



Sustainability Report



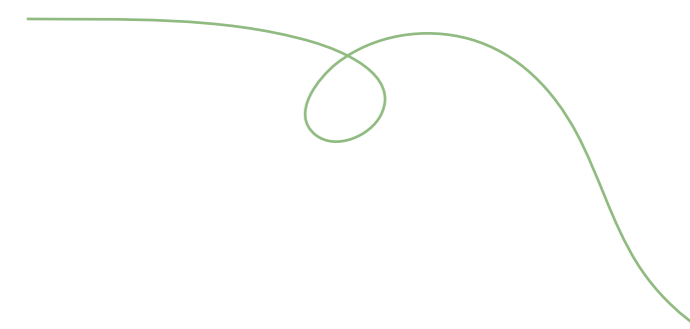
FINANCIAL YEAR 2021



This Report is also available on www.orimartin.it



Sustainability report





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Letter to Stakeholders

Dear Stakeholders,

I am delighted to present to you our **third sustainability Report**, which we audited for the second time.

As I write this document, the international context is complex. The **Covid-19** has not been fully eradicated, even if the vaccination campaign has definitely contained the disease as a whole; in this crisis ORI Martin gave top priority to the **protection of its employees**; in 2021 strong speculative dynamics were felt on raw materials, which persist even in the first months of 2022; since last autumn there have been strong tensions on the energy market, with an unprecedented increase in costs for families and businesses; finally, international tensions led to the ongoing war between **Russia and Ukraine**.

Added to all this **inflationary dynamics** are widespread again, particularly in the United States and in Europe.

At this time, I would like to express my **gratitude** to all employees who demonstrated **true dedication and flexibility** despite the most challenging conditions imaginable, contributing significantly to our ability to overcome the **crisis**. Our people have developed great **strength and resilience**, essential to face

critical issues, from **price speculations**, to inflation, to the **economic and social consequences** deriving from war and international tensions.

ORI Martin is well placed to succeed through periods of uncertainty with a strong balance sheet and highly capable people, ready to adapt and respond to emergencies. People who are strong also thanks to a century-old company history and a widespread and shared professionalism among the various company functions.

This Sustainability Report was drafted pursuant to international reference standards and enables the Company to clearly and transparently communicate its performance, the commitment and effective contribution on environmental, social and economic matters: a further step forward, in view of shared, participated growth, certifying Company prospects and vision for the expanded stakeholder community.

The reporting scope is limited to the results of the parent Company ORI Martin S.p.A.

I am convinced that corporate **social responsibility is a value to be built through concrete actions**, to be shared and communicated to **all the players involved**. Those preceding us passed these

values to us, teaching us the importance of relations with employees and the community, a long time before **sustainability** was even mentioned.

Based within the actual City of Brescia, the Company considers its relations with the town as fundamental. Every year we are committed to using **resources and investments to mitigate our environmental impact** and territorial repercussions.

The steel we produce is a **fundamental material for progress**, for the future and for the next generations. Our production system, which uses scrap as its raw material, makes us perfectly compliant with the virtuous **circular economy model**.

We continuously improve, processes and products, aiming for an ongoing innovation. Despite the crisis, mentioned above, this year the Company maintained its investment plans. In particular, since climate change and decarbonization are considered highly important issues, **the Company's intensive research and development activities provide the basis for real sustainability at the level of both products and processes**. Strategically, we aim to ensure that all of our **R&D projects** contribute to our sustainability goals.

Moreover, in the last years the Company has successfully reduced its greenhouse gas emissions and implemented a series of new projects with a strong focus on sustainability and "green steel", in line with the **United**

Nations SDGs (Sustainable Development Goals). From this year, in fact, the Company, has decided to use SDGs as a framework for designing and developing its sustainability strategy.

These challenging goals can be achieved only with people who contribute every day to the effort and offer their ideas and know-how to the company. The COVID-19 crisis, the Russia-Ukraine war and the energy crisis demonstrate once again that ORI Martin is well placed not only technologically but also in terms of the know-how and personal commitment of its employees.

Enjoy reading

The Chairman
Uggero de Miranda





chapter 1.

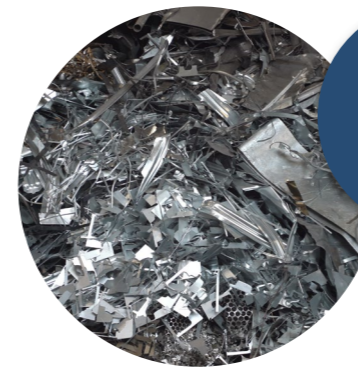
ORI Martin: Red Hot Passion for steel

1.1 Highlights 2021



559

million euros of
generated value



78%

of **waste recycled**



42,833 GJ

of **thermal energy recovered**
transferred to the district heating
of Brescia



million euros of
distributed value



530



446

people work
in the Brescia plant



687,745

tons of **steel produced**
by **recycling scrap**



of their **contract**
are **permanent**

93%



1.2 ORI Martin's identity

1.2.1 ABOUT US

ORI Martin is a modern steel plant **with an electric furnace**, considered one of the most advanced companies in technological and innovative terms. Thanks to farsighted investments in Research and Development, over the years it has become a benchmark for the steel sector.

It produces **special steels** to be mainly used for mechanical, energy and construction industries. Most of the produced steel supplies the automotive and railway sector.

The main **raw material** used to produce steel is **scrap**. Accordingly, ORI Martin is part of the **circular economy model**.

The Group's current composition is the result of a diversification strategy **that began in the 1960s** which led to the internalisation and consolidation of various companies operating at different levels of the steel industry.

This strategy is much appreciated by customers because it guarantees full **traceability**, end-product quality and punctual deliveries along the entire transformation chain.

Today the Group is composed of **ten companies**, where ORI Martin is present with either equal shares or as a majority shareholder.

The reporting scope of the **sustainability performances** presented in this document refers to the Brescia plant of ORI Martin S.p.A., which includes a steel plant, rolling mill and heat treatment plants.



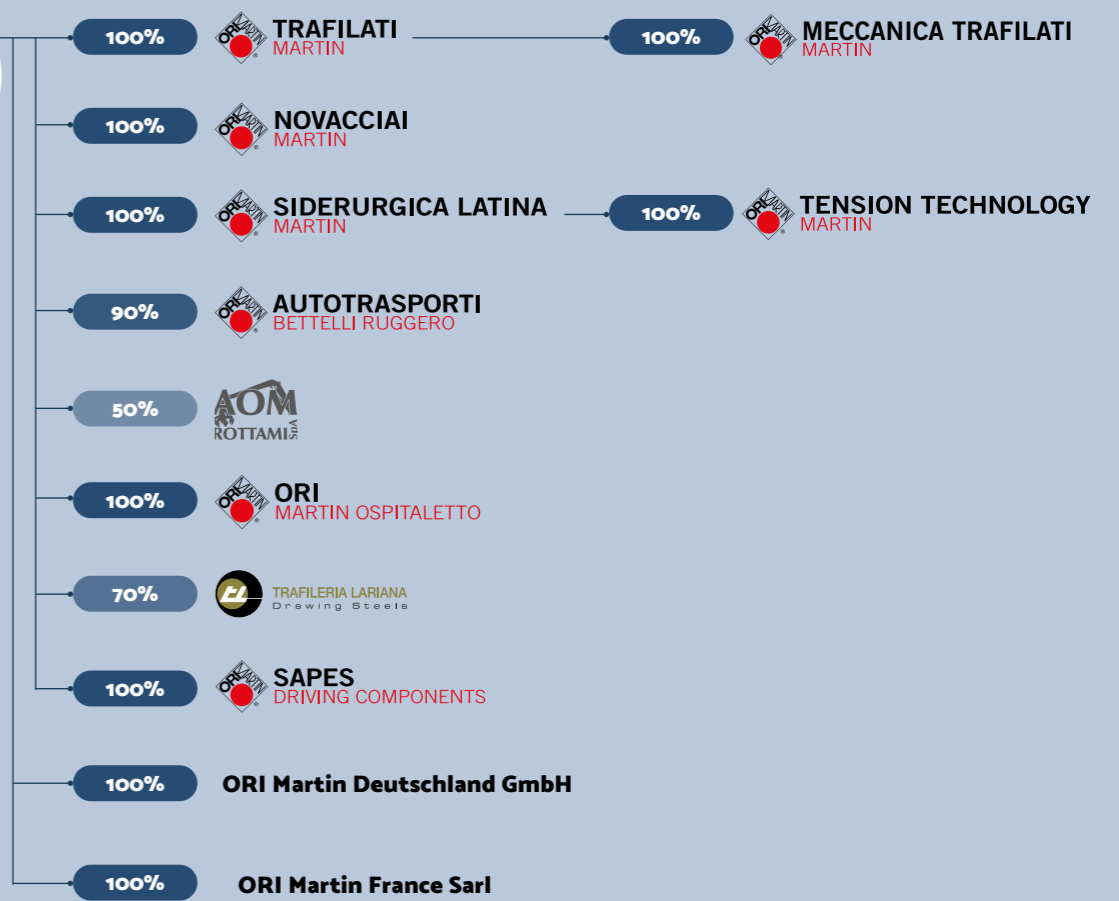
With more than 200 steel grades for special uses in the mechanical and automotive industries, **the Group is present in all the main European markets**, thanks to its strategic geographical position and a wide commercial network in all of the main markets of special steels.

BRESCIA PLANT

STEEL PLANT

ROLLING MILL

HEAT TREATMENT



- 1 ORI Martin
- 2 Sapes
- 3 Trafilera Lariana
- 4 Novacciai Martin
- 5 Tension Technology Martin
- 6 Trafilati Martin
- 7 Meccanica Trafilati Martin
- 8 ORI Martin Ospitaletto
- 9 Siderurgica Latina Martin



The **story of ORI Martin began in 1933** with the founding of Ferretti and Martin **in the San Bartolomeo district of Brescia by Oger Martin**, a Belgian engineer who arrived in Italy in 1911.

The initial business consisted in the production of **agricultural tools** by means of a **trip hammer**, water-powered by the river Fiume Grande, one of the several streams of the Mella River around which most of the historical industrialisation process of Brescia took place.

With the end of the war in **1946**, a rolling mill was launched due to the great demand for **rebar** for **post-war reconstruction**. The plant consisted

of a heating furnace powered by fuel oil and the material to be rolled was prepared by a trip hammer starting from sections of train rails and other war remnants.

In **1950** the Company began its **expansion** with the installation of its first electric melting furnace for the production of **steel from scrap**, thus providing the rolling mill with **higher quality semi-finished products**, ingots and **eliminating the trip hammer**.

This change represented the first evolution towards the current plant that now covers a total area of about 246,000 m² (87,000 m² indoors); it is

equipped with a steel plant run by an electric arc furnace, a rolling mill for wire rod and bar products and a heat treatment department (annealing, hardening and tempering). Lastly, in 2020 the Company acquired its second plant, following the incorporation of the Ospitaletto rolling mill previously managed through Ferrosider, which was acquired by Ori Martin in 2018.

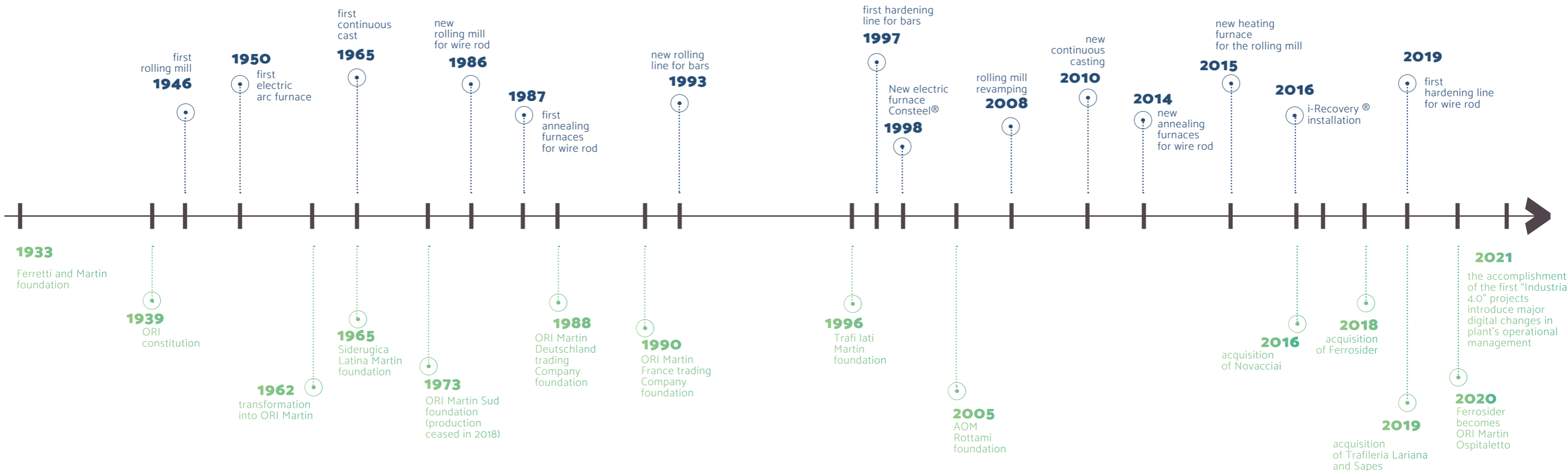
Now, with **more than 200 steel grades** for special uses in the mechanical and automotive industries, the Group **is present in all the main European markets**, thanks to its strategic geographical position and a wide commercial network in all of the main markets of special steels.

The ORI Martin Group operates in **Italy, France, Germany, England, Poland, Romania, Spain, Sweden, Turkey, Austria, Finland, Greece, Slovenia, Switzerland, Czech Republic, Netherlands, Lichtenstein** and **Bosnia** through sales offices and agents spread throughout Europe.

Outside Europe, the Group also exports to **China, South Korea, India, Algeria, Brazil, and Argentina**.

history

EVOLUTION OF THE PLANT >



EVOLUTION OF THE GROUP >

1.2 Ori Martin's identity

1.2.2 WHAT WE DO

The ORI Martin **Brescia** facility produces **steel** billets which are mainly **rolled into wire rods or bars**. These products are mainly used in the **automotive** and **railway sector**. Suspension springs, components, bolts and bars generally supply the mechanical, energy and construction industries.

The increasing specialisation required to meet the demands of the European industry inspires the growth and development of ORI Martin.

The Company pursues these objectives through great attention to **innovation, sustainability** and **research**.



ORI Martin site in Brescia produces continuous casting billets, hot rolled steel in coils and bars, and induction tempered wire.

PRODUCTS

WIRE ROD

HOT ROLLED BARS

INDUCTION TEMPERED WIRE

CONTINUOUS CASTING BILLETS

HOT ROLLED ROUND BARS

HOT ROLLED SQUARE BARS

HOT ROLLED FLAT BARS



Billets

Billets are the semi-finished product in steel with a square cross-section. Billets are produced in the **steel mill** starting from the **melting of scrap** by the electric furnace. Then casting takes place and solidification in the **continuous casting plant**. ORI Martin billets feed the Group's rolling mills and to a small extent are also marketed.

Rolling mills

The rolling process begins with **heating the billets** in a methane gas furnace; in just a few hours this takes them to the temperature required to be turned into wire rods or bars of the diameter required, and then packaged. The **hot rolled products** can then be subjected to other heat treatments to obtain specific mechanical characteristics through:

- annealing treatment of the wire rod;
- hardening and tempering of bars followed by cutting to size;
- hardening and tempering of wire rod;
- annealing treatment of bars.





The Brescia **plant is divided into three areas dedicated** to as many production phases: **steel plant, rolling mill and heat treatments.**



SCRAP

Steel plant

MELTING AND REFINING

CONTINUOUS CASTING

BILLETS

ROLLING

BARS

WIRE ROD

BAR IN COILS

Rolling mill

Heat treatment department

HARDENING

ANNEALING

MARKET

At end of life, steel products are recycled. Selected and controlled, they are returned to the steel plant as scrap: the raw material used to produce steel by electric furnace.



AREA

Steel plant

SCRAP YARD. The purchased scrap is then stored in indoor warehouses in the steel shop. The scrap is added to the furnace either through an automated **mechanical feeding system,**

(CONSTEEL®) or by scrap buckets. The production of special steel for the automotive sector requires **top quality scrap.**

ELECTRIC ARC FURNACE (EAF). At the time of production, a mix of scrap is loaded into the EAF (acronym for “Electric Arc Furnace”), selected based on the quality of the steel to be produced. Due to the electric arc in the furnace, the scrap reaches the melting temperature (about 1,600°C). In this step, **the fumes** generated by melting **are extracted** and sent to a treatment plant before being released into the atmosphere. In 2016, the **heat recovery system** of the primary fumes of the melting furnace started up (I-Recovery). This produces the heat energy to be transferred to Brescia’s existing, urban district heating network, managed by A2A and, alternatively, produces

electricity for the facility. Lime is also added to the furnace to encourage the formation of slag which removes impurities that would otherwise be detrimental to the properties of the steel. Once the melting temperature and the chemical composition required is reached, the casting is **poured into the ladle** (refractory-lined steel container) through a special tapping hole (called EBT, Eccentric Bottom Tapping) while the **slag** is poured through a side door of the furnace **into a slag pot.** To contain the increased noise generated in this stage, the **furnace** operates in a **sound-proofed shed.**

STEEL REFINING FURNACES (LF). The molten steel contained in the ladle is taken to the LF (Ladle Furnace) for metallurgical fine-tuning. In the LF station, **alloys** and fluxes are added to the molten steel until the chemical **composition** and metallurgical properties **fulfil** the quality targets. Some steel grades destined for particularly heavy

duties are subjected to subsequent degassing treatment at the VD (Vacuum Degassing) station. The ladle is then placed in a special container, the atmospheric air is removed in order to obtain a vacuum condition, thus removing the gases dissolved in the molten steel.

CONTINUOUS CASTING. Once the metallurgical set-up has been completed, with or without degassing, the ladle is brought into continuous casting where the **transformation** from liquid to solid **takes place.** This process ends

up with the production of billets, the semi-finished product of the steel plant. The continuous casting machine at ORI Martin has 5 lines. The billets produced are cooled on a special cooling bed and then stored in the warehouse in dedicated crates.

AREA

Rolling mill

The **billets** in the rolling mill department are loaded into a so-called walking **beam furnace,** fueled by natural gas, where the rolling temperature is reached (about 1200 °C).

The billets are extracted from the heating furnace and then conveyed to the rolling line.

This line is made from a set of rolling stands where the billet undergoes a sequential **reduction** in **diameter,** obtained through the passage and consequent crushing between two suitably calibrated cylinders.

All rolls (made of cast iron or tungsten carbide) are water cooled to avoid excessive heat build-up due to the high temperature of the billets being processed.

Once the desired diameter is obtained, at the end of the rolling train the product undergoes controlled air cooling to obtain specific mechanical properties. The material can be **produced in coils** for diameters from 5.5 to 42 mm (wire rod or bar in coils) **or in bars,** with a diameter between 15 and 65 mm.

The wire rod coils are then compacted into pairs to form a bundle ready for storage and shipping. The bars are cold cut according to specified lengths and packaged into bundles. A part of the rolled bars undergoes a subsequent cold process aimed at improving the straightness of the final product.

AREA

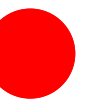
Heat treatment department

Rolled products, either coils or bars, can undergo a further **treatment** called **annealing** which improves formability for subsequent processing by the customers. The treatment consists of **heating** the product in special furnaces with an inert gas atmosphere followed by controlled

cooling. Another treatment is **quenching** and **tempering** of the rolled bars and wire rod coils and involves a sequence of two heating and cooling cycles, of variable duration, aimed at giving the steel **higher strength and toughness.**



chapter 2



Sustainability for ORI Martin

2.1 The Stakeholders

ORI Martin has always considered the dialogue with Stakeholders an essential prerogative, an element of considerable strategic and managerial importance. Over the years the Company has continuously cultivated a culture aimed at the co-existence between Company, environment and community, for the progressive integration between town and industry.

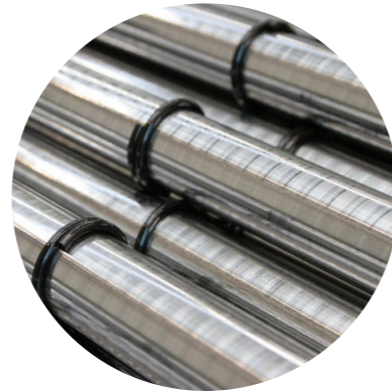
For ORI Martin, in fact, sustainability is mainly expressed in nurturing solid, lasting relationships with the Stakeholders, creating value and shared growth in daily interaction with them. Relations founded on collaboration, trust and transparency.

To draw up the Sustainability report, ORI Martin mapped its main Stakeholders. From this analysis, the twelve most relevant stakeholder classes emerged due to their level of influence and mutual dependence on ORI Martin. In view of publishing this third edition of the Report, the Company updated its materiality analysis with the direct engagement of its external stakeholders which were asked, through an on-line survey, to provide their perspective on ORI Martin's relevant aspects. The poll obtained the participation of over 70% of the recipients and led to the insertion of an additional material topic come up as significant for stakeholders, namely the assessment of sustainability along the supply chain.

Stakeholders of particular importance are the **employees**, the main asset on which ORI Martin relies to uphold and improve the quality and reliability standards so far achieved. For this purpose, the Company involves its workforce through continuous training on the main issues of safety,



EMPLOYEES



CUSTOMERS



LOCAL COMMUNITY

environment and quality. A variety of welfare initiatives, renewed every year, have also been implemented to foster a stimulating and sociable work environment.

Customers, mostly Italian and European players in the automotive, mechanical, railway and construction industries, represent the beginning and the end of each project for ORI Martin. Working exclusively on custom orders, each product is the result of close collaboration with the Customers aimed at understanding and satisfying their needs. The Company also carries out regular surveys to measure customer satisfaction in collaboration with specialised companies.

Significant influence on ORI Martin is exercised by the **local community** (citizens, local associations and foundations), towards which the Company is engaged in a relationship of transparent dialogue, based on coexistence and mutual respect. The main engagement channel is the ORI Martin Observatory, a tool for communicating with citizens set up on the initiative of the Municipality of Brescia.

Regarding the relationship with **shareholders and investors**, the management bases its growth strategies and sustainable development choices on the basis of full harmony and uniformity of vision with the owners.

For its **suppliers**, the Company considers it strategic to carefully select reliable partners, in particular for the purchase of scrap as it is the most important raw material. For this reason, it prefers to opt for relationships bound to a yearly assessment that considers all aspects of the supply chain with a focus on product quality.

Relations with the **Public Administration and control bodies** (ARPA, Inspectorate of Labour, local health authority, Ministries, Regional Government, Provincial Government, Municipal Government and European Institutions) are based on maximum collaboration and transparency.



SHAREOLDERS AND INVESTORS



SUPPLIERS OF GOODS



TRADE ASSOCIATIONS AND REGULATING BODIES

In regard to **trade associations and standardisation bodies**, ORI Martin is an active member of the main sector bodies: Federacciai, Industrial Association of Brescia and AIM - Italian Metallurgy Association, with the objective of contributing to the sustainable development of the steel sector through the research and development focused on circular economy and on the control of environmental impacts of production. The participation in RAMET (Consortium for Environmental Research for Metallurgy) falls within this framework. In addition, the Company is a member of UNSIDER (Ente Italiano di Unificazione Siderurgica - Italian Steel Unification Body). In Europe ORI Martin belongs to ESTEP (European Steel Technology Platform), based in Brussels.

With regard to the **service providers** (Contractors and Subcontractors) and **collaborators** (Consultants, Representatives, Agents), the Company builds relationships on solid professional bases and mutual respect.

For ORI Martin the **financial community**, made up of banks and institutional investors, is an important lever for the process of consolidation and expansion, based on a relationship of credibility acquired through timely, accurate and complete information on results achieved.

With regards to the **media** (newspapers, social media, television networks) the Company pays close attention to the ways in which its brand is conveyed.

Lastly, ORI Martin has found fundamental allies in its **business partners for research**, to achieve its results and continue promoting sustainable innovation. These include both Research Centres and Universities, especially Brescia University and the Polytechnic University of Milan, and private parties that the Company collaborates with, creating synergy for common projects, such as third party companies and technological clusters, like AFIL (Intelligent Factory Association Lombardy), the cluster Lombardo della Mobilità (Lombard Mobility), CSMT (Centre of Multi-



PUBLIC ADMINISTRATION AND CONTROL BODIES



COLLABORATORS



SERVICE PROVIDERS

sectorial and Technological Services) in Brescia, and Rina Consulting - Centro Sviluppo Materiali.

Since April 2020 ORI Martin participates in the JRC MATT - Metal And Transformation Technologies, a research center shared between Politecnico di Milano, A. Agrati SpA, Growermetal Srl, Mario Frigerio SpA and ORI Martin SpA on issues regarding technologies of steel transformation. More recently, in 2021 ORI joined the European Union's Horizon 2020 programme CORALIS, aimed promoting the decarbonisation of resource and energy intensive sector value chains through the implementation of viable industrial symbiosis approaches with other industrial and research poles.



FINANCIAL COMMUNITY



MEDIA



BUSINESS PARTNERS FOR RESEARCH



> Over the years the Company has continuously cultivated a culture aimed at the **co-existence** between Company, environment and community, for the progressive **integration between town and industry.**

2.2 Material topics and Sustainable Development Goals

In 2015, the countries of the United Nations approved the **Global Agenda for Sustainable Development** to 2030, which identifies and envisages the achievement of 17 Sustainable Development Goals (SDGs) representing common objectives for sustainable development on today's complex societal challenges. The agenda bases on the principle that ending poverty must go hand in hand with strategies that build economic growth and tackle a range of social needs, including education, health, social protection and employment opportunities, while addressing climate change and environmental protection. The UN Agenda calls for the engagement from all sectors, corporations and organizations to contribute, through their own daily business, to some of these goals, integrating the ambitious targets in their strategies. In this frame, ORI Martin identified **11 goals** to which to contribute through activities and strategic choices that guide the company's day-to-day activities.

SDGs	DESCRIPTION
 Good Health and Well-Being	ENSURE HEALTHY LIVES AND PROMOTE WELL-BEING FOR ALL AT ALL AGES.
 Quality Education	ENSURE INCLUSIVE AND EQUITABLE QUALITY EDUCATION AND PROMOTE LIFELONG LEARNING OPPORTUNITIES FOR ALL.
 Clean Water and Sanitation	ENSURE AVAILABILITY AND SUSTAINABLE MANAGEMENT OF WATER AND SANITATION FOR ALL.
 Affordable and clean Energy	ENSURE ACCESS TO AFFORDABLE, RELIABLE, SUSTAINABLE AND MODERN ENERGY FOR ALL.
 Decent work and economic growth	PROMOTE SUSTAINED, INCLUSIVE AND SUSTAINABLE ECONOMIC GROWTH, FULL AND PRODUCTIVE EMPLOYMENT AND DECENT WORK FOR ALL.
 Industry, innovation and infrastructure	BUILD RESILIENT INFRASTRUCTURE, PROMOTE INCLUSIVE AND SUSTAINABLE INDUSTRIALIZATION AND FOSTER INNOVATION.
 Sustainable cities and communities	MAKE CITIES AND HUMAN SETTLEMENTS INCLUSIVE, SAFE, RESILIENT AND SUSTAINABLE.
 Responsible consumption and production	ENSURE SUSTAINABLE CONSUMPTION AND PRODUCTION PATTERNS.
 Climate action	TAKE URGENT ACTION TO COMBAT CLIMATE CHANGE AND ITS IMPACTS.
 Partnership for the goals	STRENGTHEN THE MEANS OF IMPLEMENTATION AND REVITALIZE THE GLOBAL PARTNERSHIP FOR SUSTAINABLE DEVELOPMENT.



Our idea of sustainable development hinges on few key principles: attention to the environment and the local community, integration between the city and our plants, support to employees and transparency toward the stakeholders. We are strongly committed to make our daily activities impactful on these topics, in order to always be one step ahead.

Carolina De Miranda - Sustainability Manager

Sustainability



environmental



social



economic

In full compliance with the GRI Standards, **ORI Martin has identified the topics to be addressed in the Sustainability Report through a materiality analysis:** those topics reflect the economic, environmental and social impact of the Company and deeply influence the assessments and decisions of Stakeholders.

The materiality analysis was originally carried out in 2020, and then regularly reviewed in order to guarantee the adherence to stakeholders' actual pressures and expectations.

The material topics are the result of an analysis that takes into account both the external and internal relevance of each topic. The external pressures analysis was obtained by combining the synthesis of a desk analysis (consisting of the analysis of the global macro-trends of sustainability, steel sector trends, an analysis of benchmarks against competitors and a media analysis focused on the communication of ORI Martin's activities) and the result of the survey submitted in 2022 to all relevant stakeholders. The internal relevance was obtained through questionnaires and interviews submitted to the entire first line. For further details, please refer to the Methodological Note in this document.

OUR GREEN WAY OF STEEL PRODUCTION



Circular economy
i-Recovery

Heatleap project
Consteel technology
Water recycling

Renewable energies

Eaf gas treatment
Noise Reduction

Oxygen pipeline

Carbon footprint
Green Belt

Sustainable mobility

Waste recycling

Ramet consortium

Estep

Environmental and safety
certifications

Sustainability Manager



www.orimartin.com



TOPIC AREA **social**

SDGs	MATERIAL TOPIC	DESCRIPTION
 	Occupational health and safety	Ensuring employees work in healthy, safe conditions that protect the physical well-being of workers by adopting adequate safeguards to reduce potential health and safety risks and through effective and constant training.
	Staff development and training	Guaranteeing all human resources with the development of their skills thanks to continuing professional development which boosts progress and improves performance.
	Employment and staff relations	Creating an attractive working environment for young talents and maintaining a high level of employee retention, ensuring a proper work- life balance through open, consistent and transparent communication.
	Attention to the local community	Maintaining constant communication and actively interacting with the local community in favour of its development and protection through the promotion, organisation and sponsorship of events or initiatives that meet the needs of the territory.



TOPIC AREA **enviromental**

SDGs	MATERIAL TOPIC	DESCRIPTION
	Compliance with environmental legislation	Operate in compliance with current environmental laws and regulations, legally and with the limits imposed by law.
 	Energy efficiency and the fight against climate change	Operating on a mindset aimed at reducing carbon footprint and limitation of the impacts deriving from ORI Martin activities linked to climate change through initiatives that favour the monitoring and reduction of energy consumption and greenhouse gas emissions. Streamlining production processes and adoption of solutions with low energy and climate impact such as the use of renewable energy sources.
	Polluting emissions and air quality	Contributing to the improvement of air quality through the adoption of specific pollutant abatement systems and effective control of emissions.
	Limitation of environmental impacts and circular economy	Promoting a culture of resource management based on the principle of circular economy by minimising the impacts related to the production and disposal of waste deriving from the production process; lowering water consumption by optimising use, using sustainable raw materials and favouring the use of recycled materials.
	Noise pollution	Monitoring noise pollution generated by manufacturing activities and limiting the propagation of noise by implementing advanced and innovative technologies.



TOPIC AREA **economic and governance-related**

SDGs	MATERIAL TOPIC	DESCRIPTION
	Business integrity	Operating according to the ethical principles of fairness and transparency, promoting the fight against active and passive corruption and preventing anti-competitive behaviour to the detriment of the corporate reputation.
	Product quality and traceability	Ensuring high product quality in terms of performance and durability by implementing cutting-edge technologies that favour product traceability at all stages of the process by providing the market with complete, secure data.
 	Sustainable development and innovation	Focusing on Research and Development to ensure the continuity and quality of the product offered in the long term, and promote efficiency and innovation throughout the production process.
	Economic performance and the creation of value	Ensuring business continuity by guaranteeing the solidity of financial assets to generate value to be distributed among the various Stakeholders.



chapter 3



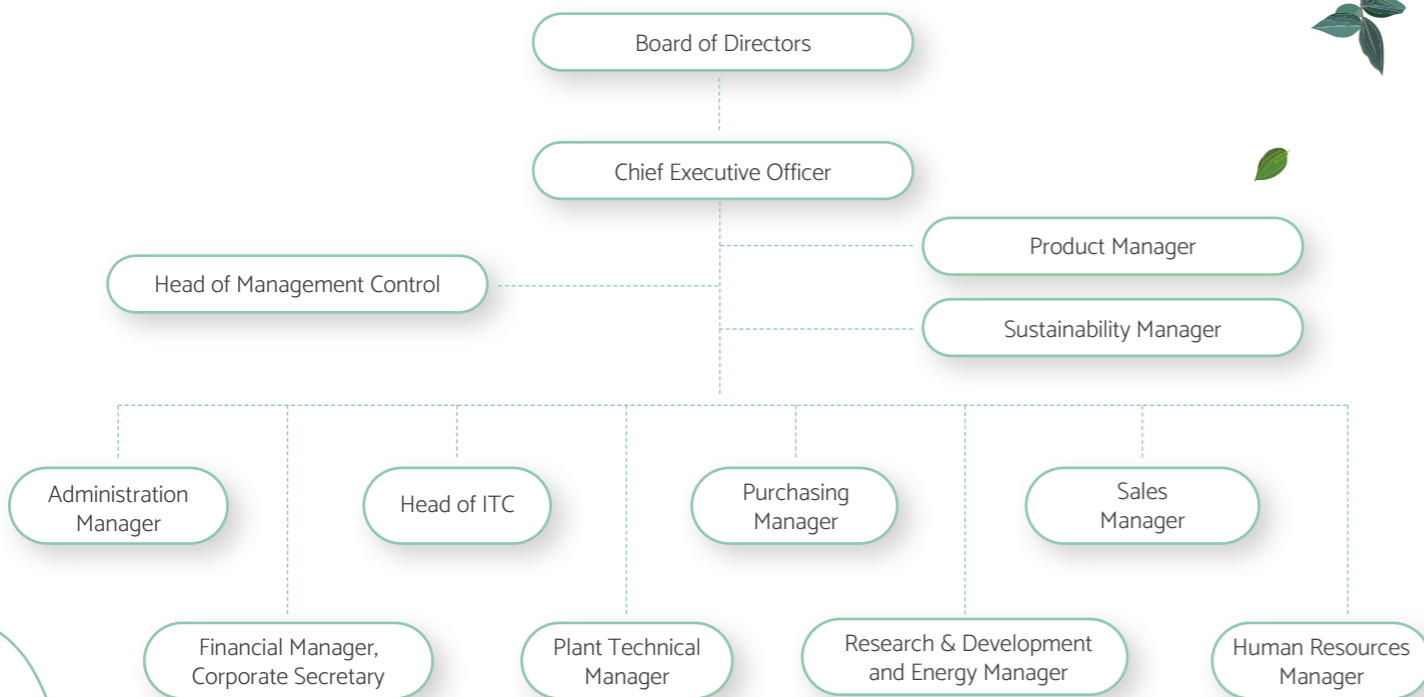
Responsible management

SDGs	MATERIAL TOPIC	DESCRIPTION
	Decent work and economic growth	<p>Optimisation in the use of natural and energy resources also through the adoption of the best technologies available for updating production and management processes; constant improvement of employee working conditions in terms of health, safety and environmental protection and maintenance of financial balance: these are the fundamental aspects of responsible management according to ORI Martin.</p> <p>The Company operates grounding on these concepts, according to high-quality standards and responsibly manages its business activities.</p> <p>To achieve this three-fold purpose, ORI Martin has structured a procedural body based on the principles established in the Code of Business Conduct.</p>
	Industry, innovation and infrastructure	
	Partnership for the goals	

The **Code of Business Conduct** document defines the preventive approach adopted by ORI Martin for the management of negative impacts, in particular relating to the environment and employee safety. This is achieved through a risk assessment which allows us to identify and implement mitigation actions in favour of the environment around the community in which the

Company operates and of its employees. In 2019, the Company established the role of **Sustainability Manager**, reporting directly to the CEO about the management and coordination at a centralised level of all the Group's sustainability activities, from reporting to the definition, implementation and monitoring of projects related to **sustainability**.

ORGANISATION CHART



3.1 Governance

COMPANY STRUCTURE

ORI Martin has implemented an organisational structure based on a system of proxies that report to a **Board of Directors** at the top, responsible for managing the Company. The Board is appointed by the Shareholders Meeting and can nominate between 3 and 11 members who are vested with the broadest powers and have the right to carry out all acts deemed appropriate to implement and achieve corporate objectives. The Board appoints the President and the Vice President if the Shareholders Meeting has not done so and elects the Chief Executive Officer.

In 2019, the Company renewed the Board of Directors for the 2019-2021 three-year period. ORI Martin then established an **Executive Committee**, including the President, Vice President, CEO and two directors (Roberto de Miranda and Giovanni Comboni). The organisational structure of ORI Martin is divided into different functions which report hierarchically to the Chief Executive Officer, each led by a manager. The Head of Control and Management, the Sustainability Manager and the Product Manager hold a cross-functional role about other specific departments.

The ORI Martin 2021 Board of Directors

*Member of the Executive Committee

Giovanni Marinoni Martin
Vice President and Director *

Uggero de Miranda
Chairman and director*

Andrea Agnelli
Chief Executive Officer *

Roberto de Miranda
Director *

Giovanni Comboni
Director *

Alessandro de Miranda
Director

Guido Rivolta
Director

Carlo Garavaglia
Director

GOVERNANCE TOOLS

The principles that inspire ORI Martin when managing its daily activities are contained in the **Code of Business Conduct**, adopted in 2009 and applied to all the Group companies. That document confirms the importance of ethical-social responsibility when conducting business, with the commitment to **comply with the interests** of all its **stakeholders** and the **community**.

All the players interacting with the Company **are required to comply with the Code of Business Conduct** and its principles.

This document constitutes an essential element of the **Organisation, Management and Control Model** (pursuant to Legislative Decree 231/2001 or Model 231) of the Group, which defines the rules, responsibilities, control measures and mitigation actions to be implemented having identified certain areas of risk.

A **Supervisory Body (SB)**, an independent body with three members, has been established to control Company management. The SB performs the supervisory, monitoring and control functions established in Model 231 and must be promptly notified of any instances, conduct or events that could cause the Model to be breached. In this regard, there is a whistleblowing procedure which guarantees confidentiality for the reporting of any misconduct. The SB also draws up a report every six months submitted to the Board of Directors and the Board of Statutory Auditors containing a summary of the activities carried out, the problems encountered, and a highlight of the reports received by the Supervisory Body during

the period. Particular attention is paid to integrity in relations with external parties, with specific reference to the prevention of cases of crimes such as corruption, money laundering and unfair competition.

All employees and external collaborators are obliged to report to the Supervisory Body on any behaviour they have come to know of directly or indirectly that falls within the cases against the Code of Business Conduct.

During the reporting period, there have been no ascertained cases of corruption or anti-competitive behaviour.

In 2020, the dispute started by the sanction inflicted on ORI Martin and other steel firms in 2017 for supposed price-fixing was finally settled in favour of the Company. The Council of State did reject the counter-appeal lodged by the Antitrust Authority after the Lazio Regional Administrative Court had accepted the Company's appeal against the sanction in 2018. In 2021, no legal actions pending nor completed regarding anti-competitive behavior occurred.

In the context of general compliance and alignment to the Code of Business Conduct and to the Model 231, the activities within the plant are governed by

TOOLS

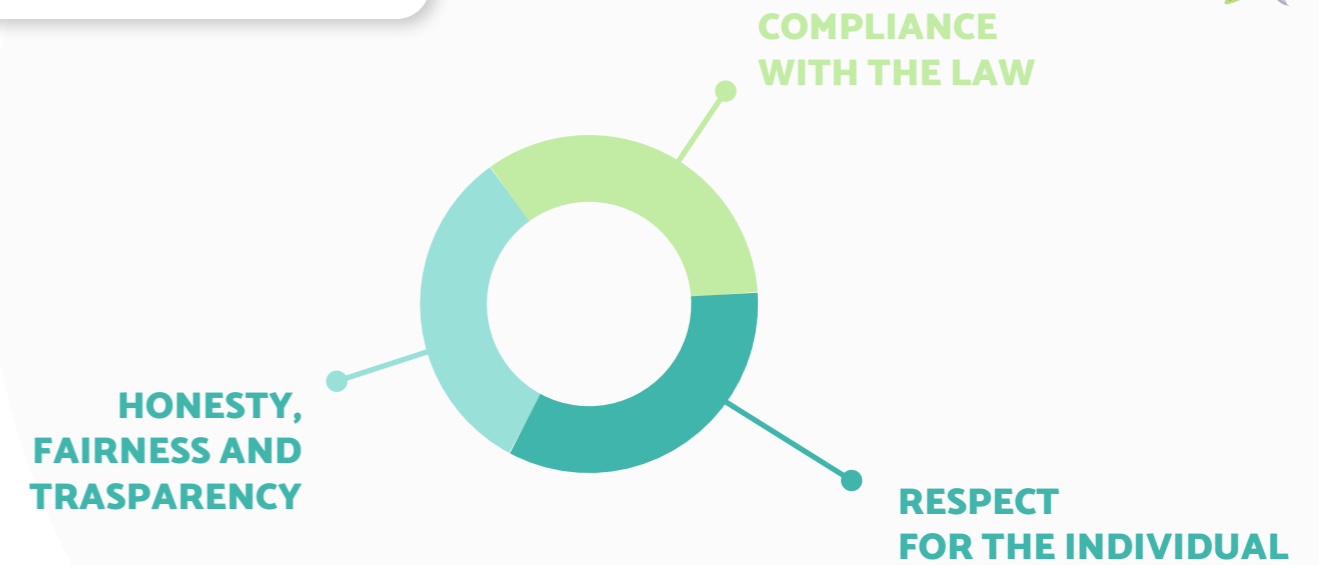
RULES

RESPONSABILITIES

CONTROL MEASURES

MITIGATION ACTIONS

Code of Business Conduct



specific policies aimed at defining procedures and Company policies in the main areas of activity.

In particular, ORI Martin has adopted a **quality policy**, placed at the basis of the Company



strategy, which reflects the attitude to pursue qualitative excellence and continuous and sustainable improvement.

The quality standards of ORI Martin are implemented through a quality management system certified according to UNI EN ISO 9001:2015, and the IATF 16949:2016, a standard referring to the automotive sector.

The cornerstone of ORI Martin's Governance is the **policy for occupational health and safety and environmental protection**.

The Company has a Management System certified according to UNI EN ISO 14001:2015 for environmental management and to UNI ISO 45001 for the management of Health and Safety. Furthermore, with the introduction of Legislative Decree 105/15, the Company has been qualified as a major accident risk in relation to the storage, beyond the thresholds outlined by the decree, of smoke abatement powders containing dangerous substances, in particular, zinc oxide and lead compounds.

In this regard, through the **major accident prevention policy**, ORI Martin outlines its commitment to prevent and monitor any dangers that could cause episodes with serious repercussions on health, environment and goods.

Efficient energy management is considered fundamental when conducting plant activities. To this end, the Company has introduced an **energy policy** that sets various objectives defined in specific implementation programs. The Company adopts an energy management system which is certified according to the UNI CEI ISO 50001:2018.

ORI Martin has defined a personal data protection model consistent with the provisions of EU Regulation 2016/679 General Data Protection Regulation (GDPR).

The Company has set up a Data Protection Committee, coordinated by the Data Protection Officer, which reports every six months to the CEO about the validity of the Model 231, any necessary amendments, additions, as well as opinions, decisions and events that have taken place regarding the protection of personal data.

The cornerstone of ORI Martin's Governance is the **policy for occupational health and safety and environmental protection.**

When setting up Model 231, ORI Martin was supported by professional consultants to identify risks associated with the offences outlined in Model 231, as defined by Confindustria guidelines: these are related to the construction of organisational, management and control models and contain methodological indications to identify risk areas and adapt them to the specific needs and peculiarities of the Company.

Furthermore, Ori Martin is engaged in **constant monitoring** of regulatory changes with an impact on Model 231, and proceeds with the necessary updates or additions to the Model according to the same criteria, therefore identifying the risks. This is achieved through document analysis, specific interviews with key people responsible for the activities, process analysis, evaluation of the control measures in place and defining specific mitigation actions if necessary.

The **risks related to environmental and health and safety aspects** are identified, evaluated and monitored according to the internal model adopted in line with the Environmental and Safety Management Systems in order to improve their performance.

As for all other types of risks specified by Model 231, the approach used is based on processes and includes the analysis of external and internal factors that can influence the Company's ability to achieve the expected results, the fulfilment of applicable legal requirements and the needs and expectations of its Stakeholders.



3.2 Creation of value

In 2020 the global economic situation was deeply affected by the Covid-19 pandemic and the measures introduced by governments to restrict the spread of infection. After a period characterized by a general and sharp decline both in economics and production, 2021 finally marked a change and witnessed a recovery in steel production in most countries.

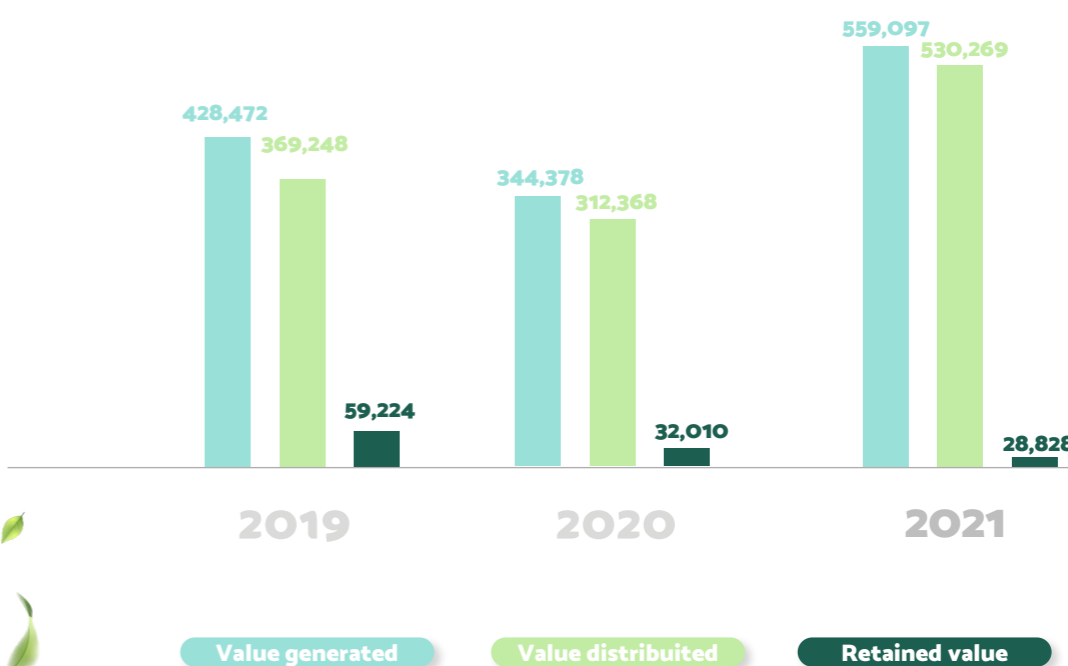
In this context, Italy's steel production, recorded in December 2021, was 24.4 million tons, an increase of 19.8% compared to 2020.

The resurgence from the difficulties experienced in the previous years was also positively reflected in the **value generated** by ORI Martin in 2021, which amounted to more than 559 million Euros, an increase of 62% compared to the previous



year, when activities have been subjected to restrictions and suspension as a measure to limit the pandemic. Pushed by the recovery of demand from various sectors, particularly the automotive, the company continues to work on consolidating its strong presence in the European market.


GENERATED VALUE (THOUSANDS EUROS)





Most of the value generated is distributed to suppliers (**501.1 million Euros in 2021**), mainly for the raw materials needed to produce steel (**392.9**) and services (**111.8**).

Net of suppliers, the value distributed amongst the other stakeholders in 2021 was transferred for 34.6 million to employees, including remunerations, benefits, social security costs and severance indemnity, and for 868 thousand Euros to the financial community, as remuneration of loaned capital. Finally, the local community and the territory benefitted for 424 thousand Euros, both as membership fees in the several associations partnered by the Group and as donations to various initiatives in support of the local community. Finally retained value (28.8 million) contributed to the enhancement of the Group's worth, both as retained profits, amortization, depreciation, and deferred taxes.



2021:
ORI Martin figures

▼

200
DIFFERENT STEEL GRADES

687,745
STEEL PRODUCTION (TON/YEAR)

559,097
TOTAL GENERATED VALUE
(THOUSANDS EUROS)

Much of the **value generated** by ORI Martin is distributed to **Suppliers, Employees, Public Administration** and **the Community**.





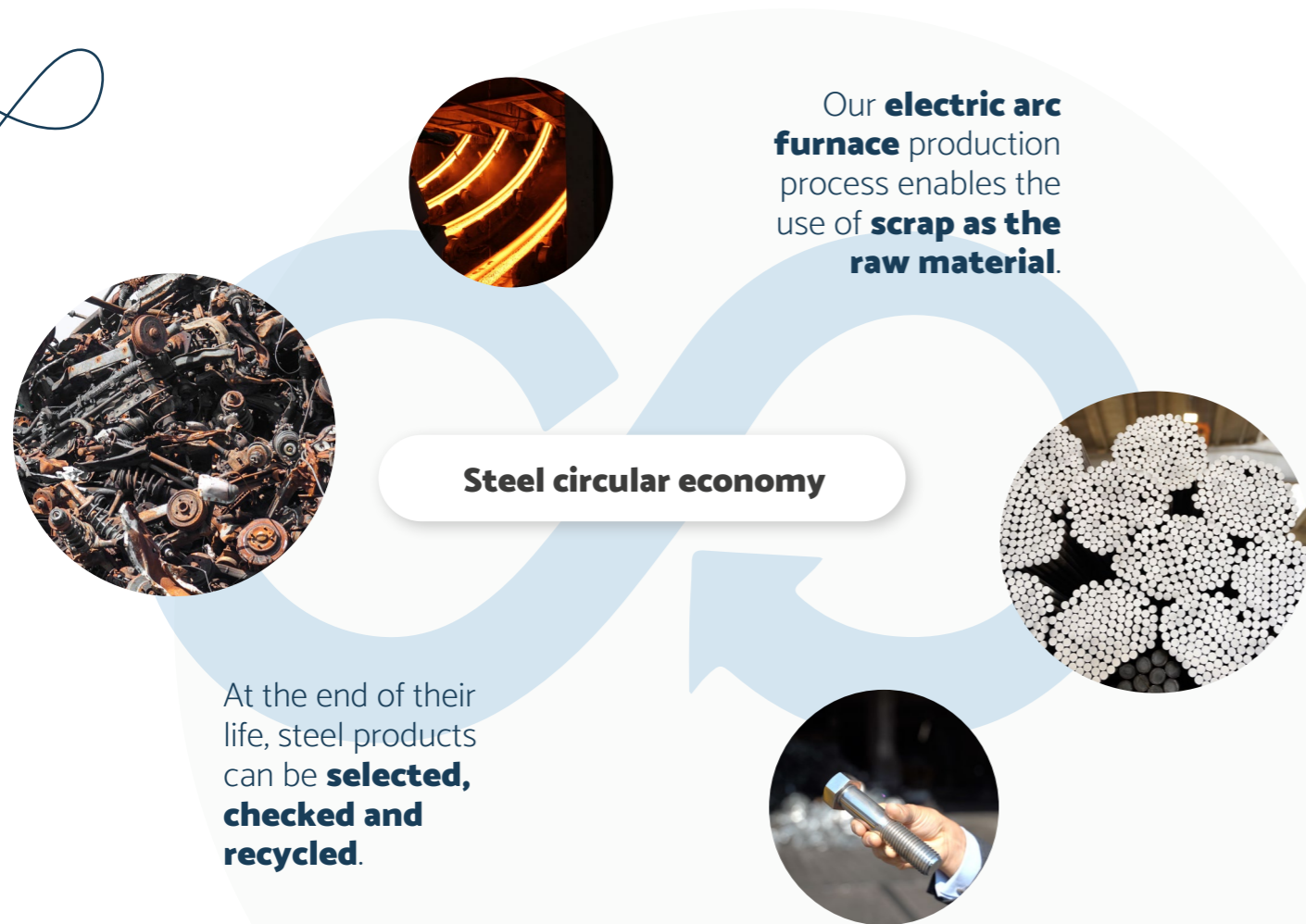
chapter 4.

Sustainable innovation and quality



SDGs	DESCRIPTION
<p>Industry, innovation and infrastructure</p>	<p>ORI Martin is located in an urban context, close to the residential area in the north of Brescia. The facility's urban location has been a stimulus over the years, motivating the Company to implement a series of projects dedicated to the district's well-being and to invest in the search for new solutions for sustainable innovation. Producing steel sustainably means integrating with the setting and cultivating relations that aim for symbiosis between industry and territory, mitigating the environmental impact to respect the quality of life of the neighboring area.</p>
<p>Sustainable cities and communities</p>	
<p>Partnership for the goals</p>	

ORI Martin produces steel using scrap.



4.1 Sustainability in the plant



In this context, the sustainability and innovation policies of ORI Martin aim at strengthening the **circular economy** model which the Company considers as the basis of its production process.

The choice to produce **steel** starting from **electric arc furnace (EAF)** melting, in fact, allows for the use of ferrous scrap as a raw material with a **double effect: reducing the use of natural resources** and **lowering the amount of industrial waste** that would otherwise be disposed of.

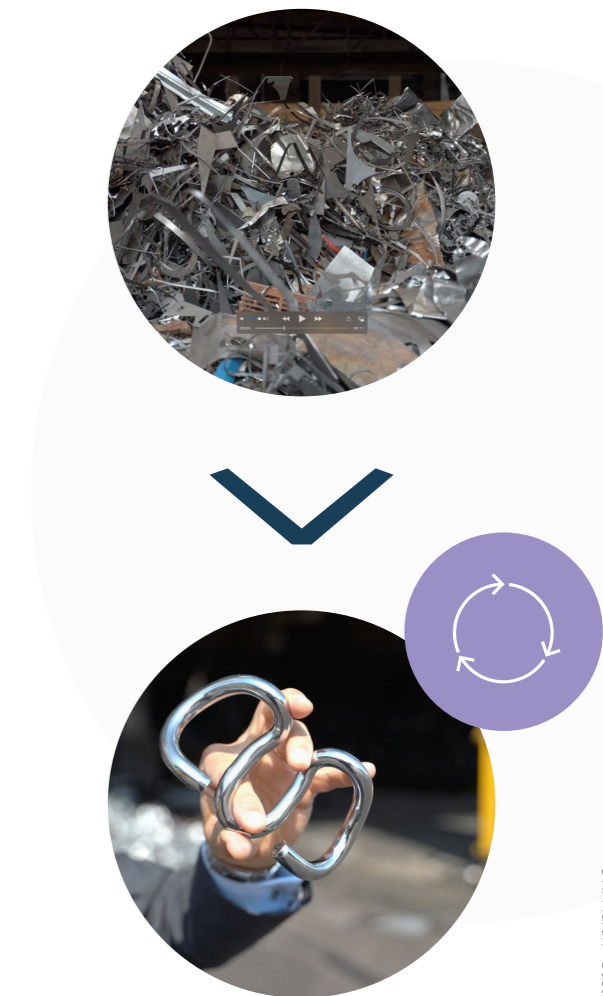
This process is made possible by the **ability of steel** to maintain all its **properties** unchanged throughout the process of melting and re-solidification.

On top of that, steelmaking production through EAF allows for a remarkable reduction of greenhouse gases (GHG) emissions compared to the integrated route, as emissions are mainly indirect, and associated with the consumption of the electricity to run the furnace. For this reason, ORI Martin is also involved in **energy** and gradual transition project of **decarbonisation** of the production processes, with the progressive increase of the use of renewable energy sources and contextual containment of greenhouse gas emissions by plant activities.

In this regard, the Company certifies the **carbon footprint** of **its products**, in order to communicate the impact generated by the components produced in the factory and identify the critical variables where action is needed (details in chapter 5.2.1).

Since November 2020, there has been an agreement in force for the purchase of **renewable energy (PPA - Power Purchase Agreement)**, that enables the

- CIRCULAR ECONOMY
- ENERGY AND GRADUAL TRANSITION
 - DECARBONISATION
 - ELECTRIC ARC FURNACE
 - I-RECOVERY
 - CARBON FOOTPRINT
 - ESTEP
 - POWER PURCHASE AGREEMENT





The ORI Martin production process **brings value to the community**, thanks to an innovative project, created in synergy with **strategic partners**.

Company to guarantee that about 10% of the plant's electricity supply comes from renewable sources. A more detailed description of the project can be found in chapter 5.2.3.

On issues such as decarbonisation and circular economy, since 2020 the Company has been taking part in the activities of **ESTEP** (European Steel Technology Platform) a no profit organisation that promotes research activities in the technological field at the European level to **improve** the

sustainability of steel processes. In particular, through the **"Clean Steel"** project, guidelines for the production of sustainable steel from electric arc furnace at the European level have been defined.

This is the framework containing the **I-Recovery®** project, which aims to **harness the heat** generated by plant's industrial processes, which would otherwise be lost, to satisfy part of the city's energy needs.



I-Recovery®
The furnace heat is conveyed, avoiding dispersion into the atmosphere. This heat is turned into steam to generate thermal energy. This energy powers the district heating of the city of Brescia.

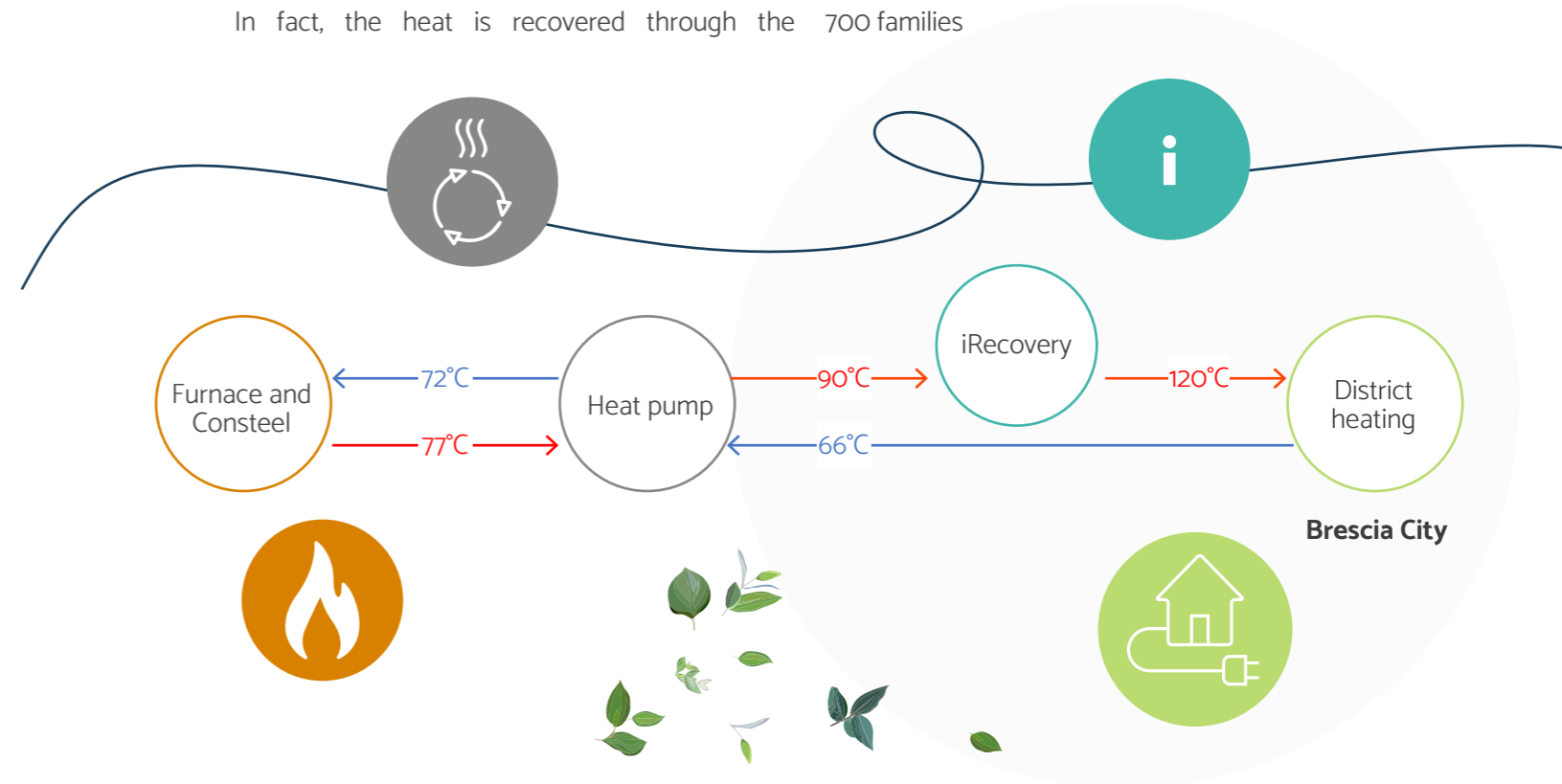
I-Recovery® is a project worth over 12 million Euros, active since 2016 and the first of its kind in Italy, implemented with a number of technical partners, in particular **Tenova, Turboden** and **A2A**.

The **I-Recovery®** system enables conveying the large amount of **heat** contained in the fumes of the **steel plant's** electric arc furnace into a system that avoids its dispersion.

In fact, the heat is recovered through the

generation of steam, which is stored and used for a dual purpose: it is either transformed into thermal energy to be fed into **Brescia district heating** network or into electricity through an organic fluid turbine (ORC).

Thanks to this **technology**, I-Recovery supplies about 10MWt for heating in the winter period, equivalent to the annual needs of about **2,000 families**. In summer, it produces clean electricity (about 1.8 MWe), equivalent to the needs of about 700 families



Another relevant stream of innovation the Company is developing relates to the recovery of heat from cooling water used for melting furnace and the Consteel® EAF. The **Heat Leap** project aims at valorizing waste heat for enhancing energy efficiency, and involves, together with ORI Martin, high skilled partners such as Turboden, large heat pump supplier, RINA Consulting – CSM, and CSMT. It was launched in 2020 by the EU-funded LIFE programme, pointing to demonstrate the environmental and economic benefits of energy recovery systems from the gas pressure reduction

process to further increase energy efficiency, reduce greenhouse gas emissions and energy bills. When completed, the project will allow ORI Martin to recover heat at a low temperature (about 70°C) and then raise it to an adequate temperature (about 120°C) to then be put into the town district heating network. In 2021 the pump was installed for the first tests and it is expected to come into operations in 2022, with the ambition to demonstrate a viable waste heat recovery system suited to the steel industry.

CORALIS

ORI Martin, with a view to developing a circular economy, has embarked on a path aimed at the valorisation and reuse of metal residues produced by manufacturing cycles and thus to an overall reduction of materials sent to landfills. In this context, the Group joined and launched the project **CORALIS**, financed by the EU under the Horizon 2020 programme, and designed to realise real industrial synergy initiatives in the territory and to reduce waste through recovery in industrial processes.

The project started in 2021 and will run until 2024. The waste produced by companies in three different industrial areas (Brescia, Hoganäs in Sweden and Escombreras Valley in Spain) and operating in different sectors, will be treated with advanced technologies to be transformed into raw

materials for other production processes.

Within the consortium, partnered by 29 companies, ORI Martin will receive residues rich in metal powders which can be recovered in the steel production process as a substitute of iron alloys, saving raw materials.

The powder before utilization must be densified in briquettes. ORI Martin will rent an industrial briquetting machine and will define the briquetting process and correct blends and will produce briquettes for industrial trials.

FROM POLYMER TO STEEL

A further initiative launched in 2021 to enhance both circularity and decarbonization refers to the use, in the melting process, of polymers from recycled plastic instead of coal. The first tests will be carried out in 2022, and they are still ongoing to assess the feasibility to introduce waste plastic, recovered from other sectors, into the steelmaking

process, without undermining the quality and technical characteristics of the final product. In addition to the possibility to divert plastic from disposal in landfills, the solution would also lead to a reduction in GHG emissions, as it would reduce the use of coal in the melting process.

CHAPTER 4

4.2 Continuous innovation

The strategic vision of ORI Martin has always tended **strongly towards innovation**.

With this in mind, over the years the activities of several Company departments have developed considerable know-how and specific experience able to guarantee **product quality** even through a number of controls formalised in operating procedures and practices, foreseeing a presence of trained, responsible, competent personnel.

At the same time, the high-quality standards required to meet market expectations impose continuous **technological innovation** needed to improve and continuously streamline the work

and use of resources.

It is on the skillful integration of these two components, **know-how and innovation**, that ORI Martin bases its conception of **development** based on **continuous improvement**.

To follow up on and make this vision effective, strategic investments are concentrated on two pillars: digital transformation and circular economy.

Focusing on these levers, ORI Martin invested more than **31.6 million Euros** in the three-year reporting period, of which over 22 for research and development specifically (**6.6 million Euros** in 2021 alone).



Billets are labelled by a **latest generation robot**.





As part of these investments, the Company has started a **digitalisation process**, focused on **valorising data** in particular in the steel production stage, and a project of increasing **robotization of processes**: the first robot appeared in the steel department in 2000 for an experimental billet labelling station.

sampling and temperature measurement in ladle furnaces, and automatic loading and unloading operations.

The first system allows the operator to select the sampling points, and to drive operations remotely, strengthening operator's **safety**, and **quality**.

The growing **integration of artificial intelligence** is applied to several production cycle activities and stages: from supporting operators with managing the scrap cycle, facilitating correct classification and enabling full, automatic filing of useful information, to the analysis of images to classify defects, on to the management of **energy consumption** in the different production departments, to analyse flows and times in the steel plant.

These are **technological improvements** that have a significant impact on operator **safety**, on the **quality** of production, on the **repeatability** and **reliability of processes**: the fundamental pillars of the ORI Martin vision.

Today there are **7 operational robots**, of which two arrived in 2021.

Those last two are robotic systems for the execution of two different activities: automatic

Research and development: ORI Martin investments

(figures expressed in millions of Euros)

2016	2017	2018	2019	2020	2021
6	5.3	4.2	7.5	8	6.6

These innovations are part of the wide **"Steel 4.0"** project.

In partnership with **Tenova**, ORI Martin is one of the four projects selected within the **Lighthouse - Industry 4.0 program proposed by the CFI** (Intelligent Factory Cluster), developed by the Italian **Ministry for Economic Development** to stimulate and encourage the increasingly massive and systematic introduction of digital

supports in production processes.

More specifically the project aims to enhance the transversal **digitalisation** process of the entire plant, involving the steel plant, the rolling mill, warehouses and centralised data collection, to create a real Cyber Physical Factory of steel. The project, launched in June 2019, and with a duration of at least three years, is based on two main phases: the first phase involved the introduction of robots



in some steps of the production process and the digitalisation of scrap yard management systems. The second phase involves the implementation of the enabling technologies of Industry 4.0 including cloud, IoT, big data analysis and robotics, in order to gather information from different departments and integrate all phases, creating an intelligent interdependence of activities. The actual research phase on these technologies will be developed in coming years; based on a development programme that also involves external partners and research centres of excellence such as the Multi-sectoral and Technological Services Centre (CSMT), the University of Brescia, the CNR of Milan and the Polytechnic University of Milan.

Another digitalisation direction is **predictive maintenance**. In this regard, the Company has strengthened its **collaboration with Danieli** by starting a project for monitoring the critical aspects of the rolling mill.

Finally, in terms of safety, the Company has also implemented an innovative system of **man on the ground tracking** that allows, through sensors and geolocators, to **safeguard** the isolated worker through the transmission of automatic and manual alarms. For further information, see chapter 6.1.2.










chapter 5.



Environmental responsibility

SDGs	MATERIAL TOPIC	DESCRIPTION
	Clean water and sanitation	<p>ORI Martin is an advanced Company on environmental matters. For several years, daily commitment has focused on continuous improvement towards a healthy, sustainable and collaborative coexistence with the area in which the steel mill operates.</p> <p>Environmental protection is one of the objectives of the ORI Martin Code of Business Conduct, and a firm principle guiding factory activities.</p> <p>In terms of operations management the Company is committed to promoting technological development aimed at reducing polluting emissions and improving energy efficiency and also by developing the skills of its staff.</p>
	Affordable and clean energy	
	Sustainable cities and communities	
	Responsible consumption and production	
	Climate action	

5.1 Environmental management

In 2002, ORI Martin had already provided itself with an **Environmental Management System** certified UNI EN ISO 14001 and an integrated policy for environmental protection highlighting the Company's commitment to safeguarding both the environment and occupational health and safety in a combined manner - these two aspects being so fundamental and so embedded in the Company activities.

The Company has also implemented an **Energy Management System** compliant with UNI EN ISO 50001, with certification attained in 2020.

As for the environmental impact, plant activities are authorised and regulated by the **Integrated**

ORI Martin is an advanced Company on **environmental matters**.

For several years, daily commitment has focused on continuous improvement towards a **healthy, sustainable and collaborative coexistence with the area in which the steel mill operates**.



Environmental Authorisation (AIA) issued first of all in 2006 and renewed in 2017.

In compliance with AIA provisions, ORI Martin adopts a **plan to monitor and control the environmental impacts**, with special reference to atmospheric emissions, water discharge and noise, periodically checked by the Regional Agency for environmental protection (ARPA).

In addition, AIA provides for the need to use **the best available techniques (BAT - Best Available Technologies)** defined at the European level. ORI Martin's approach is also reflected in actions to improve the environmental impact.

Confirming Company's commitment to environment and safety, the investments since 2017 amount to over **9.5 million** euros, 16% of total investments in the last five years.

5.2 The resources employed

5.2.1: MATERIALS USED

Electric arc furnace steel production involves the use of ferrous **scrap** as a **raw material**, consisting of steel elements recovered from other sources and then melted to be processed again in a potentially infinite cycle.

This circular aspect makes the **production cycle of ORI Martin** an important lever not only for developing **circular economy** models, but also for the transition to production models with less impact in terms of energy consumption and CO₂ emissions.



Ferrous **scrap, controlled and monitored**, arrived in the steel plant to be recycled.



Billets, wire rods and bars produced using scrap leave the steel plant for new applications. **At the end of their life cycle, they will become scrap again.**



The **scrap** is put through systematic checks to exclude the presence of radioactive or contaminated material and eliminate the risk of melting those substances.

The procedure includes a radiometric detection phase at the entrance, a visual inspection phase when the material is unloaded, integrated with a digital system, as well as further monitoring during the production process by means of fixed detectors installed throughout the plants.

In **2021** more than **700 thousand tons** of ferrous scrap were **melted** in the **steel plant's electric furnace**, covering a fundamental role in the production process, with a percentage of around **93%** compared to the total raw materials used at input.

5.2.2 WATER RESOURCES

Water is amongst the most monitored resources by ORI Martin as it is a **vital asset to be preserved**, and a crucial element required to cool the furnaces in the steelmaking process. Further minor consumption comes from offices, the canteen and the changing rooms. In ORI Martin, given the different destinations of water, two different water sources are used: for the potable use, a dedicated network connects the plant to the municipal water supply. Water for the industrial use instead, is drawn from three wells located within the perimeter of the plant. To reduce water hardness and related scale problems, part of the water withdrawn from the wells is treated with a reverse osmosis system.

In order to limit the overall water consumption, the water is recirculated and cooled with evaporative towers or unit heaters.

The other non-renewable raw materials are used in lesser percentages: alloys just over 2% and pig iron just over 4%. Other non-renewable materials are also used during the process. The highest percentages concern lime, used as flux, and coal, used as a reducing and swelling agent.

Other materials are electrodes, graphite and refractories as well as gases such as oxygen, nitrogen and to a lesser extent argon. Please refer to table "301-1: Materials used by weight or volume" in the Statistical Appendix for details of the quantities.

WATER RESOURCES VITAL ASSET

EFFICIENT USE OF ENERGY RESOURCES

Water that comes into direct contact with steel during the cooling phase requires treatment to eliminate metal scales and oils. In that case, water is conveyed **to special collection tanks** to be sent to the purification **plants** (one for the steel plant and one for the rolling mill), equipped with settling tanks and sand filters.

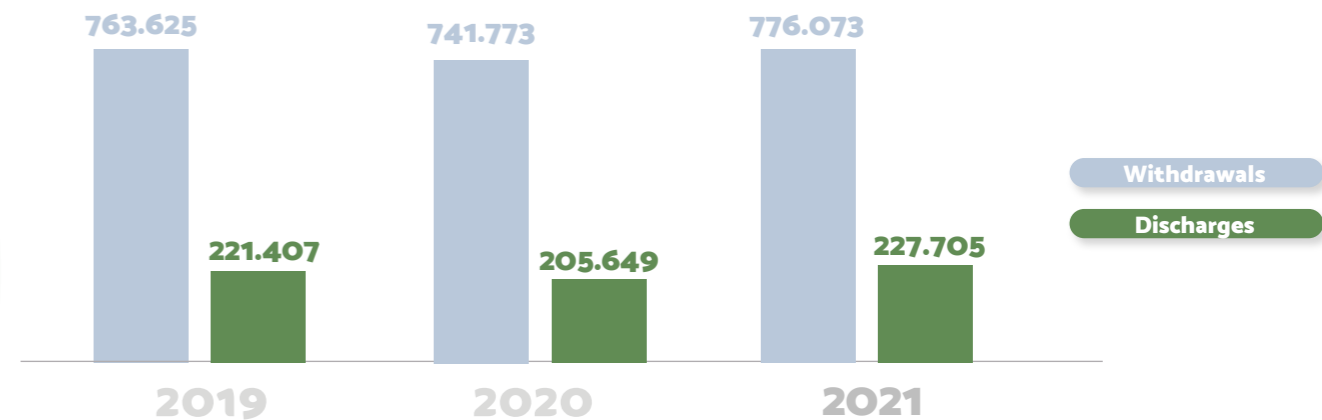
The treated water effluents are delivered to surface waterways (Fiume Grande Superiore and Roggia Fiumicella) and, as outlined in the AIA monitoring plan, the Company checks the quantity on a monthly basis and quarterly for the discharged water quality.

In the Statistical Appendix, the analysis of discharge points is reported in the tables "Water discharge analysis".



For ORI Martin **water is precious**. Collection tanks enable the **recycling of water used in the industrial process**.

WATER WITHDRAWALS AND DISCHARGES (m³)



During 2021, 762,149 m³ of water were withdrawn from the three different wells in addition to 13,924 m³ of water from the city aqueduct, for a total of 776,073 m³. In parallel, 227,705 m³ were

discharged from the different production phases, thus determining a total of 548,368 m³ of water consumption.

5.2.3 ENERGY CONSUMPTION

Energy consumption, core feature of the entire steel production process, is another strategic topic and requires ORI Martin to manage energy accurately by committing to an **efficient use of energy resources**.

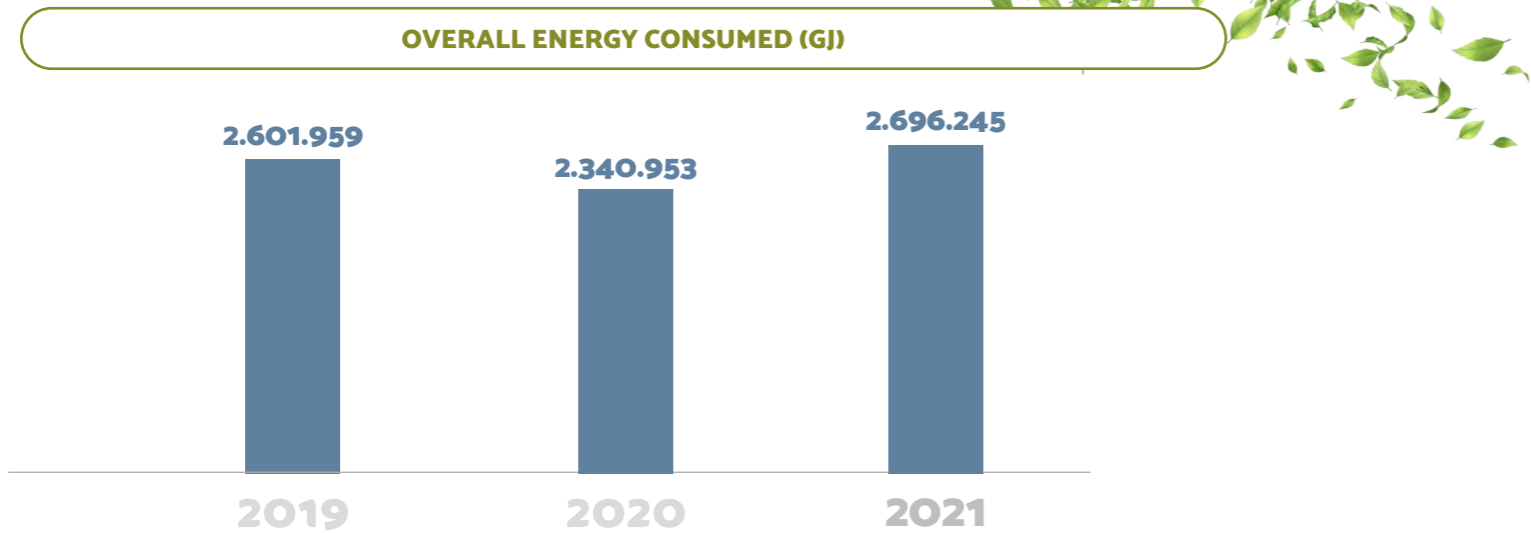
This commitment is outlined in the **Energy Policy** where it sets out some objectives of continuous improvement and staff training as well as involvement, dialogue and consultation across all Stakeholders such as employees, suppliers and

contractors.

With this in mind, the Company monitors energy consumption and plans investments aimed at **reducing its usage** and therefore lowering **greenhouse gas emissions**.

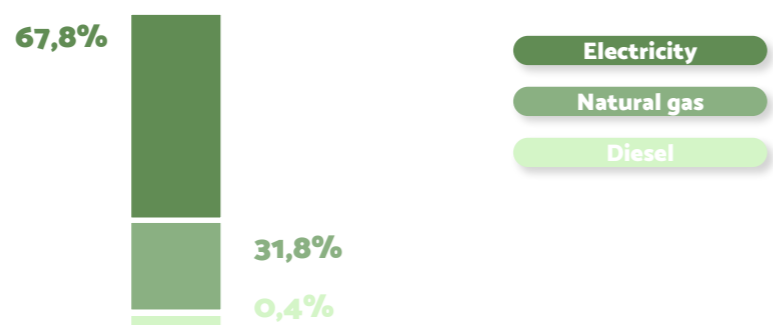
The energy spent by ORI Martin in 2021 amounted to 2,696,245 GJ, an increase of 15% compared to the previous year, in line with the resumption of production activity.

OVERALL ENERGY CONSUMED (GJ)



The main energy sources employed are internal handling within the plant and for the **electricity, natural gas** and for a minor Company car fleet. percentage **diesel and petrol** used for the

ENERGY SOURCES (2021)



Electricity is the main energy source used for most production processes and accounted for 67.8% of total consumption in 2021: it is mainly used to power the melting furnace, the ladle furnaces and the rolling mill as well as all services and auxiliaries. The energy supply comes from the Terna high voltage network and from power produced by the I-Recovery plant during the summer. In 2021, the energy recovery system enabled self-production of about 11,990 GJ.

furnaces for heat treatments and the steel plant burners. The gas supply is provided by the Snam network.

Furthermore, during the winter period thanks to the I-Recovery project ORI Martin injects heat recovered from the steel plant fumes into the district heating network of the city of Brescia, managed by A2A, the local energy and heat supplier. 42,833 GJ were transferred in 2021.

Natural gas is mainly used to power the furnace for heating the billets in the rolling mill, the

Regarding diesel, the main use is for fuel forklifts, which are one of the most widely used equipment

in large factories and companies, as their ability to lift very heavy loads significantly reduces the time needed for loading and unloading operations, while increasing the safety of operators. At ORI Martin, the **forklift fleet** consists of **24 units**, 13 of which have a lifting capacity of over 10 tons and are used for handling rolls in the production departments. Of these **2 are electrically powered in the testing phase.**

THE ORI MARTIN GREEN ENERGY

In October 2019, ORI Martin finalised a 5-year **Power Purchase Agreement (PPA)** with a Swiss energy trader (DXT Commodities) and a German investment fund (KGAL Investment Management).

That agreement foresees energy production through a 53 MW photovoltaic power station installed in Sardinia and launched in November 2020.

Signing a PPA is a long-term commitment that allows KGAL to invest in the power station, ensuring the sale at a fixed price without depending on the public incentive system and therefore without burdening the state.

THE AIR LIQUIDE OXYGEN PIPELINE

Since 2018 the ORI Martin plant has been connected to the Air Liquide oxygen pipeline that spans across the municipalities of Brescia and Ospitaletto through an underground pipeline about **5 km** long for a direct supply of gaseous oxygen.

Implementing the project has enabled ORI Martin to avoid liquefaction of the oxygen used, **thus saving approx. 4,000 tons of CO₂ per annum.**

There is also a tangible advantage for the territory since the infrastructure **avoids** the transit of approximately **1,250 trucks a year** which saves **CO₂** (about 270 tons per year), nitrogen oxides and particle emissions.

Finally, as part of the project, Air Liquide financially supported extraordinary **reforestation and maintenance activities** in the area of the Mella river and on the city's mountain "La Maddalena", the town's largest green area (4,000 hectares) belonging to **"Parco delle Colline"** which involves Brescia and six other municipalities.

At ORI Martin, the **forklift fleet** consists of **24 units**. Of these **2 are electrically powered** in the testing phase.



5.3 The management of impacts

The material resources used in the production process, water and energy, generate external outcomes that have an impact on the environment globally and on the neighbouring territory locally. Aware of the consequences that this impact has

on nature, the surrounding environment and the people who live in it, ORI Martin adopts a strategy of **continuous monitoring** and at the same time a **constant effort** to develop innovative solutions **to act directly at the root of impact.**

5.3.1 THE GREENHOUSE GAS EMISSIONS (GHG) AND THE CO₂ FOOTPRINT

In the current global context we are witnessing the diffusion of initiatives undertaken by companies to limit their impact linked to **climate change**, such as the reduction of **GHG** emissions generated directly and indirectly by their activities.

the plant and identify the critical variables that require intervention in terms of organisation and management of production and business processes. The aim is a continuous reduction of its GHG emissions in absolute and relative terms with respect to the different types of products.

The Brescia facility is part of the **Emission Trading System (EU - ETS)**, an instrument set up by the European Union Directive 2003/87, aimed at monitoring and progressively reducing greenhouse gas emissions from the highest energy-intensive industrial sectors. The ETS system, designed to tackle climate change, is founded on a mechanism called “cap and trade”. This mechanism caps the presence of a maximum limit of tons of CO₂ that industrial plants subject to the ETS system can emit. Based on the actual quantity emitted and declared annually, the subjects receive or purchase emission quotas that can be exchanged through a sale on the global CO₂ market.

Following an initial energy consumption analysis recorded in 2016, the carbon footprint study was repeated in every year from 2018 onward, reflecting the continuous commitment undertaken by Ori Martin **to monitoring its greenhouse gas emissions.**

The 2021 study, has been validated by an external body which certifies its compliance to ISO 14064-1: 2018 for the quantification and reporting of gas emissions and their removal. The analysis considers the energy consumption and the materials used in the production process to calculate the total tons of CO₂eq and per activity and establishes emissions in three categories.

In addition to the regulatory compliance required by the ETS Directive and in line with the commitment undertaken toward the environment and the continuous fight against climate change, the Company has decided to calculate the **carbon footprint** of its products to communicate the impact generated by the products made in

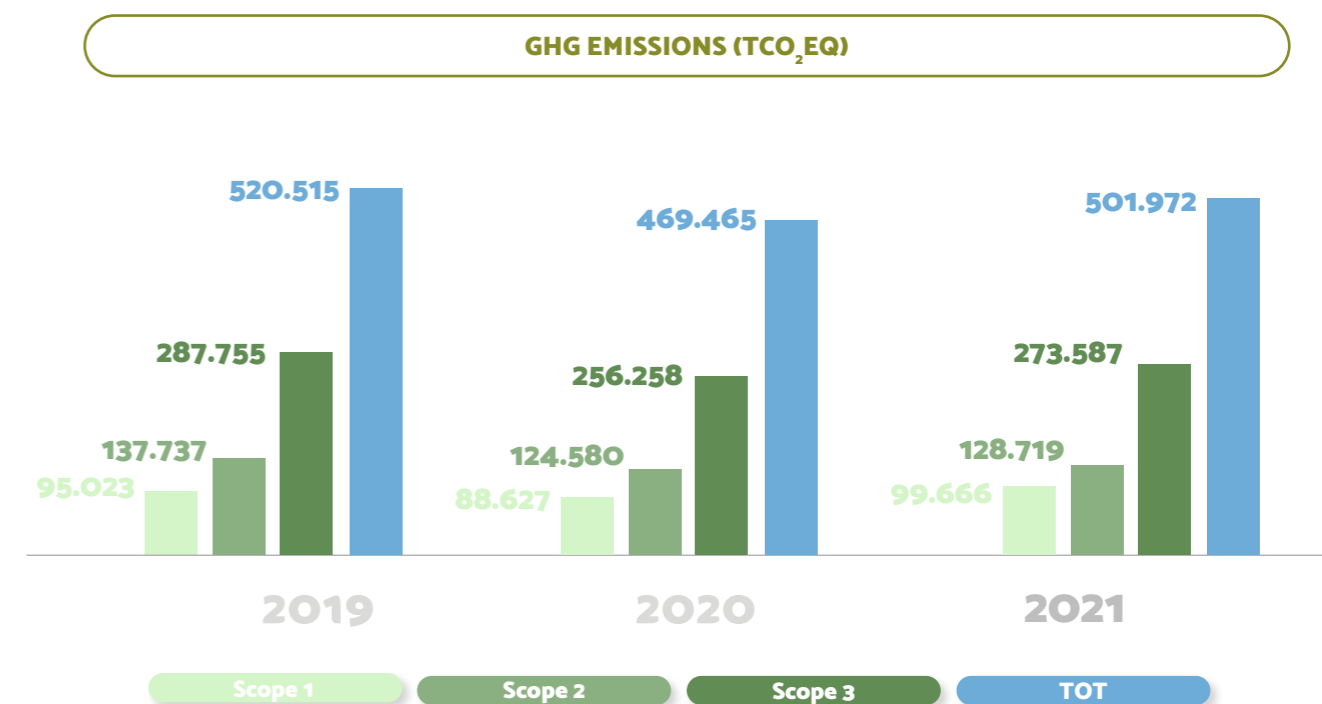
INVENTORY OF GHG EMISSIONS BASED ON ISO 14064-1

According to the guideline's requirements¹, the **GHG emissions** have been estimated by distinguishing between direct and indirect ones. In 2021, 501,972 tCO₂eq were emitted. Of these

EMISSION CATEGORY	DEFINITION
Scope 1 - Direct	Direct emissions coming from use of fossil fuels and other materials in the factory's in-house processes.
Scope 2 - Indirect	Indirect emissions associated with the consumption of electric energy supplied from outside.
Scope 3 - Indirect	Indirect emissions from transport, from products and services used in the plant; emissions generated outside the plant linked to the use of products.

the main contribution (55%) comes from indirect emissions Scope 3, amounting to 273,587 tCO₂eq. Direct (Scope 1) and indirect emissions from electricity (Scope 2), contribute to over 45% of the organisation's emissions and constitute the scope of action for direct efficiency improvements by ORI Martin.

The comparison with **emission data** of the previous years highlights that 2021, notwithstanding the rebound of the activities, marked a **general drop**, in the overall level of GHG emissions, demonstrating the company's efficient commitment to making its production processes more and more efficient.



¹ The Greenhouse Gas Protocol, A Corporate Accounting and Reporting Standard, published by The Greenhouse Gas Protocol Initiative, is one of the mostly widely recognized international standards for the accounting and reporting of GHG emissions

GHG EMISSIONS IN 2021

19.9%
25.6%
54.5%

Scope 1

Scope 2

Scope 3

Specific emissions increase as the industrial processes associated with the processing steps linked to each individual product increase. In fact, the processing of steel billets requires fewer steps than the production of rolled products (for example, hot rolled bars) or products subject to rolling and further special processing (for example, quenched and tempered bars).

This level of analysis allows the Company to identify **actions targeted** at **reducing** impact both at the process level, acting on Scope 1 and Scope 2 emissions, and at the level of the entire value chain, taking action on Scope 3 emissions through initiatives jointly with suppliers, customers and other external Stakeholders.

THE ENVIRONMENTAL PRODUCT DECLARATION

As a further step towards an environmentally sustainable production, ORI Martin has concluded the Life Cycle Assessment (LCA) of its steel products in order to register them for the Environmental Product Declaration (EPD) certification. The processes started in 2021, and led to the achievement of this prestigious result in yearly 2022. The EPD is a voluntary declaration describing the environmental performances of products in compliance with the ISO 14025 international standard. The declaration is issued by an external body after an extended examination of the product lifecycle performances, attesting the robustness of the monitoring and controlling of the environmental performance of products. The declaration is linked to steel billets, annealed wire rods and bars, hot-rolled wire rods and bars, quenched and tempered bars.

5.3.2 EMISSIONS INTO THE ATMOSPHERE

The protection of air quality is an important issue for ORI Martin, which uses the **best available technologies (BAT)** to **limit emissions** into the atmosphere below thresholds that could have negative consequences on the surrounding community and to comply with the requirements imposed by AIA.

produced by the rolling mill, the Company intervened introducing low NOx (nitrogen oxides) burners on the billet heating furnace, installed in 2015.

The **monitoring** of pollutant **emissions** released into the atmosphere involves **annual or six-monthly** sampling of the outfeed flows from the chimneys which makes it possible to measure the concentration values of the pollutants subject to limitations.

There are **16 emission points** in the plant. The most significant emission comes from the fumes abatement system of the steel plant, where there are two side-by-side bag filters.

The Statistical Appendix shows the values referring to the concentration detected on the samples taken from the two main emission points (the chimneys E1 and E1-bis of the steel plant fumes abatement system), compared with the respective minimum thresholds.

As shown by the data, the concentrations always remain much **lower** than the prescribed limits.

Furthermore, with regards to the emissions

SPECIFIC EMISSIONS PER PRODUCT UNIT

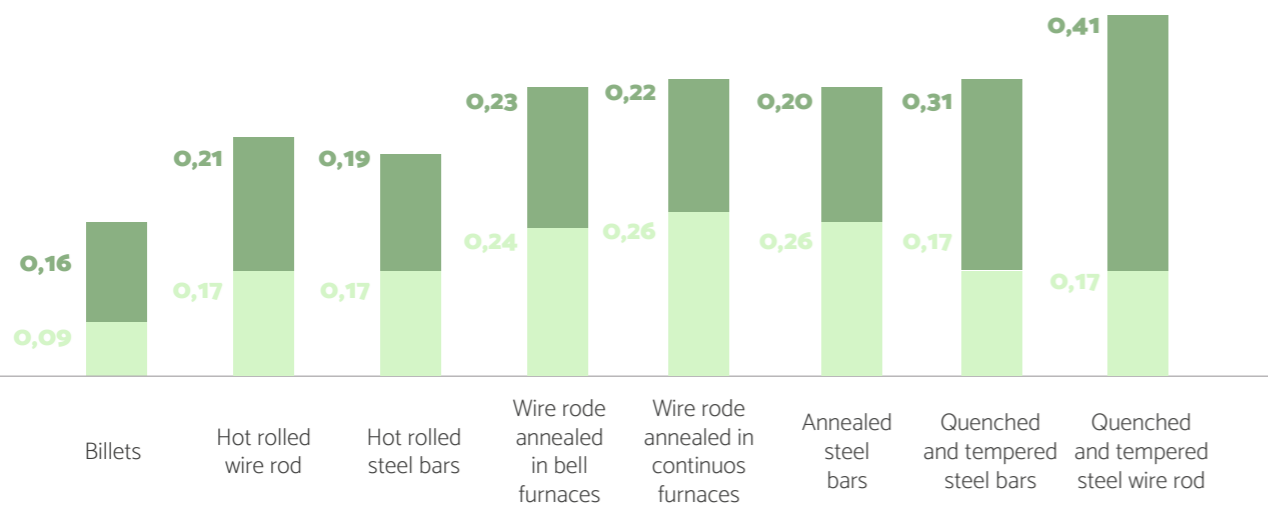
Thanks to the carbon footprint study, ORI Martin was able to determine the **emission intensity** attributable **to each product** generated in the different production phases (steel plant, rolling mill or heat treatments).

The results of the study also brought to light the contribution of each single emission category which then enabled the identification of actions aimed at reducing the impacts on individual products.

The data below relates to 2021 in tons of CO₂eq per ton of product (Scope 1 and Scope 2):

EMISSION INTENSITY IN 2021 (TCO₂EQ/T PRODUCT)

0,25 0,38 0,36 0,47 0,48 0,46 0,48 0,58



Scope 1

Scope 2

TOT

5.3.3 WASTE

Waste is one of the main consequences of the steel production process and ORI Martin manages it within its own **certified ISO 14001 management system** and in compliance with AIA provisions.

The adoption of a **circular economy model** also involves proper and effective management of production processes with the aim of **minimising the amount** of unusable industrial **waste** and favouring its recovery as much as possible. **In 2021, waste sent for recovery represented 78% of the total**, entirely treated offsite.

The main **waste** produced by the plant is untreated **slag**, an inert material that develops during the melting of scrap in the electric arc furnace (black slag) and during the treatment of steel in the ladle (white slag).

The black slag, following a process of separation and recovery of steel fragments, is sent to authorised platforms specialised in the reuse for road foundations and bituminous conglomerates. The white slag is instead sent to approved landfills for disposal after separation and recovery of any steel fragments.

Production also generates a significant amount of **scale**, a surface layer of iron oxide that is produced when the billets are cooled or rolled.

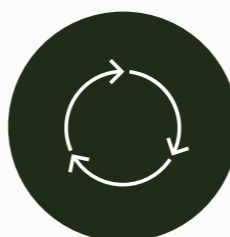
This substance is collected and sent for recovery to be used in the production of cement. Finally, **solid waste** produced from fumes treatment is separated through filtration from the fumes extraction systems in the hot area of the steel plant. The dust is stored in special silos and then loaded onto trucks to be transferred to authorised companies specialised in the recovery of zinc.

TYPE OF WASTE (TONS)	2019	2020	2021
Non-hazardous and recovered waste	96,783	86,032	95,187
Non-hazardous waste sent to landfill	32,264	29,797	29,942
Total non-hazardous waste	129,046	107,572	125,101
Hazardous waste recovered	7,916	8,243	8,608
Hazardous waste sent to landfill	57	14	28
Total hazardous waste	7,973	8,257	8,636
Total waste	137,019	115,829	133,737

The **total** of the **waste** generated in 2021 by ORI Martin activities was 133,737 tons, a **15% increase** compared to the total of 115,829 tons in 2020 due to the production increasing.

Another interesting aspect is that of the total hazardous waste, **only 0.32%** was sent to **landfills**, the rest was recovered.

76% waste of 2021 was sent for recovery



5.3.4 NOISE POLLUTION

ORI Martin pays **great attention to the acoustic impact** caused in the surrounding area by the activities of the plant and the movement of heavy vehicles.

For several years, the **Company** has been **intervening** in the **most critical areas** of the plant by installing **soundproofing** walls and doors with the aim of containing the noise produced by the systems.

These interventions complied with the noise pollution limits set by the Municipal Government. Furthermore, for transparent relations, the Company has adhered to the external reporting system, set up by the Observatory established by the Municipality (see box "ORI Martin Observatory"), which guarantees citizens the possibility to report episodes creating disturbance in the area.



THE ORI MARTIN OBSERVATORY

In order to create a stable communication channel and a continuous dialogue between institutions, the Company and the neighbourhood in an area of **close co-existence** between **industrial settlements** and **residential areas**, since **2013** the **ORI Martin Observatory** has been active. It was established to develop and make permanent the first ORI Martin Technical Table, set up by the Municipal Government of Brescia in 2010.

The composition is the main representatives of the territory: in fact, it includes **members of the Executive** and **Municipal Council**, the **District Council**, the **Council for the Environment**, as well as a **Company representative** and a **workers representative**.

The main topics concern information on environmental impacts and traffic issues resulting from the activity of the plant along with a search for solutions to the problems reported by citizens. **The Observatory's activity is periodically reported** on the **website of the Municipal Government of Brescia** (www.comune.brescia.it), where the 2021 report is available.

Direct communication with the territory is carried out through a procedure whereby the Company guarantees **to listen to any reports** from the neighbourhood regarding disturbance attributable to industrial activity such as vibrations, dust, odour and traffic. The procedure establishes that a suitable number of **reporting parties**, residents in the neighbourhood next to the factory, can transmit reports promptly.

The complaint is then recorded in a special register "Citizen Nuisance Reporting Model", which also collects the intervention implemented by the Company to eliminate or reduce any anomalies. The register is available to the Observatory and the District Council. In **January 2020** a new reporting model was introduced for **noise**.



chapter 6



Social responsibility

SDGs	MATERIAL TOPIC	DESCRIPTION
	Good health and well-being	Human resources are the main pillar for ORI Martin's growth. Aware of the strategic importance of its workforce, the Company manages human resources by focusing on their enhancement and their complete integration into the corporate culture . Staff management is based on the Code of Business Conduct , which promotes respect for equal opportunities, growth of individual skills, development of teamwork and continuous learning in the overall effort aimed at cultivating skills and competencies for everyone. Through training and professional updating, the energy and creativity of individuals will find full expression for the realisation of their potential. Particular attention is also paid to the local community , through initiatives that promote inclusiveness and diversity, and the evaluation of its suppliers , in order to avoid unlawful behaviour that also involves developing countries
	Quality education	
	Decent work and economic growth	
	Sustainable cities and communities	

6.1 ORI Martin's team

6.1.1 THE WORKFORCE

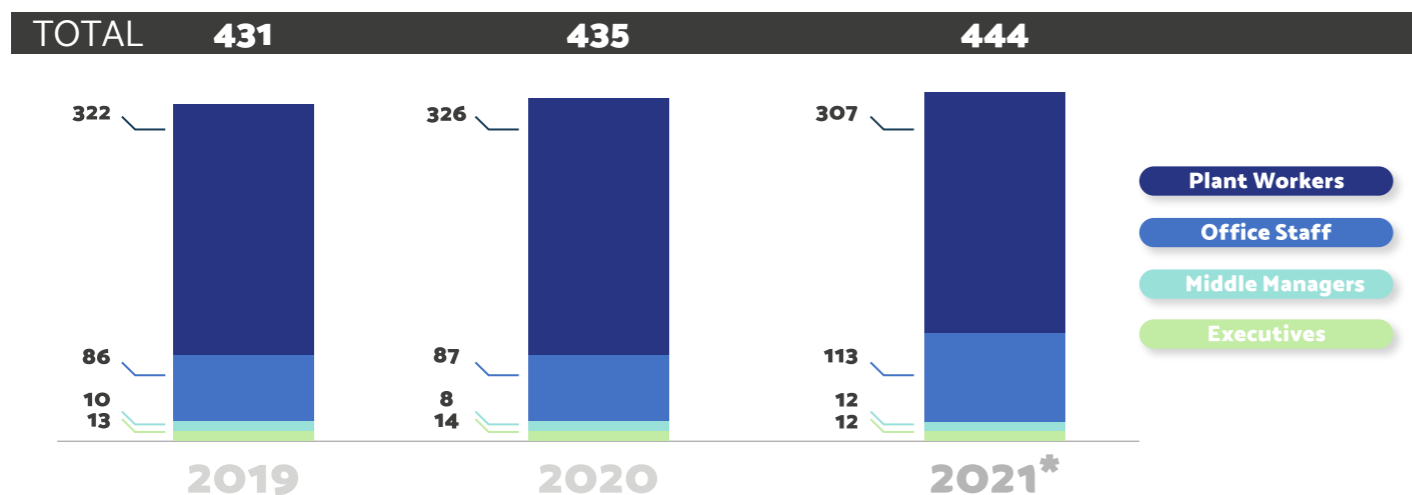
ORI Martin's workforce consists, as of 31 December 2021, of **446 employees** (+3% with respect to 2020 and 2019), in a constantly growing trend that made it possible to achieve the brilliant results of recent years.

The workforce increase has a strong significance for the territory as well, since a large part of the staff lives the province of Brescia.

+3% EMPLOYEES



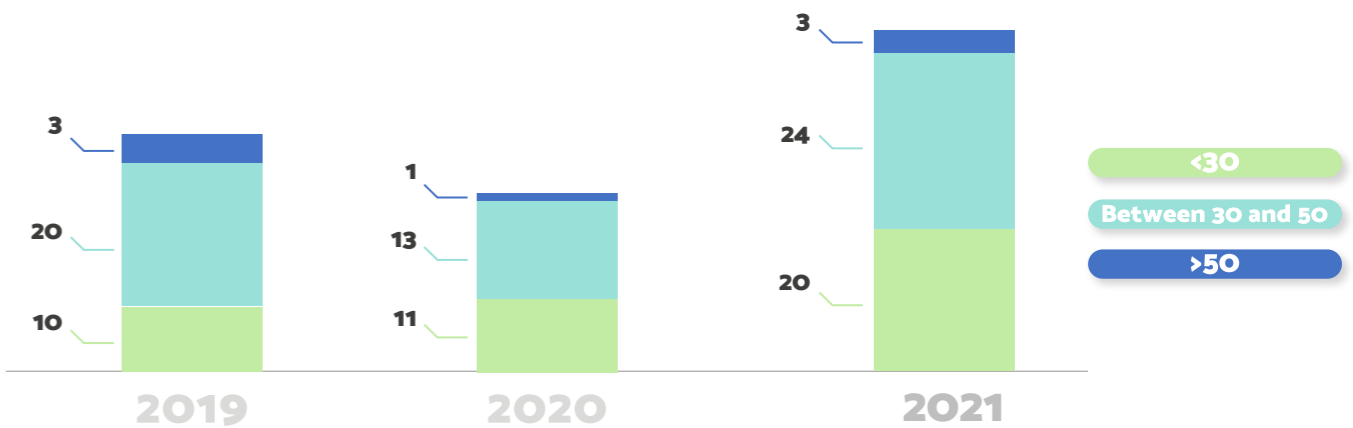
WORKFORCE BY PROFESSIONAL CATEGORY (UNITS)



The most represented category is plant workers, counting 309 at the end-of-year reporting, which is 69% of the total workforce, followed by office staff (113), executives and middle managers (12 in each category). As per gender composition, the Company reflects

the prevalence of the male workforce, which is a common feature in particular for the steel sector, due to the major share of the so-called "blue collars" employed in the plant. Barring this latter category, the percentage of women in the workforce (white collars and executives) is 18%.

NEW HIRES BY AGE DISTRIBUTION



The growth of the workforce recorded in recent years is due to the positive and constantly increasing trend in hirings. By 2021, **47 new employees** were hired, 20 of whom are less than 30 years old, witnessing the effort the Company is doing to attract and employ young talents. On the contrary, terminations were 36, of which 22 affected the most experienced piece of the population, mostly for retirement reasons.

agreements: the national reference contract applied is the Metalworking-Industry (CCNL) on top of a second-level contractual scheme, renewed in 2021, that provides employees with a series of additional perks, such as productivity and quality bonuses, professionalism rises and training bonuses.

Trade Unions are a **key interlocutor** for HR management since they record a high rate of engagement among ORI Martin employees.

Besides expanding its workforce, Ori Martin is also striving to enhance its employees' stability and continuity, fundamental elements of any relationship of loyalty and mutual trust.

The Company can count on consolidated

This position is reflected in the contracts in place at the plant, where **93%** of the workforce is **employed on permanent contracts**. The Company also allows for part-time employment, affecting only a minority of employees with just 3 out of 446.

All employees are subject to collective contractual





relationships developed over many years of open dialogue with the Unions, characterised by mutual respect and recognition with a focus on the issues of greatest interest to the workers.

The Company endeavours to meet and inform the Trade Unions about strategic Company choices

6.1.2 A SAFE WORKPLACE

Striving to achieve continuous improvement means first of all ensuring a **healthy and safe working environment for the employees**, constantly analysing the work environment and taking into account all the factors relevant to safety.

that could cause significant changes to the existing manufacturing structure and work organisation, with minimum notice going from 6 to 24 months based on the type of contract.



In conducting and developing those activities the Company takes into account the requirements, regulations and standards of reference and their modifications, while maintaining regulatory compliance through a **health and safety management system**.

The system, certified since 2011 according to BS OHSAS 18001: 2007, was updated in 2019 according to UNI EN ISO 45001 and covers all the employees and workplaces of the plant.

Furthermore, the Company has qualified as a major accident risk (lower threshold RIR plant) according to Legislative Decree 105/15 which enforces Directive 2012/18/EU. The liability is related to the storage, beyond the thresholds allowed by the decree, of fumes abatement powders containing dangerous substances, in particular zinc oxide and lead compounds classified as dangerous for the environment.

For this reason, according to Decree requirements, ORI Martin has developed the **Major Accident Prevention Policy**, which includes the objectives set in the field of prevention and control

of major accidents for the protection of health, the environment and goods.

According to the management system, the health and safety of workers is supervised by a structure that reports to plant Management, where there are key figures such as the Head of the Prevention and Protection Service (RSPP), safety officers, a Company doctor and the Workers Safety Representatives (RLS), in accordance with Legislative Decree 81/2008.

ORI Martin has set up an internal workgroup, including Technical Department, Human Resources, Department Managers, RSPP and RLS, which meets quarterly to evaluate the performance indicators and define the related corrective actions and new operational procedures regarding Environment & Safety.

In addition, an internal reporting system is in place, set up to define the appropriate corrective or improvement actions. All reports deemed valid are analysed by management, the RSPP and the managers of the department concerned and can

lead to improvement actions.

In accordance with Legislative Decree 81/2008, ORI Martin manages the hazards related to health and safety in the plant by identifying and assessing risks through a specific procedure aimed at monitoring, mitigating and updating them.

ORI Martin has a Company doctor (specialised in Occupational Health) to carry out regular medical assessments on workers of all departments.

The main health issue that most frequently affects steel plant and rolling mill workers is loss of hearing, for which the Company has implemented a specific monitoring system based on age group and risk exposure levels.

Furthermore, ORI Martin is active on the

prevention front, with training courses for employees suited to the specific tasks and risks and through initiatives aimed at promoting a healthy and balanced lifestyle.

With regard to the Covid-19 pandemic, during the year the Company kept on strictly taking all restrictive measures based on governmental and regional guidelines regarding virus containment measures, in order to guarantee the safeguard of employees' health and safety while enduring business continuity.

Due to the consequences of the pandemic, which continued into 2021, the company made use of the Covid-19 wage guarantee fund for a total of approximately 7,000 hours.



MAN ON THE GROUND TRACKING SYSTEMS

As part of the Light House 4.0 project, during 2021 ORI Martin initiated a major **cybersafety project**: the development of systems for the **safety and security** of workers in indoor and isolated environments, in order to **quickly, automatically and accurately** report and manage a possible illness or accident. These systems consist of worker-wearable devices, communicating with several sensors installed around the plant, that monitor the worker's posture, transmit an alarm (manual or automatic) and detect their precise location through geolocators, thus allowing for a timely intervention from physicians or other workers in case of need.

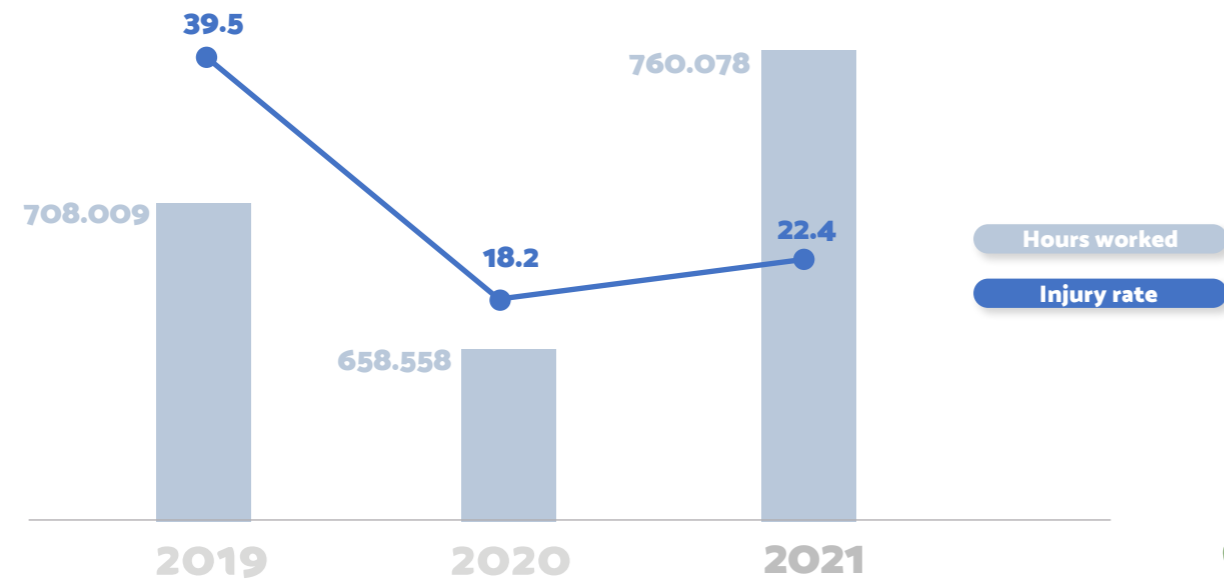
As for **injury rates**², the frequency index increased slightly from 18.2 in 2020 to 22.4 in 2021, mainly driven by the full recovery of production activities compared with 2020. The index is determined by a total number of **injuries** equal to 17, a slight increase over the previous year (13 injuries in 2020), of which none is defined as "of serious consequences", i.e. causing an absence longer than six months. Considering the entire three-year period, the index decreased by 40%. Additionally, the severity index, that considers the number of days lost and the number of hours worked, marked a decrease of over 37% over the same period (from 1.24 to 0.77).

² For the definition and calculation of injury rates please refer to the Methodological Note.

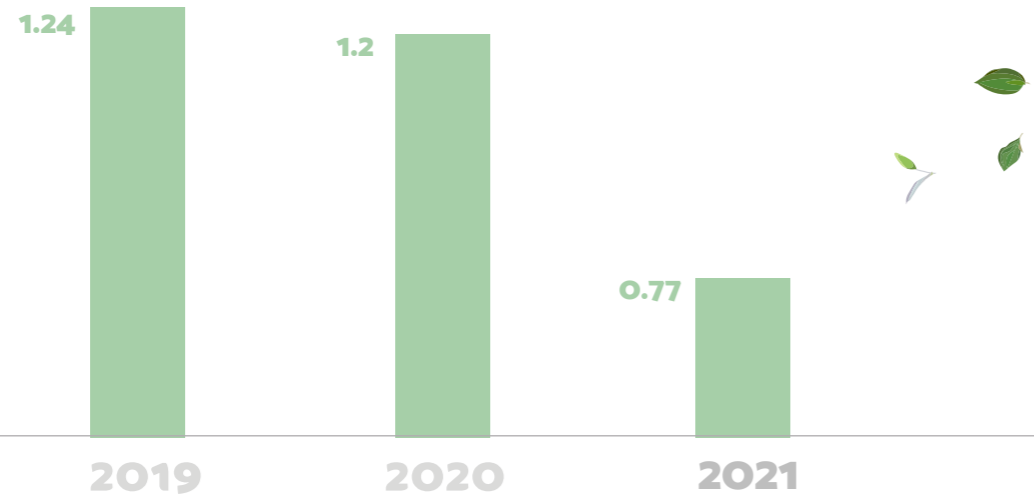


WOMEN LUNCH

In order to promote and foster the sense of belonging of the female component of the Company's workforce, ORI Martin launched a new initiative in October 2021: the Women lunch. The event consisted of a lunch specifically dedicated to all women employed in ORI Martin and it was conceived as a symbolic measure to counter the image of steelwork as a male environment and indeed recognize the fundamental role of women in the overall functioning of the organization.



SEVERITY INDEX



6.1.3 SKILLS DEVELOPMENT

Development of individual skills and permanent learning are amongst the levers that the ORI Martin Code of Business Conduct identifies for the management and **enhancement** of its **human capital**.

Hand in hand with innovation related to products and production processes, ORI Martin considers it essential to constantly **update** the **skills** and know-how of its people.

ORI Martin takes care to develop skills through targeted training in terms of technical and behavioural content.

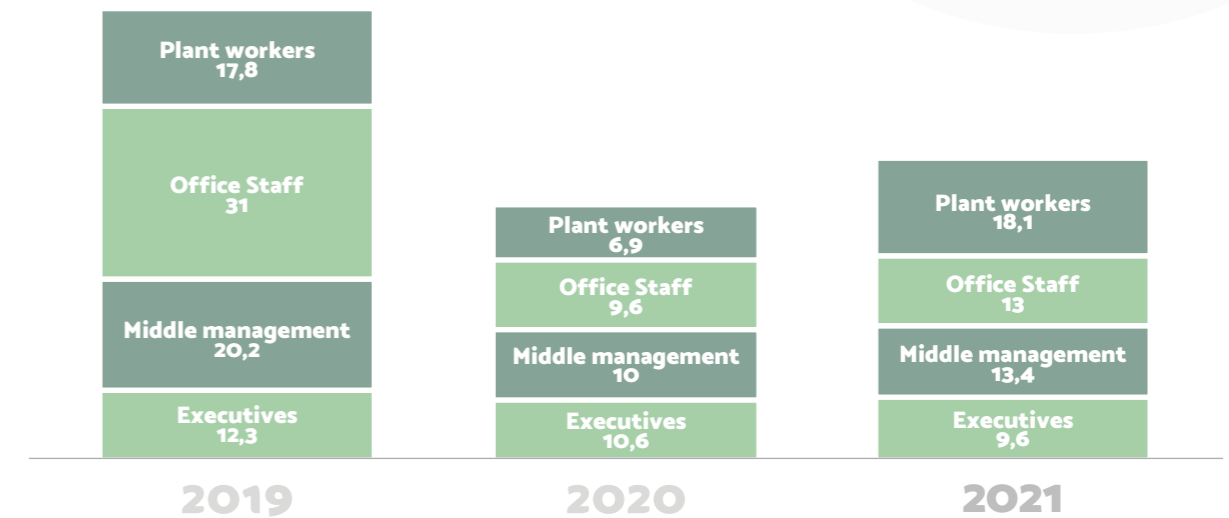
Planning is handled annually by the Human Resources function, through a special training plan laid out in collaboration with the Head of the Prevention and Protection Service (RSPP), Quality Assurance and the Workers' Representatives (RLS). The Company's focus on **transversal skills** has also grown, such as **digitisation, teamwork and diversity**.

SKILLS DEVELOPMENT HUMAN CAPITAL



Training hours per capita amount to 16.0* per employee, an increase over the previous year (7.6 in 2020) due to the fact that courses that were suspended during the pandemic were made up and to the increase in staffing levels, which resulted in more training hours being provided.

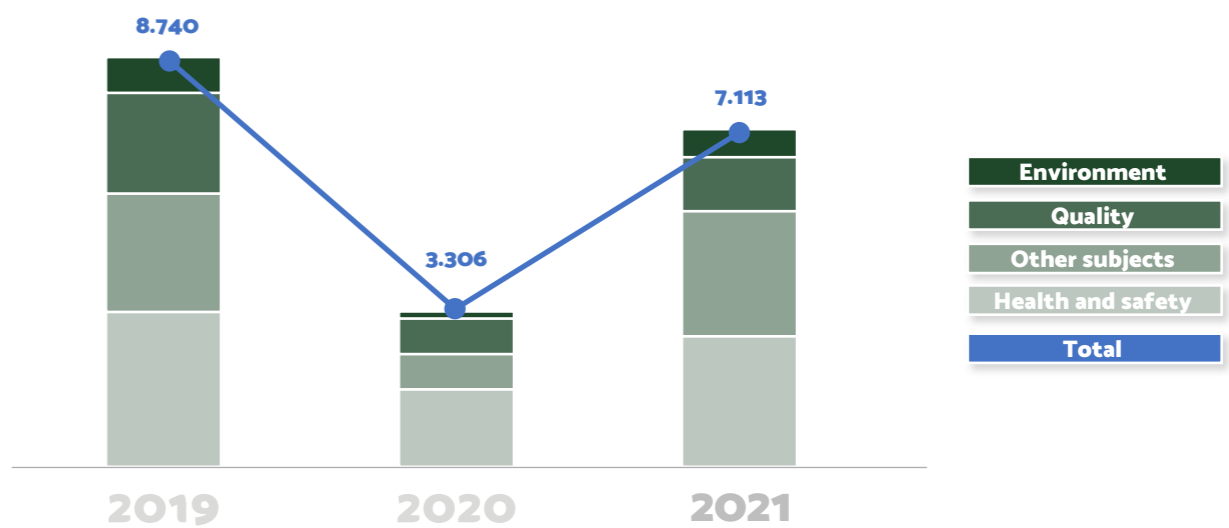
HOURS OF TRAINING PER CAPITA BY CATEGORY



During 2021, beside the regular training on health and safety topics, a large amount of training hours was organized on corporate communication, blue and white collars.

and in particular on the "Diversity and change management" subject, that were provided to all blue and white collars.

TOTAL TRAINING PROVIDED IN 2021 DIVIDED BY TOPIC



WELL-BEING IN ORI MARTIN



In the belief that the development of human resources must also include the ability to support **employee well-being** and **personal satisfaction**, over the last few years ORI Martin has promoted various initiatives aimed at improving work-life balance.

In this area, the Company intervenes on several levels.

On a **financial level**, an integration fund has been set up for employees' health costs and other solidarity interventions (**FAIO**, ORI Martin Internal Assistance Fund).

In addition, the Company guarantees a monthly contribution to be allocated to the Cometa Supplementary Fund.

ORI Martin provides ad hoc **scholarships** to reimburse the expenses incurred by employees related to their children's education, such as tuition, university fees and textbooks.

Another **solidarity** initiative takes place in the event of the death of an employee where one working hour (from each employee) is donated to the heirs of the deceased. Furthermore the Company gives out seniority and marriage bonuses, Christmas gifts and gift packages for the children of employees at Saint Lucy (Italian celebration on 13th December).

On the **prevention front**, the Company organises days dedicated to the distribution of vaccines for employees on a voluntary basis. In addition, it supports the campaign promoted by ANT foundation in order to prevent melanoma and thyroid diseases.

On the prevention front, information sessions are organised by the Italian Association for Organ Donation (AIDO) which, in 2019, awarded ORI Martin with the "gold medal for social commitment", an award given to people, institutions or professionals who have contributed to the culture of giving by collaborating with AIDO.

Lastly, the historical element of the Company is the **Elderly Group**, active since 1980 to develop relationships between older workers and active workers, encourage voluntary activities outside working hours, support Members or their families in disadvantaged situations and promote educational, cultural, recreational activities.

The Group now has about 270 members and celebrates the Company Elder's Day every year.

In 2019, the Company also launched the "**Train the Brain**" project against cognitive loss, dementia and Alzheimer. In addition, in-person talks were arranged with a neuropsychologist in order to prevent and control the cognitive state. The "Neuro-psychological screening reports" were sent to participants directly.

- ELDERLY
- SCHOLARSHIP
- INTEGRATION FUND
- SOLIDARITY
- PREVENTION



6.2 SUPPLY CHAIN PARTNERS

ORI Martin exercises its founding principles and values according to its Code of Business Conduct in the activity it carries out every day with commercial counterparts, primarily suppliers and customers.

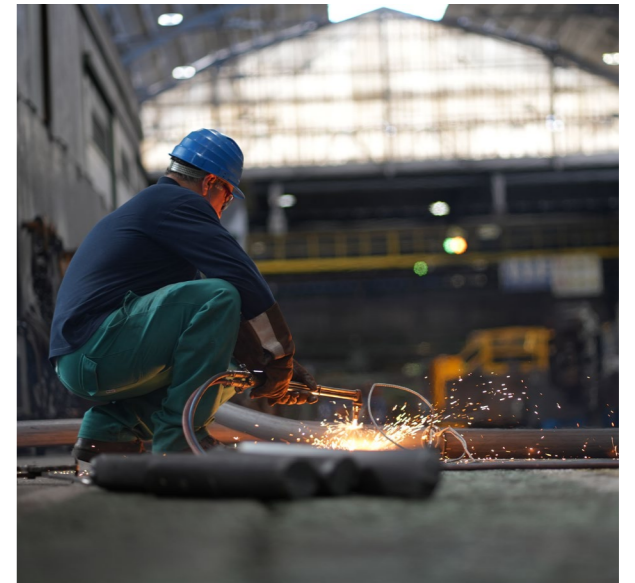
Aware of the strategic importance of selecting reliable partners for the construction of solid and lasting growth over time, ORI Martin adopts a policy of careful **selection** of its **suppliers** (in line with ISO 9001 and IATF 16949 requirements) and promptly listening to Customer needs and requirements.

Suppliers must be listed in the Register of qualified Suppliers and in order to get to that stage, they must be **assessed** according to a **qualification procedure** based on a cross-functional evaluation across all Company departments: the managers of Purchasing, Quality, Environment and Safety Departments are called upon to assess their respective areas of expertise on different levels.

ORI Martin's suppliers therefore demonstrate the ability to meet the highest standards of professionalism and quality in all relevant aspects.

Furthermore, due to the crucial importance of their role, particular attention is paid to suppliers of the raw materials needed for the production process - ferrous scrap above all - or of services for outsourced activities. These suppliers have a certified quality management system according to UNI EN ISO 9001/2015. Scrap suppliers must also be in possession of a certification in line with EU Regulation 333/2011 for the treatment of scrap as non-waste.

All suppliers must be in compliance with environmental and safety regulations and further requirements are introduced in order to assess



suppliers' alignment with health and safety standards and those in terms of labour insurance and the guarantee of regular wages. The upholding of these requirements is monitored through a management information system that records the expiry date of the certificates.

For materials purchased that are considered "hazardous substances/mixtures/products" for humans and the environment, the relevant Safety Data Sheet is always requested from the supplier, which describes the characteristics of safety and environmental aspects.

For each order, suppliers are required to fully adhere to rules outlined in Legislative Decree 231/2011 and to comply with the contents of the **ORI Martin Code of Business Conduct** and the provisions in Legislative Decree 196/2003 (Privacy Code) and EU Regulation 676/2016 (GDPR) which therefore all constitute essential contractual conditions.

Once a year, suppliers receive a **rating** referred to the **quality of the product and service**, established automatically based on an algorithm combining any non-conformities detected in the period of reference with other parameters, for example delivery punctuality.

The main ORI Martin supplies originate mainly from Northern Italy, also due to where the facility is located in an industrial basin where many steel chain companies can be found.

The proximity of suppliers also provides a competitive advantage in terms of minimisation of shipping costs.



Amongst raw materials, the main item concerns **scrap** mainly supplied by the subsidiary AOM Rottami S.p.A. based in Lombardy. **Pig iron and direct-reduced iron** are instead of non-EU origin.

The supply of materials used in the production process is also monitored from the point of view

of the produced CO2 emissions.

Volumes transported and kilometres travelled are recorded for each supplier and each delivery.

The calculation is then included in those of the scope 3 carbon footprint emissions, reported in chapter 5.3.1 "Greenhouse gas emissions and CO₂ footprint".

AOM, STRATEGIC PARTNER FOR SCRAP



The guarantee of an ORI Martin quality product begins upstream of the process, in the meticulous selection of the raw materials. Over 95% of the raw material used is represented by scrap, which therefore plays a central role in the production process.

In order to ensure the highest standards of quality and reliability for its raw materials, ORI Martin can count on a consolidated relationship with AOM Rottami S.p.A. which supplies over 80% of its annual needs.

AOM Rottami is a Company **founded in 2005** by ORI Martin and an experienced, historic partner in the scrap trading sector. AOM Rottami is active in the collection, processing and marketing of metal scrap; based in the province of Bergamo, AOM Rottami has a storage, processing and shipping capacity of over 100,000 tons/month.

Besides the pre-requirements requested by ORI Martin of all scrap suppliers (such as ISO 9001/2015 certification and certification pursuant to EU Regulation 333/2011), AOM Rottami is certified ISO 14001/2015 (Environmental management system) and ISO 45001/2018 (Occupational health and safety system), thus providing a further guarantee of a management system based on the **monitoring** and continual **improvement** of its environmental, and occupational health and safety **performance**.

Listening to **customer** needs and suggestions and the development of solutions able to satisfy and anticipate their requests are strategic activities of vital importance for a Company that defines its competitive advantage by working on custom orders based on the needs expressed each time by the customer.

Upstream of processing, ORI Martin brings added

value to the offer by customising and adapting production to customer requirements and integrating complete and innovative proposals. Downstream of the order, however, the Company collects any complaints through a specific function and carries out **satisfaction** surveys, periodically submitted to customers to verify the level and effectiveness of the service offered.

MEMBER OF

FEDERACCIAI

AIM

CONFINDUSTRIA BRESCIA

RAMET

ACIMAF

UPIVEB

ANCCEM

Listening to customer needs and suggestions and the development of **solutions** able to **satisfy** and **anticipate** their requests are **strategic activities** of vital importance for a Company that defines its competitive advantage by working on custom orders based on the needs expressed each time by the customer.



ORI Martin is committed to establishing business relationships based on a solid foundation of shared rules and ethical principles.

For this reason a declaration is made available to all customers, renewed every year, whereby relations with countries belonging to conflict zones are excluded. This way customers can declare the absence of so-called conflict minerals in the steel purchased: those are resources extracted in high-risk regions where the minerals trade could be based on forced labour or may finance illegal activities. ORI Martin operates according to the principles defined by the UN Global Compact although it has not formally joined.

ORI Martin is committed to favouring intermodal freight to deliver its products to foreign customers. As a result of the long distances to be covered, a significant reduction in greenhouse gases is achieved.

With respect to the activities of trade associations, ORI Martin is an active member of the main reference sector bodies: **Federacciai** and the **Italian Metallurgy Association (AIM)**.

As part of its participation in the **Brescia Industrial Association (AIB)**, the Company is part of **RAMET**, a consortium that brings together over twenty companies in the steel and metallurgical sectors, engaged in environment-related research projects. Moreover, ORI Martin belongs to **ACIMAF** (Italian Wire Machinery Manufacturers Association) and in other associations active along the automotive supply chain like the **Union of Italian Screw and Bolt Manufacturers (UPIVEB)**, the Italian Spring **Manufacturers (ANCCEM)** and collaborates with the technological clusters involved in innovation.

6.3 TERRITORY



ORI Martin
in **San Bartolomeo**
(Brescia)



Being **part of a community** for ORI Martin means not only committing to establish a constructive co-existence based on the principles of constant **dialogue** and mutual respect with the **territory**, but also dedicating itself to proactive action to contribute to the general improvement of the surrounding **context**.

To develop these initiatives, ORI Martin can count on a **relationship** based on **mutual trust** gained over the years with both the **Municipal Administration** and with the **District Council**. Considering the indirect impacts generated by

mobility to and from the plant, **ORI Martin** has invested in redesigning **the access routes** and in encouraging alternative mobility by building **more than 3 km of cycle paths** around the plant. Also a city **bike sharing** service was set up to encourage employees to reach their workplace on bike.

And for years now, the Company has been using **electric cars** for all transfers within Brescia.

Another initiative to the benefit of **green** areas in the district was a **gift** to the Municipality of an **urban wood**. **More than 500 trees** have been planted to **enhance the area** and mitigate the environmental impact. A park area of about

40,000 square metres, situated to the north of the facility, added to the one of another **40,000 square metres** transferred to the Municipality to deduct expenses foreseen are part of the Urban-planning Agreement of 2000.

For about forty years ORI Martin has been supporting more than thirty **associations** and **institutions** operating in the **social, cultural, artistic areas**, supported with annual contributions and followed over the years together with the Company's **Elder's Group**.

In the social field the commitment in favour of **Scuola Nikolajewka** - an important organisation active in the field of disability - stands out since its foundation in 1983, as well as the support, started in 2019, of a Community Centre, a decentralised institution within the **Municipality Administration**, which works for the elderly and vulnerable groups of the resident population. In 2021, the company supported the San Bartolomeo sports group by providing sportswear for two

young teams.

As for educational institutions, the Company supports the **Benedetto Castelli Foundation**, which promotes and enhances the educational offer of the Technical Institute of the same name and the **International High School for Business Guido Carli**.

In terms of cultural offer, ORI Martin has been supporting **MUSIL, the Museum of Industry and Labour** for years, an absolutely unique institution in Italy. It has already opened some exhibition centres in the Province of Brescia, while the main location is going to open in town in the next few years.

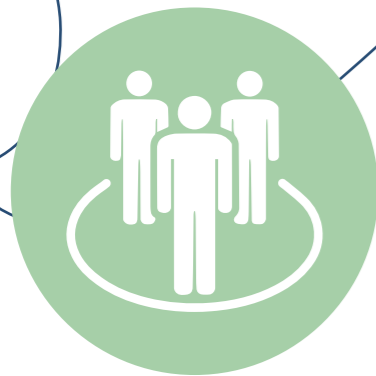
Convinced that relations with the territory develop at different levels, the ORI Martin commitment is also aimed at sustaining and strengthening the social and relational fabric that it belongs to, with its **artistic and cultural heritage**.

On this point, in 2020 it finalised its three-year participation in the **"Alliance for culture"**, to support cultural initiatives promoted by the **Brescia Museums Foundation**.

On 16 October 2020, the statue of the **Vittoria Alata (Winged Victory) symbol of the city of Brescia, returned to Brescia after two years of restoration work**. The restoration was made possible by a specific contribution made by ORI Martin in the previous years.

Finally, during the hard times of the Covid pandemic, ORI Martin has participated in several **initiatives** promoted locally (**aiutiAMO Brescia, SOSTieni Brescia**) to **manage and face the health, social and work emergency** caused by the **pandemic**, in the memory of our Vice President,





Annamaria Magri, who died of Covid in March 2020.
In particular, during 2021, the Company participates to the **“Un vaccino per tutti” (a vaccine for all)** initiative to promote the procurement of anti-Covid 19 vaccines for developing populations and encouraging to join the vaccination campaign among people working in companies and their families.

THE BUST OF OGER MARTIN IN SAN BARTOLOMEO PARK

In September 2021, with the presence of the Major of Brescia, the commemorative bust of Oger Martin, who founded ORI Martin in 1933 after moving from Belgium, was inaugurated in the San Bartolomeo Park in Brescia,

“Oger Martin was an old pioneer, an explorer of new markets. Dear great-grandfather Oger, you would be proud to know that we have walked this path in your wake. Today the group that bears your name consists of a dozen companies and employs more than a thousand families. Today, more than ever, your memory lives on in the teachings and moral values that you have transmitted to us: attachment to the family, attachment to work and respect for others”

Giovanni Marinoni Martin, Vice President



In **September 2021**, with the presence of the Major of Brescia, the **commemorative bust of Oger Martin, who founded ORI Martin in 1933** after moving from Belgium, was inaugurated in the San Bartolomeo Park in Brescia.

201-1: Direct economic value generated and distributed (Euros)

Generated value	2019	2020	2021
Value of production ¹	419,576,659	342,788,840	557,590,088
Income from equity investments	1,41W5,100	1,003,477	1,003,477
Other financial income	380,536	585,863	503,050
Extraordinary income	7,099,481	0	0
Total value generated	428,471,776	344,378,179	559,096,615

Distributed value	2019	2020	2021
Value to suppliers	328,088,123	287,685,808	501,091,930
Value to employees	32,457,916	30,125,581	34,614,341
Value to the Public Administration ²	7,346,173	- 7,216,409	- 6,729,583
Value to capital providers	932,589	1,044,318	868,222
Value to the community	423,469	728,932	424,134
Total value distributed	369,248,270	312,368,230	530,269,044

Retained value	2019	2020	2021
Operating income	23,274,748	8,226,601	-1,541,023
Depreciation / Provisions / Write-downs / Revaluations	35,948,759	23,783,349	30,368,594
Total retained value	59,223,506	32,009,950	28,827,571

¹ In this document, the "Value of production" item differs from the one reported in the financial statements for the year, as the extraordinary income was extracted and reported in the appropriate item.

² The 2020 and 2021 figures are negative for fiscal receivables accrued and tax prepayments made.

102-8: Information on employees and other workers

	2019			2020			2021 ³		
	M	F	Total	M	F	Total	M	F	Total
Total workforce	407	24	431	411	24	435	422	24	446
Permanent contracts	387	23	410	396	23	419	391	24	415
Fixed term contracts	20	1	21	15	1	16	31	0	31
Full-time	406	22	428	410	22	432	422	21	443
Part-time	1	2	3	1	2	3	0	3	3

401-1: New employee hires and employee turnover - Female

	2019		2020		2021	
	Hires	Turnover	Hires	Turnover	Hires	Turnover
< 30 years old	1	0	0	0	2	0
30 to 50	8	1	2	0	2	3
> 50 years old	1	0	0	2	0	1
TOTAL	10	1	2	2	4	4

401-1: New employee hires and employee turnover - Male

	2019		2020		2021	
	Hires	Turnover	Hires	Turnover	Hires	Turnover
< 30 years old	9	2	11	2	18	3
30 to 50	12	8	11	5	22	8
> 50 years old	2	11	1	12	3	21
TOTAL	23	21	23	19	43	32

401-1: New employee hires and employee turnover - Total

	2019		2020		2021	
	Hires	Turnover	Hires	Turnover	Hires	Turnover
< 30 years old	10	2	11	2	20	3
30 to 50	20	9	13	5	24	11
> 50 years old	3	11	1	14	3	22
TOTAL	33	22	25	21	47	36⁴
RATE	7.7%	5.1%	5.8%	5.3%	10.5%	8.1%

³ Excluding terminations occurred on 31/12/2021, 2021 figures are: 444 in total, 420 men (389 permanent and 31 fixed term) and 24 women, all permanent. As for contract type, all are full-time, except for 3 women in part-time.

⁴ Considering terminations occurred on 31/12/2021, the total number of terminations is equal to 34, as two male employees over 50 left the Company in December 2021, and the rate equals to 7.7%.

404-1: Average hours of training per year per category

Category	2019	2020	2021
Executives	12.3	10.6	9.6
Middle Managers	20.2	10.0	13.4
Office Staff	31.0	9.6	11.3
Plant workers	17.8	6.9	18.0
TOTAL	20.4	7.6	15.9

GRI 403-9: Work-related injuries

Category	2019	2020	2021
Hours worked	708,009	658,558	760,078
Number of work-related injuries	29	13	17
of which with more than 3 days absence	26	12	17
of which commuting incidents	1	0	0
of which high-consequence work-related injuries (>180 days absence)	1	1	0
Number of fatalities	0	0	0
Rate of work-related injuries	39.5	18.2	22.4
Rate of high-consequence work-related injuries	1.4	1.5	0
Rate of fatalities	0	0	0
Severity index	1.24	1.20	0.77

GRI 403-10: Work-related ill health

Number of cases of recordable work-related ill health ⁵	1	1	1
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⁵ With respect to Work-related ill health, there was a case of hearing loss in 2019 and one in 2021, one of dermatitis in 2020.

301-1: Materials used

Raw materials	Units of measurement	2019	2020	2021
Scrap	Tons	681,804	649,652	701,720
Ferroalloys	Tons	16,062	14,353	16,963
Reduced iron	Tons	17,575	-	-
Pig iron	Tons	25,476	21,250	33,253

Raw materials	Units of measurement	2019	2020	2021
Lime	Tons	30,397	29,643	38,823
Coal	Tons	11,915	12,041	12,717
Refractory	Tons	11,464	10,241	11,200
Electrodes	Tons	1,259	1,144	1,251
Graphite	Tons	1,579	1,234	1,570
Oxygen*	m ³	16,278,276	15,108,468	17,038,772
Nitrogen**	m ³	5,398,916	5,342,489	5,675,481
Argon**	m ³	416,962	339,942	423,339

* The volume of oxygen is measured under normal conditions, i.e. at 1,013.25 millibar atmospheric pressure and at 0°C.
 ** The volume of nitrogen and argon is measured under standard conditions, i.e. 980.5 millibar pressure and 15°C.

303-3: Water withdrawal

Water withdrawal	Units of measurement	2019	2020	2021
Withdrawn from groundwater	m ³	754,840	731,396	762,149
Withdrawn from third party resources	m ³	8,785	10,377	13,924
Total withdrawn water	m³	763,625	741,773	776,073

303-4: Water discharge

Water withdrawal	Units of measurement	2019	2020	2021
Discharge into surface waters	m ³	221,407	205,649	227,705

Analysis of waste water from the steel plant S1 - Annual average

Parameter (mg/l)	Limits (mg/l)	2019	2020	2021
Total suspended solids (TSS)	80	< 5	< 5	< 5
C.O.D (O ₂)	160	< 10	< 10	< 10
Total hydrocarbons	10	< 0.5	< 0.5	< 0.5
Iron (Fe)	2	< 0.10	< 0.10	< 0.10
Copper (Cu)	0.1	< 0.01	< 0.01	< 0.01
Zinc (Zn)	0.5	< 0.05	< 0.05	< 0.05
Nickel (Ni)	2	< 0.10	< 0.10	< 0.10
Total chromium (Cr)	2	0.10	0.10	0.10
Lead (Pb)	0.2	< 0.05	< 0.05	< 0.05

Analysis of waste water from the rolling mill s3 - Annual average

Parameter (mg/l)	Limits (mg/l)	2019	2020	2021
Total suspended solids (TSS)	80	< 5	< 5	< 5
C.O.D (O ₂)	160	11.7	14	12
Total hydrocarbons	5	< 0.5	< 0.5	< 0.5
Iron (Fe)	2	< 0.10	< 0.10	< 0.10
Copper (Cu)	0.1	< 0.01	< 0.01	< 0.01
Zinc (Zn)	0.5	< 0.05	< 0.05	< 0.05
Nickel (Ni)	2	< 0.10	< 0.10	< 0.10
Total chromium (Cr)	2	< 0.10	< 0.10	< 0.10
Lead (Pb)	0.2	< 0.05	< 0.05	< 0.05

302-1: Energy consumed within the organisation (GJ)

Energy consumed in the plant (in GJ)	2019	2020	2021
Electricity purchased from the grid	1,762,094	1,593,780	1,817,206
Natural gas	820,272	729,960	857,575
Diesel fuel	10,973	8,089	9,408
of which diesel for internal handlings and transport	9,783	7,340	8,410
of which diesel for the car fleet	1,190	749	998
Petrol	-	-	65
Self-produces and consumed electricity	8,618	9,123	11,990
Total	2,601,957	2,340,952	2,696,245
Thermal energy sold	82,749	52,111	42,833

Analysis of the main polluting emissions into the atmosphere from steel plant chimneys (mg/Nm³)

Pollutant	Limit value (mg/Nm ³)	Chimney measurement E1			Chimney measurement E1bis		
		2019	2020	2021	2019	2020	2021
Total organic carbon (TOC)	20	6.8	4	24	8.7	3.7	2
Nitrogen oxides (NO _x)	300	6	11	< 5	7	10	6
Σ(Pb,Mn,Cu,V,Sn)	5	0.0147	0.0065	0.0238	0.0178	0.0157	0.0306
Σ(Cr,Ni,Co,V,As,Cd)	1	0.0015	0.0015	0.0018	0.0034	0.0029	0.0035
Mercury	0.05	< 0.0006	< 0.0006	< 0.0005	< 0.0006	< 0.0006	0.0011
IPA*	0.01	0.000021	0.000019	0.000028	0.000018	0.000019	0.000024
PTS	5	0.4	< 0.2	< 0.3	0.4	0.5	< 0.3
Hydrochloric acid	10	< 0.5	< 0.5	< 0.5	0.5	< 0.5	< 0.5
Hydrofluoric acid	2	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2
PCDD/PCDF (ng I-TEQ/Nm ³)	0.1	0.0017	0.0012	0.0017	0.0014	0.0006	0.0024
PCB dl** (ng I-TEQ/Nm ³)	-	0.0012	0.00091	0.00060	0.0010	0.00097	0.00052

* The value is the sum of the composites reported in the table of Legislative Decree 152/06 as amended.

** By PCB we are referring to dioxin like PCBs.

306-4: Waste recycled (t)

	2019	2020	2021
Non-hazardous waste	96,783	77,789	95,187
Hazardous waste	7,916	8,243	8,608
Total sent for recovery	104,699	86,032	103,975

306-5: Waste sent to landfill (t)

	2019	2020	2021
Non-hazardous waste	32,264	29,783	29,914
Hazardous waste	57	14	28
Total sent to landfill	32,321	29,797	29,942

Methodological Note



The third Sustainability Report of ORI Martin S.p.A. (in the text “ORI Martin” or “Company”), with operational site and registered office in via Cosimo Canovetti 13 in Brescia, was drawn up in accordance with the **“GRI Sustainability Reporting Standards”**, the most recent and widespread non-financial reporting standards published in 2016 (and updated in 2018 and 2020) by the **Global Reporting Initiative (GRI)**, based on “Core” option.

This edition of the Sustainability Report is the second to be audited by an external party.

The document, drawn up to provide information on the aspects and significant sustainability impacts of the Company’s complies with the **reporting principles** required by the GRI Standards, such as the **inclusiveness of Stakeholders, Sustainability context, materiality, completeness, accuracy, balance, clarity, comparability, reliability and Timeliness.**

The document presents the initiatives and performances linked to topics considered as “material” for ORI Martin and its Stakeholders (see chapter 2 “Sustainability for ORI Martin”). The period from 1/1/2021 to 31/12/2021 is the reporting year and a comparison with the previous two-year period (2019-2020) has been reported.

The reporting scope is limited to ORI Martin S.p.A. exclusively, with specific reference to the **Brescia plant** and excludes subsidiaries and Ospitaletto plant.

Material Topics

In addition to what is reported in chapter 2.2 “Material topics”, ORI Martin has adopted a methodological approach that complies with the guidelines of the Global Reporting Initiative (GRI), identifying the universe of potentially relevant topics through a context analysis.

This analysis considered:

- global macro-trends of sustainability;
- trends in the steel sector;
- the benchmarks and reporting practices of the main competitors;

- the media, and in particular communication regarding the activities of ORI Martin;
- internal Company documentation
- Online survey directly engaging external stakeholders.

The topics that emerged from the context analysis were evaluated by Top Management representatives, the main Company functions and the Company Owners through a dedicated workshop.

Participants were asked to assess the level of significance of the environmental, social and economic impacts associated with each issue, assigning a score on a scale of values (from low to very high) which made it possible to obtain the average level of significance of impacts perceived within the organisation.

Boundary of material aspects

Material topic	GRI disclosure	Boundary		Reporting boundary
		Internal	External	
Compliance with environmental legislation	307: Environmental compliance	ORI Martin	-	-
Energy efficiency and the fight against climate change	302: Energy 305: Emissions	ORI Martin	Suppliers	The impact is extended to suppliers limited to Scope 3 GHG emissions
Polluting emissions and air quality	305: Emissions	ORI Martin	-	-
Limitation of environmental impacts and circular economy	301: Materials 303: Water and effluents 306: Waste	ORI Martin	-	-
Noise pollution	-	ORI Martin	-	-
Occupational health and safety	403: Occupational health and safety	ORI Martin	-	-
Staff development and training	404: Training and education	ORI Martin	-	-
Employment and staff relations	401: Employment 402: Labor/Management Relations	ORI Martin	-	-
Attention to the local community	413: Local communities	ORI Martin	Local community	-
Business integrity	205: Anti-corruption 206: Anti-competitive behaviour	ORI Martin	-	-
Product quality and traceability	-	ORI Martin	-	-
Sustainable development and innovation	-	ORI Martin	-	-
Economic performance and creation of value	201: Economic performance	ORI Martin	-	-
Sustainability along the supply chain	308: Supplier environmental assessment 414: Supplier social assessment	ORI Martin	Suppliers	-

Calculation methods

Energy consumption

In relation to energy, consumption was measured for each source and subsequently converted into GJ. To uniform each source to the same unit the conversion factors provided in the “UK Government GHG Conversion Factors for Company Reporting - Fuel properties” of DEFRA were used in the 2021 version.

GHG emissions

The data reported in section 5.3.1 “Greenhouse gas emissions” are based on the study conducted by ORI Martin together with an external collaborator to analyse the carbon footprint. Emissions are expressed in tCO₂eq. The method used to calculate the emissions of Scope 1, Scope 2 and Scope 3, in compliance with ISO 14064:2018 considers the following operating limits and emission factors:

Source	Consumption source registered	Emission factor source
Direct emissions		
Stationary combustion emissions	EU-ETS	EU-ETS
Mobile combustion emissions	Purchases of diesel for internal movements	IPCC
Company cars	Purchases of diesel Company cars	FETRANSP
Process emissions	EU-ETS	EU-ETS
Fugitive emissions	Registers of refrigeration group maintenance	IPCC
Indirect emissions from electricity		
Indirect emissions from imported electricity	Electricity purchase invoices	ISPRA
Indirect emissions from transport		
Upstream transport activity (procurement)	Km travelled by truck from the supplier to the plant	IPCC
	km travelled by other vehicles to the supplier	Measuring and managing CO ₂ emission of European transport
Downstream transport activities (shipments)	Km travelled by truck from plant to customer or intermodal junction	IPCC
Employee home/work transport	Number of employees, average trip	FETRANSP
Indirect emissions from assets used		
Emissions from assets purchased	Natural gas, electricity (consumption)	Electricity carbon intensity in European Member States
	Technical gases and other relevant raw materials	Worldsteel - CO ₂ Data collection, Ecoinvent 3.4
Emissions from waste disposal	Waste outgoing to disposal and recovery	Ecoinvent 3.4
Emissions associated with product use		
Emissions associated with product use	Products leaving the Company	Hires

Health and safety

For calculation of the injury indexes, the GRI guidelines were adopted in order to make the data comparable with the rest of the market.

The calculation methods used for the various accident rates are shown below:

- the rate of recordable work-related injuries is calculated as the ratio between the total number of recordable work-related injuries (excluding those in progress) and the number of hours worked in the same period, multiplied by 1,000,000. Accidents of less than three days of injury leave are excluded;
- the frequency of high-consequence work-related injuries is calculated as the ratio between the total number of accidents with injury leave of more than 180 days and the number of hours worked in the same period, multiplied by 1,000,000;
- the severity index is calculated as the ratio between the number of days lost and the number of hours worked, multiplied by 1,000. Accidents of less than three days of injury leave are excluded.

Information and contacts

The data and information collection was managed by the Sustainability Manager.

For information and specific requests regarding the contents of ORI Martin's 2021 Sustainability Report, please refer to the following mailbox:

info@orimartin.it

GRI Content Index

GRI standard	Disclosure	Description indicator	Document section	Notes and omissions
General disclosure				
GRI 102: General disclosure 2016	Organizational profile			
	102-1	Name of the organisation	12.1 About us, Methodological note	-
	102-2	Activities, brands, products and services	12.2 What we do	-
	102-3	Location of headquarters	12.1 About us, Methodological note	-
	102-4	Location of operations	12.1 About us, Methodological note	-
	102-5	Ownership and legal form	12.1 About us, Methodological note	-
	102-6	Markets served	12.1 About us	-
	102-7	Scale of the organization	3.2 Value creation 6.1 ORI Martin's team, Statistical Appendix	-
	102-8	Information on employees and other workers	6.1 ORI Martin's team, Statistical Appendix	-
	102-9	Supply chain	6.2 Supply chain partners	-
	102-10	Significant changes to the organisation and its supply chain	-	No significant changes occurred during the reporting period
	102-11	Precautionary Principle or approach	5, Environmental responsibility	-
	102-12	External initiatives	6.3 Territory	-
	102-13	Membership of associations	6.2 Supply chain partners	-
	Strategy			
	102-14	Statement from senior decision-maker	Letter to Stakeholders	-
	Ethics and integrity			
	102-16	Values, principles, standards, and norms of behaviour	3.1 Governance	-
	Governance			
	102-18	Governance structure	3.1 Governance	-
	Stakeholder engagement			
	102-40	List of stakeholder groups	2.1 The Stakeholders	-
	102-41	Collective bargaining agreements	The entire workforce is covered by collective bargaining agreements.	-
	102-42	Identifying and selecting Stakeholders	2.1 The Stakeholders	-
102-43	How to involve Stakeholders	2.1 The Stakeholders	-	
102-44	Key topics and critical aspects raised	2.1 The Stakeholders	The methods of interaction and involvement of Stakeholders adopted by ORI Martin enable the collection of various issues, problems and opportunities that have arisen and to analyse them appropriately by considering and managing them and aligning work with a view to continuous improvement.	

GRI standard	Disclosure	Description indicator	Document section	Notes and omissions
General disclosure				
Reporting practices				
GRI 102: General disclosure 2016	102-45	Entities included in the consolidated financial statements	Methodological note	-
	102-46	Defining report content and topic boundaries	2.2 Material topics and Sustainable Development Goals, Methodological note	-
	102-47	List of material topics	2.2 Material topics and Sustainable Development Goals, Methodological note	-
	102-48	Restatements of information	No restatements made	-
	102-49	Changes in reporting	No changes were made compared to the 2020 Sustainability Report	-
	102-50	Reporting period	Methodological note	-
	102-51	Date of most recent report	The previous Sustainability Report was published in July 2021 with reference to 2020 performance	-
	102-52	Reporting cycle	Annual	-
	102-53	Contact point for questions regarding the report	Methodological note	-
	102-54	Claims of reporting in accordance with the GRI Standard	Methodological note	-
	102-55	GRI content index	GRI Content Index	-
	102-56	External assurance	Auditing firm report	-
GRI 200 economic indicators				
Economic performance				
GRI 103: Management approach 2016	103-1	Explanation of the material topic and its Boundary	2.2 Material topics and Sustainable Development Goals, Methodological note	-
	103-2	The management approach and its components	3.2 Creation of value	-
	103-3	Evaluation of the management approach	3.2 Creation of value	-
GRI 201: Economic performance 2016	201-1	Direct economic value generated and distributed	3.2 Creation of value	-
Anti-corruption				
GRI 103: Management approach 2016	103-1	Explanation of the material topic and its Boundary	2.2 Material topics and Sustainable Development Goals, Methodological note	-
	103-2	The management approach and its components	3.1 Governance	-
	103-3	Evaluation of the management approach	3.1 Governance	-
GRI 206: Anti-corruption 2016	205-3	Confirmed incidents of corruption and actions taken	3.1 Governance	-

GRI standard	Disclosure	Description indicator	Document section	Notes and omissions
GRI 200 economic indicators				
Anti-competitive behaviour				
GRI 103: Management approach 2016	103-1	Explanation of the material topic and its Boundary	2.2 Material topics and Sustainable Development Goals, Methodological note	-
	103-2	The management approach and its components	3.1 Governance	-
	103-3	Evaluation of the management approach	3.1 Governance	-
GRI 206: Anti-competitive behaviour 2016	206-1	Legal actions for anti-competitive behaviour, anti-trust, and monopoly practices	3.1 Governance	-
GRI 300 environmental indicators				
Materials				
GRI 103: Management approach 2016	103-1	Explanation of the material topic and its Boundary	2.2 Material topics and Sustainable Development Goals, Methodological note	-
	103-2	The management approach and its components	5.1 Environmental management, 5.2.1: Materials used	-
	103-3	Evaluation of the management approach	5.1 Environmental management, 5.2.1: Materials used	-
GRI 302: Energy 2016	301-1	Materials used by weight or volume	5.2.1: Materials used, Statistical Appendix	-
Energy				
GRI 103: Management approach 2016	103-1	Explanation of the material topic and its Boundary	2.2 Material topics and Sustainable Development Goals, Methodological note	-
	103-2	The management approach and its components	5.1 Environmental management, 5.2.3 Energy consumption	-
	103-3	Evaluation of the management approach	5.1 Environmental management, 5.2.3 Energy consumption	-
GRI 302: Energy 2016	302-1	Energy consumption within the organization	5.2.3 Energy consumption, Statistical Appendix	-
Water and effluents				
GRI 103: Management approach 2016	103-1	Explanation of the material topic and its Boundary	2.2 Material topics and Sustainable Development Goals, Methodological note	-
	103-2	The management approach and its components	5.1 Environmental management, 5.2.2 Water resources	-
	103-3	Evaluation of the management approach	5.1 Environmental management, 5.2.2 Water resources	-
GRI 303: Water and effluents 2018	303-1	Interactions with water as a shared resource	5.2.2 Water resources	-
	303-2	Management of water discharge-related impacts	5.2.2 Water resources	-
	303-3	Water withdrawal	5.2.2 Water resources, Statistical Appendix	The water stress level in the area where water is withdrawn and discharged is qualified as "Medium-high" by the Water risk Atlas of the World Resources Institute.
	303-4	Water discharge	5.2.2 Water resources, Statistical Appendix	-
	303-5	Water consumption	5.2.2 Water resources, Statistical Appendix	-

GRI standard	Disclosure	Description indicator	Document section	Notes and omissions
Emissions				
GRI 103: Management approach 2016	103-1	Explanation of the material topic and its Boundary	2.2 Material topics and Sustainable Development Goals, Methodological note	-
	103-2	The management approach and its components	5.1 Environmental management, 5.3 The management of impact, 5.3.1 The greenhouse gas emissions (GHG) and the CO ₂ footprint, 5.3.2 Emissions into the atmosphere	-
	103-3	Evaluation of the management approach	5.1 Environmental management, 5.3 The management of impact, 5.3.1 The greenhouse gas emissions (GHG) and the CO ₂ footprint, 5.3.2 Emissions into the atmosphere	-
GRI 305: Emissions 2016	305-1	Direct (Scope 1) GHG emissions	5.3.1 The greenhouse gas emissions (GHG) and the CO ₂ footprint, Statistical Appendix	-
	305-2	Energy indirect (Scope 2) GHG emissions	5.3.1 The greenhouse gas emissions (GHG) and the CO ₂ footprint, Statistical Appendix	-
	305-3	Other indirect (Scope 3) GHG emissions	5.3.1 The greenhouse gas emissions (GHG) and the CO ₂ footprint,	-
	305-7	Nitrogen oxides (NO _x), sulphur oxides (SO _x) and other significant air emissions	5.3.2 The polluting emissions, Statistical Appendix	Values are reported in terms of concentration of pollutants instead of total tons to enable comparison with AIA indications. Values also refer to the plant's two main emission points.
Waste				
GRI 103: Management approach 2016	103-1	Explanation of the material topic and its Boundary	2.2 Material topics, Methodological note	-
	103-2	The management approach and its components	5.1 Environmental management, 5.3 The handling of impact, 5.3.3 Waste	-
	103-3	Evaluation of the management approach	5.1 Environmental management, 5.3 The handling of impact, 5.3.3 Waste	-
GRI 306: Waste 2020	306-1	Waste generation and significant waste-related impacts	5.3.3 Waste	-
	306-2	Management of significant waste-related impacts	5.3.3 Waste	-
	306-3	Waste generated	5.3.3 Waste, Statistical Appendix	-
	306-4	Waste diverted from disposal	5.3.3 Waste, Statistical Appendix	-
	306-5	Waste directed to disposal	5.3.3 Waste, Statistical Appendix	-
Environmental compliance				
GRI 103: Management approach 2016	103-1	Explanation of the material topic and its Boundary	2.2 Material topics, Methodological note	-
	103-2	The management approach and its components	5.1 Environmental management 5.3 The management of impact, 5.3.3 Waste	-
	103-3	Evaluation of the management approach	5.1 Environmental management 5.3 The management of impact, 5.3.3 Waste	-

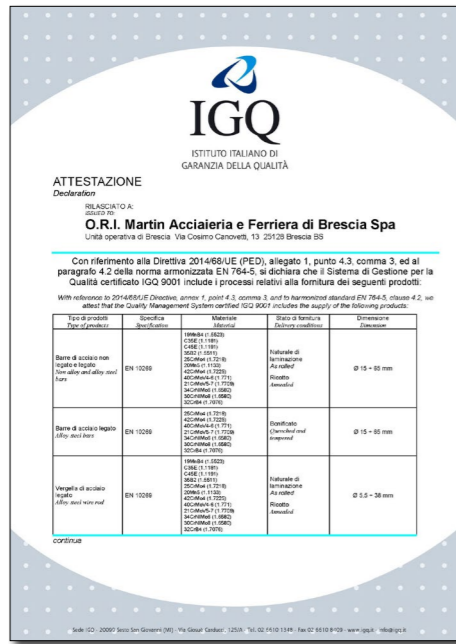
GRI 307: Environmental compliance 2016	307-1	Non-compliance with environmental laws and regulations	No case of non-compliance with environmental laws and/or regulations occurred during 2021.	-
Supplier environmental assessment				
GRI 103: Management approach 2016	103-1	Explanation of the material topic and its Boundary	2.2 Material topics and Sustainable Development Goals, Methodological note	-
	103-2	The management approach and its components	6.2 Supply chain partners	-
	103-3	Evaluation of the management approach	6.2 Supply chain partners	-
GRI 308: Supplier environmental assessment 2016	308-1	New suppliers that were screened using environmental criteria	All new suppliers were evaluated according to the criteria described in Chapter 6.2 Supply chain partners. No further screening procedures are adopted.	-

GRI standard	Disclosure	Description indicator	Document section	Notes and omissions
GRI 400 social indicators				
Employment				
GRI 103: Management approach 2016	103-1	Explanation of the material topic and its Boundary	2.2 Material topics and Sustainable Development Goals, Methodological note	-
	103-2	The management approach and its components	6.1.1 The workforce	-
	103-3	Evaluation of the management approach	6.1.1 The workforce	-
GRI 401: Employment 2016	401-1	New employee hires and employee turnover	6.1.1 The workforce, Statistical Appendix	-
Labor/Management Relations				
GRI 103: Management approach 2016	103-1	Explanation of the material topic and its Boundary	2.2 Material topics and Sustainable Development Goals, Methodological note	-
	103-2	The management approach and its components	6.1.1 The workforce	-
	103-3	Evaluation of the management approach	6.1.1 The workforce	-
GRI 402: Labor/Management Relations 2016	402-1	Minimum notice periods regarding operational changes	6.1.1 The workforce	-
Occupational health and safety				
GRI 103: Management approach 2016	103-1	Explanation of the material topic and its Boundary	2.2 Material topics and Sustainable Development Goals,	-
	103-2	The management approach and its components	6.1.2 A safe workplace	-
	103-3	Evaluation of the management approach	6.1.2 A safe workplace	-

GRI 403: Occupational health and safety 2018	403-1	Occupational health and safety management system	3.1.2 Governance tools, 6.1.2 A safe workplace	-
	403-2	Hazard identification, risk assessment, and incident investigation	6.1.2 A safe workplace	-
	403-3	Occupational health services	6.1.2 A safe workplace	-
	403-4	Worker participation, consultation, and communication on occupational health and safety	6.1.2 A safe workplace	-
	403-5	Worker training on occupational health and safety	6.1.2 A safe workplace	-
	403-6	Promotion of worker health	6.1.2 A safe workplace	-
	403-7	Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	6.1.2 A safe workplace	-
	403-8	Workers covered by an occupational health and safety management system	6.1.2 A safe workplace	-
	403-9	Work-related injuries	6.1.2 A safe workplace, Statistical Appendix	-
	403-10	Work-related ill health	6.1.2 A safe workplace, Statistical Appendix	-

GRI standard	Disclosure	Description indicator	Document section	Notes and omissions
Training and education				
GRI 103: Management approach 2016	103-1	Explanation of the material topic and its Boundary	2.2 Material topics and Sustainable Development Goals, Methodological note	-
	103-2	The management approach and its components	6.1.3 Skills development	-
	103-3	Evaluation of the management approach	6.1.3 Skills development	-
GRI 404: Training and education 2016	404-1	Average hours of training per year per employee	6.1.3 Skills development, Statistical Appendix	-
	404-3	Percentage of employees receiving regular performance and career development reviews	6.1.3 Skills development	100%
Local communities				
GRI 103: Management approach 2016	103-1	Explanation of the material topic and its Boundary	2.2 Material topics and Sustainable Development Goals, Methodological note	-
	103-2	The management approach and its components	4.1 Sustainability in the plant, 6.3 Territory	-
	103-3	Evaluation of the management approach	4.1 Sustainability in the plant, 6.3 Territory	-
GRI 413: Local communities 2016	413-1	Operations with local community engagement, impact assessment, and development programs	4.1 Sustainability in the plant, 6.3 Territory	-

Supplier social assessment				
GRI 103: Management approach 2016	103-1	Explanation of the material topic and its Boundary	2.2 Material topics and Sustainable Development Goals, Methodological note	-
	103-2	The management approach and its components	6.2 Supply chain partners	-
	103-3	Evaluation of the management approach	6.2 Supply chain partners	-
GRI 414: Supplier social assessment 2016	414-1	New suppliers that were screened using social criteria	All new suppliers were evaluated according to the criteria described in Chapter 6.2 Supply chain partners. No further screening procedures are adopted.	-
Other material topics				
Noise pollution				
GRI 103: Management approach 2016	103-1	Explanation of the material topic and its Boundary	2.2 Material topics and Sustainable Development Goals, Methodological note	-
	103-2	The management approach and its components	5.3.4 Noise pollution	-
	103-3	Evaluation of the management approach	5.3.4 Noise pollution	-
Product quality and traceability				
GRI 103: Management approach 2016	103-1	Explanation of the material topic and its Boundary	2.2 Material topics and Sustainable Development Goals, Methodological note	-
	103-2	The management approach and its components	4.2 Continuous innovation	-
	103-3	Evaluation of the management approach	4.2 Continuous innovation	-
Sustainable development and innovation				
GRI : Management approach 2016	103-1	Explanation of the material topic and its Boundary	2.2 Material topics and Sustainable Development Goals, Methodological note	-
	103-2	The management approach and its components	4.2 Continuous innovation	-
	103-3	Evaluation of the management approach	4.2 Continuous innovation	-



Independent auditors' report on the 2021 Sustainability Report

To the Board of Directors of
Ori Martin S.p.A.

We have been appointed to perform a limited assurance engagement on the Sustainability Report of Ori Martin S.p.A. (hereinafter also "the Company") for the year ended on December 31, 2021 (hereinafter also "Sustainability Report").

Responsibilities of the Directors for Sustainability Report

The Directors of Ori Martin S.p.A. are responsible for the preparation of the Sustainability Report in accordance with the "Global Reporting Initiative Sustainability Reporting Standards" issued by GRI - Global Reporting Initiative ("GRI Standards"), as described in the paragraph "Methodological Note" of the Sustainability Report.

The Directors are also responsible for that part of internal control that they consider necessary in order to allow the preparation of a Sustainability Report that is free from material misstatements caused by fraud or not intentional behaviors or events.

The Directors are also responsible for defining the commitments of Ori Martin S.p.A. regarding the sustainability performance as well as for the identification of the stakeholders and of the significant matters to report.

Auditors' independence and quality control

We are independent in accordance with the ethics and independence principles of the International Code of Ethics for Professional Accountants (including International Independence Standards) (IESBA Code) issued by the International Ethics Standards Board for Accountants, based on fundamental principles of integrity, objectivity, professional competence and diligence, confidentiality and professional behavior.

Our audit firm applies the *International Standard on Quality Control 1 (ISQC Italia 1)* and, as a result, maintains a quality control system that includes documented policies and procedures regarding compliance with ethical requirements, professional standards and applicable laws and regulations.

Auditors' responsibility

It is our responsibility to express, on the basis of the procedures performed, a conclusion about the compliance of the Sustainability Report with the requirements of the GRI Standards. Our work has been performed in accordance with the principle of "*International Standard on Assurance Engagements ISAE 3000 (Revised) - Assurance Engagements Other than Audits or Reviews of Historical Financial Information*" (hereinafter "*ISAE 3000 Revised*"), issued by the *International Auditing and Assurance Standards Board (IAASB)* for limited assurance engagements. This principle requires the planning and execution of procedures in order to obtain a limited assurance that the Sustainability Report is free from material misstatements.

Therefore, the extent of work performed in our examination was lower than that required for a full examination according to the ISAE 3000 Revised ("reasonable assurance engagement") and, hence, it does not provide assurance that we have become aware of all significant matters and events that would be identified during a reasonable assurance engagement.

The procedures performed on the Sustainability Report were based on our professional judgment and included inquiries, primarily with the Company's personnel responsible for the preparation of the information included in the Sustainability Report, documents analysis, recalculations and other procedures in order to obtain evidences considered appropriate.

In particular, we have performed the following procedures:

1. analysis, through interviews, of the governance and the management process of the topics related to sustainable development inherent to the Company's strategy and operations;
2. analysis of the process relating to the definition of material aspects included in the Sustainability Report, with reference to the criteria applied to identify priorities for the different stakeholders' categories and to the internal validation of the process outcomes;
3. understanding of the processes that lead to the generation, detection and management of significant qualitative and quantitative information included in the Sustainability Report.

In particular, we have conducted interviews and discussions with the management of Ori Martin S.p.A. and we have performed limited documentary evidence procedures, in order to collect information about the processes and procedures that support the collection, aggregation, processing and transmission of non-financial data and information to the department responsible for the preparation of the Sustainability Report.

Furthermore, for significant information, considering the Company's activities and characteristics:

- at Company level
 - a) with reference to the qualitative information included in the Sustainability Report, we carried out inquiries and acquired supporting documentation to verify its consistency with the available evidence;
 - b) with reference to quantitative information, we have performed both analytical procedures and limited assurance procedures to ascertain on a sample basis the correct aggregation of data.
- for the Brescia site of Ori Martin S.p.A. which we have selected based on its activity, relevance to the performance indicators and its location, we have carried out a site visit during which we have had discussions with management and have obtained evidence, on a sample basis, regarding the appropriate application of the procedures and calculation methods used to determine the indicators.

Conclusion

Based on the procedures performed, nothing has come to our attention that causes us to believe that Sustainability Report of Ori Martin S.p.A. for the year ended on December 31, 2021 has not been prepared, in all material aspects, in accordance with the requirements of the GRI Standards, as described in the paragraph "Methodological Note" of the Sustainability Report.



Other Information

The comparative information presented in the Sustainability Report for the year ended on December 31st, 2019 and on December 31st, 2020 have not been examined.

Brescia, June 15, 2022

EY S.p.A.
Signed by: Marco Malaguti
Auditor



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