Ugine's finishing workshop in the GESiM safety challenge for a final in 2026.
- Prepare ISO 45001 certification for our downstream sites.
- Continue to develop the HSSE skills of our teams, both operators and supervisors.
- Relaunch a Quality of life at work survey in 2025 with Technologia.



Performance monitoring

Lost-time injury frequency rate (LTIFR)*

2024

2,8

2023

3,2

Quality of Life at Work Index Ugitech SA (France)

2021

63 %

2018

62 %

*The definition of LTI (Lost Time Injury) used by Ugitech has been established to take account of the differences in regulations specific to each country hosting a production unit.

The a priori French translation of LTI as "Work-related injury with lost time" does not correspond to the same realities related to French, European or extra-European definitions. Indeed, the recognition of an accident varies from one country another depending on the length absence, the extent of the treatment, the ability to set up adapted workstations or the possibility identifying corrective actions according to their own regulations.

To give meaning and consistency to Ugitech's results and in order to be able to compare them with the results of the SSG Group's other international entities, we consider that lost-time accidents officially classified as LTI must:

- be linked to the industrial activity itself (interaction with a production facility, tooling, processed product or handling equipment that is part of the planned tasks, excluding actions that are not specific to the job),
- generate one or days' absence from work consecutive to the day of accident,
- not being able to benefit from a modified workstation,
- significant care (invasive, immobilisation, etc.).

All Ugitech sites, i.e. Ugitech sa Ugitech Italia Srl, Ugitech T.F.A. Srl, SMEZ GmbH and UGI'RING, are included in this indicator. Ugitech employees (under all types of contracts) and temporary workers are also included, which broadens the scope. Beyond the need for international consistency, this specific indicator and the perimeters taken into account reveal the accidentology specific to our industrial activities. All accidents are reported appropriate in each country, in accordance with local regulations.

■ On target

■ Partially met target

■ Target not met

Attractiveness and equal opportunities

Defining the issue

As the largest private employer in Savoie and one of the top 50 exporting companies in the Auvergne-Rhône-Alpes region, Ugitech is deeply rooted and involved in its local communities.

Aware of its role in society, it is also working with all local players to develop its attractiveness, employment, training and integration in industrial professions.

Given our strategic and HR challenges over the medium and long term, it remains a top priority to identify and anticipate our needs in terms of organization, jobs and skills.

At the same time, it's important to be in tune with our environment and to have a clear understanding of the jobs that are in short supply on the job market. To this end, we have deployed an employer branding strategy to attract candidates for the industrial jobs of the future.

Recurring annual targets / KPIs

Gender diversity:

have **20 %** of women in the workforce

Every year:

40 apprentices
professionalisation, CIFRE or VIE contracts

65 trainees

Quality targets

- Promote Swiss Steel Group's employer brand through media campaigns and local initiatives.
- Structure and drive our school relations policy by initiating long-term partnerships with targeted schools.



Université Savoie Mont-Blanc internship and employment forum

Existing shares

Despite a still uncertain economic climate, Ugitech has been able to maintain its work organization, but has also pursued its efforts in terms of brand visibility for potential candidates. 65 permanent hires have been done in 2024.



"Place de l'emploi" forum organised by France Travail, with our partner GEIQ

Employer branding

In 2024, Swiss Steel Group launched a project to overhaul the Group's employer brand. This work is still ongoing.

However, locally, we have continued to bring our Ugitech employer brand to life in order to achieve 3 major objectives:

- expand Ugitech's geographical reach to the general public,
- consolidate and develop our partnerships with schools and training organizations,
- develop our recruitment communications by using new visuals and new communication channels.

In 2023, we launched an in-depth, joint study with the Group's various entities to come up with a new Swiss Steel Group employer brand communication plan. So far, these discussions have resulted in the pooling of our social networks via a single page for use by all the Group's entities. The overall communication plan has been delayed due to the changes in the Group's organization that are currently underway.

Local deployment of the employer brand

Locally, we were able to take part in a number of initiatives to continue to promote our employer brand locally. We took part in a number of job fairs organized by schools and local authorities in our area.

The UIMM (Union of Metallurgy Industries and Trades) also gave us the opportunity to take part in the "Carrefour des Métiers" in Albertville once again, with the aim of promoting industrial careers to young people. This event gives secondary school students in the area the opportunity to find out more about careers and vocational training to help them decide what career path to take.



Since the end of 2022, Ugitech has been a proud member of the «Les entreprises s'engagent en faveur de l'accès à l'emploi» club. This community was launched by the President of the Republic in July 2018, with the aim of strengthening and perpetuating the link between the State and Business in favor of employment for all sections of the public. We are still a member of this club and take part in the workshops offered, where relevant to our issues.

In 2023, Ugitech has made a commitment, through a new company agreement on professional equality, disability and arduous work, to take action to promote gender equality. We are stepping up the deployment of actions under this agreement, particularly in recruitment. To this end, we have taken part in several events to promote the industry and metalworking sector to women.

In February, five of our female engineers took part in a round table entitled FIRST: Femmes et Ingénieures, Réussir en Sciences et Technologies (Women and Engineering, succeeding in science and technology) organised by the Lycée Berthollet. At this round table, our female engineers were able to talk to female students to encourage them to take up scientific and technological careers.

The aim is to encourage young people to identify with their profession by creating "role models" (people who are seen as an example to follow).

In March, one of our production engineers was also able to take part in a meeting with high school students thanks to the C'Génial Foundation and their action.

The event was entitled "Engineers and technicians in the classroom". Two hours classroom discussions gave her the opportunity to present her profession and answer questions from the high school students present, with the aim of inspiring them to take up careers in science and technology.

Since the autumn, one of our research engineers has been involved with the Capital Filles association, mentoring a final year high school student to help her with her career choice. Capital Filles organizes group workshops in secondary schools to raise awareness of the impact of gender stereotypes, which are likely to constrain them when making their first career choices. In the final year of secondary school and first year of study (bac+1), young women can benefit from individual mentoring by female company volunteers, who come to support them in their career path choice and help them to believe in their potential, while opening the doors to different fields, particularly in science and industry.

To identify our future talent externally and raise our standards, we have defined and deployed a recruitment strategy that is differentiated and tailored to each audience. We are developing innovative recruitment solutions and new supplier partnerships.

Our recruitment strategy

To meet our needs, and given the tightness of our employment pools, we are implementing multiple and diversified recruitment solutions.

In-House temporary employment

Target: profiles close to industry.

Challenges: Challenges responsiveness to our customers' changing needs, non-critical jobs.

Direct recruitment solution on permanent contracts

Target: trained and highly experienced profiles in industry.

Challenges: filling critical jobs with qualified staff.

Apprenticeship recruitment solution

Target: profiles trained by us.

Challenges: anticipating our needs by creating a talent pool, building loyalty and developing the employer brand.

How: apprenticeship contract.

Recruitment solution with certification training for external audience

Target: profiles with little to no experience of industry.

Challenges: anticipating the volume of the exercise, non-critical jobs.

How: selection using the Simulation Recruitment Method, professional training contract leading to a CQPM (Certification de Qualification Paritaire de la Métallurgie).

Three people started this course in 2024, obtain a CQPM Industrial Maintenance Operator qualification.

Diversifying and differentiating our recruitment

To capitalize on our know-how and integrate key skills to develop our markets, we rely on a clever balance between:

- internal promotion and mobility processes,
- investment in external recruitment processes.

To identify our in-house talent, we have implemented a talent, job and skills management tool: Talentsoft. This tool enables us to instantly circulate all our available job offers to employees looking for mobility.

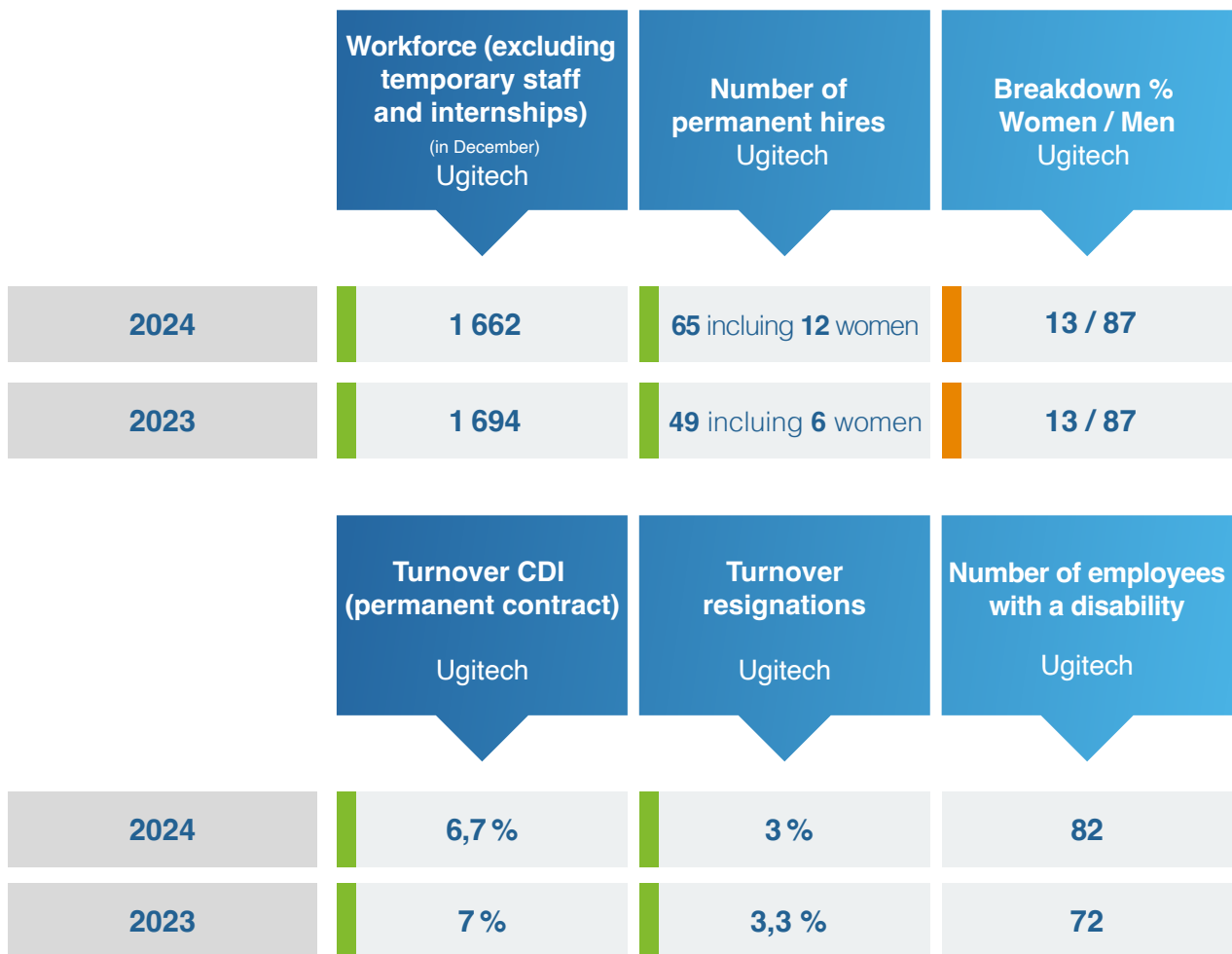


2024 work-study integration day

Future actions

- Continue to roll out Ugitech's employer brand and reputation on all our sites, thanks to a new campaign initiated by the Group.
- Maintain the development of a pool of operators, in particular through training leading to certification.
- Continue to organize an internal training program to help our employees develop their skills in jobs in short supply.

Performance monitoring



■ On target
 ■ Partially met target
 ■ Target not met



Sustainable development day with our partners from the Lycée René Perrin

Youth policy and school partnerships

Despite the difficult economic climate, we are determined to continue welcoming young people into our structures. We have confirmed our commitment to youth employment, initiated in 2017.

Strategic challenges for the coming years remain attracting and retaining young talent.

The aim of our Youth Policy is to meet our skills needs hiring the best talent at the end of training periods, focusing on 4 areas:

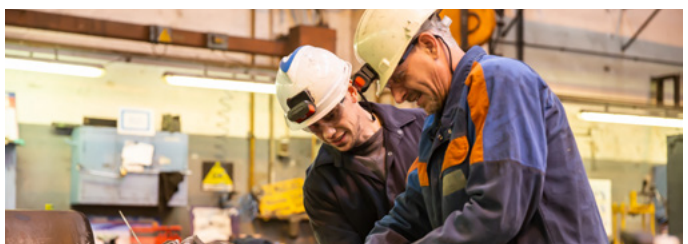
- Strengthen our existing partnerships with schools and associations and develop new relationships with target schools.
- Maintain a sustained policy of taking on trainees in terms of volume and quality (at all levels), to meet the real needs of our departments. We are focusing on our short-staffed professions.
- Maintain and strengthen an ambitious policy of taking on apprentices (42 this year) in order to:
 - play an active role in training young people for careers in industry, as part of our commitment to society,
 - take on a significant number of work-study students in France, in maintenance, production and support functions.
- Promoting this pool of young talent: induction day for apprentices and an Apprentices Council to create dedicated events throughout the year.

Recurring annual targets / KPIs

Every year:

40 apprentices
professionalization,
CIFRE or LIFE contracts

65 trainee schools



Over the last 4 years, our commitment has been reflected in the signing of concrete, binding partnerships:

- the signing of letters of commitment to take on trainees and work-study students with the Lycée René Perrin in Ugine (73), which specializes in industrial science and technology,
- Ugitech is a member of the school's Board of Governors,
- membership of the Alptitude Association, whose aim is to help students in the preparatory classes at the Lycée Berthollet prepare for their careers and to develop relations between students and companies,
- membership of and involvement in the Board of Directors and Executive Committee of the Club des Entreprises of Savoie Mont-Blanc's University,
- involvement as a Member of the Board of Directors of AFPMA de l'Ain,
- a presence at numerous job fairs and open days,
- involvement on the Board of Directors of the CFAI in La Motte Servolex,
- joining the office of the Mission Locale Jeunes d'Albertville,
- the signing of a partnership with the CGénial Foundation.

We work with young people in a variety of ways: visiting our production site, taking part in courses or conferences, business school entrance interviews or job interviews.

We also take part in numerous job dating events organized by or with our partner schools and organizations.

The aim is to raise our profile among young people, to exchange ideas with them and also to give a chance to all those who are interested in an internship or work-study placement with us.

2024 satisfaction survey

Ugitech was once again awarded the "Best Trainee Experience" label by Speak & Act in 2024.

We are in 4th place in the ranking of companies with the best ratings from interns and work-study students, with an average satisfaction score of 4.28/5, up on last year.

The trainees and apprentices who worked at Ugitech in 2023-2024 praised:

- 95 % satisfaction with managerial support,
- 93 % of young people feel they have improved their skills,
- 92 % appreciate the quality of the work entrusted to them,
- 88 % say they are satisfied with our commitment on Corporate Social Responsibility (CSR).



A enduring partnership with secondary school, high schools and universities

Ugitech, like industry in general, has poor image, particularly among young people. The challenge is clear: to increase our attractiveness by raising awareness of our professions and our company, both at the Ugine site and at our regional sites.

Recurring annual targets / KPIs

A regular level of school visits:

between **30** and **45**
per year

Quality objectives

- Raising awareness of our company and our businesses to encourage vocations among schoolchildren in the broadest sense of the term.
- Forging long-term partnerships with schools in our employment catchment areas.

Existing shares

Our ambassadors, and also our staff, are very much involved in the work carried out in establishments:

- creation of mini companies at secondary school,
- simulated job interviews in high schools and BTS classes,
- BTS and VAE jury,
- presentation of companies and careers, simulated interviews (project run in conjunction with the region),
- joint work on partnership projects between Ugitech and the town of Ugine.

Thanks to our Ambassadors

The Ugitech Ambassadors Association has been in existence for 9 years. This association brings together around thirty young retirees from the company who want to stay in touch with the world of work. Their role is to represent Ugitech at various events at secondary schools and universities, but above all to respond favorably to requests to visit the Ugine industrial site. This enables us to open up our company not only to schools, but also to economic and institutional associations, etc.

The actions and visits of our ambassadors have returned to a normal rhythm after the strong impact of the pandemic and the accident in 2022.



Visit university students with the Ambassadors

19 visits, for a total of 400 visitors, were organized in 2024. That's more than 60 half-days of mobilization for our ambassadors committed to their mission. The majority of visitors came from the neighboring Savoie and Grenoble Academy regions.

Through their dedication, these ambassadors are helping to reveal to future generations the realities and diverse trades of the industry.

To broaden the target audience

Ugitech is now a partner of the CGénial Foundation, which aims to promote technical professions to secondary school students.

This year, we took part in the "engineers and technicians in the classroom" initiative to talk about their professions and encourage young people to take up their careers.

As a potential recruiter

We regularly communicate the fact that the company is recruiting.

Ugitech is a member of the Club des Entreprises of Savoie Mont-Blanc University. This gives the company real visibility among students and, above all, helps to forge and strengthen links between Ugitech and the university world. To consolidate these links, we regularly take part in initiatives with our target schools, such as Savoie Mont Blanc University's business week.

We were able to present our company to around 100 students from our target courses at our stand in the Business Village.

This year we also took part in our first PITON project in partnership with the Savoie Mont-Blanc University.

PITON projects are innovation accelerators that enable companies to take in, for an internship, a multidisciplinary team of students.

For this first project, the students had 3 months to create a digital solution for real-time display of consumables in one of our production workshops. The IT solution they developed has been in operation since the end of their placement. Ugitech teams are so pleased with the solution that it will be rolled out to other sectors in 2025. At the end of the PITON placement, we offered a work-study contract to one of the three students and decided to relaunch a new project with a new team in 2025.

In addition, during the sustainable development day organized at Ugitech, the Lycée René Perrin accompanied us to run a stand to explain to our employees the importance of relations with schools and of our partnership to feed our recruitment pools. It was also an opportunity to thank many of our managerial staff who are always willing to take on trainees as part of their teams.

Encouraged by the strong recruitment needs in the machining and boiler-making trades, and the lack of training opportunities for adults wishing to retrain in the Maurienne and Tarentaise valleys, the ADOSIS

association, in conjunction with the Savoie UIMM, has set up a training center in Frontenex. The aim is to help companies in the area find qualified staff to meet their needs. Ugitech has been a partner of the Fab'Academie since autumn 2022, and we were able to attend its graduation ceremony in 2024!

In the same spirit, and in line with our commitments, we have developed similar partnerships as close as possible to our establishments.

We have set up a partnership in the Eure region, with our Brionne site and the Usin'Eure production school. This is a school on a human scale: a class of around twenty students over two levels (CAP-CIP with machining option) who are put in real-life situations on industrial machines to train them to be production operators. The school is funded by the apprenticeship tax and by orders placed with students by production companies.

Benefits for students

"Learning by doing": the idea is to diversify the type of work to be carried out by the pupils so as to enrich their learning and ensure that they master a wide range of materials (plastic, steel and aluminium), shapes, etc. to be machined.

Benefits for Ugitech

- create a pool of potential future operators,
- increase Ugitech's visibility in the local community,
- benefit from an additional supplier. 3 orders have been placed since the beginning of the year,
- plastic or steel wear parts used to guide the wire along the processes,
- copper parts for the maintenance of welding machines at the wire drawing mill in Brionne.

The students were also able to visit our Brionne industrial site. We have also developed a relationship with the "Marais Sainte-Thérèse" training center in Saint-Etienne, which enabled us to take on people on introductory courses and then integrate one of them into a machine grinder course, enabling him to obtain a CQPM in conventional digital machine grinding.



Students and supervisors of the PITON project

Future actions

- Maintain the ambassadors' actions and reinforce them by the recruitment and employer brand manager.
- Roll out our school relations strategy, listing all our actions throughout the year.
- Represent Ugitech at meetings with students: career presentations, career paths, forums, etc.
- Strengthen and consolidate initiatives taken at other sites: initiate partnerships with schools close to all our sites.

Performance monitoring

	Number of visits: School, High school, Universities Ugitech (Ugine)	Average number of apprentices	Distribution % of total apprentices women / men Ugitech
2024	19	37	19 / 81
2023	17	29	12/88



Students at Usin'Eure production school in Brionne

■ On target

■ Partially met target

■ Target not met

Social dialogue

Defining the issue

Promote responsible social dialogue that ensures a balance between social progress and economic performance, remaining at the heart of social issues and the company's economic activity.

Quality objectives

- Protect the health and guarantee the safety of our employees, to whom we want to ensure a good Quality of Life at Work (QWL).
- Develop regular and constructive relations with employees representative bodies based on recognition, legitimacy and mutual respect.
- Building on the relationship between Managers/employee representatives/Reinforced employees.
- Develop employee satisfaction.

Existing shares

Adapting to the new social regulatory framework and the level of activity

After preparing for the introduction of the new classification in 2023, year 2024 was marked by its roll-out to employees.

Roll-out a new classification system

The new job classification resulting from the new national collective agreement for metallurgy of February 7th 2022 came into force on 1st of January 2024.

In concrete terms, each employee was able to see on his or her pay slip for January 2024 the new title of his or her job and the corresponding classification level. At the same time, the committees monitoring agreement on the terms and conditions of deployment within Ugitech SA continued until April 30th, 2024, when the agreement came to an end. In the end, 10 monitoring committees have been held throughout the deployment process.

The latest monitoring committee meeting provided an opportunity to take stock of the Class'Ugitech 2024 project. A total of 313 jobs were described for all Ugitech SA sites.

39% of jobs gave rise to a request for clarification of the classification assigned.

103 complaints were lodged, representing 7% of the workforce excluding temporary and alternating staff.



Human Resources managers and managers were able to deal with all the complaints within the timeframe set out in the agreement. Some resulted in confirmation of the job classification, others led to a change in classification without a change in grade, others led to a change in job class and finally some led to a change in job.

The joint dispute prevention committee set up under this agreement met on March 8th and April 26th, 2024 in the presence of the HR Director, the HRBP and Employee Relations Project Manager, a representative of each signatory trade union organization, the manager who participated in the description of the job in question and the employee who lodged the complaint. Each of these commissions provided an opportunity for a joint analysis of the situation of an employee disputing the classification assigned to his job, despite the various levels of explanation already provided as part of his prior dispute.

Each employee then received a copy of the commission's decision within one month of the meeting.

These commissions have fully achieved their objective, as disputes have been brought before industrial tribunal following the roll-out of the new job classification at Ugitech.

Life of the new classification

With the new classification in place, we then had to address the issue of its life.

A job map has been posted on the intranet so that employees can see the classification of all the company's jobs and better appreciate the possibilities for internal career development.

The new Job Description Sheets have been used for the new job offers.

The Job Description Sheets are of course subject to change:

- either when there is a change in organization that justifies it,
- or if a need is identified during professional interviews, a key moment when, in application of the new collective agreement, the manager and the employee must check that the content of the form matches the actual job.



As soon as a Job Description Sheet is modified, a new quotation is required. It was also necessary to define an HR procedure for creating a new job and closing existing one. The next step will be to make all the company's Job Description Sheets available to employees on the intranet.

The company agreement on how to implement the impact of the new collective agreement for the metallurgy industry.

Management and the representatives of the trade unions representing Ugitech wished to examine the possible impact of the new joint job classification method and the new provisions of the collective agreement in terms of individual relations, on the existing provisions within the company and define possible adaptations.

An agreement was signed on the 19th of January 2024 between management and three representative trade unions.

This agreement came into force on the 1st of January 2024 for an indefinite period.

Regarding the impact of the new job classification resulting from the new collective agreement, the parties have noted that the following subjects have been affected:

- supplementary pension contributions,
- the minimum wage scale,
- the terms and conditions for calculating the seniority bonus,
- Ugitech management,
- the production team manager replacement bonus,
- the management of mechanical transitions from non-executive to executive status and from executive to non-executive status,
- credits for the variable portion of employees with executive status and fixed daily rates.

All of these issues have given rise to concerted adjustments.

Regarding the impact of the new collective agreement in terms of salary compensation for certain work arrangements, parties noted that the salary provisions in force within Ugitech for shift work arrangements were generally more favorable.

As a result, the parties agreed that there was no need to apply the compensation defined by the new national collective agreement for the metallurgy industry in this respect.

Challenge of our social rules

The entry into force of the new collective agreement for the metallurgy sector of February, 7th 2022 on the 1st of January 2024 provided an opportunity to challenge our current social rules in order to meet both Ugitech's operating needs and employees' aspirations in a difficult economic climate.

Discussions between management and labor at the end of 2023 led to the signing of an agreement. This led to the implementation of measures aimed at:

- offset some impacts,
- harmonize some social rules within Ugitech (called into question by the new collective agreement for the metallurgy industry),
- providing professional support for employees whose status has changed as a result of their new classification, by a specific training. Around twenty employees benefited from specific support throughout the year.

The signing of a 5-year agreement on organization of working hours has enabled us to implement major changes in teleworking and the management of flexitime, in order to give greater flexibility to these ways of organizing working time.

Discussions were also held between management and employee representatives on value-sharing arrangements, redefining a new framework for the profit-sharing in line with the company's strategic challenges. This was also an opportunity to define the methods for sharing value when there is an exceptional increase in the company's profits.

Relations with regional and national trade union

As part of an open and responsible social dialogue, management is developing exchanges with the bodies of the various trade unions present at Ugitech in order to share common concerns.

In 2024 we continued these exchanges with the CFDT: on the initiative of Ugitech's CFDT elected representatives, management had the pleasure of receiving Ms Marylise LEON, General Secretary of the CFDT, in November. She was accompanied by several officials from the Confederation, members of the federal bureau and SymétAL Alpes Loire (the CFDT metallurgy union) and representatives of the Syndicat CFDT Chimie Énergie Alpes et 2 Savoie. Whatever the field, it is important for management to seize the opportunity to exchange views with such decision-makers, particularly on the prospects and challenges facing European and French industry in general, and Swiss Steel Group and Ugitech in particular.

In terms of social dialogue, this is not a first, since in 2023 we were already able to receive

Mr François HOMMERIL, President of the CFE-CGC, as part of the roll-out of the "Elles de la Métallurgie" initiative in France. While place of women in the world of work was one of the themes also addressed by Ms Marylise LEON, it was above all opportunity for management to highlight our technical expertise, skills and know-how through a visit to the Research Centre. The discussion continued in the meeting room with a more detailed presentation of our activities, our strategy and our short-, medium- and long-term issues and challenges.



CFDT delegation visits Ugine



Professional equality

The gender equality index in 2024 is: 88 / 100.

A new agreement on professional equality between men and women, the prevention of arduous work and disability management was signed on the 16th of May 2023.

In terms of professional equality, management and employee representatives wanted to build on the actions already undertaken.

In terms of recruitment, the challenge is to remove the barriers to integration in order to integrate more women into the production and maintenance professions. This means continuing to improve working conditions by making jobs more adaptable to as many people as possible, in conjunction with the prevention of arduous work.

To this end, this year we carried out a benchmark survey of companies that have succeeded in increasing the number of women in their workforce, in an attempt to find solutions. We also questioned our female production employees about their integration conditions to identify areas for improvement. We have also raised awareness among our employees and managers about diversity in teams. Other actions remain to be carried out on the prevention of arduous work to improve the accessibility of our jobs.

Disability management

For several years now, Ugitech has been committed maintaining employment for people with disabilities.

To achieve this, it is essential to change the cultural representations of disability. This means putting in place an action plan to address disability issues at all levels of company: management, supervisors, staff representatives and employees.

In May 2023, three of the four company's representative trade union organisations signed the Gender Equality / Hardship / Disability agreement. It proposes a new three-year disability action with the following ambitions:

- change the way disability is viewed within the company,
- adopting the right posture (for managers, teams and people with disabilities),
- bringing diversity to life within the company.

Having set out the legal framework and then the context for diversity and inclusion, we have identified the conditions that are conducive to a diversity policy.

Participation in initiatives

NAs part of the European Week for the Employment of People with Disabilities (SEEPH), we worked with BENETHIK, a young company that is guiding us in developing inclusion within our company.

In concrete terms, they ran information meetings on disability in the production workshops and for the support functions. They also brought in a Cecifoot association to give our employees a demonstration. The aim was to show that disability is not an obstacle; you just have to accept that things can be done differently.

Lastly, we organized some "Duo Days", and once again the experience was a success. This year we developed our relationship with a local ESAT in Albertville to continue developing our responsible purchasing.

To continue our progress in this area, we have introduced liaison interviews with employees who have been off sick for more than 30 days. If the person on sick leave so wishes, they can request an appointment to prepare their return to work and limit social exclusion.

We have been more active in communicating with the company's employees, via our intranet, in order to provide more information on a regular basis.



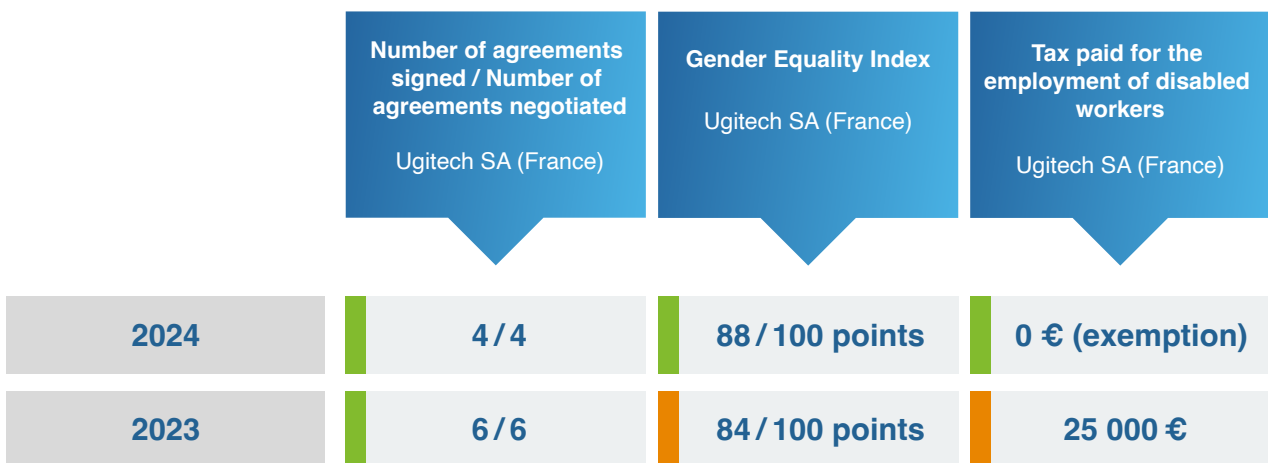
Duo Day 2024 at the company restaurant



Workshop on raising awareness of the RQTH (Recognition of the Status of Disabled Workers) by our partner BENETIK

Future actions

- Adapte our work organization and operating methods to meet the needs of our business and our strategic challenges as closely as possible.
- Challenge our employee savings and profit-sharing in order to offer employees even more effective schemes, incorporating eco-responsible concerns in line with the company's strategy.
- Adapte the operating procedures and resources of social and economic committees to improve social dialogue.
- Communicate more effectively with employees about the company's supplementary pay schemes to encourage them to make better use of them.



■ On target
 ■ Partially met target
 ■ Target not met

Skills development and access to training

Definition of the issue

Ugitech's human capital, made up of its men and women, is the company's greatest asset.

This is the factor that sets us apart from our competitors and enables us to be the world leader in our markets.

To meet our medium- and long-term challenges, it is essential to identify and anticipate our needs in terms of organization, jobs and skills, while taking into account employment-related constraints.

The forward-looking management of our organizations, jobs and skills is a major project to support Ugitech's transformation and its strategy.

It is designed to anticipate foreseeable changes in jobs and skills in line with Ugitech's strategy, defined multi-year plans.

Recurring annual targets / KPIs

Our aim is to invest at least

3% of our payroll
in the training budget

Quality objectives

Our aim is to have the most appropriate organizations and skills to meet our strategic challenges.

Existing shares

Job and Career Management Action Plan

As the GEPP (Job and career management) agreement is due to expire at the beginning of 2024, negotiations have begun with all the representative trade unions within Ugitech at the end of 2023, enabling us to take stock of the actions implemented over the last 4 years and to look ahead to new challenges.

New areas of work were set out to prepare the proposal for a new agreement through recognition workshops. More than sixty employees divided into objective categories worked on the notion of recognition within Ugitech around 3 axes: What do we want to recognize? How do we want to recognize it? Why do we want to recognize it?

This feedback has enabled us to propose a new agreement to our social partners that addresses the following issues:

- to look ahead and meet the challenges facing Ugitech and Swiss Steel Group,
- making a success of our ecological and digital transition,
- maintain our employment competitiveness,
- issues of attractiveness, recruitment of young people and career transitions,
- continue to involve employees in their own skills development.

Skills Development Plan

Ugitech sees training as an investment in the future of the company and its employees, and not simply as a cost.

Investment in training is aimed at capitalizing on our business know-how and developing skills.

In 2024, we were once again confronted with a series of unfavorable events in our economic and geopolitical environments, which had a significant impact on the decline in our business. This context forced us to define and deploy a series of measures to adapt our activities to this situation, and this will continue in the first months of 2025.

Among all the adaptation measures, the skills development plan is a major lever. This is our corporate commitment. In this context, we would particularly like to highlight the efforts of everyone - the Training Department, HR teams and in-house trainers - who have made it possible to propose and implement training schedules of professional quality over several weeks in 2023. This is a collective contribution to the service of our customers and internal stakeholders.

Our skills development strategy is a response to these contradictory demands. It enables our organizations to adapt their skills to the current context, but also to prepare for the future. Ugitech's challenges are many and varied:

- more than ever, to make health and safety our top priority. And we do this by continuing to collectively question our organizational practices and individual behavior, while respecting the basic rules and conditions,

- continue to consolidate our business expertise. This will be achieved by strengthening the quality of our transfer processes, through training engineering where appropriate. All this while continuing to develop versatility and the transfer of skills between workshops or sites,
- continue to support our managers as their roles evolve in a rapidly changing economic and organizational context,
- to define, for each of our business areas, the challenges, impacts and concrete skills requirements for the future of our company in major areas such as the ecological transition and digital transformation.

In 2024, as already mentioned in the section on health, safety and working conditions, Ugitech is committed to an addiction prevention program.

2 training courses have been set up: the first for managers and staff representatives and the second for all our employees at all our sites in France. 178 and 961 employees respectively were trained in 2024.

Safe Up is helping us to implement this approach.

The training and awareness-raising courses provided by Safe up enable people to understand all the issues involved in preventing addiction at the heart of the company, in the field, through real-life cases, but also in a fun and dynamic way, interactive teaching methods (videos, role-playing, debates, etc.). The freedom to speak that is created during the training courses encourages dialogue and promotes taboo-free exchanges on this subject.



Formation Safe Up



Training to raise awareness of environmental issues: Climate Fresco

At the heart of our strategy, decarbonization involves raising awareness among our employees. To go beyond information received by 100% of employees during their induction, Ugitech is rolling out the collective intelligence workshops of the climate fresco. Eight employees have been trained to run these workshops and have joined the fresco community.

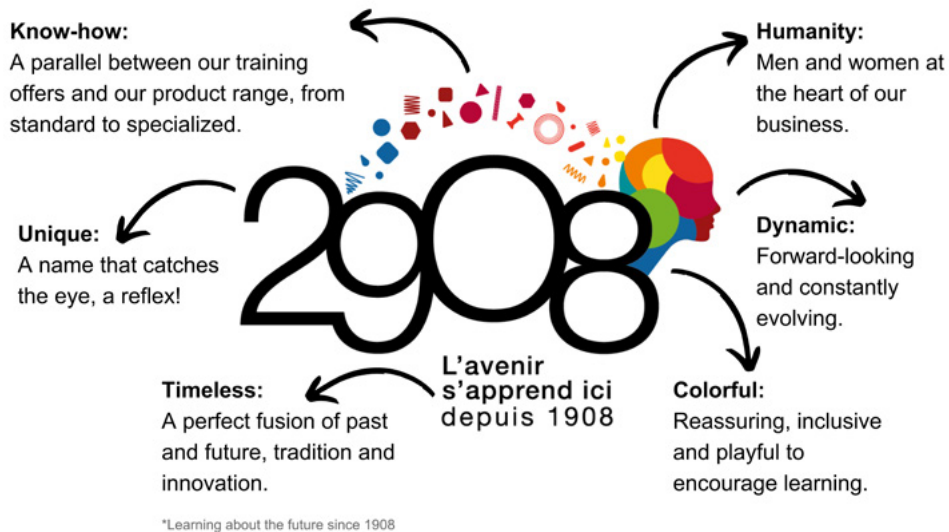
In 2024, we organized a one-day training session specifically on environmental issues, setting up a climate mural and raising awareness of environmental and energy issues.

24,588 hours of training were provided under the Skills Plan in 2024.

Training guidelines are defined in line with the company's CAP 2025 strategy:

- health and safety: in particular mandatory trainings and trainings on machine compliance,
- integration of newcomers and support for internal transfers as to enable them to be operational as quickly as possible and in good conditions,
- developing the business skills of existing employees, so that they can take on board the necessary changes brought about by the investments made in their sectors, but also prepare for the changes of tomorrow and the move to other business lines,
- management: to help managers provide better support for their teams and projects,
- digital transition: to help all staff get to grips with the new tools,
- a commitment to the environment, incorporating the principles of eco-responsibility by contributing to the sustainability of natural resources and climate protection.

Induction training sessions for newcomers continue to be held, enabling us to pass on the Group's values to our most recent recruits.



Deployment of an in-house school

Ugitech has decided to set up its own in-house school to meet its specific business needs. The mastery and transmission of know-how are important issues for Ugitech.

In Ugine, a number of courses have been set up in partnership with the metallurgy industry:

- a team manager course,
- an Autonomous Industrial Production Crew course,
- an Internal Trainer course,
- a "Passage Cadre" course,
- a machinist course,
- a Maintenance Operator course.

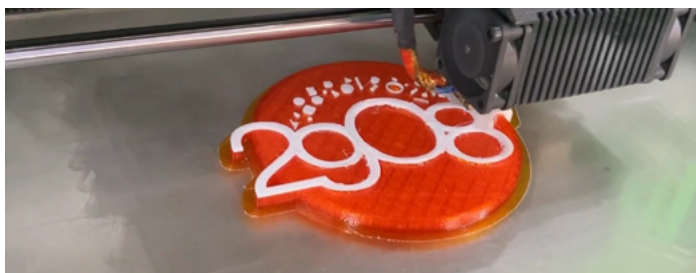
All these courses lead to official certification: « Certificat de Qualification Paritaire de la Métallurgie » or « Certificat de Compétences en Entreprise. »

Around 175 in-house training modules are offered in areas such as continuous improvement, health and safety, business techniques and management and communication.

To help our in-house trainers develop their skills, a certification course has been in place since 2019 with 17 already certified.

The aim of this approach is identified and enhance the skills of our in-house trainers and to support their development.

In 2024, a new career path has been defined for our methodist and should be implemented during 2025.



Ugitech has developed an in-house school, Ecole 2908, with the following aims:

- training for our professions, which are in short supply,
- create specific training courses for the stainless steel industry, which are non-existent on the training market,
- enable us to recruit profiles that are sometimes far removed from the world of industry, and to broaden our talent pool through our training courses,
- transfer know-how to maintain a high level of skills,
- contribute to the attractiveness of the employer brand.

2908 refers to a historic year... The creation of Forges et Acières Électriques Paul Girod in 1908!

This name is accompanied by a visual identity that reflects energy and values that drive this in-house school.



Training rooms located with this new identity created using a 3D printer

The framework defined and validated by the Management Committee several years ago has remained the DNA of the internal school project, which is part of our CAP 2025 strategy. This shows how important it is to pass on our know-how within Ugitech. We are convinced that this new identity will increase our visibility, enable us to attract new candidates, ensure that we capitalize on our knowledge and develop the skills of our employees, and quite simply enable Ugitech to secure its future... why not, until 2908!

2024 training pathway

Training courses for maintenance professions

The maintenance professions are under pressure on the job market. There are more needs in companies than there are trained people coming out of school.

To alleviate our recruitment difficulties, in 2023 we set up a training program for the CQPM Industrial Maintenance Operator. This has been set up in partnership with AFPI Savoie (a UIMM training center) and GEIQ Industries Savoie (Groupement d'Employeur pour l'Insertion et la Qualification).



Award of a "committed company" certificate by the GEIQ

Notre objectif était de créer un groupe de personnes, sans qualification dans le domaine de la maintenance, pour leur faire suivre une formation d'un an, en alternance, afin d'obtenir un certificat et de pouvoir ensuite intégrer nos équipes en CDI.

Our aim was to create a group of people with no qualifications in the field of maintenance, so that they could follow a one-year work-study course to obtain a certificate and then join our teams on permanent contracts.

This project, initially intended to be shared with other companies, ended up with a 100% Ugitech promotion, due to a lack of candidates from the other companies.

In 2024, 4 external people with varied profiles, as well as an employee from our rolling mill team, completed this course. 4 of them passed their certification. Of the 4 external people, 2 stayed with us on permanent contracts in maintenance and 2 were eventually integrated into production positions.

The success of this first course prompted us to organize a new promotion. We once again proposed to other companies in our employment area. However, due to a shortage of partners and candidates, this year we took 2 people on an inter-company training course at the AFPI training center in La Motte Servolex. Our ambition is to repeat this type of training every year.

Machinist training course with Fab'Academie

In 2022, AFPI Savoie has launched a training centre for adults in industrial trades, based in Frontenex.

The aim is to train people for jobs that are in short supply and particularly sought after by industries in the Maurienne and Tarentaise valleys. Ugitech is a partner of this school and contributes to its development through a grant.

Thanks to Fab'Academie, one of our employees was able to take a machinist's course to fill recruitment need at our company. We were able to take part in his graduation ceremony in 2024. We will also be able to consider other training and recruitment opportunities at a later date, in the boilermaker sector.

Team management course

A group of 11 trainees from different workshops (rolling mill, finishing and, meelting shops) and different sites (11 from Ugine and 1 from Grigny) have started a training program to obtain a CQPM Autonomous Team Leader qualification. All of our production and maintenance team managers attended this training course.

The course represents 170 hours of training, 50% of which is provided by our in-house trainers.

The modules taught are as follows: Managing a team and its performance, communicating effectively, Managing in an economic, legal and social context, IT tools, Ugitech tools, etc.

4 group coaching sessions and 2 individual coaching sessions are also included in the program to help learners put together their application and defend their project in front of a panel made up of managers from other Savoie metallurgy companies.

This process should lead to certification in the 2nd quarter of 2025.

Course to become an Executive

As part of the introduction of the new collective agreement, around 20 employees have had their jobs classified as executive. To support these changes, Ugitech has signed an agreement to provide specific support.

This 35-hour support program enabled the new managers to benefit from the following training modules: the fundamentals of project management, leading a project team, managing diversity.

This process was accompanied by the completion of a cross-functional project and a presentation of the project in December 2024 an internal jury up of a member of the Management Committee, heads of department

Management culture

Managerial culture can be defined as the shared ways of being and acting within a group of managers that contribute to its stability and coherence.

The aim of the managerial culture approach is to establish a managerial culture that is shared by everyone in order to achieve our strategic objectives by strengthening team spirit and commitment. The challenges of the managerial culture approach are to create a common language and benchmarks for all Ugitech managers.



Usineur's graduation ceremony

The success of our company depends on the men and women in our teams. Management culture is a differentiating factor in achieving our strategic objectives.

That's why Ugitech has set up this approach to anchor a shared culture and define a common set of benchmarks to better understand our VUCA (Volatile, Uncertain, Complex and Ambiguous) environment and better manage the contradictions and day-to-day difficulties faced by our managers.

The managerial positions at Ugitech are:

- remain agile and innovative adapting continuously to a fast-moving world,
- trust each other through greater delegation/subsidiarity to be more effective,
- give meaning and working cross-functionally,
- be demanding and benevolent in ensuring our performance, by listening attentively,
- set an example by respecting rules and commitments.

All managers benefit from Management Culture Days, which are organized around 3 workshops:

- 1.** Workshop dedicated to managerial postures and our alignment, in order to take ownership of decisions and directions, managerial alignment and solidarity, and foster proximity between managerial levels.
- 2.** Skills workshop, to discover new managerial tools and know-how, review the basics and practice putting them into practice.
- 3.** Co-development workshop, to encourage direct exchange between managers, break the feeling of managerial solitude, learn from others and teach to others.

The first three workshops are supplemented by five perpetuation modules corresponding to each of the postures. By combining external contributions and internal events, they enable the work begun during the first three days of the process to continue.

To date, more than 260 managers have been trained at Ugitech France.

In 2024, now that the approach is well underway, an adjusted program will be delivered as part of our Team Leader training program and for new managers.

We've also set up Ugi'Care pairs: two is better than one!

On the second day of the Managerial Culture approach, participants are invited to choose a "CARE" pair (Coaching, Accompaniment, Feedback, Experience). This pair will meet throughout the Management Culture process.

The idea is collective intelligence by providing regular feedback thereby increasing our ability to change our managerial attitudes.

In 2024, the managerial culture approach will continue to gain momentum, as an additional training program focusing on the development of soft skills (interpersonal and behavioral skills) has been defined and will be rolled out in 2025.

Digitalization for HR development

Again, in synergy with our group, we have rolled e-learning training campaigns on the theme of information security.

In order to meet the training needs of employees, and where the solution was suitable, an e-learning program was offered to learners. It will be implemented as part of the 2025 training plan.

In 2023, all executive people reviews were managed digitally, using our Human Resources Information System (HRIS). After completing forms to assess the skills and potential of their staff, managers took part in "business line staff reviews". The aim was to share and calibrate views, break down barriers between teams and ensure that the succession planning needs and potential of our employees were better taken into account.

Ugitech's people review was then consolidated to validate the profiles with potential at a Group level. These profiles were presented to Swiss Steel Group management at the beginning of 2024 in a special review.

For 2024, the aim was to extend the digital staff review process to the entire Technicians and Administrative Technicians and Supervisors (ATAM) population.



Coachello

Ugitech makes the leap to platform coaching. This system has been used extensively at Ugitech for several years to support managers in their development.

The year 2024 marks a turning point for this practice, with Ugitech subscribing to the Coachello platform. It offers greater flexibility in the organization of coaching sessions and offers a wide range of coaches with a constant budget.

The idea is speed up the launch of coaching when a need is identified and to offer several forms of support tailored to individual needs.

This initiative is therefore fully in line with our employees' individual development plans.

Future actions

- Deployment of HRIS access to all employees, including production staff.
- Implementation of e-learning to support our experts.
- Continued certification of our in-house trainers and development an in-house trainer community.
- Setting up training courses for jobs in short supply.
- Deployment of the Softskills program as a complement to the Management Culture approach.
- Continued deployment of actions linked to job and career management and negotiation of a new agreement.
- Communication plan for the in-house school.

	Number hours of training Ugitech SA (France), excluding trainees	Average number of day training per person / year (excluding temporary workers and trainees) Ugitech SA (France), excluding trainees	Training: % total payroll Ugitech SA (France), excluding trainees
2024	54 075 hours	3,4 days	2,0%
2023	54 452 hours	3,7 days	2,0%
Of which tool training			
2024	29 490 hours		
2023	27 539 hours		
Of which training in other area			
2024	14 086 hours		
2023	10 951 hours		
Of which safety training			
2024	10 499 hours		
2023	15 962 hours		

On target

Partially met target

Target not met



Business relations and territory

Employee commitment

Defining of the issue

Ugitech is committed to disseminating and maintaining its corporate values and culture. To this end, a number of in-house events are organized to foster a sense of belonging and raise awareness of new issues among our employees.

Recurring annual targets / KPIs

A minimum of **5 events** per year.

Quality objective

Maintaining a spirit of cohesion within Ugitech.

Actions in 2024

- From May to September, all Ugitech entities in France and abroad initiated a "Global Health and Safety day" with a focus on circulation: The event, entitled "Safe mobility, inside and outside the company" (details on page 52), was attended by around 1,200 employees.
- In 2024, for the fifth time, Ugitech took part in the Odyssey, a joint sporting event to fight breast cancer locally and together. Around a hundred people, including employees and their families, took part in this charity challenge. Ugitech 3rd ranks in "Groups and Companies Challenge" thanks to the large number of participants.
- On June, 20th, the second Sustainable Development Day (the concept of which is detailed on page 15) brought together 400 employees in 2024, largely

more than the previous year. The principle of participation was based on registration, including operators working on shifts. The feedback was very positive, which is an important factor in raising employees' awareness of Sustainable Development.

- On June, 24th 2024, the Group launched its "Big Breakfast" initiative. This event brought together teams from the same or different departments to enjoy breakfast and snacks throughout the day and night, in order to integrate as many employees as possible including shift workers. It was an opportunity to talk about Swiss Steel Group, to get to know it better and to create a bonding moment.
- On November 21st, as part of the European Week for People with Disabilities, Ugitech offered its employees a day to raise awareness of employability of people with disabilities: recognition of the status of disabled workers, Céci-foot and Duo Day were on the program (see page 73).
- The "Christmas sweaters" event was repeated as a way of sharing the Christmas spirit. This initiative was also shared across the Group.

Future actions

In 2025, we will repeat all the events organized in 2024, economic conditions permitting.



Performance monitoring

Number Ugitech internal events

2024

6

2023

2

On target

Partially met target

Target not met

Local communities' contributions

Defining the issue

Raise Ugitech's profile as a major player in the local economy.

Recurring annual targets / KPIs

A media presence **twice a month** on average.

At least **one partnership project** with the town of Ugine per year.

Quality objectives

- Raising Ugitech's profile.
- Playing a socially responsible role in our environment.

Actions in 20244

Local commitment

Ugitech entities maintain their local commitments through several networks in the various districts where Ugitech is present: Mécabourg, UIMM, AFPMA, Mission Locale, etc.

- In September 2024, Ugitech signed a partnership agreement with Framatome's Fuel Business Unit, which has a plant adjacent to ours in Ugine. The aim of this Long Term Agreement is to pool design and production resources to develop products that will enable our two companies to strengthen our positions in our own markets and penetrate others where we want both to grow and strengthen France's industrial sovereignty.



Ecomobility and car sharing

- Industrial developments at the Framatome site in Ugine for the French nuclear program require the creation of new workshops (VIM furnace, VAR furnace, etc.), using available surface areas and thus reducing existing car parks. To make up for this shortfall, Ugitech is proposing to use one of its sites to build a silo car park. From mid-2026, this car park will be shared by Framatome and Ugitech employees.
- A three-way partnership agreement has been signed between Ugitech, the Communauté de Communes Arlysère and the Agence Écomobilité de Savoie on the theme of soft mobility. The agreement sets out mutual commitments in the following areas: communication and awareness-raising on soft mobility in general, implementation of actions to facilitate the development of car-pooling in order to reduce car-pooling and encourage the use of bicycles or other alternative modes, as well as information and encouragement to try out existing public transport routes, depending, of course, on working hours. Under the umbrella of the Savoie Ecomobility Agency, a map of where all employees live was drawn up in order to make recommendations for a mobility plan. Throughout the year, and during Sustainable Development Day, Ugitech informed and encouraged its employees to use the "Blablacar Daily" car-sharing application, which covers 100% the cost of the journey for passengers and compensation for drivers. This approach is being taken more widely across the basin, since our local industrial colleagues, Framatome and Timet, are also involved.

- On April, 30th 2024, Lhyfe, one of the world's pioneers in the production of green and renewable hydrogen, and Ugitech announced the signing of a memorandum of understanding for the creation a green hydrogen unit on the Ugine site (Savoie). The aim is to decarbonize part of Ugitech's industrial activities and contribute to the decarbonization of local mobility and the sustainable model of winter tourism, particularly in the context of the 2030 Winter Olympics. This is the first agreement in Europe to replace fossil fuels with green hydrogen in the stainless steel sector. Other stakeholders involved include the Communauté d'agglomération d'Arlyère and the Auvergne-Rhône-Alpes Region.
- On December 21st 2023, as part of a consortium agreement (Région Auvergne-Rhône-Alpes, Communauté de Communes des Vallées d'Aigueblanche, Communauté de Communes Cœur de Tarentaise, Département de la Savoie, Savoie ENR, the French State and the industrial companies Tokai Cobex Savoie and UGI'RING), the stakeholders involved have decided to set up a project in La Léchère to supply the Tokai Cobex Savoie and UGI'RING industrial sites via a natural gas/biogas/hydrogen network. The arrival of gas via the network strengthens the activity of Tokai Cobex Savoie (250 jobs) and enables the launch of the BAM4EVER project, creating 100 additional jobs. In addition, around 400 indirect jobs will also be created, some of them locally. This project reduces the environmental impact with 6,000 tons of CO₂ emissions avoided by replacing heavy fuel oil with gas and reducing lorry traffic by 15 heavy goods vehicles per week.
- Ugitech employees who are volunteer firefighters have an agreement with the Savoie and Haute-Savoie Departmental Fire and Rescue Services (SDIS). This enables them to benefit from training time and facilities for heavy external operations.
- Invited to the Assises du volontariat (volunteer work) in Savoie, Raphaël Rey, Managing Director of Ugitech, spoke about the company's experience in managing its volunteer firefighters.

This event gives companies and the SDIS 73 the opportunity to talk about the benefits of having volunteer firefighters within their organizations, as well as different managerial approaches.

- Visit from the association of young company directors: Ugitech is sometimes asked to provide its infrastructure. The association of young business leaders used the amphitheater for an important meeting. Ugitech also plays a role in helping smaller companies. Participants were able to visit the site. Representatives of Ugitech's management took part in the discussions.
- Visit from the Banque de France: Raphaël Rey is a member of the Consultative Council of the Banque de France, representing the industry sector. To this end, quarterly meetings are organized, one of which included a visit to Ugitech. These meetings enable us to gain a better understanding of the realities of the different sectors and to take their interests into account.
- As a supplier of stainless steel for mechanical and safety parts to automotive equipment manufacturers, Ugitech naturally supports the town of Ugine, which on 15 November 2024 was awarded the label of "Town hosting vintage cars" by the French Federation of Vintage Vehicles (FFVE).



Partnership with Framatome

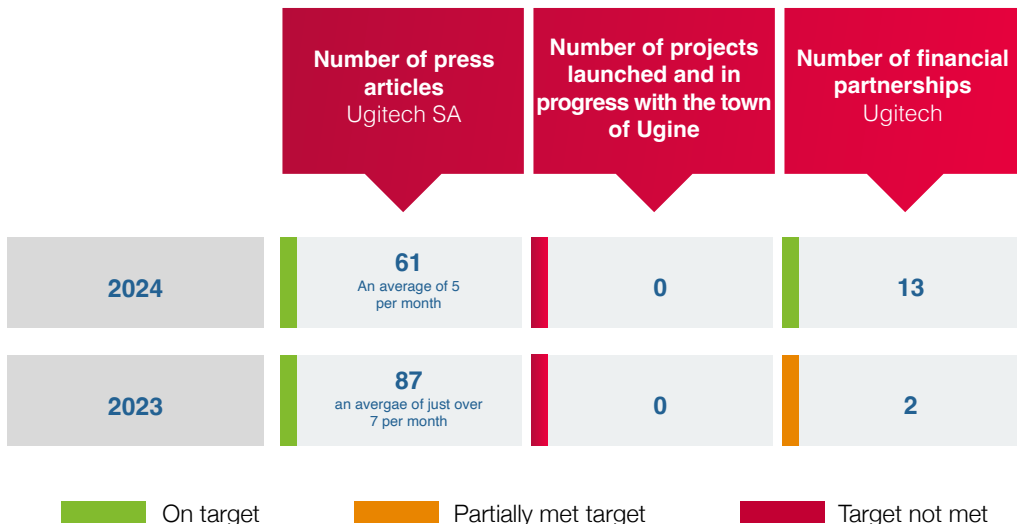


Financial partnerships (examples)

- In terms of financial partnerships, we were delighted a donation of €500 to the Ugine fire brigade.
- An Italian Ugitech entity has decided support swordswoman Giulia Rizzi in her dream of taking part in her first Olympic Games. She is now part of the first Italian women's epee team to win a gold medal at the Paris 2024 Olympic Games.

Future actions

- Ugitech wants to remain a major player in the region and in 2025 will continue to be attentive to all the initiatives and projects to support.



Ethics and internal control

Defining the issue

- Fighting corruption, conflicts of interest and free competition (antitrust).
- Protecting our assets, data and know-how.
- Respect good practices in terms of working conditions and environment.
- Ensuring the long-term viability of our internal control system.

These issues are governed by laws that we must never break. The consequences of breaking these laws can be very serious, both financially and in terms of image. We must put in place the necessary procedures and organizations to avoid any risk of violating these laws, and train and inform our staff so that they take good practices into account.

Our internal control system is a mean to check that our internal procedures are being followed. It reflects our commitment to identify potential failures. We must keep it alive and make it evolve in line with our business.



Recurring annual targets / KPIs

Making **100 %** available **of our staff**, our Code of Conduct and the resources needed to warn a compliance failure.

Our aim is to be free **from corruption and obstruction of our staff** in free competition.

Each year we aim to have our **internal control system validated** by an external audit firm.

Qualitative objectives

- Ensuring that the company complies with all applicable regulations on corruption (Sapin II Act), antitrust and conflicts of interest.
- Protecting our assets, data and know-how.
- Reinforce a shared perception and understanding of our values.

Our organization

Ugitech is part of Swiss Steel Group, a company listed on the Swiss stock exchange, which complies with Swiss reporting regulations. This includes a number of supervisory organizations:

- the Ethics Steering Committee,
- internal audit via the Audit Committee,
- external audit,
- the ICS (internal control system).



Internal Audit reports to the Audit Committee to ensure the independence of the reporting process, and the ICS is regularly reviewed by internal and external audit teams. To reinforce control, a whistleblowing hotline is in place to ensure all employees and third parties safe and free report for any breaches of the Code of Conduct.

Swiss Steel Group has a Compliance Department that serves all its entities. This department focuses on preventing any breach of current ethical laws and regulations. Compliance's main task is to implement a Compliance Management System that meets the company's requirements in relation to its environment and to roll it out to all its subsidiaries.

In each entity, the CEO is specifically responsible for compliance. He is supported by a Compliance Officer he has appointed within his area of responsibility. Together, they provide the Group Compliance Department with the support it needs to implement the Compliance program. They provide local expertise in the creation and adaptation of internal guidelines. Information and working meetings are organized every quarter between the Group Compliance Department and the local Compliance Officers, and between the Group Compliance Department and the local Compliance Officers.

The Compliance departments, whether local or at Group level, also work closely with the International Transport department during monthly committees. In this way, they ensure that our import and export controls comply with the laws and regulations in force, in terms of sanctions and embargoes, particularly following the latest geopolitical events.

Code of Conduct

It includes all the principles of the United Nations Global Compact and the OECD guidelines. It sets out the standards expected internally and from our supply chain to ensure compliance with local and international laws and human rights within the Group and our supply chain: child labor, forced labor, rights of association, discrimination (gender, politics, religion), health and safety working conditions. It also deals with the management of conflicts of interest, the prevention of corruption (bribes, gifts, hospitality, sponsorships, donations, etc.), breaches of antitrust law and environmental aspects.

Distributed in 2015, the code of conduct was updated in 2017. This document, which is easily accessible to all staff, was incorporated into the internal regulations. It was then updated and validated by Group Management at the end of 2023. This new version was sent to all employees and has been available on our website since the beginning of 2024. It has been fully indexed to the new internal regulations since the first of January, 2025. Since 2019, a specific Code of Conduct for suppliers has been in place. Strategic suppliers are asked to commit to comply with it. It was also reviewed in 2024.

Internal policies on anti-corruption, fair competition and professional associations

These documents explain our internal guidelines and contain practical examples, checklists and explanatory notes on anti-corruption and anti-trust behavior. These guidelines also detail the sanctions and actions to be taken if breaches of our Compliance rules are reported.

They can be accessed via the Swiss Steel Group intranet site.

Our anti-corruption policy has been updated and rolled out to all employees in June 2023. In particular, it includes our policy on gifts and invitations, and donations and sponsorship, with the introduction of a register.

Compliance Charter

It describes the principles on which the Compliance Officer acts. It was updated in 2020 to clarify the role of each, specify the scope of its application and was renamed the "Compliance Organization Policy".

On-site and e-learning Compliance training

Since 2015, in collaboration with the Swiss Steel Group, Ugitech has been training its employees in:

- anti-corruption rules,
- antitrust rules,
- the Code of Conduct.

These courses combine learning with the exploration of real-life cases.

Six e-learning training modules was rolled out to all employees concerned:

- code of conduct,
- anti-corruption,
- antitrust,
- data protection,
- the fight against money,
- commercial compliance.

In 2023, an extensive training campaign was carried out. A video on our Code of Conduct and our whistleblowing system was shown to shift staff in all our sites in France (Ugine, Bourg, Brionne, Imphy, Saint-Etienne and Grigny). Face-to-face training on our Code of Conduct, our anti-corruption policy and our whistleblowing system was given to employees who may have contact with external stakeholders (customers, suppliers or other third parties) in all our sites in France and Italy. Our sites in Germany were trained in the same way in 2024. Management at each Ugitech site, as well as certain key functions, have also received specific training on our anti-corruption measures and the Sapin II law.

A total of 1,439 people has been trained since 2023.

Sites	Face to face	SAPIN II	Video	Total
BOURG	23	1	82	106
BRIONNE	15	1	56	72
GRIGNY	6		10	16
IMPHY	20	1	70	91
SMEZ	12	1		13
ST ETIENNE	6	1	14	21
TFA	11			11
UGINE	294	13	785	1092
UGITECH Italia	16	1		17
Total	403	19	1017	1439

In 2024, we organized several catch-up sessions for all employees who had not been trained before. Further remedial training sessions will be organized in 2025, as well as e-learning sessions for those less exposed to the risk of corruption.

Data protection

For several years now, we have been working with Swiss Steel Group on a data protection (GDPR) in-depth study. After identifying and describing the processes affected by these regulations, procedures were put in place and internal communications were carried out. In 2023, we set up a data risk map. Other actions are currently being rolled out and will continue in 2025.

Internal warning system

Swiss Steel Group has made available to all Ugitech staff since 2015 a mean to submit information concerning a breach of our ethical rules. The company's employees and third parties (customers, suppliers or other third parties) can use this professional alert, which is accessible free of charge, 24 hours a day, 7 days a week, 365 days a year.

Speak-Up Line (internet and telephone service)

This system enables all employees and third parties to report criminal acts using a highly secure process:

- informants call a helpline,
- they leave a message on an answering machine or send written information via the platform, in their native language,
- whistleblowers can remain anonymous or not, as they choose. A whistleblower policy was rolled out in 2022. It is freely available on the intranet. It sets out the role of whistleblowers and their protection, as well as the procedure to launch an alert. Extensive internal communication campaign (message from the Group CEO to all employees, posters displayed at all sites in the busiest places) was carried out to roll out the campaign and remind people of the means available for raising an alert, in particular via the Speak-Up Line

Ugitech is also subject to the anti-corruption law Sapin II, which requires the implementation of eight measures to prevent and detect corruption:

- 1.** Code of conduct, incorporated into the internal regulations.
- 2.** Internal whistleblowing system designed to collect reports from employees.
- 3.** Mapping of corruption risks by business and geographical area in which the company operates.
- 4.** Procedures for assessing the situation of customers, first-tier suppliers and intermediaries regarding risk mapping.
- 5.** Internal or external accounting control procedures designed to ensure that books, records and accounts are not used to conceal corruption or influence peddling.
- 6.** A training program for the most exposed managers and staff.
- 7.** Disciplinary system enabling company employees to be punished for breaches of the Code of Conduct.
- 8.** Internal monitoring and evaluation of the measures implemented.

An in-depth study of our compliance with the Sapin II law was carried out in 2019 by a specialist service provider. The conclusions of this study were very favorable in terms of our anti-corruption measures. Since then, a working group comprising all the Swiss Steel Group Compliance Officers affected by this law has been set up and steered by the Group Compliance Department. Improvement actions are defined according to a roll-out program.

In 2022, compliance risks (including corruption) were mapped in a common format with Swiss Steel Group. In 2023, it was expanded to include human rights and environmental aspects, covering all our sites in France, Italy and Germany. In 2024, it was updated and expanded again to include new potential risks.

Our Internal Control System

Since Swiss Steel Group is listed on the Swiss stock exchange, each subsidiary must provide annual proof of existence of an internal control system. Work on the Internal Control System (ICS) began in 2006. It has been updated annually since 2008.

This system is broken down into as many processes as previously defined in the process map.

Each process is therefore composed of a matrix of internal controls. These are made up of a list of potential risks about the ICS. The analysis of these risks is carried out in collaboration with each process manager, at the same time as the analysis of the general risk map.

One or more controls are identified for each risk. They are also referenced.

Each control is described in a specific sheet and a list of supporting documents is drawn up. In all, 136 internal controls are referenced in Ugitech's ICS, 64 more than two years ago.

Every year since 2008, Ugitech's ICS has been updated in its entirety (100% of internal controls). Internally, each manager updates the description sheets for his or her area. In all cases, 100% of the evidence documentation dated for current year is collected.

In 2022, Swiss Steel Group provided all its subsidiaries with an IT tool to standardize this system. A new matrix of internal controls has been proposed, with a description of good practices for each of them. This development has enabled us to review our ICS in depth and to confirm that we are well aligned with our Group. In 2023, we continued this development by integrating new controls, mainly in the areas of ethics, safety and IT. The 2024 annual update has been completed.

The external audit firm EY & Associés audits Ugitech's ICS on an annual basis, verifying its existence within the company based on the annual internal update. EY & Associés also carries out specific checks with business line managers.

At the end of this review, it is able to validate or not the existence of the ICS.

The existence of Ugitech's internal control system was validated in 2024 by an external audit firm, as it has been every year since its creation in 2008.

Cyber security for information systems

Cyber security is an essential element in the governance of our information systems.

Compliance

Ugitech's information system security guidelines are based on international standards (ISO 27000) for information security management in the broadest sense. Ugitech's information system is regularly assessed by auditing firms against the ISO standards and standards for which Ugitech is certified.

As a French company belonging to a European group, Ugitech is obliged to comply in an exemplary way with French and European regulations applicable to the industrial and telecommunications sectors.

These include, in particular:

- intellectual property and the protection of sources (copyright, Intellectual Property Code, APP procedure, etc.),
- preserving the confidentiality of commercially and technically sensitive information (customer data, HR data, customer technical configuration data, etc.),
- financial and accounting regulations (tax and accounting obligations, traceability and auditability),
- to the personal data protection obligations laid down by the regulations (GDPR).

The security of Ugitech's Information System is structured around four fundamental criteria:

- **Confidentiality:** the system's ability to restrict access to information to authorized persons only.
- **Availability:** the ability of the system to be accessed and used when necessary and by authorized actors.
- **Integrity:** the ability of the system to remain intact, accurate, uncorrupted and unaltered. This criterion can also be extended to the system's ability to provide proof of this integrity (traceability, authenticity of sender and content, etc.).
- **Traceability:** the system's ability to provide proof of this integrity by retaining traces of the status and movements of information.

Strategy

Ugitech is committed to continuous improvement in the security of its information systems. Risks are multiplying and threats are evolving rapidly. Reinforcing protection measures is vital for the company. For this reason, Ugitech draws up an annual cyber security roadmap describing the projects required to reinforce protection, as well as the processes that need to be implemented or optimized.

Ugitech also relies on the support of cyber security experts who assist us daily with sensitive and complex issues. Risk analysis are regularly carried out when new systems are set up ("cybersecurity by design"), or on historical systems, to identify risks and assess the measures to the measures to implement to better protect them.

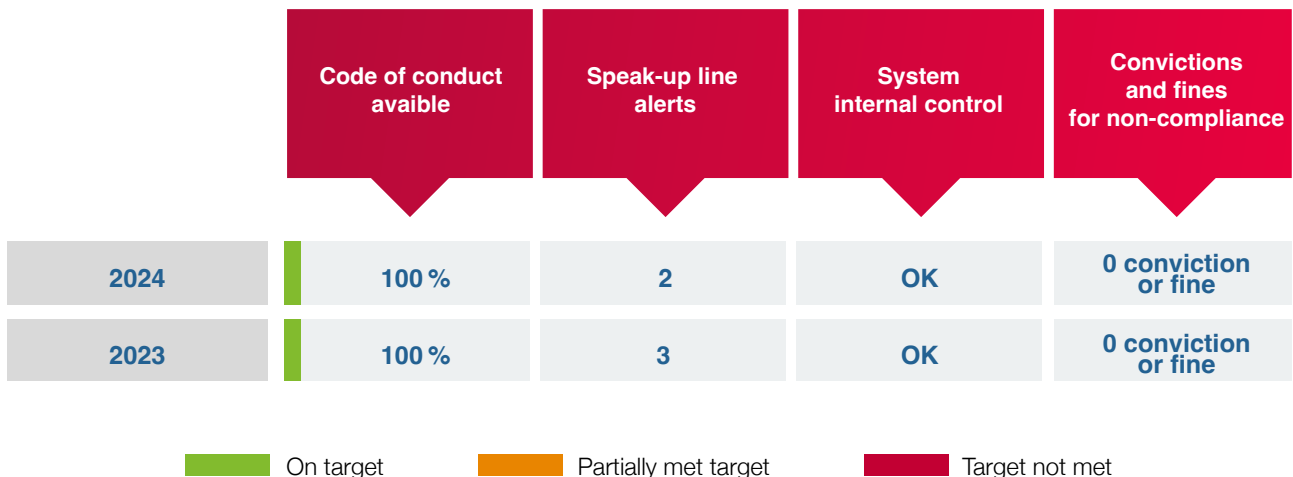
Awareness

Ugitech employees regularly attend awareness training sessions on cyber risks and threats, and on the best practices and behavior. The large number of suspected threats reported by users is one of the key indicators that testify to the awareness training efficiency.



Future actions

- Pursue additional actions against corruption (Sapin II law). Communicate a new policy on conflicts of interest.
- Continue to verify the correct application of data protection regulations (GDPR). Implement corrective actions and continue communications on this subject.
- Continue to make compliance and ethics documentation available for better information sharing.
- Regularly train and inform our buyers and sellers about the rules and how to deal with our business partners.
- E-learning training on ethics, anti-corruption, antitrust, data protection and other compliance topics.
- Further in-depth analysis of our Internal Control System on the basis of the proposed new framework of the Group.



Responsible purchasing

Defining the issue

Sustainable procurement plays a key role because of its influence on the environment, social responsibility and corporate reputation. It aims to reduce ecological footprint by conserving natural resources, promoting ethical working conditions, encouraging supplier diversity and enhancing local impact. These practices help to improve the company's image, limit the risks associated with the supply chain and support sustainable business models. Regulatory compliance and growing consumer expectations are driving companies to adopt these approaches, contributing to their sustainability, ethics, local roots and long-term competitiveness.

The main areas in which we are working are as follows:

- reduce our environmental impact and that of our partners,
- developing circular economies,
- strengthen relations with our local partners,
- supporting our suppliers their quest for excellence and getting them to adhere to our ethical values.

Qualitative objectives

As part of our responsible purchasing approach, in addition to the standard qualitative and financial criteria, we monitor our environmental impact using a number of indicators:

- the use of proximity,
- recycling and doping our residues for reintegration into our process,
- the use of recycled products or offcuts from other industries whenever possible to promote the circular economy,
- taking account of carbon footprint in some of our consultations (particularly raw materials),
- evaluating and monitoring our suppliers on CSR issues (ethics, compliance, environmental footprint, etc.).

Existing shares

Our mission is to promote our ethical standards by encouraging our suppliers to adhere to our code of conduct, by incorporating elements of Corporate Social Responsibility (CSR) into our specifications and when evaluating our suppliers. It also involves Benchmarking with our suppliers and other manufacturers to ensure continuous improvement and the adoption of market best practice.

We pay particular attention to compliance with standards and regulations, such as Conflict Minerals, REACH, SDS, Safety Protocol and Prevention Plan, to ensure the safety of all stakeholders.

Relationships with our suppliers play a key role in our company's major financial and strategic challenges. It is crucial because of its impact on results in terms of quality and meeting deadlines. A long-term relationship with our suppliers offers a number of advantages, including:

- anticipate and adapt quickly to events that could disrupt our environment,
- maintain strong links with our partners and markets,
- redirecting the flow of our suppliers to other Group entities or even to our competitors,
- maintain a strong sense of solidarity with our various partners, enabling a reversal of roles between buyers and suppliers (resale of internal offcuts),
- be part of a relationship of continuous improvement that can benefit all parties, and so be able to remain innovative and effective in the area of responsible purchasing.

Our partnership for the recycling and doping of our waste has been renewed under a multi-year contract. There are still areas for improvement in order to broaden the scope of waste to be recycled. Doping is carried out other waste in compliance with regulations. This approach enables us to increase the nickel and molybdenum content, thereby boosting the burial of our reclaimed residues.

The UGI'RING project will also have a major impact on the purchasing department, enabling us to reduce our dependence on mining operators and thus drastically reduce our impact on the environment.

Energy-saving measures have been implemented with the Technical Department, such as heat recovery the installation of variable speed drives.

Several initiatives to purchase certified green energy have been undertaken.

We have established a partnership with a platform dedicated managing and monitoring third-party risks. This platform stores and verifies regulatory documents. It alerts the customer and reminds the supplier when necessary, particularly with regard to economic dependence and the monitoring of undeclared work.

We have overhauled and intensified our supplier risk assessments and analysis, incorporating Corporate Social Responsibility themes. All staff are trained in the concepts of corruption and compliance at Group level (see chapter "Ethics and internal control").

At the initiative of Swiss Steel Group, a supplier day was organized in 2024 in each of the production units with a view to deepening relations. 18 suppliers were invited to the Ugine site to help us optimize our indirect purchasing (price and performance).

Ugitech works closely with its strategic suppliers to promote continuous improvement and create mutual value. This initiative is launched in partnership with our strategic suppliers and takes concrete form through the implementation and monitoring of quality reviews, audits and annual assessments.

We could mention in this context:

- the partnership with API Restauration, with the introduction of short, local and organic circuits and the participation ESATs for company catering,
- wagon handling with Captrain and hydrogen traction opportunities,
- the partnership with Engie Cofely to monitor and reduce the use of polluting refrigerants and reduce our consumption of heating and air conditioning,
- equipment regulations,
- the change of industrial cleaning service provider to enable continuous improvement of techniques and innovations (safety and water use, mechanisation of a radiant cleaning operation),
- the partnership with HARSCO Environnement for briquetting services and slag management,
- the partnership with Befesa to recycle our by-products.

Our ambition for the coming years is to continue to renew our service contracts, while including CSR progress criteria.

Swiss Steel Group has introduced a due diligence tool to limit the risks associated with third parties. This approach is based on two key steps adapted to the level of risk:

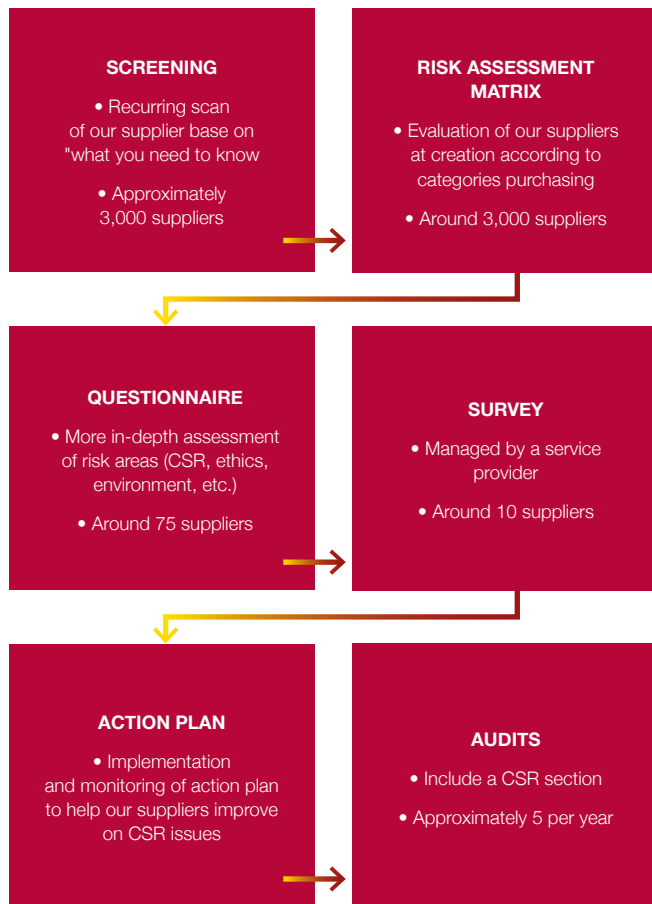
- 1. Reputation and sanctions control:** a systematic review is carried out for all business partners (suppliers, customers, managers, major transactions, sponsorships, donations, mergers and acquisitions). This tool identifies potential risks such as:
 - sanctions and embargoes,
 - public legal decisions (convictions, indictments, etc.),
 - unfavorable media reports (corruption, human rights, environment, etc.).
- 2. Enhanced risk assessment:** this in-depth analysis applies to partners with a high-risk profile and takes into account:
 - for suppliers: the services/materials supplied, their location, their strategic importance, etc.,
 - for customers: their sector activity, their location, their impact on the company, etc.

The result of this assessment determines the level of risk and the actions to be taken. To ensure a uniform approach between subsidiaries, Swiss Steel Group has defined a common procedure and an escalation process in the event of a problem, which also allows Ugitech's sister companies to contribute to these analyses.

Future actions

In addition to the above actions we intend to broaden our approach along four lines:

- Develop purchases of recycled products in partnership with our customers.
- Optimize audit process by focusing on CSR.
- Develop a rating system for social and environmental performance.
- Systematize the carbon footprint in our consultation criteria.



Performance monitoring

Use of bulk packaging (raw materials and scrap metal entering the Ugine site) values received

2024

98 %

2023

98 %

% of Ugine's maintenance purchases made from local service providers* (departments bordering Savoie)

2024

85 %

2023

96,7 %

* This indicator now considers all stocks, including those with sales of < 10,000€ (previously excluded from the calculation). Previous data has been recalculated to ensure comparability of results.



■ On target

■ Partially met target

■ Target not met

Compliance with accounting and tax regulations

Legal structure, Tax compliance, Fraud

Legal structure

Ugitech SA is a limited company established in France with its head office in Ugine (73).

Organization & tax legislation

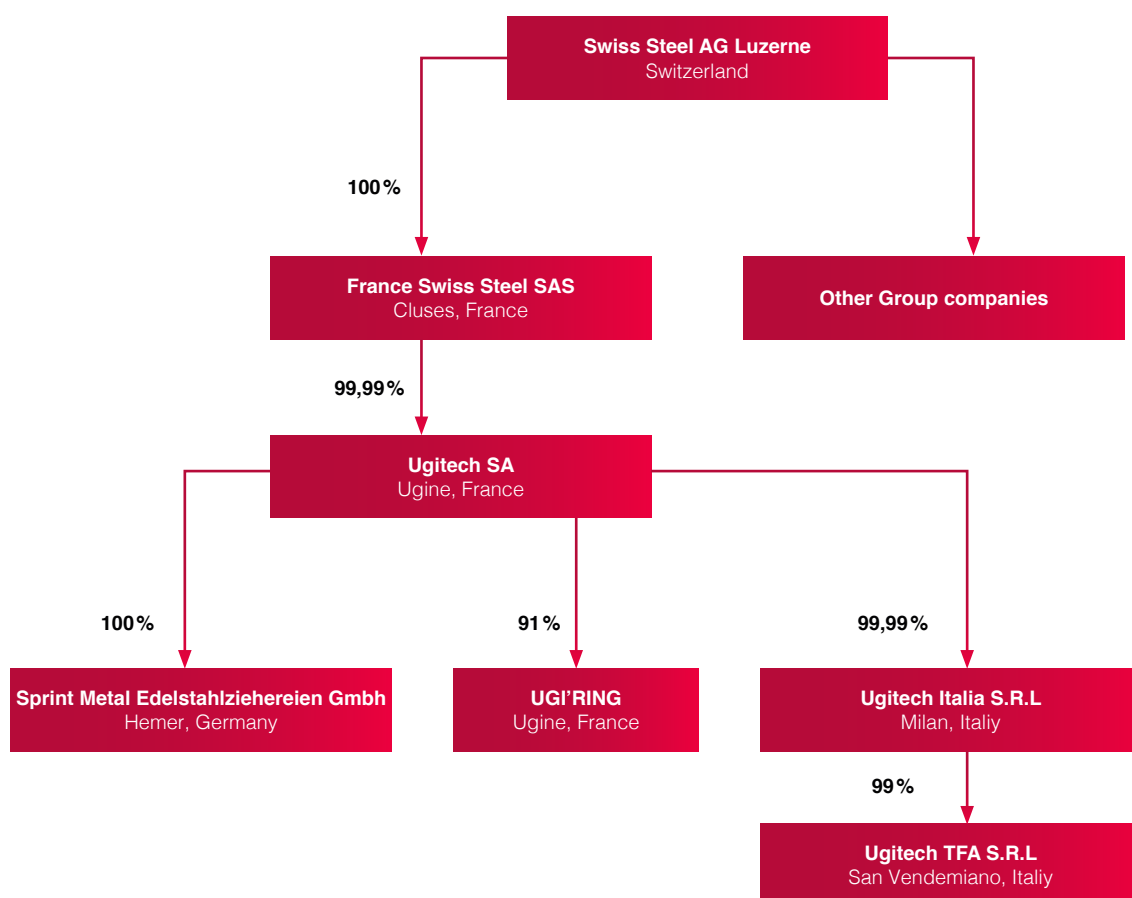
Ugitech SA has no branches or subsidiaries operating in tax-privileged countries.

Ugitech SA does not carry out any operations abroad that would fall under the concept of permanent establishments within the meaning of international agreements or the applicable criteria defining a permanent establishment in the absence of an agreement.

Information system & internal controle

All accounting is computerized using the SAP software package.

This organization of the Information System, together with internal control, ensures perfect consistency and integrity of data from the various modules of our SAP system (purchasing, sales, production, etc.).



Tax rules are updated, among other things, via the publishers monitoring and maintenance systems, which provide support documentation for legal changes to the Information System. The dedicated in-house FI-CO department handles development requirements issued by the Tax Accounting department.

The Tax Accounting department ensures that the rules implemented in the Information System are compliant and validates changes through functional tests.

The automated checks carried out on invoices are recorded to reduce the risk of fraud through the amount and quantity limits managed by the system.

95% of supplier invoices are pre-ordered, with each line being reconciled three times between order, receipt and invoice.

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

Internal control ensures both compliance with current tax legislation and data protection and archiving.

To support the existing software package, specialist software is also used to meet regulatory requirements: tax returns, fixed asset management and supplier invoice management.

Future actions

Preparing for electronic invoicing.

Computerized accounting

Procedures for presenting computerized accounts: Article L. 47 A-I of the French Tax Procedures Code (LPF) stipulates that taxpayers who keep their accounts using computerized systems must present them in the form of dematerialized files when audited by the tax authorities.

This accounting file must comply with codified standards.

Existing shares

FEC (Fichier Écriture Comptable) compliance: for each tax year, Ugitech SA ensures compliance with the standards published by the DGFIP (Direction Générale des Finances Publiques).

Accounting and tax organization: internal control

The Accounting and Tax Department is structured around 5 main areas to cover all legal and tax obligations relating to the business of Ugitech SA and all its French sites, as well as IFRS reporting.

The Accounting Department is assisted by external advisors as and when required.

Organization to comply with current legislation

The department ensures that the company and its employees comply with the tax laws of the countries in which it operates, and that it fulfils its tax reporting and payment obligations in a timely manner.

The process is as follows:

- Each subsidiary is responsible for preparing tax returns in accordance with local regulations.
- Each subsidiary is responsible for paying its own taxes within the deadlines set by law.
- In intra-Group relations, the accounting departments of each subsidiary coordinate their activities in compliance with the rules governing intra-Group relations and local obligations.
- The Group's monthly reporting, prior to consolidation, includes an analysis of the amount of corporation tax and deferred tax.

Training & expertise

Each member of our staff is a professional accountant and tax advisor with an accounting background. Specific in-house and/or external training courses are provided to ensure that employees' knowledge is kept up to date and that they are multi-skilled.

Annual training plan

- VAT training: refresher course,
- training information: Annual Finance Act,
- regulatory monitoring through reference publications: RF, Éditions F. Lefebvre.

Audit & control of accounts

Scope of the audit engagement:

- the audit of the annual financial statements prepared in accordance with French accounting rules and principles,
- additional due diligence on the financial statements submitted to the parent company, Swiss Steel AG, for the preparation of its consolidated financial statements and the provision to its auditor of the information required to perform its engagement on the consolidated financial statements.

The representation letter signed by the CEO and CFO is binding and attests to the quality and completeness of the information provided to the auditors. This applies to fraud and compliance issues.

State - Local authorities and taxation

Ugitech SA and its production plants based in France (Ugine, Imphy, Bourg-en-Bresse, Brionne, Saint-Étienne, Grigny) contribute to the development of all the local authorities to which they are attached by virtue of their establishment, through the Contribution Économique Territoriale (CET) and the Taxe Foncière (TF).

The company is liable for corporation tax (impôt sur les sociétés - IS) in France and is attached to the Major Companies Division (Direction Générale des Grandes Entreprises - DGE) of the Public Finance Department (Direction Générale des Finances Publiques - DGFIP) based in Pantin.

Ugitech SA ensures that it complies with the tax laws of the countries in which it operates and fulfils its tax declaration and payment obligations within the required deadlines.

Subsidiaries comply with local tax laws.

Significant research and development expenditure incurred by Ugitech SA is eligible for the CIR (Research Tax Credit). The CIR scope is managed by a cross-functional team from the Finance and Research Departments.

Tax consolidation

Since 2007, Ugitech SA has been consolidated for tax purposes with its parent company, Swiss Steel France S.A.S., whose registered office is based in Cluses (74).

International activities - Transfer pricing: Compliance

Ugitech SA and its subsidiaries mainly operate outside France, partly through the Swiss Steel Group distribution network.

In this context, compliance with international rules when setting transfer prices between affiliated companies is a response to the potential risk of transferring profits from one country to another.

In compliance with international regulatory obligations and recommendations arising from the work of the OECD, and in accordance with French legislation, Ugitech SA has been preparing documentation in accordance with the OECD Principles since 2010.

Existing shares

Ugitech SA has been complying with transfer pricing documentation obligations since 2010. Ugitech SA has complied with the reporting obligation since 2013.

Ugitech SA, as a subsidiary of Swiss Steel Group, prepares a specific country-by-country declaration, in response to a recommendation arising from the work on country-by-country reporting. Transfer prices are reviewed as part of the internal controls implemented by the company. Ugitech SA updates the documentation justifying transfer prices for each financial year..



Value added tax

VAT identification

Article 214 a) of Council Directive 2006/112/EC of November, 28th 2006 provides that Member States shall take the measures necessary to ensure that any taxable person, with the exception of those referred to Article 9⁽²⁾, who, within their respective territories, carries out supplies of goods or services giving rise to a right of deduction, other than supplies of goods or services for which VAT is payable solely by the customer or the recipient in accordance with Articles 194 to 197 and Article 199, is identified by an individual number.

Ugitech SA carries out a monthly control of all its operations by cross-checking VAT collected and the turnover.

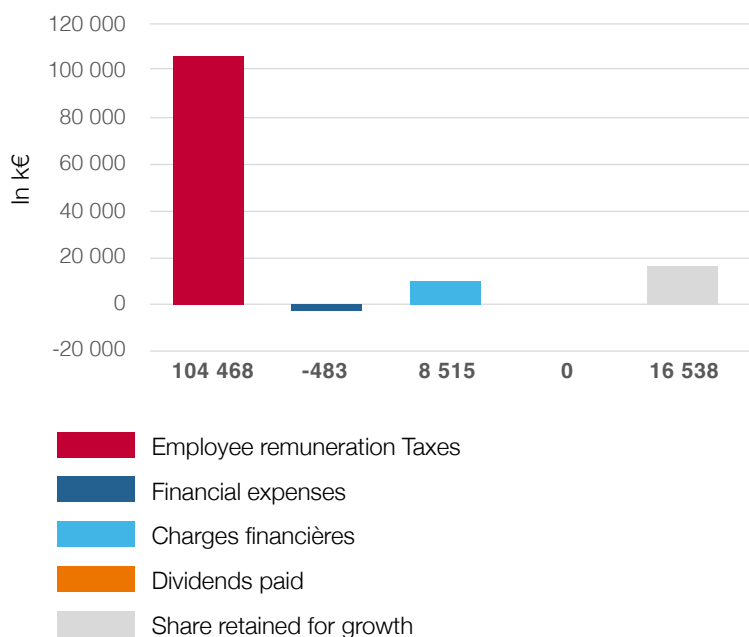
Existing shares

- Ugitech SA is registered for VAT in France.
- Ugitech SA is registered for VAT purposes in Germany.
- Ugitech SA is registered for VAT in Italy.
- Cross-checking of VAT returns and DEBs.
- Monthly VAT return and reconciliation with turnover.
- VIES test of Ugitech SA suppliers' VAT identification.
- VIES test of Ugitech SA customers' VAT identification.

Future action

Introduction of electronic invoicing: Ugitech's obligation to switch to electronic invoicing has been postponed to September 2026; put on stand-by in 2024, it will be relaunched in 2025.

Breakdown of value added by



Tax compliance

Because it is part of the DGE, accounting audits are the responsibility of the Department of National and International Audits (DVNI).

The latest audit confirmed Ugitech SA's tax compliance.

Customs & compliance dual-use goods

Ugitech SA has been an Authorized Economic Operator (AEO) since 2014 and handles its import customs clearance operations in-house.

Since 2017, the company has benefited from the Community Centralized Customs Clearance procedure, enabling it carry out import or export operations in several Union Member States, centralizing its customs formalities in France.

This label and authorization, which are strategic for Ugitech, demonstrate our reliability (mastery of our customs processes, compliance, site safety/security aspects, etc.) to the French customs authorities.

Concerning dual-use goods: we do not sell or buy dual-use products in the countries listed.

In case of doubt, the company will contact the SBDU (Customs Department) for validation.

Ugitech SA

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