



# SUSTAINABILITY REPORT 2024

**TRATOS<sup>®</sup> Tt**  
cables for a moving world

# 1 CEO LETTER

Today's Tratos is the result of a substantial evolution, which took place *abruptly* following three important foreign acquisitions and a merger through incorporation of an Italian company active in the production of energy from alternative sources, making it a predominantly pan-European group.

Through the acquisition of production sites designated for dismantling and closure due to economic and political changes that have shifted the focus of many major investors outside Europe, the holding company, Tratos S.r.l., heads a group of approximately six hundred and fifty direct employees, seven production sites, and sales offices located throughout Italy, Germany, Spain, and England.

Taking pride in the aforementioned extraordinary financial transactions, our growth and the remarkable operating results achieved in recent years, we remain committed to pursuing the objectives envisaged in our business plan in order to contribute to the Net Zero goal and, consequently, to decarbonisation through the development of technologies aimed at promoting the so-called circular economy. In this regard, we are committed to using alternative low-emission materials and investing in new machinery that meets the latest energy efficiency standards. We are also very pleased to mention the recent incorporation of five hydroelectric power stations and a photovoltaic plant, with a total energy output of approximately 4MWh.

We confirm the solid relationships, forged over 59 years of history, with leading Italian and European banks, driven and generated by mutual trust, which is essential for us to guarantee a constant cash flow and enable us to issue *performance and warranty bonds* required of us in public and private tenders in all European markets. With this in mind, our main goal is to do our utmost to maintain the high rating we have today by meeting the ESG criteria required by these institutions.

Our main strategy has always been to promote, whenever possible, the local economy of our factories, either directly or indirectly, maintain the supply chain in Europe and be among the leading players in promoting manufacturing independence of our continent.

Lastly, we hope to maintain the solidity that distinguishes us for as long as possible, averting events that could diminish the enthusiasm we currently feel in working daily for the well-being of the company and all its *stakeholders*, honouring with vibrant satisfaction the memory of our founder Egidio Capaccini, who, upon returning from decades of immigration in Argentina, believed that Tratos' primary objective should be to prevent the depopulation of the municipality of Pieve Santo Stefano and the neighbouring mountain areas reduced to starvation after the Second World War, at the forefront with that of the current ESG objectives.



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**WE WILL NOW WRITE ABOUT SUSTAINABILITY FOR TRATOS, REFERRING TO RECORDS KEPT SINCE 1984 IN THE DIARY ARCHIVE OF THE TOWN OF PIEVE SANTO STEFANO.**

## 2 HIGHLIGHTS 2024 4S

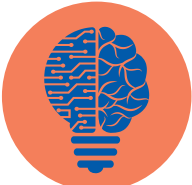
The disclosure of the sustainability report (2023 report – published voluntarily) was made possible thanks to the publication of the document on the website, <https://tratosgroup.com>, and in links shared via e-mail by Tratos' sales, quality and sustainability departments, as well as its dissemination on our social media channels.

We have not received any reports or requests for clarification at the e-mail address set up to collect feedback from stakeholders ([sustainability@tratos.it](mailto:sustainability@tratos.it)) regarding the 2023 Sustainability Report.



**SECURITY**

*Security to manage potential risks, protect data, and have a positive impact on the local community*



**INNOVATION**

*Innovation to create more innovative and sustainable products and to grow our human capital*



**SUSTAINABILITY**

*Sustainability to create a sustainable value chain in compliance with ESG principles and to contribute to current energy transition processes*



**SATISFACTION**

*Customer satisfaction is the main driving force behind Tratos, implementing a short-range policy, establishing a direct relationship, and creating excellent service.*

### 3 OUR COMPANY

**The name Tratos Cavi S.p.a. is derived from TRAFilerie TOScane**

Tratos Cavi S.p.A. was founded in 1966 by Egidio Capaccini in Pieve Santo Stefano (Arezzo). The company, initially focused on the drawing of copper, expanded its horizons by successfully embarking on the production of electrical and telecommunication cables. In 1974, Albano Bragagni started a process of technological growth and product diversification, entering new qualified markets. Subsequently, with the forming of new industrial and commercial companies such as Smaltos S.p.A., Braids Srl and Tramet Srl, an integrated industrial group controlled by the holding company, TRATOS Srl, was created. A continuous process of innovation, expertise in engineering, research into chemicals and materials, high qualifications of the employees, direct assumption of responsibility, teamwork, focus on objectives and decentralisation of local operational liabilities: these are the strengths that have allowed Tratos to become a global business and to develop special cabling products for transport networks for the Fusion for Energy project.

This document is the Tratos Group’s Sustainability Report. The reporting scope of the Sustainability Report includes the Tratos

companies included in the Italian scope - Tratos SRL [Italian Tax Code 01799580400], Tratos Cavi for the offices of Pieve S. Stefano and Catania [Italian Tax Code 00861640514] and Tratos HV [Italian Tax Code 00143970515] with Group Italian VAT number – 02328320516 – and the company located in England - Tratos UK Ltd [GB VAT number 178-830-961].

Tratos SRL - Tratos Cavi SpA - Tratos HV SpA | Italian VAT number – 02328320516 / Tratos UK ltd GB VAT number 178-830-961

We have not yet included all the companies making up the Tratos Group in the current sustainability reporting scope. This remains one of our goals for the near future.

Sustainability reporting is voluntary on the part of the company, with the aim of communicating its

Tratos' sustainability reporting is carried out in a manner that and sustainability results to our stakeholders. Given that the publication of the sustainability report is not mandatory for the Tratos Group.

**SIC code**

	27120
<b>Tratos UK ltd</b>	27310
	27320

**ATECO code**

TRATOS CAVI / TRATOS HV	<b>27.32</b>
TRATOS SRL	<b>70.1</b>

### 3.1 History

## 20th Century

## 21st Century



**1966**  
TRATOS IS FOUNDED



**1979**  
COPPER CABLES FOR  
TELECOMMUNICATIONS AND  
INSTRUMENTATION



**1980**  
ALBANO BRAGAGNI  
JOINS THE COMPANY



**1981**  
TRATOS LTD IN THE  
UNITED KINGDOM



**1983**  
TRAMET IS FOUNDED



**1983**  
FIRE RETARDANT AND  
FIRE RESISTANT CABLES



**1987**  
FIBRE OPTIC CABLES



**1988**  
CATANIA



**1990**  
PRODUCTION OF MEDIUM  
VOLTAGE CABLES



**2000**  
START OF PRODUCTION  
OF UMBILICAL CABLES



**2008**  
ACQUISITIONS  
AND NEW OFFICES



**2012**  
FUSION FOR ENERGY  
CONTRACT FOR ITER



**2015**  
AWARD TO TRATOS



**2016**  
TRATOS STARTS THE PRODUCTION  
OF HIGH VOLTAGE CABLES



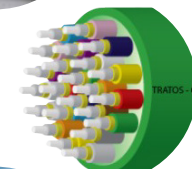
**2016**  
INVESTMENTS



**2017**  
FIFTY YEARS



**2019**  
QUEEN'S AWARD  
FOR INNOVATION



**2020 - 2022**  
MAJOR R&D PROJECTS (FRI)  
Ministry of Economic Development



**2023**  
- Cable with 144 and 288 fibres  
and smaller diameters  
- Anti-ice ropes  
- Carbon cables  
- BRAST Cable

**2024**  
- Purchases of 3 companies in the EU  
- CEC R&D Project

## 3.2 Tratos' activities and products

Trafilerie Toscane was founded in 1966 in the Tuscan hills of Pieve Santo Stefano and went on to become the TRATOS Group. The Bragagni-Capaccini family holding, which produces Tratos branded products and distributes them worldwide, was created through acquisitions and mergers.

- **Tratos Srl** – Pieve Santo Stefano (AR) Italy, via Stadio, 2. Head Office of the Group's Governing Body [Provision of administrative services for the coordination and control of the activities of the Tratos Group].
- **Tratos Cavi Spa – Plant in Pieve Santo Stefano** (AR) Italy, via Stadio, 2. Initial core, site for the design, production and sale of multiple types of Tratos cables, produced directly with semi-finished products from the group's other production units [low, medium and high voltage power cables up to 150 kV (Um=170 kV), instrumentation, signalling, fibre optic, telephone and data transmission cables, trailing cables, optical ground wires (OPGW)].
- **Tratos Cavi – Spa – Catania Plant** Italy. Strada XIII - industrial area [production and sale of low voltage power cables, instrumentation, signalling, fibre optic, telephone and data transmission cables, trailing cables]
- **Tratos HV** - Plant in Pieve Santo Stefano (AR), via Pian di Guido, 45 [production of low, medium and high voltage energy cables up to 150 kV (Um=170 kV), instrumentation, fibre optic, telephone and data transmission cables, trailing cables; production of compounds; production of bare conductors for medium and high voltage overhead lines, optical ground wires (OPGW)].
- **Tratos UK Ltd** – Plant in Knowsley (UK). A wide range of low-voltage cables, including those with flexible interlocked reinforcement, are produced at this plant.
- **Tratos Cavi UK Ltd**<sup>1</sup> - United Kingdom - Swindon - production of fibre optic cables.
- **Tratos Cavi Iberica S.L.U** – Madrid (SP) San Sebastian headquarters – headquarters of sales representative offices for the Spanish market.
- **Telent Fibre Optic S.L.U.**<sup>2</sup> - production of fibre optic cables
- **Tratos Cavi Germany GmbH**<sup>3</sup> - production of optical ground wires (OPGW), aluminium conductor steel reinforced cable (ACSR)

### TRATOS in the world

#### 7 production plants

#### 2 storage locations

#### 9 sales offices

<sup>1</sup> Joined the Tratos group in 2024, but not involved in sustainability reporting

<sup>2</sup> Joined the Tratos group in 2024, but not involved in sustainability reporting

<sup>3</sup> Joined the Tratos group in 2024, but not involved in sustainability reporting



### 3.3 System certifications

Management schemes	Tratos Cavi PSS	Tratos Cavi CT	Tratos HV	Tratos SRL	Tratos UK
ISO 9001	X	X	X	X	X
ISO 14001	X		X	X	X
ISO 45001	X	X	X	X	X
ISO 50001				X	
ISO 14064- 1	X	X	X	X	X
EMAS				X	
ISCC +	X		X		
PdR 125				X	

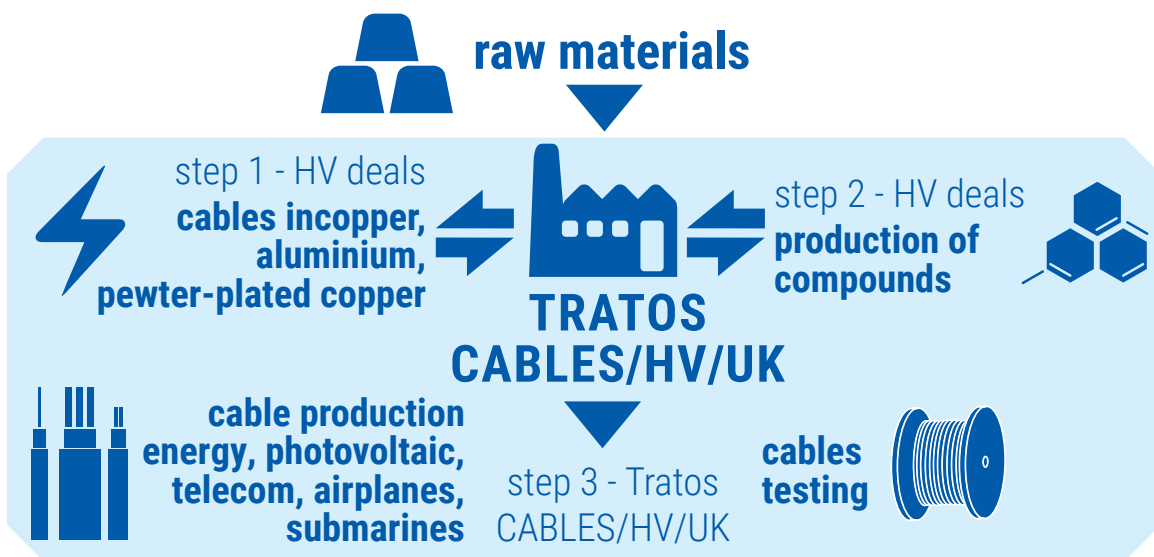
### 3.4 Our value chain

Tratos manufactures power cables, fibre optic cables, telecommunications cables, instrumentation cables and cables for underwater and aerial applications.

The company develops and manufactures its products entirely in-house: from the metallurgical department, where copper and aluminium wire rod is processed, to the production of the complete cable, right through to testing (THE PRODUCTION PROCESS).

Tratos has its own dedicated department for the production of compounds for sheathing and insulation, which is sometimes supported by third-party suppliers to cover the entire material requirement.

The supply chain is relatively short: the company tends to purchase its main raw materials – copper, aluminium and plastics – directly from upstream suppliers.



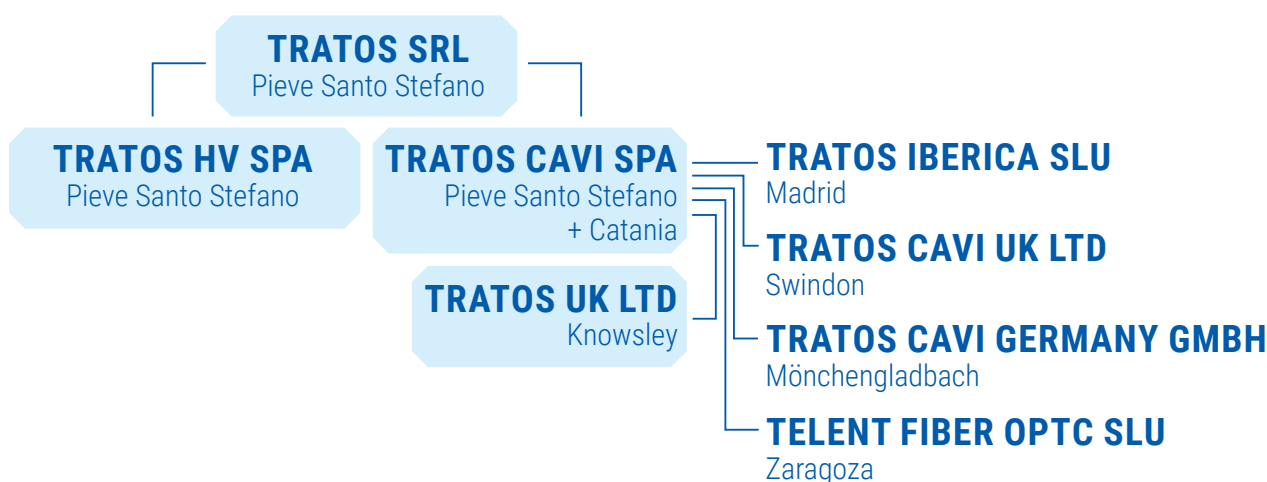


Figure 1 The companies represented by the coloured box are reported in the following sustainability report.

Copper comes mainly from Europe and South America, aluminium from Europe and Asia, while plastics and other components are purchased from both international and local suppliers, with preference given to the latter where possible (Local Purchasing)

Italian production, led by Tratos Cavi and Tratos HV, is supported by Tratos UK, based in Knowsley, which supports manufacturing and commercial operations in the British market. Distribution is also managed through a warehouse in Spain, which serves

the Iberian market, and by sales offices in Spain and support centres in the UK and China.

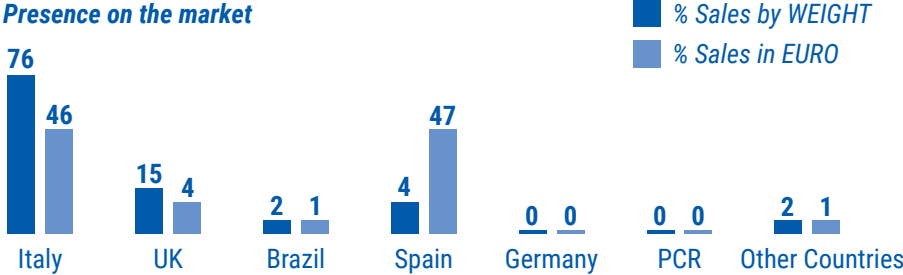
Tratos collaborates with universities, research institutions, and industrial partners for technological innovation and sustainability (RESEARCH AND DEVELOPMENT). The commitment to safety and regulatory compliance is reinforced by the presence, in the main office, of the laboratory accredited for the execution of fire reaction tests of cables pursuant to the CPR Regulation (Labelling and compliance with CPR requirements).

### 3.5 Tratos in the world

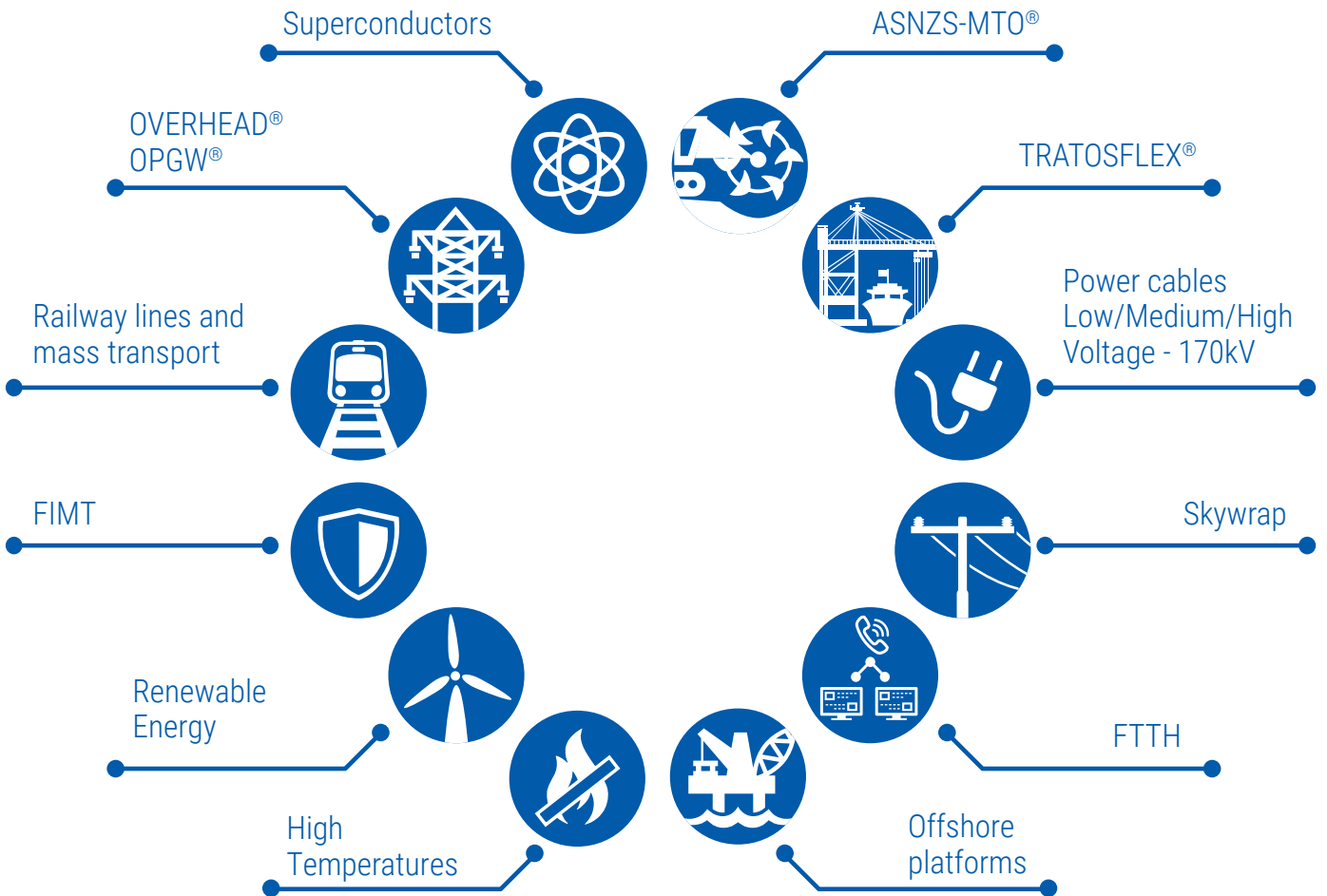
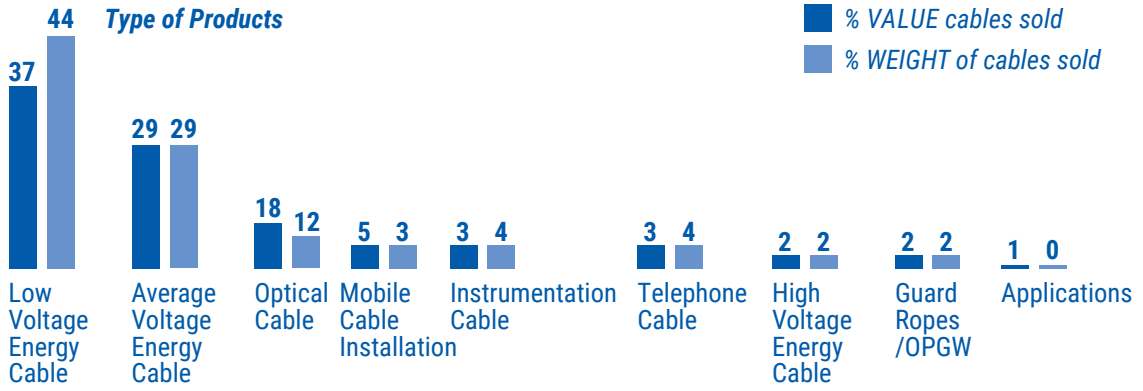
TRATOS Group Employees		2022	2023	2024
Tratos Cavi	Women	16	16	23
	Men	207	217	218
Tratos HV	Women	1	1	1
	Men	89	92	102
Tratos SRL	Women	3	3	3
	Men	6	7	6
Tratos UK	Women	n/a	n/a	6
	Men	n/a	n/a	33
<b>TOTAL</b>		322	336	392

### 3.6 Presence on the market

Through its subsidiaries, Tratos srl markets products manufactured in its factories in the following countries: Italy, Europe, United Kingdom, Brazil and China



### 3.7 Tratos product types



### 3.8 Value, mission, strategy

Pieve Santo Stefano has a history stretching back thousands of years:

*"In Roman times logs were thrown into the river Tiber where they floated to Rome. Two thousand years later, instead of logs, there are copper wires, fibre optics and superconductor cables."*

The Tratos plant is home to unique technology that few in the world can produce. Some examples of the high-tech products bearing the Tratos brand are superconductor cables supplied for the construction of the nuclear fusion power plant in France (the ITER project), trailing cables for the port of Busan in South Korea, and cables for the railway network in Great Britain.

Tratos was originally set up in this small, remote shed in Pieve Santo Stefano. The town of Pieve Santo Stefano and its citizens become an integral part of the company, which made an important contribution to the economic growth of the area.









The *mission of Tratos*, from Egidio Capaccini to Albano Bragagni, remains that of ensuring the well-being of the fellow citizens of Pieve, not only within the boundaries of the company, but also through the administration of the town, as Bragagni was mayor of Pieve for twenty-nine years.

Tratos is a large production company with a small family business. Tratos touches many countries around the world, but the heart of the company remains in this small Tuscan town in the province of Arezzo. In keeping with our mission, the Chairman, Albano Bragagni, never thought of moving the headquarters.



### 3.9 An international network

Tratos has a strong presence on the national and international markets, and also plays an important role in several global trade associations and research and development organisations.

ASSOCIATION	ROLE OF TRATOS	REPRESENTATIVE
 <b>EUROPACABLE ECBL</b>	Working fire Task Force on Product Environmental Footprint – Energy Sustainability Leadership Team	D. Dori M. Camaiti E. Bragagni Capaccin, M. Camaiti
  <b>AICE/ANIE</b>	ANIE - Deputy Chairperson with responsibility for the Environment and Sustainability  <i>Working groups to which we belong:</i>  LV power cables group MV and HV power cables group Communication cables working group	Elisabetta Bragagni Capaccini   D. Dori D. Dori M. Camaiti
 <b>CEI</b>	<i>Committees to which we belong:</i>  CT 11/7 – overhead power lines and conductor materials SC 18A – Electrical cables for ships and offshore fixed and mobile units CT 20 – Power cables CT 20 – Host/Coordinator, the “Sustainability” Working Group 2023 SC 20A – High voltage power cables CT 86 – fibre optics SC 86A – fibres and cables SC 86B – Connection devices and passive components for fibres SC 86C – optical systems and devices CT 306 – Interconnection of electronic communication equipment	S. Boncompagni, A. Posati V. Bellini, F. Montalti V. Bellini M. Camaiti D. Dori F. Montalti, E. Feliciano, M. Gori F. Montalti, M. Gori F. Montalti, M. Gori F. Montalti, M. Gori F. Montalti
 <b>CONFINDUSTRIA</b>		Elisabetta Bragagni Capaccini General Representative Tratos Cavi SpA
 <b>CHAMBER OF COMMERCE AREZZO - SIENA</b>		Elisabetta Bragagni Capaccini Industry Representative on the Board
 <b>IF COMMITTEE AREZZO - SIENA</b>		Elisabetta Bragagni Capaccini Confindustria Toscana Sud
 <b>ICAS Italian Consortium for Applied Superconductivity</b>		Elisabetta Bragagni Capaccini Board of Directors’ Meeting

# 4 SUSTAINABLE DEVELOPMENT PURSUANT TO THE SDGS

**Electrification and digitalisation** are two fundamental levers for sustainable development according to the **Sustainable Development Goals (SDGs)**. Cables are the backbone of this global transformation. Through its production activities, Tratos plays a key role in the **energy transition**, contributing to **decarbonisation** with cables for plants from renewable sources (solar, wind), and **digitalisation** with advanced **fibre optic** solutions.

The company is actively committed to reducing its environmental impact through:

- Find low-impact **recycled raw materials** (16.1.2);
- the **monitoring and management of the carbon footprint**, in compliance with the certifications **ISO 14064** and **ISO 14067** (14.3);
- investments in **solar energy** to power its production plants (Pieve Santo Stefano, Catania, Tratos HV)(13.2.2).

Tratos participates in cutting-edge international projects, such as the ICAS consortium and the Fusion4Energy program, providing superconducting cables for the ITER reactor, contributing to research on clean and accessible energy (**14.2 Research and Development**)

In addition to the environmental aspect, Tratos actively promotes **social sustainability** through:

## 4.1 United Nations Global Compact

Tratos is a member of the **United Nations Global Compact**, the world's largest corporate sustainability initiative. The company is committed to applying and promoting the **10 fundamental principles** relating to human rights, labour, environment and the fight against corruption, integrating them into its strategy and corporate culture. Since **2022**, Tratos has published its own **Sustainability Report**, transparently reporting the actions taken in line with the principles of the Global Compact and SDGs.

## 4.2 Science Based Targets initiative (SBTi)

Tratos has embarked on a structured path of **decarbonisation** by joining the **SBTi**, with the aim of setting **climate targets** in line with **science and the Paris Agreement**, while keeping global warming within **1.5°C**. In **2024**, the company defined its **base year (baseline)** for the measurement of emissions, in line with the **GHG Protocol** standard, breaking down the impacts into **Scopes 1, 2 and 3**. The next steps include:

- the definition of **medium and long-term** objectives;
- the **validation of the targets** by SBTi;
- implementation of **concrete actions** to reduce emissions along the entire value chain.



- the **creation of jobs** in economically disadvantaged areas (e.g. Catania, Knowsley - UK);
- the **strengthening of gender equality**, with **women accounting for 50% of the Board of Directors and shareholders..**

Tratos maintains strong ties with local communities, reinvesting in the region (20) and supporting environmental research initiatives, the circular economy and industrial partnerships to accelerate the transition to a fairer and more resilient economy. Tratos participates in two important international initiatives:



**Global Compact**  
Network Italia



**SCIENCE  
BASED  
TARGETS**

DRIVING AMBITIOUS CORPORATE CLIMATE ACTION

The **science-based** approach adopted by Tratos favours **real and measurable reductions** in emissions, avoiding the use of temporary offsets (carbon offsetting), and promotes a **responsible and credible climate transition**.

### 4.3 Rating ESG Ecovadis

EcoVadis is a platform for companies to improve their environmental and social practices.

The EcoVadis platform helps monitor the sustainability performance of suppliers with an assessment. EcoVadis' reliable classifications and monitoring tools enable companies

to manage risks and incorporate eco-innovations into their global supply chains.

The overall score (0-100) reflects the quality of the company's sustainability management system at the time of the assessment.

#### ECOVADIS SCORE

	2022	<b>61/100</b>
	2023	<b>65/100</b>
	2024	<b>66/100</b>
	2025	<b>70/100</b>

Tratos' score is higher than that of the 86th percentile<sup>4</sup> of the companies assessed by EcoVadis in the same sector.

The percentile ranking shows how our score compares with the scores of other companies. Tratos is in the 86th percentile, which means that our score is greater than or equal to the score of 86% of all companies evaluated by EcoVadis.

<sup>4</sup> The percentile rank is calculated when the score is published.

### 4.3.1. Ratings by credit institutions

Thanks to the assessments of the ESG ratings by various credit institutions (which have been required since 2021, as per the European Banking Association (EBA) for an overall assessment of the ESG criteria for granting credit), Tratos has increased its rating as a result of obtaining various certifications such as, for example, ISO 14064, ISO 14067, ISO 14001 and the score obtained with ECOVADIS. For Tratos, achieving suitable ratings is essential in order to be able to have the full trust of banks and other financial institutions, and to be able to bridge the payment gap between customers and suppliers. The payment gap exists, above all, for certain types of raw materials, such as, for example, metal materials, which require payment in advance, in contrast to payments made by customers which occur some time after the Tratos products have been delivered.

Our high rating allows us to obtain guarantees and assurances from banks, which are essential in order to be able to work with public entities and through tender processes.

Banks take on a fundamental role in guiding the sustainable transition, started with their ability to direct the flow of business capital and to provide funding following the ESG rating. Tratos activities fit well within the sustainable transition: thanks to the production of cables aimed at energy efficiency and the technological development of communications, we can reach even higher ratings and approval for financing from trusted credit institutions.

## 5 6 – GOVERNANCE ASPECTS

The holding company Tratos SRL, headquartered at the main plant in Pieve Santo Stefano (AR), plays a central role in the governance of the entire Group, holding majority stakes in the subsidiaries: Tratos Cavi, Tratos HV and Tratos UK.

The Group's plants are closely interconnected from an operational perspective thanks to the use of a shared management system, which allows for constant mutual updating and ensures a rapid and efficient flow of information, including to all plants.

As a holding company, Tratos SRL carries out the activity of

direction and coordination of subsidiaries, providing strategic and operational guidelines in areas such as management, planning, organisation and control of company activities (with financial and administrative tasks). While Tratos Cavi SpA (Pieve S. Stefano) is the core of all company activities.

The Board of Directors meets at least once a year to approve the financial statements, and further meetings are called to resolve on ordinary or extraordinary matters. During 2024, four meetings were held, with 100% participation of the members.

### 5.1 The structure of corporate governance as at 31/12/2024

The following table explains the governance structures of all companies included in the sustainability report.

Position held	Office			
	Tratos SRL	Tratos Cavi	Tratos HV	Tratos UK
<b>CHAIRPERSON</b>	Albano Bragagni	Albano Bragagni	Albano Bragagni	Albano Bragagni
<b>DEPUTY CHAIRPERSON</b>	Ennio Bragagni Capaccini	Ennio Bragagni Capaccini	Ennio Bragagni Capaccini	Maurizio Bragagni Ennio Bragagni Capaccini Elisabetta Bragagni Capaccini
<b>CHIEF EXECUTIVE OFFICER</b>	Ennio Bragagni Capaccini Elisabetta Bragagni Capaccini	Ennio Bragagni Capaccini Elisabetta Bragagni Capaccini	Ennio Bragagni Capaccini Elisabetta Bragagni Capaccini	-
<b>DIRECTOR</b>	Marta Capaccini	Marta Capaccini Mirko Gori Maurizio Bragagni	Massimo Seri Marco Camaiti	Neil Ancell Germano Bragagni Enrico Scambia Kevin Martin
<b>MANAGING DIRECTOR</b>	-	Germano Bragagni Oriano Gregori Massimo Seri	Germano Bragagni Piergiorgio Venturi Settimio Metozzi Oriano Gregori	-
<b>Secretary</b>	-	-	-	Kevin Martin

The TRATOS Group is led by the Chairperson, Mr. Albano Bragagni, who is the legal representative<sup>5</sup> and is responsible for the management of the Group, including product, process and the Company Management System. The Chairperson also has managerial functions at an organisational level. On the boards of directors of all companies within the scope, there is a separation between the roles of Chairperson and chief executive officer [2-11].

In the absence of the Chairperson, their representative functions are performed by the Deputy-Chairperson and CEO, Ennio Bragagni Capaccini, and the CEO, Elisabetta Bragagni Capaccini. The division of responsibilities entails:

- Ennio Bragagni Capaccini, head of the Purchasing department;
- Elisabetta Bragagni Capaccini head of the Sales department [2-9]

The **appointment of the Board of Directors' Meeting** (BoD), the highest level governing body of the Tratos Group, takes place through a process developed directly by the **shareholders** of the various group companies. The main criteria guiding this process are **trust, competence** and **management skills** of the persons proposed for appointment [2-10]. Appointments are limited to members of the family that owns the company (who are also shareholders), selected for their in-depth knowledge of the company and the skills they have acquired over time. This structure guarantees direct involvement in decision-making processes and promotes constant attention to the prevention and mitigation of negative impacts and potential conflicts of interest [2-11, 2-12].

The BoD is also responsible for reviewing and approving the sustainability report, with authority delegated to the CEO Elisabetta Bragagni Capaccini (head of the sustainability committee) to monitor the performance of indicators, including environmental, social and economic [2-13, 2-14].

The BoD approved the following sustainability report, pending review by the independent third party, during the meeting held on 10/09/2025 (NOTA METODOLOGICA).

The presence of non-shareholder members on the BoD also strengthens the balance of decision-making and ensures more impartial management of processes, further contributing to the prevention of conflicts of interest. In addition to the diversified composition of the Board of Directors, the prevention and management of conflicts of interest is also entrusted to specific control bodies, which carry out independent monitoring and reporting activities [2-15]:

- Board of Statutory Auditors
- Supervisory Body, consisting of one internal employee and two external members
- Independent Auditors

These bodies participate in BoD Meetings, during which critical issues or management risks are highlighted. Other entities within the organisation, such as **employee representatives, safety representatives, environmental representatives** and the various **operational offices representatives** (e.g. administration, IT, technical, commercial, purchasing), may also report problems or critical situations. This communication network promotes more informed and conscious decision-making by the Board. During 2024, no critical issues were reported to the Board of Directors [2-16].

During 2024, induction and updating activities were carried out for the members of the Board of Directors on issues related to sustainability and the management of ESG impacts; however, these initiatives have not been formally documented or included in a structured skills development plan [2-17]. Currently, shareholders oversee the Board's compliance, but starting in 2025, a more structured process for evaluating performance and supporting the development of the governance body is expected to be introduced, in line with the requirements of standard [2-18].

In absence of a remuneration committee, the remuneration policy for the Board and senior management is decided every



<sup>5</sup> Pursuant to art. 2381 of the Italian Civil Code and art. 19 of the articles of association, as well as legal representation, all powers of ordinary and extraordinary administration of the company, which fall within the corporate purpose.

three years by the Board of Directors and Shareholders. Directors receive fixed remuneration for performing their duties (in some cases fringe benefits) and may receive variable remuneration linked to results [2-19].

In the variable part, there is no component related to ESG issues. A system is being studied to introduce an ESG component into the variable part of directors' remuneration (by 2026) [2-20].

Annual remuneration ratio [2-21]:

<b>Ratio between the total annual remuneration of the highest-paid person and the average total annual remuneration of all employees (excluding the aforementioned person)</b>	Tratos SRL	Tratos Cavi	Tratos HV	Tratos UK
<b>2024</b>	1.32	4.62	1.55	4.58

<b>Ratio between the percentage increase in the total annual remuneration of the highest-paid individual and the average percentage increase in the total annual remuneration of all employees (excluding the aforementioned individual).</b>	Tratos SRL	Tratos Cavi	Tratos HV	Tratos UK
<b>2024</b>	31.22	28.61	-8.32	0

## 5.2 Company Policy

The TRATOS Group has adopted a General Policy that defines its commitment to responsible and sustainable management. The policy is applied across all Group companies and is based on recognised international standards (ISO 9001, 14001, 45001 and 50001), reflecting the principles of continuous improvement, respect for human rights and the precautionary principle.

Tratos UK Ltd has its own environmental policy in line with ISO 14001, and a specific health and safety policy that complies

with UK legislation (Health and Safety at Work Act 1974) and ISO 45001.

Policies are approved by management and communicated through internal training, posting, and made available to stakeholders.

The Tratos group then defined its policies (<https://tratosgroup.com/about-us/governance/policies-procedures-statements/>), which include the following topics:

<b>Policies</b>	<b>Tratos Cavi</b>	<b>Tratos HV</b>	<b>Tratos SRL</b>	<b>Tratos UK</b>
<b>Policy Statement</b>		X		X
<b>Code of Ethics</b>	X	X	X	
<b>Anti-corruption and bribery policy</b>				X
<b>Anti-slavery and human trafficking policy human rights policy</b>				X
<b>Corporate social responsibility</b>				X
<b>Human rights policy</b>				X

Each policy has been prepared by the structure and approved by the members of the Board of Directors (Chairpersons, CEOs). Sustainability commitments are integrated into business processes through certified management systems and the direct involvement of management. Activities are planned and monitored to align with the Group's strategic objectives, with a focus on quality, efficiency, social and environmental

responsibility. We have launched an improvement initiative to integrate all policies and make them more effective [2-23].

Policy makers are listed in the organisation chart (see 5.3). Each sectoral policy is explained to staff in training and awareness-raising initiatives [2-24].

### 5.3 Organisation Chart

Roles, responsibilities and powers of directors, employees and collaborators are defined through resolutions and/or internal procedures (e.g. Conduct Criteria), and must be acknowledged, accepted and respected by all those involved.

These responsibilities are assigned by the Management through formal communications. This is followed by a training programme, accompanied by a company organisation chart and a reference operating context.

The relations between the different company figures and the management of the activities are regulated through operating procedures. Any internal disputes that cannot be resolved between company departments shall be submitted to the Management, which shall intervene to resolve them. The management of the Company Management System is delegated with full authority to Elisabetta Bragagni Capaccini, in order to ensure its proper functioning and continuous improvement.

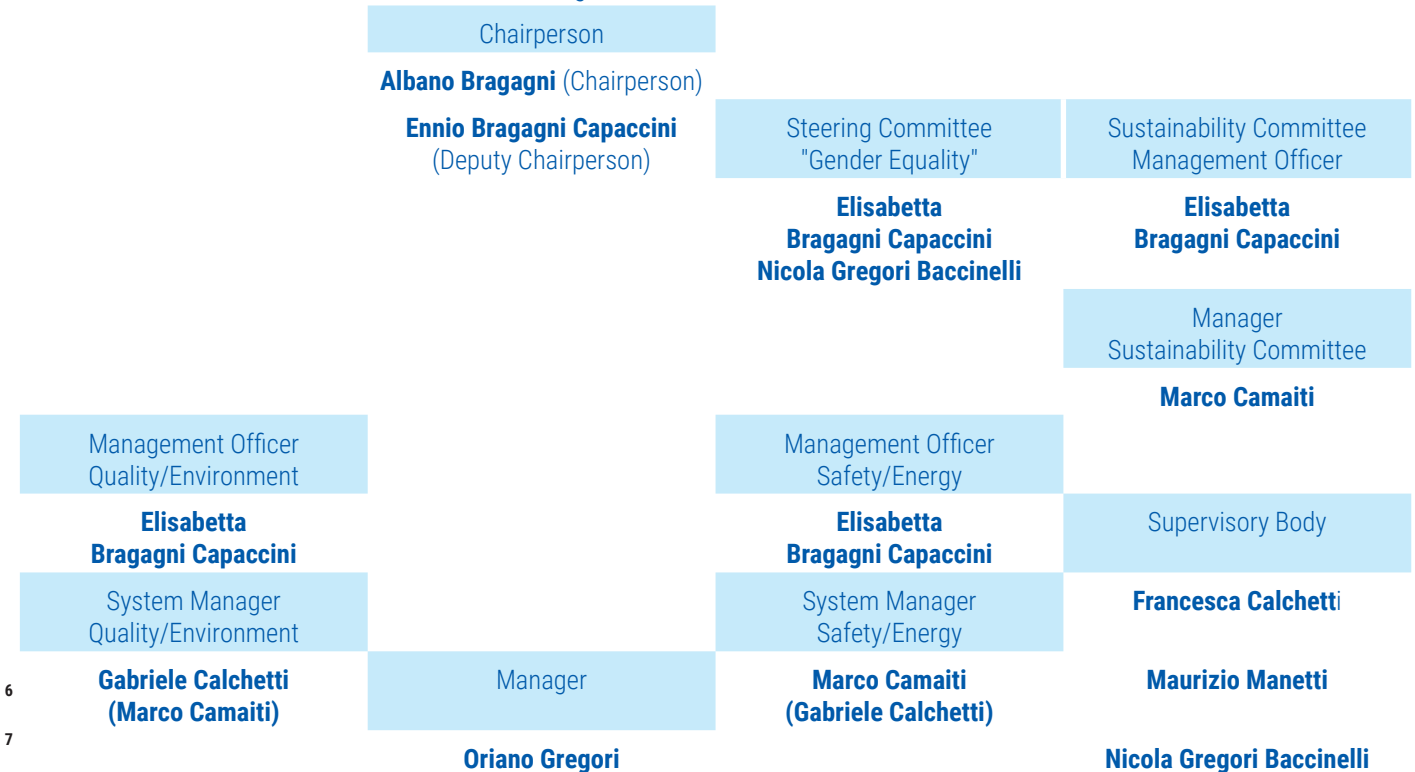
#### 5.3.1. Senior Manager

100% of the members of the Board of Directors who hold managerial positions in companies within Italy come from the local community (Pieve S. Stefano and the neighbouring

municipalities of Valtiberina). The BoD of Tratos UK, on the other hand, 78% of managers come from the community [202-2]

#### Organisation Chart TRATOS SRL

Organisation Chart TRATOS SRL

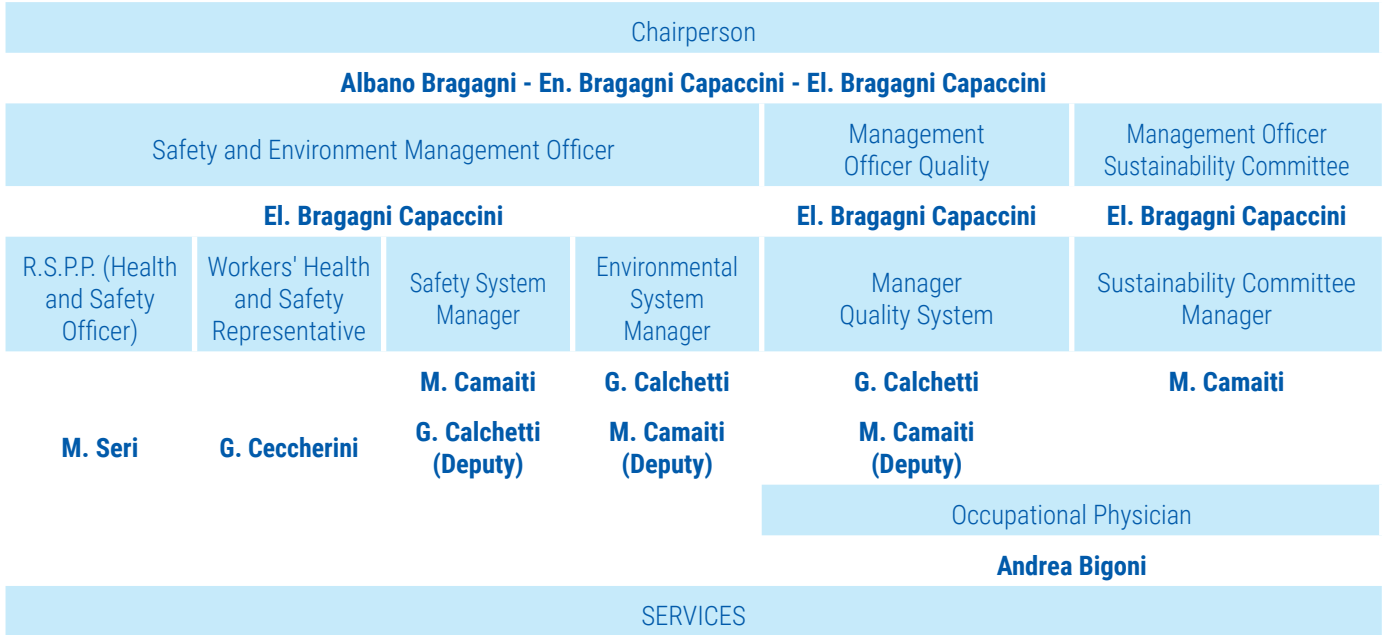


6 The workers' safety representative (WSR) is the spokesperson for the workers and has the task of reporting to the management team any issues that may arise during day-to-day activities (Tratos prepared its safety plan on the basis of the results of the risk assessment that were deemed acceptable, the objectives, and the actions envisaged to avoid possible accidents.). The WSR at Tratos Cavi PSS is G. Ceccherini, the WSR at Tratos Cavi CT is S. Speranza, the WSR at Tratos HV is A. Berretti, and the WSR at Tratos srl is T. Guerrini.

7 Sustainability Committee: its role is to promote and monitor sustainability initiatives within the company. The sustainability committee consists of a representative for the management team, the cable design department, the materials R&D department and the HSE - Health, Safety and the Environment - department. Some sustainability committee members also represent Tratos, in terms of sustainability, in the Europacable associations (Task Force on Product Environmental Footprint – Energy – M. Camaiti and Sustainability Leadership Team – E. Bragagni Capaccini, M. Camaiti) and the AICE association (Elisabetta Bragagni Capaccini - Vice Chairperson with the Environment and Sustainability mandate).

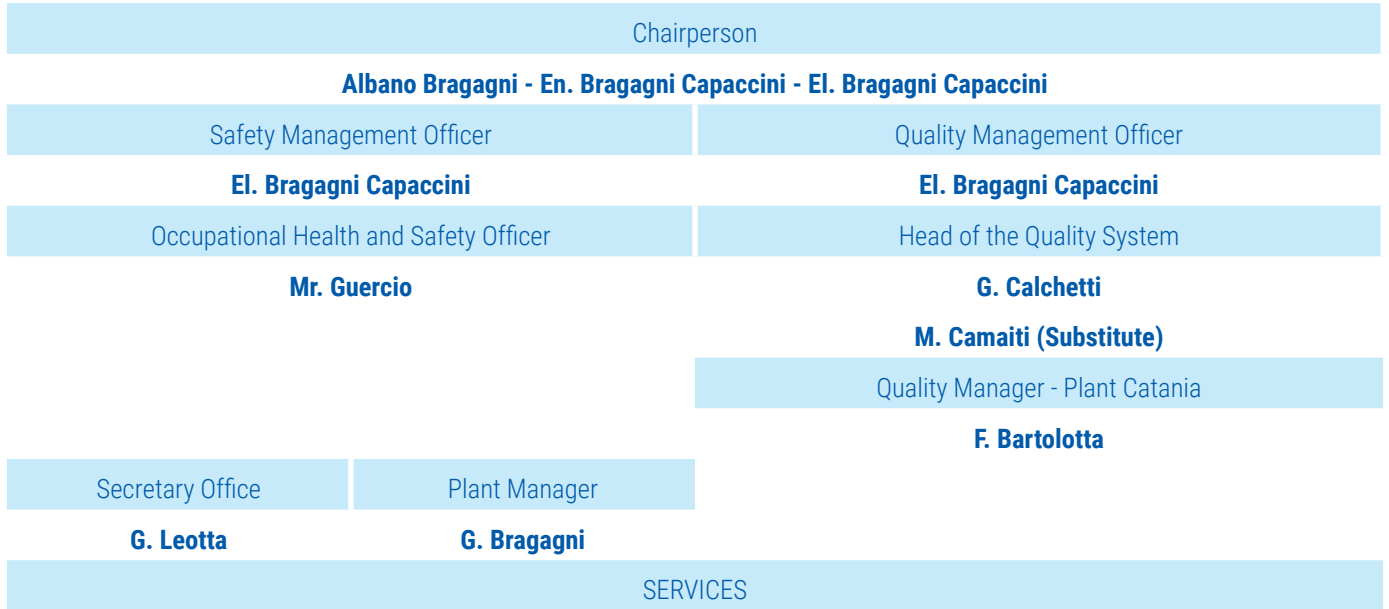
**Organisation Chart TRATOS CAVI SPA - PIEVE SANTO STEFANO**

Organisation Chart TRATOS CAVI SPA - PIEVE SANTO STEFANO



**Organisation Chart TRATOS CAVI SPA - Catania**

Organisation Chart TRATOS CAVI SPA - CATANIA



**Organisation Chart TRATOS HV - PIEVE SANTO STEFANO**

Organisation Chart TRATOS HV - PIEVE SANTO STEFANO

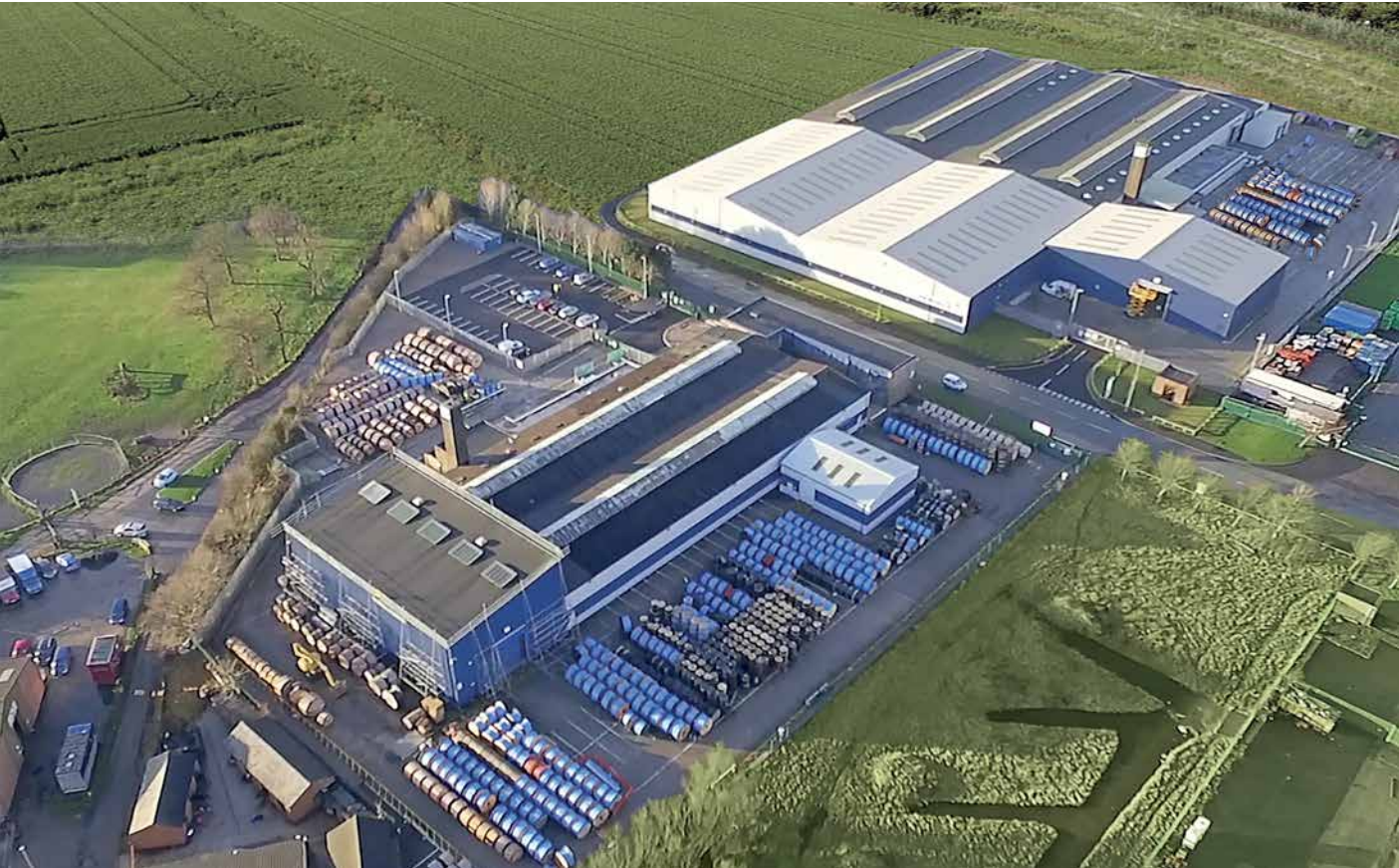
Chairperson			
<b>Albano Bragagni - En. Bragagni Capaccini - El. Bragagni Capaccini</b>			
Safety Management Officer	Quality Management Officer	Environment Management Officer	Sustainability Committee Management Officer
<b>El. Bragagni Capaccini</b>	<b>El. Bragagni Capaccini</b>	<b>El. Bragagni Capaccini</b>	<b>El. Bragagni Capaccini</b>
Manager Safety System	Manager Quality System	Manager Environment System	Manager Sustainability Committee
<b>M. Camaiti</b> <b>G. Calchetti (Substitute)</b>	<b>G. Calchetti</b> <b>M. Camaiti (Substitute)</b>	<b>G. Calchetti</b> <b>M. Camaiti (Substitute)</b>	<b>Marco Camaiti</b>
R.S.P.P. (Health and Safety Officer)			
<b>M. Seri</b>			
W.S.R.			
<b>A. Berretti</b>			
Operational	Occupational Physician		
<b>G. Camaiti</b>	<b>Dr. C. Baldassarri</b>		
SERVICES			



**Organisation Chart TRATOS UK Ltd – Knosley – UK**

Organisation Chart TRATOS UK Ltd – Knosley – UK

CEO					
<b>Maurizio Bragagni</b>					
SHEQ Director			ELAS (External)		
<b>Elisabetta Bragagni Capaccini</b>			<b>Wayne Dunning</b>		
SHEQ Deputy		SHEQ Manager		Ellenbrooke (External)	
<b>Alan Harrison</b>		<b>Gianfranco Lutri</b>		<b>Ian Sparks</b>	
Office	Factory	Maintenance		Warehouse	



## 6 ETHICS AND INTEGRITY

TRATOS bases its corporate culture on values of **fairness, transparency, inclusion and human respect**, promoting an ethical and responsible work environment. The Group's commitment goes beyond regulatory compliance, with the aim of integrating these principles into every activity and professional relationship.

### 6.1 Code of Ethics and Conduct

The **Code of Ethics and Conduct**, an integral part of the **Organisation Model 231** (pursuant to Italian Legislative Decree 231/2001), defines the principles of conduct and responsibility that guide all Group companies.

### 6.2 Whistleblowing Procedure

In compliance with **Directive (EU) 2019/1937** and **Italian Legislative Decree 24/2023**, Tratos has introduced a **Whistleblowing Procedure** for its Italian offices (while for its UK office, in compliance with the Public Interest Disclosure Act) that allows employees, suppliers and stakeholders to report, even anonymously, any behaviour that is contrary to company values or the law. The reporting channels, differentiated for Italian and English offices, are managed by an **independent body** that guarantees confidentiality, impartiality and protection of the whistleblower [2-25, 2-26].

In general, non-conformity reports received from stakeholders are treated as part of the **PO 712 Operating Procedure**, which regulates the non-conformity and corrective actions management system.

Although the effectiveness of the actions is monitored over time, a formal system of participatory review with stakeholders is not yet envisaged [2-25].

To ensure consistent and transparent management, TRATOS has adopted a structured ethical governance system that includes the **Code of Ethics and Conduct, Whistleblowing Procedure** and **management of non-conformities**.

The model was approved by **Tratos S.r.l.** in 2023 and by **Tratos Cavi** and **Tratos HV** in 2024, while the UK company is currently adjusting to local regulations.

The Supervisory Committee (SB) ensures the application of the Code, monitoring compliance with the relevant laws and ethical principles.

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**No. complaints/reports from whistleblowing channels**

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zero

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### 6.3 Protection of human dignity and human rights

The Tratos Group respects all human rights in the United Nations Universal Declaration of Human Rights.

In its policies and Code of Ethics, the Tratos Group respects all human rights. In particular, it recognises the importance of ensuring a safe, respectful and inclusive working environment, in line with the principles of the European Framework Agreement on Harassment and Violence at the Workplace, signed by the European social partners and implemented at national level (ESC, BUSINESSSEUROPE, UEAPME, CEEP and ETUC).

Framework agreement on harassment and abuse in the workplace:

- recognises that harassment and violence, including psychological or physical violence, can have serious consequences for people's health, dignity and well-being;
- establishes common guidelines for employers and employees to identify, prevent and manage these phenomena in the workplace;
- promotes zero tolerance company policies towards such behaviour;
- invites the social partners in the individual Member States to implement the agreement at national level through collective bargaining, codes of conduct or other initiatives.

With this in mind, the company has adopted tangible measures to prevent any form of harassment, abuse or behaviour that undermines personal dignity. In particular, upon recruitment, each employee is required to sign a declaration of acceptance and commitment, which explicitly refers to the contents of the agreement and the principles of respect, integrity and collaboration that govern internal relations.

This decision represents an important step towards promoting a corporate culture based on mutual respect.

## 6.4 Categories of stakeholders

The categories of stakeholders relevant to Tratos, considering the sector to which the Company belongs, are as follows:

This list was prepared following meetings held at various company locations.

- **Employees and collaborators:** individuals who participate directly in company activities, contributing to the management and development of the organisation, as well as freelancers and consulting and design firms that provide technical support to the company's activities;
- **Customers:** enterprises, companies and other entities to which Tratos provides products and services;
- **Institutions and Public Bodies:** Italian and international political and institutional bodies that contribute to the execution and functions of updating, verification and control of laws and regulations within their field of expertise, in order to maintain a collaborative and transparent relationship by facilitating dialogue on issues of particular interest: Municipality of Pieve Santo Stefano;
- **Community and the local area:** the people and the environment that can be affected by Tratos' activities in the local area. Tratos maintains good relations with local, national and international authorities. Tratos supports social, cultural and educational initiatives aimed at developing personal skills and improving living standards. Furthermore, Tratos continuously contributes to the economic well-being and growth of the communities in which it operates by providing efficient and technologically advanced services;
- **Competitors:** enterprises, companies and other entities that compete economically with Tratos for services and products related to the sector; Prysmian, Nexan;
- **Suppliers:** businesses, companies or other entities that have formalised a relationship with Tratos for the supply of products, goods or services, including subcontractors. Tratos is committed to ensuring that its purchasing procedures comply with quality, safety and environmental requirements, seeking the best conditions available on the market;
- **Credit Institutions and Financial Intermediaries, Financing Shareholders and Investors:** banks, credit, securities and insurance intermediaries. Tratos is committed to ensuring equal treatment for all classes of shareholder;
- **The market:** the transparent communication of information to the market and investors according to criteria of fairness, clarity and equal access;

- **Research and development centres:** training institutions and research centres, aimed at fostering the development of corporate training activities and contributing to sustainable development: ENEA, University of Pisa, University of Florence, NEST, Prolabin. The hubs are Italian because all R&D activities are carried out in Italy at Tratos Cavi Spa.
- **Environment:** protection of the environment and the surrounding area, using renewable energy sources and bio/recycled resources in order to minimise environmental impacts;
- **Trade Unions**
- Stakeholders are involved with the following samples

The sample of INTERNAL STAKEHOLDERS interviewed is represented by:



34

EMPLOYEES  
of various levels and duties



9

WORKERS  
in the production department

The sample of EXTERNAL STAKEHOLDERS interviewed is represented by:



16

SUPPLIERS



41

CUSTOMERS



11

RESEARCH BODIES /  
COLLABORATORS FOR R&D



9

BANKS



MUNICIPAL  
ADMINISTRATION

Stakeholders are involved in identifying material issues, but also in other areas such as satisfaction surveys and analysing needs and expectations.

## 7 MATERIALITY ANALYSIS

After the materiality analyses of the previous sustainability reports (2022, 2023)<sup>8</sup>, we refined the study of the sustainability issues most relevant to Tratos for this Sustainability Report.

Tratos has also chosen to report on its actions towards sustainable development for 2024 on a **voluntary basis<sup>9</sup> in compliance with the GRI**. Although Tratos is not currently subject to the regulatory requirements introduced by the CSRD Directive (EU 2022/2464), it has chosen to voluntarily initiate a double materiality analysis process, in line with the provisions of the European Sustainability Reporting Standards (ESRS) and the guidelines published by EFRAG.

The objective was to identify, in a structured manner, the material sustainability issues relevant to the Group, first by assessing the impact that the company has on the environment and society (impact materiality - inside-out), and then by initiating a process to assess the effects that ESG issues may have on the organisation's economic and financial performance (financial materiality - outside-in). Both dimensions took human rights assessments into account.

The process, divided into four main steps, was developed as follows:

- 1) Review of Tratos 2023 materiality analysis for the selection of impact measures
- 2) Involvement of internal and external stakeholders<sup>10</sup> through structured ESG questionnaires, to assess the interest in impact measures;
- 3) Identification of relevant sustainability issues, followed by assessment and clustering based on expressed interest;
- 4) Assessment of material issues through IRO (Impact, Risks and Opportunities) analysis to develop financial materiality, based on the criteria envisaged by the ESRS.

<sup>8</sup> Materiality analyses 2022 and 2023 were developed from a first phase of bibliographic study, analysing non-financial reports from the same sector, non-financial reports from competitors, sustainability reports from different business contexts and related to the same geographical areas, in order to identify the topics belonging to the environmental, social and governance (ESG) categories of greatest interest to Tratos, always taking into account the impacts on human rights.

<sup>9</sup> Directive (EU) 2022/2464 (CSRD) expands sustainability reporting requirements. The European Commission's "Omnibus" proposal (February 2025) envisages an extension to 2028, the raising of the threshold to over 1,000 employees and the simplification of ESRS standards. Although not yet subject to the obligation, Tratos has already drawn up a Sustainability Report in compliance with the GRI standards.

<sup>10</sup> For the 2025 reporting, Tratos is committed to introducing a stakeholder categorisation system in order to distinguish the different types involved in a structured manner. Variables such as the nature of the relationship (e.g. suppliers, customers, employees, local communities), geographical origin (local, national, EU, non-EU), gender, place of work and professional role (distinction between manual workers, office workers and other company functions) will be taken into account. The objective is to create a register that allows for the accurate analysis of the contributions collected, assigning the appropriate weight to the responses received and ensuring anonymity at all times.

## 7.1 Impact materiality (inside-out)

The sustainability issues identified by stakeholders are listed in OUR COMPANY.

**Table 1 List of sustainability issues (related to ESG topics, environment, social and governance) submitted to Tratos stakeholders**

CLASS	SUSTAINABILITY ISSUE
E1-1	Energy efficiency
E1-2	Consumption monitoring
<b>E1-3</b>	<b>GREENHOUSE GAS EMISSIONS (TM5)</b>
E2-1	Eco product design
<b>E2-2</b>	<b>CIRCULAR ECONOMY</b>
E3-1	Water pollution
<b>E4-1</b>	<b>SUPPLY CHAIN (TM1)</b>
E4-2	Recycled raw materials
E5-1	Air pollutants
E6-1	Damages to Biodiversity
E7-1	Education for sustainability
S1-1	Communication of business objectives
S2-1	Enhancing employee skills and abilities
<b>S3-1</b>	<b>HEALTH AND SAFETY</b>
S4-1	Employee benefits
S4-2	Equal opportunity
<b>S5-1</b>	<b>SUPPORT FOR THE LOCAL COMMUNITY</b>
G1-1	Positive business performance
<b>G2-1</b>	<b>CLIENT SATISFACTION (TM2)</b>
G3-1	Product quality
G3-2	Product Innovation
G4-1	Research and development
<b>G5-1</b>	<b>CYBERSECURITY (TM3)</b>
G5-2	Digitalisation
G6-1	Ethical Transparency
G6-2	ESG Strategy Transparency
G7-1	Partnerships with other companies
G8-1	Management of risks
G9-1	Supplier assessment

The evaluation process by the stakeholders includes:

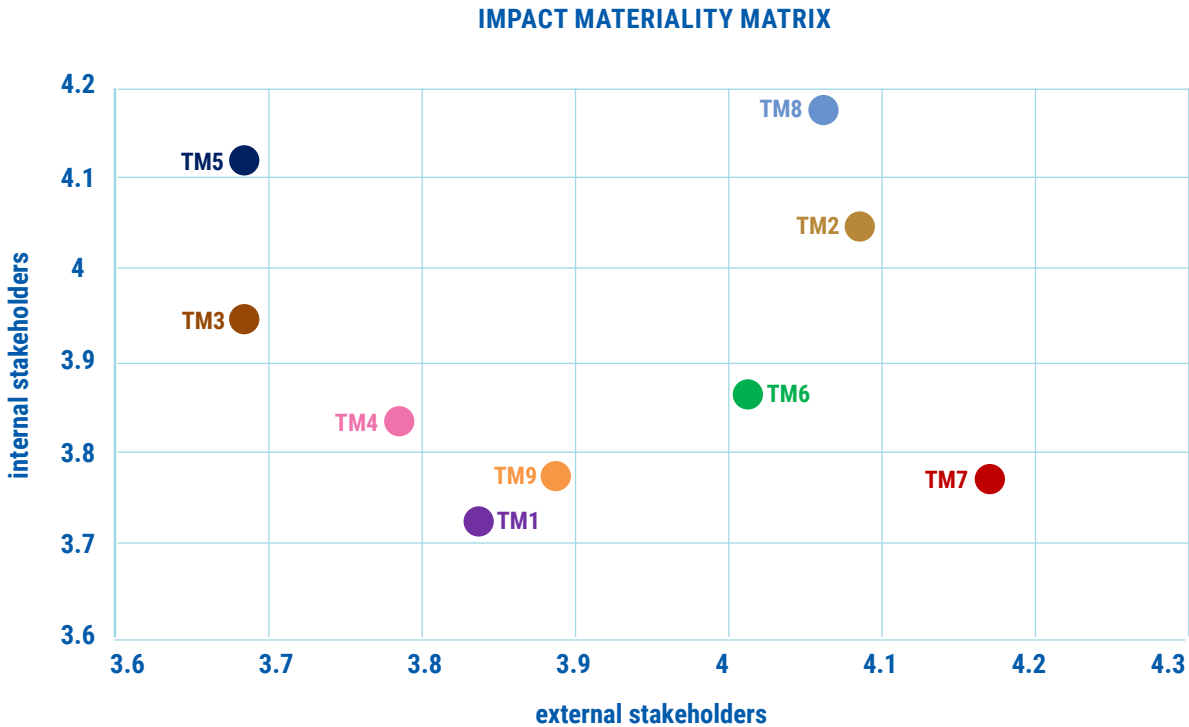
submission of ESG questionnaires to employees via online form

sending ESG questionnaires to external stakeholders via an online form.

The questionnaires involved assigning scores of between 1 (not at all relevant) to 5 (very relevant) to the various issues, for the purpose of assessing a stakeholder’s level of interest. Internal stakeholders voted on the magnitude and probability of each topic/impact, actual or potential, in the short term, related to ESG issues. The results of the two votes were mediated. External stakeholders voted on the magnitude of each topic/impact. The result was mediated.

The output of this phase was the impact materiality matrix, which represented all the issues that emerged. The most relevant topics, positioned in the upper right quadrant (>3.6), were selected and grouped into material topics (MT), shown in Figure 2.

Figure 2 Impact materiality matrix, only the graphic representation of the top right quadrant (>3.6) is shown.



## 7.2 Financial materiality (outside-in) – IRO Analysis

Based on the material issues that emerged from the impact analysis, an IRO analysis was conducted, which made it possible to assess:

- **impacts** are the positive or negative effects that a company generates on the environment, society and the economy. Understanding the impacts implies the evaluation of the direct and indirect consequences of the company's activities;
- **risks** are potential negative effects that ESG factors could have on a company. Risks can be regulatory, physical, reputational or financial: identifying these risks is essential for strategic planning and risk management, as part of financial materiality;
- **opportunities** are the potential benefits that a company can gain by adopting an ESG strategy, which translates into sustainable practices that can often lead to innovation, cost savings and an improved reputation.

The breakdown of the IRO analysis of each material issue is reported under the same issue within the document (Analisi Rischi e opportunità TM1, Analisi d'Impatti, Rischi e Opportunità TM2, Analisi Rischi e Opportunità TM3, Analisi dei rischi e delle opportunità TM4, Analisi impatti, rischi e delle opportunità TM5, Analisi rischi e opportunità TM6, Analisi di rischi e opportunità TM7, Analisi Rischi e Opportunità TM8, Analisi Rischi e Opportunità TM9).

This assessment made it possible to identify the ESG issues that can significantly affect the economic and financial resilience of the company, thus completing the framework of double materiality pursuant to the approach envisaged by the ESRS-1. Compared to the previous Sustainability Report for the year 2023, the only topics that were not confirmed as material were TM 'Transparency, ethics and integrity', which was positioned at the bottom left (< 3.6) in terms of materiality impact. Although excluded from the list of material topics, information relating to these topics has been included in the chapter ETICA E INTEGRITÀ.

**Table 2 shows the financial materiality analysis, with IRO analysis - Impacts, Risks and Opportunities assessed in relation to the material issues identified through the impact materiality analysis.**

Material Topics	CLASS	Impact topics	KPIs – impact measures	Risk time horizon	Opportunity time horizon	Total
<b>TM1</b> Sustainable supply chain	G	-Evaluation of suppliers	- % suppliers with ISO 9001 - % late payments - % local purchases	medium	medium	7.5
<b>TM2</b> Customer satisfaction	G	- Positive business performance - Customer satisfaction - Product quality	- NC over km of cable - T20 – response times - T21 -complaint management - NC for CPR certifications	short	medium	7.8
<b>TM3</b> Cybersecurity	G	-Cybersecurity -Digitalisation	Under evaluation	medium	medium	7.8
<b>TM4</b> Consumption of energy	E	-Energy efficiency - Consumption monitoring	ENERGY INTENSITY (product & turnover)	short	short	9.3
<b>TM5</b> Greenhouse gas emissions	E	-Greenhouse gas emissions	INTENSITY OF GHG EMISSIONS (product & turnover)	medium	medium	8.3
<b>TM6</b> Innovation for the Circular Economy	I	- Eco product design - Circular Economy - Recycled raw materials - Research & Development - Partnerships with other companies - Product Innovation	- EPD per production unit - % Recycled Plastics - % Recovered packaging - Investments in R&D on turnover - Production waste %	short	short	8.3
<b>TM7</b> Health and safety	S	-Health and safety	- Frequency index and - accident severity index	medium	medium	6.8
<b>TM8</b> Training and skills	S	- Enhancing employee skills and abilities	- no. of people trained in the ESG field	long	long	6.8
<b>TM9</b> Support for the local community	S	- Support for the local community	- Chimney emission intensity - Community/employee donations - Pro capita fuel bonus	medium	medium	6.8

## 8 SUSTAINABLE SUPPLY CHAIN TM1

In an industrial context increasingly oriented towards ESG criteria, building a sustainable value chain has become a strategic objective for Tratos. Managing the entire supply cycle responsibly – from sourcing raw materials to distributing the finished product – means not only ensuring quality and operational continuity, but also reducing environmental impact, promoting fair working conditions and strengthening business resilience.

Tratos adopts an integrated approach to sustainability along the supply chain, aware that the choices made upstream directly influence environmental, social and economic performance downstream. In this process, collaboration with reliable suppliers who share our values is essential to generating shared value and proactively addressing challenges related to innovation, traceability and regulatory compliance.

### TM1 – SUSTAINABLE SUPPLY CHAIN

#### POSITIVE IMPACTS

The integration of ESG principles into supply chain management represents a tangible opportunity for Tratos for sustainable growth. In line with the requirements introduced by the Corporate Sustainability Reporting Directive (CSRD) and GRI Standards, material traceability, process transparency and social responsibility become distinctive elements in relations with stakeholders, customers and investors. The sustainable approach strengthens the company's reputation, promotes

access to new markets and allows Tratos to align with the SDG Goals, in particular SDG 12 (Responsible consumption and production) and SDG 8 (Decent work and economic growth). Collaboration with reliable suppliers aligned with these values also contributes to building a more resilient and innovative supply chain, capable of improving environmental performance and product quality.

#### NEGATIVE IMPACTS

The path towards a more sustainable supply chain also involves some critical elements. The adoption of environmental and social criteria in procurement processes can lead to an increase in direct costs, especially for materials with reduced environmental impact, such as recycled plastics or certified metals. In the current context, where the availability of these raw materials is not yet fully developed, there are risks associated

with the continuity of supply and price volatility. Furthermore, ESG assessment of suppliers requires new organisational tools and greater commitment in terms of internal resources, both for operational management and for monitoring compliance throughout the supply chain. This involves a delicate transition phase, which must be managed gradually to avoid negative impacts on industrial performance.

#### STRATEGIES

In response to the challenges associated with building a more sustainable value chain, Tratos has embarked on a structured path, consistent with the ESG due diligence principles set out in European regulations and reporting standards such as the CSRD. The company aims to strengthen collaboration with selected suppliers through ESG criteria integrated into qualification and

monitoring processes, promoting transparency, reliability and environmental and social performance. Another key element of the strategy is the diversification of supply sources, which is essential for reducing risks related to the availability of sustainable materials and ensuring operational continuity without compromising the required quality standards.

### 8.1 Risks and opportunities analysis TM1

The **Supply Chain** involves responsible management, in social, environmental as well as economic terms, of all processes, from procurement, production and distribution to quality control. Good management of the supply chain ensures an important level of control of the flows of **materials** and **information**, allowing improved operational performance and lower costs, with a positive effect on competitiveness. Tratos is committed to forming close relationships with its strategic suppliers and establishing a shared organisational process for the entire supply chain.

Managing the supply chain in a sustainable way, pursuant to ESG principles, can generate **risks** and **opportunities** for the company.

The search for more sustainable raw materials leads to a direct increase in purchase costs, an increase in transport costs (if you try to favour lower-impact transport such as electric or rail transport) and also an increase in costs related to material import procedures, for example, when the material comes from non-EU countries<sup>11</sup>. The availability of more sustainable materials also represents a risk factor for the company, as these materials are not yet predominant on the market and suppliers are not always able to meet the company's requirements to cover its entire needs.

The ESG assessment process for suppliers is fundamental to structuring a sustainable supply chain. Implementing this process leads to an increase in costs and resources for the company. Replacing old suppliers and managing new suppliers can also lead to increased costs.

## 8.2 Responsible procurement

Although copper and aluminium are indispensable for the energy transition, their virgin extraction entails very high environmental and social costs. To make the electrical cable supply chain truly sustainable, it is necessary to invest in recycling, transparency and technological innovation

KPI TM1 <sup>12</sup> : Payment delay	%
Tratos Cavi	-7.8
Tratos HV	2.4
Tratos SRL	-18.5
Tratos UK	0.2

## 8.3 Local Purchases

Although a large quantity of raw materials is purchased from outside the EU, Tratos tends to follow the **principle of proximity**, with the aim of establishing economic relationships with what is nearby, both places and people in the local area.<sup>13</sup>

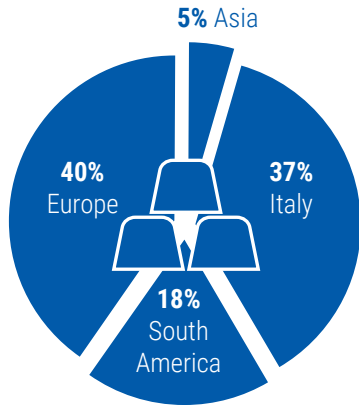
Tratos also tries to make the best use of local resources in the fields of design, construction and maintenance of systems and plants. Tratos wants to help the professionals in our community benefit, even indirectly, by creating regular job opportunities and involving all the businesses in our community in the company's internal processes.

Tratos, meaning the management team together with the professionals and technicians in various fields, has always established direct relationships with Tratos suppliers by visiting their companies in person in order to understand their internal processes that lead to the development of the raw materials we need.

<sup>11</sup> Materials subject to CBAM, a complex instrument that is an integral part of the EU's efforts to achieve Net Zero by 2025, which applies an additional cost on carbon emissions associated with imports of certain goods (cement, iron, steel, aluminium, fertilisers, electricity and hydrogen) and therefore for Tratos Aluminium and Steel, if they are imported from non-EU countries. Companies importing these goods into the EU must declare the CO2 emissions contained in the goods and purchase corresponding CBAM certificates. When the CBAM enters its operational phase, the importing company will have to submit an annual CBAM declaration, which includes the quantities imported and the related emissions, and finally purchase CBAM certificates corresponding to the declared emissions.

<sup>12</sup> In compliance with the **ESRs G1-6 – Payment practices** principle, Tratos monitors payment times to its suppliers using an indicator that measures the number of days of delay in settling invoices beyond the agreed terms. This KPI reflects the company's commitment to ensuring fair and responsible payment practices, in line with ESRs requirements, helping to preserve the financial stability of suppliers, particularly those that are small or more vulnerable.

<sup>13</sup> For Tratos offices, local procurement is considered to be that originating from the national territory: Italy for Italian offices and Great Britain for Tratos UK



% material purchased per country (Kg)

KPI TM1 <sup>14</sup> : Local purchases – KPIs	% purchases	
	Tratos Italia	Tratos UK
% by weight	33	34
% by value	24	26

A sustainable supply chain can bring various opportunities, such as implementing the company's decarbonisation process, which Tratos has begun to implement by joining the science-based SBTi initiative, thus setting targets in line with climate science to achieve Net Zero by 2050.

The sustainable supply chain enables the company to already be in line with tenders and funding that have sustainability requirements. The most logistically favourable and accessible

supply chain enables the company to build loyalty with suppliers/customers in order to receive and guarantee the necessary supplies.

Economies of scale can also reduce costs and result in lower financial rates.

Supporting an ESG-compliant supply chain enhances the company's reputation with all its stakeholders.

### 8.4 Supplier assessment

Currently, the initial evaluation of a new supplier is carried out by verifying the availability of the ISO 9001 certificate.

The ISO 9001 certificate is registered in the management system<sup>15</sup>.

Based on the type of supply, RGS and RSA decide the actions to be taken, in the event of the absence of a certificate.



<sup>14</sup> In compliance with the **ESRs G1-2 principle – Management of Relationships with Suppliers**, Tratos measures the rate of procurement from local suppliers, defined as those located within the national territory. This indicator reflects the company's commitment to promoting a sustainable and resilient supply chain, reducing transport-related emissions and supporting the local economy. Monitoring the percentage of purchases from local suppliers makes it possible to assess the territorial impact and overall sustainability of the supply chain.

<sup>15</sup> Formalised in the management system only for Tratos Cavi. It is planned to extend this procedure to all other locations.

**8.4.1. ISO 9001 supplier evaluations**

KPI TM1 <sup>16</sup> - % suppliers with ISO 9001	% Suppliers evaluated
	Tratos Cavi
of the total	28
valid assessment	62

Tratos has initiated a process to assess all suppliers from an ESG perspective and will report on this in its next reports (2025 planning and 2026 implementation). A method for assessing suppliers in the ESG field, using questionnaires developed to gather information from the purchasing department, in order to better manage the material procurement process, considering not only economic criteria but also integrating the social and environmental characteristics of suppliers, assessing the impact on the environment and society (308-2, 414-2). The ESG questionnaire for supplier assessment will allow a rating – obtained from the questionnaire as the sum of the various KPIs – to be assigned to each supplier.

The rating will, therefore, be useful for keeping track of the progress of ESG activities across Tratos' entire value chain.

The supplier qualification system will initially be implemented at Tratos Cavi's sites, and will subsequently be rolled out to all other sites.

ESG 2024 assessments	No. suppliers evaluated
N° suppliers evaluated in line with environmental criteria GRI 308-1 , 308-2	0
Number of suppliers assessed using GRI social criteria 414-1, 441-2	0

**8.5 Tax strategy**

The principles of the tax strategy define the guidelines for the Group companies, inspire the company's operations in the management of the tax variable and require the implementation of appropriate processes to ensure their effectiveness and application. The basic principles for the group are:

- **Transparency**
- **Figures**
- **Legality**

The Board of Directors defines the tax strategy for the Tratos Group and ensures its implementation within the Group, thereby assuming the role and the responsibility of ensuring the dissemination of a corporate culture marked by the values of honesty and integrity and the principle of legality.

**8.5.1. Compliance and non-compliance**

For the year 2024, there was no non-compliance with laws and regulations or other socio-environmental and economic penalties [2-27].



16 In compliance with the ESRs G1-2 principle – Management of Relationships with Suppliers, Tratos manages relations with its suppliers, currently evaluating them on the basis of the ISO 9001 certification. The evaluation process is currently being expanded through an ESG questionnaire, aimed at integrating environmental, social and governance criteria into the selection and monitoring of suppliers, in line with the objective of more responsible and sustainable supply chain management.

## 8.6 Economic Performance

Economic performance is crucial for Tratos, as it forms the basis for all other activities related to ESG (environmental, social and governance) areas. The positive financial results of recent years have facilitated innovation, enabling significant investments in machinery, facilities and research and development (R&D).

On the contrary, negative economic performance could compromise payments to suppliers and employees, with serious repercussions on the local territory. These unfavourable results could also affect investments and internal operating expenses (such as maintenance), as well as damaging banks' confidence in the company.

To meet customer demands, Tratos is streamlining its warehouses to make deliveries more reliable, frequent, rapid

and traceable. Tratos aims to invest in Europe, avoiding financing low-cost labour and focusing on:

- Increased production capacity to meet the growing market demand.
- Development of telecommunications technologies directly in Europe, reducing dependence on external markets.
- Promoting the digital transition and the development of Artificial Intelligence (AI), with a strong focus on growing expertise in the field of telecommunications.

This approach will enable Tratos to maintain a strong position in the market while promoting innovation and sustainability.

### 8.6.1. Economic and financial results

2024	Tratos SRL (€)	Tratos Cavi (€)	Tratos HV (€)	Tratos UK (€)
<b>Revenue from sales and services (euro)</b>	8,448,973	224,737,653	35,414,681	24,540,072
<b>A) Total value of production (Euro)</b>	8,472,736	231,774,286	35,327,612	25,154,070
<b>B) Total Costs of production (Euro)</b>	7,716,721	198,364,851	32,122,450	24,325,041
<b>Gross Margin (€) (A-B)</b>	756,015	33,409,435	3,205,162	829,029
<b>Net profit (€)</b>	741,575	19,618,556	2,033,390	633,056
<b>Total Turnover (€)</b>			293,141,379	
<b>Distributed economic cost (Euro) 2024</b>	<b>Tratos SRL</b>	<b>Tratos CAVI</b>	<b>Tratos HV</b>	<b>Tratos UK Idt</b>
<b>PAYMENTS TO CAPITAL SUPPLIERS / Financial income and expenses</b>	251,147	6,332,169	543,131	-
<b>PAYMENTS TO THE PUBLIC ADMINISTRATION / Current income taxes</b>	318,616	8,301,567	684,339	-
<b>INVESTMENTS IN THE COMMUNITY / Donations</b>	-	17,166	-	-
	<b>Tratos SRL</b>	<b>Tratos CAVI</b>	<b>Tratos HV</b>	<b>Tratos UK Idt</b>
<b>R&amp;D investments (Euro) 2024</b>	-	468,855	60,859	-

Tratos did not receive any subsidies from the public administration in 2024 [201-4].

Costs of production 2024 (EURO)	Tratos SRL	Tratos Cavi	Tratos HV	Tratos UK
<b>Raw, ancillary materials, consumables and goods</b>	6,915,308	129,863,169	20,164,006	18,944,098
<b>Services</b>	266,271	44,489,940	4,918,878	-
<b>Leased assets</b>	18,759	678,789	585,024	-
<b>Staff</b>	451,232	11,425,309	4,818,625	5,380,944
<b>Depreciation and amortisation</b>	7,090	7,890,573	2,105,831	-
<b>Changes in inventories of raw, ancillary and consumable materials and goods</b>	45,330	2,151,779	-572,755	-
<b>Sundry operating expenses</b>	12,731	1,865,292	102,841	-
<b>Total</b>	7,716,721	198,364,851	32,122,450	24,325,041

## 8.7 Potential issues

In order to invest in innovation, Tratos will increasingly have to take into account potential climate change issues, such as the increase in the magnitude of extreme weather events.

There were no extreme weather events in the reporting year in the areas included in the reporting scope.

In 2024, there were no catastrophic events and no potential critical issues were reported in the various ESG areas.

### 8.7.1. Natural disaster insurance

The Tratos Group (Italy) insurance policy covers **direct and indirect damages** to company property and assets. Risks also assessed in relation to climate change [201-2]. The main types of insured claims include:

- **Natural and catastrophic events:** earthquakes, tsunamis, floods, intense snowfall, volcanic eruptions, frost, hail, landslides and avalanches.
- **Malicious and socio-political events:** terrorist acts, riots and civil unrest.

- **Water and liquid damage:** flooding, rain infiltration, liquid dispersion.
- **Technical and operational damages:** machinery failures, electrical/electronic phenomena, damage during loading/unloading, damage to electronic equipment and artistic goods.
- **Others:** structural collapses and extra post-disaster expenses.

## 8.8 Pension plan

For Italian companies, the payment of contributions and severance pay is mandatory for the company. Tratos UK will comply with its legal obligations regarding auto-enrolment into The People's Pension scheme, in compliance with the *Pensions Act 2008*.

The statutory retirement plan is the one managed by INSP. Another retirement plan provided by Tratos is the industry pension fund, the **Fondo Gomma**. Membership of the **Fondo Gomma** requires Tratos to contribute a certain fixed quota value. Investment in either fund is at the employee's discretion, depending on market inflation and on whether a more/less aggressive investment is preferred. There are no private supplementary funds.

## 9 TRATOS INVESTS IN INNOVATION

In a European context that is accelerating the development of fibre optic infrastructure, Tratos is positioning itself as a key player, responding to the growing demand for advanced connectivity solutions, which is also fuelled by the expansion of artificial intelligence. The company is committed to continuous technological evolution, with innovative projects such as **multi-core fibres**, designed to support the high performance required by new AI developments. Another strategic sector is that of **underwater cables**, driven by the dual need for data and energy connectivity, where demand is growing rapidly in line with the objectives of the European Green Deal and the transition to sustainable energy.

In 2024, Tratos made significant infrastructure and industrial investments to support sustainable growth and innovation. The main initiatives involved expanding production facilities with new land and buildings, installing energy-efficient 5.0 machinery (TM4 - Energy consumption), the internalisation of compound production to reduce the use of external processing (TM1 - Sustainable supply chain) and the enhancement of the digitalisation of production processes (TM2 - Customer satisfaction).

At the same time, the Group strengthened its international presence through the acquisition of AFL Telecommunications Europe (Swindon, United Kingdom), AFL Telecommunications GmbH (Mönchengladbach, Germany) and Endurance Telnet (Zaragoza, Spain). Furthermore, following the merger through incorporation of Genergy Spa of Arezzo, a company active in the production of electricity from hydroelectric and photovoltaic plants, Tratos has expanded its commitment to energy sustainability and the production of energy from renewable sources (TM5 - Greenhouse gas emissions).

Tratos' strategy aims to strengthen its presence in the European market, with new sites distributed across different geographical areas to meet the growing demand for fibre optic cables and solutions for the telecommunications and energy sectors. The goal is to offer comprehensive, technologically advanced products that enable the future of data transmission and energy management. The Group's strong commitment to sustainable innovation will drive infrastructure modernisation processes and the development of smart grid solutions for high-speed telecommunications networks across Europe.

Investments and acquisitions, which are directly commercial in nature and supported by medium- to long-term financing, contribute to sustainable and responsible growth, generating positive indirect economic impacts on communities and the local economy. These include: the creation of new jobs, the strengthening of the local industrial supply chain, the dissemination of advanced technical skills and the stimulation of technological innovation.

In line with national and European priorities (Industry 5.0, National Recovery and Resilience Plan, Green Deal), Tratos' interventions promote energy and digital transition, reducing environmental impact and promoting inclusive growth. Temporary impacts related to expansion or integration phases are managed through safety plans, environmental monitoring and dialogue with stakeholders.

Tratos thereby confirms its commitment to leading the evolution of connectivity solutions in Europe and globally, maintaining a central role in changing markets.

### Tratos Cavi Investments 2024

Fixed assets	Acquisitions during the year (Euro)
Land and buildings	32,123
Plants and machinery	1,252,135
Industrial and commercial equipment	489,725
Sundry assets	216,671
<b>Fixed assets under construction and installation</b>	<b>3,788,171</b>

**Tratos HV investments 2024**

<b>Fixed assets</b>	Acquisitions during the year
<b>Land and buildings</b>	224,449
<b>Plants and machinery</b>	618,221
<b>Industrial and commercial equipment</b>	26,302
<b>Sundry assets</b>	2,142

Below is a list of the percentages for a total acquisition value of €22,867,94:

- Telnet Optical Fiber Slu with registered office in Zaragoza (Spain), acquired 100%;
- Tratos Cavi Ltd with registered office in Swindon (United Kingdom), acquired 100%;
- Tratos Cavi Germany GmbH of Monchengladbach (Germany), acquired 100% .



Figure 3 Tratos Cavi UK Ltd registered office in Swindon – United Kingdom. Production of fibre optic cables, umbilical cables for underwater applications and energy cables



Figure 4 Tratos Cavi Germany GmbH with registered office in Mönchengladbach, Germany. Manufacture of guard rope cables for medium and high voltage application



Figure 5 Telnet Fiber Optic S.L.U based in Zaragoza, Spain. Production of fibre optic cables

In 2024, the photovoltaic systems for self-production of energy for Tratos Cavi, Pieve Santo Stefano plant and for Tratos HV came into operation.



Given Tratos' commitment to innovation processes, in 2024 it received the prestigious **BTOB Award**<sup>17</sup> during a ceremony held in Tuscany. Elisabetta Bragagni Capaccini, CEO of Tratos Group, accepted the award on behalf of the company, reflecting Tratos' ongoing commitment to excellence and sustainable growth. The BTOB Award reaffirms Tratos as a forward-thinking company that combines innovation with a deep respect for its cultural and environmental roots. The recognition reflects Tratos' ongoing commitment to promoting sustainability and excellence in its activities.



<sup>17</sup> The BTOB Awards celebrate and reward the best companies, focusing on innovation, internationalisation, sustainability and strategic growth in their sectors and in different territories. This event highlights entrepreneurial success stories, offering participating companies an opportunity for networking and discussion.

# 10 CLIENT SATISFACTION – TM2

## POSITIVE IMPACT

Customer satisfaction is at the heart of Tratos' strategy, which recognises the importance of continuous innovation at every stage of its business, from design to production and R&D. Tratos is committed to providing tailor-made products adapted

to specific customer requirements, certifying its processes and products according to national and international standards. This approach enables Tratos to constantly expand its markets and consolidate customer confidence.

## NEGATIVE IMPACT

Customer dissatisfaction can stem from various factors, such as delivery delays, incorrect quantities or non-compliant products (NC). These issues can compromise the company's

image and reputation, with the risk of losing customers. For this reason, Tratos constantly monitors satisfaction ratings to prevent such negative impacts.

## STRATEGIES

Tratos aims to respond quickly to customer needs, offering customised and rapid solutions. To compete with growing competition, the company focuses on innovative and technological products that meet the specific needs of its customers.

Its compact and flexible corporate structure allows for rapid decision-making and execution, enabling it to respond quickly and with great flexibility. The company aims to continuously improve its integrated system in order to eliminate causes of dissatisfaction and constantly improve the quality of the service offered.

## 10.1 Impact, Risk and Opportunity Analysis TM2

The issue of customer satisfaction represents a crucial material element, with significant economic implications. Negative company performance can in fact constitute a tangible risk for the entire business, in particular for the sale of high quality products. Such performance may also generate extraordinary financial costs, for example related to product recalls, contractual penalties or the need to repair the company's image, negatively affecting profitability and financial stability.

Tratos recognises that customers are among its most strategic stakeholders: losing their trust due to non-compliant or inferior products would have a significant impact on its credibility and reputation. Furthermore, any price increases resulting from

inefficiencies could reduce the company's competitiveness in the market.

However, this scenario also opens up important opportunities. A focus on quality and customer satisfaction can stimulate new investment and more effective management of business processes. Tratos approaches this challenge with a swift and flexible decision-making model, capable of adapting to specific customer needs while strengthening loyalty. Further opportunities arise from the possibility of expanding into new markets, supported by the solid relationships built with current customers and the company's reputation for reliability.

## 10.2 Our customers and the customer care approach

Tratos places the customer at the centre of all its activities, from product design to manufacturing, directly gathering requests and integrating a sustainable approach in line with ESG principles. The company strives for continuous improvement to meet customer expectations, constantly expanding its markets and collaborating with partners and suppliers to develop innovative solutions with sustainable value. Tratos adopts a strategy of absolute commitment to quality, which extends to the entire production system and suppliers, strictly applying international ISO standards. The company is ISO 9001

certified for quality management and ISO 14001 certified for environmental management, verified by independent bodies (BSI and AENOR-IQNET). These certifications demonstrate Tratos' commitment to product quality, customer satisfaction and continuous improvement in environmental performance.

During the reporting period, the company did not receive any substantiated complaints regarding breaches of customer privacy or cases of data leakage, theft or loss [418-1]

### 10.2.1. Labelling and compliance with CPR requirements

In recent years, Tratos has developed increasingly advanced standards for fire performance in cables intended for use in the railway, mass transport and civil infrastructure sectors, in compliance with the Construction Products Regulation (CPR). The company manufactures flame-retardant cables that are halogen-free and have low smoke emissions, designed to ensure maximum safety for people and equipment in the event of a fire.

All cables subject to CPR regulations are tested internally at the LAT accredited laboratory no. 1789L – site A, compliant with ISO/IEC 17025 and recognised by ACCREDIA. Tratos is accredited to perform fire reaction tests in compliance with CPR standards, while the official classification of cables is issued by notified third-party bodies, such as IMQ, based on the results obtained. The presence of an in-house laboratory guarantees high standards of quality, rapid response times and reliability towards the customer to be guaranteed.

To support this strategy, the company has installed the **Fire Testing System for Cables – KBT 916** (Flame Propagation, Heat and Smoke Development System (CEI EN 50399) that allows the main test required by the CPR Regulation to be carried out internally, improving efficiency and process control. The equipment available allows flame propagation tests (CEI EN 60332-1), heat and smoke development, smoke density measurement (CEI EN 61034-1-2) and evaluation of gas acidity during combustion (CEI EN 60754-2) to be carried out, in compliance with the relevant European standards. Compliance with CPR requirements is an integral part of the Tratos **Quality Management System**. All compliant cables are **CE** marked<sup>18</sup> and accompanied by a **Declaration of Performance (DoP)**, to guarantee the traceability and safety of the product. In 2024, **47% of the cables manufactured** across all sites included in the reporting scope were certified pursuant to the CPR Regulation, confirming the company's ongoing commitment to promoting quality, safety and sustainability throughout the entire value chain.

### 10.2.2. Certification of products

TRATOS GROUP COMPANIES,  
ARE CERTIFIED IN THE SAME WAY AS OUR PRODUCTS  
IN AGREEMENT WITH CUSTOMERS,  
INTERNATIONAL STANDARDS  
AND CURRENT LAWS.



CUSTOMERS CERTIFICATIONS



<sup>18</sup> During the reporting period, TRATOS did not identify any cases of non-compliance with current regulations or self-regulation codes regarding the information and labelling of products and services

### 10.3 Management of the commercial process, design and production

Tratos manages all stages of the production cycle internally – from order acquisition to product delivery – ensuring quality, traceability and compliance with technical and regulatory requirements.

The **Sales Service** represents the first point of contact with the customer and ensures contractual clarity, technical support and after-sales service.

The **Design** analyses the technical specifications and defines the **Technical Specification**, a document that establishes the

materials, processing and controls necessary to ensure the conformity of the product.

**Production** operates under controlled conditions, with intermediate and final tests and continuous monitoring of process parameters. An **identification and traceability** system ensures complete control over raw materials, semi-finished and finished products, ensuring transparency throughout the supply chain.

### 10.4 Customer satisfaction and conformity assessment

Tratos considers customer satisfaction a strategic indicator of its corporate performance and a fundamental pillar of corporate social responsibility. To this end, it has implemented structured processes to constantly monitor and improve the effectiveness of its products and services.

Through the Quality Management System, the organisation promptly records all non-conformities relating to materials already delivered, documents the solutions adopted and plans any corrective actions. This information is subject to analysis during the Management Review (P.O. 721), in order to guarantee the continuous improvement of the system and full compliance with customer expectations.

Customer feedback is also collected directly from the Sales Department, during meetings for negotiations or after-sales assistance. The results, shared with Management, the Quality Manager (QM) and the Environmental Manager (EM), contribute to the monitoring of the effectiveness of the system and the definition of targeted actions.

Tratos considers customer satisfaction a strategic pillar of its quality and sustainability policy. Through a Quality Management System that complies with international standards, the company monitors the performance of its products and services, systematically collects customer feedback and implements continuous improvement measures.

#### 10.4.1. KPI – Client Satisfaction

Customer satisfaction is measured both indirectly (requests, complaints, sales trends) and through structured questionnaires, which evaluate product quality, response times, technical assistance and complaint management.

The results for 2024 confirm an excellent level of performance, the result of proactive management and constant collaboration between company departments.

Indicator	Description	Amount 2024
T20 <sup>19</sup>	Response time to the customer	100
T21 <sup>20</sup>	Customer complaint management	98

At the same time, the management of **non-conformities** follows a structured process (P.O. 711), based on analysis of the causes, definition of corrective actions and verification of effectiveness. In 2024, the indicator dedicated to product quality confirmed the reliability of Tratos production:

<sup>19</sup> Minimum objective 76.0

<sup>20</sup> Minimum objective 72.0

### 10.4.2. KPI – Product Quality

<b>KPI TM2<sup>21</sup>: Product NC index/ 1,000 km</b>	%
<b>% NC of product out of 1000</b>	0.1
<b>KPI TM2<sup>22</sup> – NC for CPR certifications</b>	No.
	0

Tratos also adopts ethical and transparent principles in the management of commercial relations, based on:

- Impartiality in the provision of products and services
- Clear and regulatory-compliant communication
- Protection of personal data, in compliance with EU Regulation 679/2016 (GDPR)

This integrated approach ensures high quality standards, responsible customer relationship management and continuous improvement in business performance.

During the reporting period, the organisation did not identify any cases of non-compliance with regulations or self-regulatory codes relating to marketing communications, including advertising, promotions and sponsorships [417-3].

21 In compliance with the **ESRs S4-5 principle – Consumers and End-users**, Tratos monitors its approach to preventing and managing negative impacts on end consumers, with a particular focus on quality, safety and complaint management. To this end, a specific indicator has been defined to assess the effectiveness of actions taken to ensure safe and reliable products and services.

22 In compliance with the **ESRs S4-4 principle – Consumers and End-users**, Tratos ensures the quality, safety and transparency of information intended for consumers and end users. **CPR certification** is a key element for the protection of the end user and to ensure the compliance of the products with safety standards. The relative **KPI** is represented by the **number of non-conformities (NC) issued for CPR certifications**, which is useful for monitoring the effectiveness of controls and the quality management system.

# 11 CYBERSECURITY TM3

## POSITIVE IMPACT

Digitalisation and information technology offer Tratos a wide potential for growth. Advanced IT systems allow efficient data management, promoting business continuity, innovation

and competitive advantage. A solid cybersecurity strategy strengthens customer trust, improves corporate reputation and contributes to financial sustainability.

## NEGATIVE

The increase in digitisation entails greater risks of computer vulnerability. Tratos is actively engaged in strengthening security measures to prevent disruptions to essential services

and mitigate the economic and reputational risks associated with potential cyber attacks.

## STRATEGIES

- Periodic simulations of **incident response** and malicious attacks.
- Continuous checks on the effectiveness of the **XDR and SOC** systems.
- Regular **Disaster Recovery** checks.
- **Continuous training of personnel**, also through simulations of attacks (e.g. phishing).
- **Extension of the secure digitisation** of processes and consolidation of the IT infrastructure, in line with compliance and digital sustainability standards.

## 11.1 Risks and Opportunities Analysis TM3

Digital activities can lead to different **risks and opportunities**:

Integrated business process management enables companies to automate and coordinate processes, ensuring a continuous and optimised flow of activities. This approach, often supported by digital technologies, facilitates work between the different departments, reduces errors and improves overall efficiency.

The increased costs of modernising IT systems, combined with employee resistance to change, can indeed create a risky situation for companies.

Telecommunications disruptions can pose significant risks, including business interruption, loss of intellectual property, and substantial recovery costs following cyber attacks. Cyber attacks can cause serious operational and economic damage, resulting in financial losses and business interruptions.

Cybersecurity is a dynamic process that requires continuous and constant commitment on the part of the company, providing the opportunity to protect its digital resources, such as sensitive data, maintain operational continuity, and enable compliance with European digital security regulations<sup>23</sup>

The **Tratos** Group, with seven offices in Italy, Spain, the United Kingdom and Germany, has adopted a **single centralised information system** at its headquarters in Pieve Santo Stefano, with the aim of ensuring security, efficiency and operational continuity.

<sup>23</sup> NIS2 Directive, which aims to strengthen cybersecurity and the resilience of networks and information systems in the European Union. NIS2 requires companies to protect their digital assets, such as sensitive data, maintain business continuity and comply with specific regulations. The objective is to prevent cyber attacks, reduce risks and ensure the continuity of essential services.

### 11.1.1. Strengthening IT security

The **Cyber Security Tratos** project is based on four pillars:

**External security** – The offices are interconnected via a secure MPLS network (TIM), with a single point of access to the Internet protected by a Checkpoint firewall.

**Internal security** – All endpoints are protected by the **XDR Cynet** system, managed by **Var Group - Yarix** with 24-HOUR SOC service.

**Backup and Disaster Recovery** – **Veeam** on three levels: daily backup on NAS, copy on tape stored securely, and replication in a Disaster Recovery environment isolated from the network.

**Training and certifications** – Tratos has obtained a positive evaluation according to the **Cyber Essentials scheme**

(IASME<sup>24</sup>), which certifies compliance with the minimum internationally recognised cybersecurity requirements.



### Improvement of the IT infrastructure

During the year, the IT department implemented a structured plan to enhance security and the company's infrastructure:

**Installation of new generation Fortinet firewalls** in all group sites, for greater perimeter protection.

**Implementation of the XDR Cynet system** on servers and clients for proactive threat monitoring.

**Upgrading of the SIT management system** to the new VB version, with improvements in stability, performance and compatibility.

### Digitisation and Industry 4.0

Tratos has introduced solutions for the **digitisation of production and management processes**, in line with the principles of **Industry 4.0**: automation of machine processing and setting parameters using **OPC-UA** technology;

new IT modules for business management, production planning, logistics and waste traceability (RENTRI) fully integrated into the company's management system.

### International Integration

The integration of the information systems at the **Tratos Cavi UK - Swindon** headquarters in Swindon is currently in progress, with migration to the unified SIT system and training of local staff to ensure uniformity, security and operational continuity at group level.

**In short**, the actions taken by Tratos strengthen **cyber resilience**, improve **management efficiency** and support the **sustainable digital transition** of the entire group, in line with ESG and technological innovation objectives.

<sup>24</sup> **IASME**, since 2020, has become the only Cyber Essentials Partner of the National Cyber Security Centre. IASME is committed to helping companies improve cybersecurity, risk management and good governance through an effective and affordable range of certifications. The IASME Consortium was established in 2012 to take the results of the project forward. Today, IASME offers six different certifications and delivers to organisations of all sizes and in all sectors.

# 12 ENERGY CONSUMPTION TM4

## 12.1 Sustainable energy for possible change

In a global context increasingly committed to combating climate change, Tratos recognises the importance of responsible energy use and the progressive reduction of greenhouse gas emissions. For a company active in the production of cables for energy, telecommunications and fibre optics, energy efficiency is a strategic factor from both an environmental and competitive perspective.

The company's energy policies focus on improving the efficiency of production processes, increasing the use of renewable sources and reducing dependence on fossil fuels, with the aim

of making a concrete contribution to the energy transition and the achievement of the objectives of Agenda 2030 and the Paris Agreement.

The adoption of advanced technologies, in line with Industry 4.0 and 5.0 principles, and the introduction of digital consumption monitoring systems enable processes to be optimised, waste to be reduced and the organisation's energy resilience to be improved. At the same time, the installation of renewable energy systems helps to reduce environmental impact and strengthen the energy independence of production sites.

### POSITIVE IMPACT

- Reduction of energy costs and greater independence from the gas market.
- Improving competitiveness and energy resilience.

- Tangible contribution to the transition to a sustainable and low-emission energy system.

### NEGATIVE IMPACT

- Risks associated with continuity of supply in volatile energy markets.
- Dependence on technological developments and the availability of highly efficient solutions.

- Time required for fleet renewal and replacement of obsolete technologies.

### STRATEGIES

- Gradual replacement of machinery with highly energy-efficient solutions, including through funds provided for in the Industry 5.0 plan.
- Installation and expansion of renewable energy systems for the self-generation of clean energy.

- Timely monitoring of consumption through advanced sensors and digital control systems.
- Optimisation of production processes through automation and reduction of energy waste, with a view to Industry 4.0.

## 12.2 Risk and Opportunity Analysis TM4

The issue of energy consumption is complex and brings with it both **risks and opportunities**.

The key to a sustainable future lies in the ability to manage energy consumption responsibly, adopting efficient technologies and promoting the transition to renewable sources.

An inefficient energy management system poses financial and operational risks for a company such as Tratos. Exclusion from subsidised financing and tenders (many incentives and tenders, both public and private, reward companies with high energy efficiency standards) combined with dependence on fossil fuels exposes the company to fluctuations in the energy market, with possible cost increases and supply disruptions. Furthermore,

any geopolitical instability or unforeseen events may lead to supply disruptions, resulting in production stoppages and economic losses. The transition to sustainable energy sources, although bringing opportunities, can present risks related to technological innovation and potential failures in investments for energy efficiency.

Tratos' development of an energy-efficient system, supported by continuous monitoring, offers significant opportunities. This includes access to financing, particularly for Industry 5.0 projects, and the possibility of achieving greater independence in energy generation, stabilising supply costs. The adoption of renewable and innovative technologies can further reduce costs and ensure service continuity.

## 12.2.1. Measurement of energy <sup>25</sup>

Total internal energy [GJ]	2023	2024
<b>Tratos Cavi</b>	87542	93719
<b>Tratos HV</b>	85582	94773
<b>Tratos UK</b>	Na	5311

### 12.2.1.1. ENERGY PRODUCED BY COGENERATION

Cogeneration is the combined production of electricity and heat from the same primary energy (e.g. natural gas), which guarantees significant energy savings compared to separate production. Trigeneration is an extension of cogeneration, i.e. combined production of electricity, heat and chilled air/water.

Unlike conventional thermal power plants, where the production of electricity by burning fuel is between 30-55% efficient and results in a loss of thermal energy that is lost as heat, in cogeneration most of the heat is recovered and utilised, increasing the energy yield to 60-90%. Switching to a cogeneration unit can save up to 30% on energy costs, as well as cutting carbon dioxide (CO<sub>2</sub>) emissions.

Evolution of High Yield Cogeneration (CAR):

- Directive 2004/8/EC transposed by Italy and in effect since 2011
- Directive 2012/27/EU transposed in Italy by Italian Legislative Decree no. 102/14
- National Energy Plans, Decree Law no. 112/2008 and Decree of 8 March 2013 - National Energy Strategy (SEN 20-20-20: GHG reductions, renewable development, energy efficiency)

Promoting energy efficiency can contribute to achieving the greenhouse gas reduction target. According to Italian Law no. 308/82 (1982) and later with Italian Laws no. 9/91 (1991) and no. 10/91, the following are also regarded as energy sources assimilated with renewable energy sources: cogeneration, understood as the combined production of electrical or mechanical energy and heat.

Tratos has a cogenerator in operation at Tratos Cavi in Pieve Santo Stefano and a trigenerator at Tratos HV. The fuel used for the action of co- and tri-generator is methane<sup>26</sup>.

<sup>25</sup> Coefficients used for the inventory of CO<sub>2</sub> emissions in the UNFCCC national inventory (average of the values for the years 2021-2023). This data can be used to calculate emissions from 1 January 2024 to 31 December 2024.

Conversion of energy consumption	
Methane	35.584 GJ/1000 Stdm <sup>3</sup>
Methane	1 mc = 10.69 kWh
Electricity	0.0036 GJ is 1 kWh
Diesel	42.873 GJ/ton
Other conversion values	
Diesel density	0.835 kg/L
Car consumption	23.8 Km/L
Ferry speed	20 knots (37 km/h)
Cargo ship speed	25 knots (46 km/h)
Ship consumption	10,000 L/h

<sup>26</sup> Methane fuel taken from the national grid is metered to monitor the amount of energy consumed within the company (GRI 302-1), while the energy produced by the co- and tri-generation plants is not metered, to avoid double metering. When reporting emissions, methane fuel taken from the national grid is metered in Scope I to quantify the company's direct emissions (GRI 305-1).

ENERGY CONSUMPTION WITHIN TRATOS		INTERNAL ENERGY CONSUMED (GJ) 2024			
		Tratos Cavi PSS	Tratos Cavi CT	Tratos HV	Tratos UK
ELECTRICAL ENERGY EE - CONSUMED	Cogenerator <sup>27</sup>	17,411	n/a	32,529	1,440
	Photovoltaic	900	n/a	2,609	n/a
	Public	4,612	12,609	10,076	464
	<b>Total</b>	<b>61,162</b>	<b>13,342</b>	<b>82,016</b>	<b>4,804</b>
METHANE CONSUMED	of which goes into co/ regeneration	38,089		70,737	na
LIQUID FUEL		129	-	72	-
COMPANY CARS		687			43
internal changes		279	-	-	-
<b>Total</b>		<b>67768</b>	<b>25951</b>	<b>94773</b>	<b>5311</b>

ENERGY CONSUMPTION OUTSIDE TRATOS	EXTERNAL ENERGY CONSUMED (GJ) 2024	
	ROAD	SHIP
MP TRANSPORTED INTO TRATOS	33,885	22,141,342
CHANGES BETWEEN OFFICES	4,742	15,626
DELIVERY TO THE CUSTOMER	93,564	9,055,447
WASTE COLLECTED	2,173	2,023



Figure 6 Installation of photovoltaic panels at Tratos HV

<sup>27</sup> Electricity produced by co/trigenerators is obtained from the combustion of natural gas, a portion of which is methane consumed from the grid. This contribution of electricity is not counted towards the total value of internal energy consumed.

GJ	Tratos Cavi (PSS)	Tratos Cavi (CT)	Tratos HV	Tratos UK
<b>RENEWABLE ENERGY</b>	900	0	2609	0
<b>INTERNAL ENERGY TOT</b>	67,769	25,951	94,773	5,311
<b>Renewable ratio/TOTAL INTERNAL ENERGY GJ</b>	1%	0%	3%	0%

KPI TM4 <sup>28</sup> : ENERGY INTENSITY	u.m.	Tratos Cavi	Tratos HV	Tratos UK
<b>Wires produced</b>	Km	83255	9443	3509
	Ton	17525	2296	1854
<b>Turnover</b>	Euro	224737653	35414681	24540072
<b>Internal energy</b>	GJ	93719	94773	5311
	MWh	26033	26326	1475
<b>External Energy<sup>29</sup></b>	GJ		31370514	
	MWh		8714031.8	
<b>Internal energy intensity</b>	<b>GJ / Km<sup>30</sup></b>	1.13	10.04	1.51
	<b>GJ / ton</b>	5.348	41.283	2.864
	<b>KWh / Euro</b>	0.116	0.743	0.060
<b>External energy intensity</b>	<b>GJ / Km<sup>31</sup></b>		326.07	
	<b>GJ / ton</b>		1447.31	
	<b>KWh / Euro</b>		29.73	

Energy intensity represents the ratio between total energy consumption within the organisation and both the kilometres and kilograms of cable produced and the turnover for the year 2024.

Currently, data on the reduction in total energy consumption (302-4, 302-5) and the reduction in energy consumption of the product and service are not yet available. A study is being

launched to investigate energy efficiency in order to assess the possibility of reducing energy consumption costs

Solutions are being studied, including possibilities for reducing consumption for each line, considering the specific type of processing.

<sup>28</sup> In compliance with the **ESRs E1-5 principle – Energy consumption and mix**, Tratos monitors overall energy consumption, assessing energy intensity in relation to both the kilometres and kilograms of cable produced and turnover. This indicator measures the energy efficiency of production and monitors the sustainability of the energy mix used, supporting the company in reducing its environmental impact and transitioning to more sustainable sources.

<sup>29</sup>

<sup>30</sup> This intensity is calculated solely for the purpose of further internal assessment. The organisation parameter used to calculate energy intensity is cable weight (GRI 302-3) and turnover (ESRS E1-5).

<sup>31</sup> This intensity is calculated solely for the purpose of further internal assessment. The organisation parameter used to calculate energy intensity is cable weight (GRI 302-3) and turnover (ESRS E1-5).

### 12.2.2. Building the Future with Renewables

To combat climate change, reduce environmental impact and contribute to the energy transition, in 2024 Tratos activated photovoltaic panel parks at its production sites in Pieve S. Stefano and Catania, and incorporated Genergy Spa, a company that produces electricity from hydroelectric plants (Morrovalle, Sassoferrato, Pianoro) and photovoltaic plants (Nicosia).

To estimate how much energy these power stations would produce in a year, we can use the following formula:

$$\text{Energy (kWh)} = \text{Power (kW)} \times \text{Annual hours of actual operation}$$

**Estimated annual hours of actual operation<sup>32</sup>:**

If all the power stations were active throughout 2024, it is estimated that total annual production would be approximately:

$$5,156,800 \text{ kWh} = 5,156 \text{ MWh}$$

Plant	Power	Production (kWh/year)
<b>Nicosia (photovoltaic)</b>	992 kW	1,388,800
<b>Morrovalle (hydroelectric)</b>	590 kW	2,360,000
<b>Sassoferrato (Hydroelectric)</b>	98 kW	392,000
<b>Pianoro</b>	136 kW	544,000
<b>Pieve S. Stefano</b>	118 kW	472,000
<b>Total</b>		<b>5,156,800</b>



<sup>32</sup> **Photovoltaic:** in Italy, an average of 1,200-1,500 hours/year are considered depending on the area. Sicily (Nicosia - EN): 1,400 hours/year (good irradiation). **Hydroelectric:** it is more continuous and can even reach 4,000-5,000 hours/year (depending on the available water flow rate). Let's consider 4,000 hours/year for a realistic estimate.

# 13 GREENHOUSE GAS EMISSIONS (GHGs) TM5

Tratos considers the reduction of CO<sub>2</sub> emissions a strategic priority. The company adopts low-impact technologies and materials, promotes recycling and energy efficiency along the entire value chain. It has embarked on a path of decarbonisation

by joining the Science Based Targets initiative (SBTi), in line with the objectives of the Paris Agreement and the 2030 Agenda.

## POSITIVE IMPACT

The reduction of climate-changing emissions is a priority for Tratos, in line with the objectives of the Paris Agreement and the 2030 Agenda. The main actions in place include:

- Use of renewable sources (photovoltaic);
- Adoption of energy efficient technologies (i.e. cogeneration);

- Optimisation of production and logistics processes;
- Periodic monitoring of atmospheric emissions entrusted to third parties.

The company has also joined the Science Based Targets initiative (SBTi) to define scientifically validated decarbonisation objectives.

## NEGATIVE IMPACT

- Investments and long timeframes for the transition to a low-emission model;
- Risk of exceeding the regulatory limits on emissions;

- Limited control over indirect emissions (Scope 3);
- Dependence on the future availability of more efficient and accessible clean technologies.

## STRATEGIES

- Adoption of renewable energy plants on site;
- Replacement of machinery with highly efficient models, with support from Industry 5.0;
- Regular environmental controls on emissions;

- Integration of environmental traceability into information systems;
- Commitment in the SBTi for a measurable decarbonisation aligned with the global objectives.

## 13.1 Impact, Risk and Opportunity analysis TM5

Greenhouse gas emissions represent both a source of risk and a strategic opportunity for Tratos. Climate change, particularly the increase in extreme weather events, can damage infrastructure and increase operating costs, especially for air conditioning and logistics. Added to these are regulatory pressures (such as the CSRD), potential supply disruptions and risks associated with a poorly managed energy transition, which could exclude the company from tenders or funding.

At the same time, reducing emissions improves operational efficiency, lowers energy costs, provides access to ESG-sensitive markets and increases business resilience.

Tratos is implementing tangible decarbonisation actions:

- replacement of machinery with more efficient technologies (Industry 5.0);
- installation of photovoltaic systems in Pieve Santo Stefano and Catania;
- use of renewable sources and cogeneration to reduce dependence on gas;
- periodic monitoring of emissions through third parties.

The strategy integrates environmental sustainability, innovation and competitiveness to proactively address climate risks and consolidate the Group's position over the long term.

### 13.2 Science Based Targets initiative – SBTi

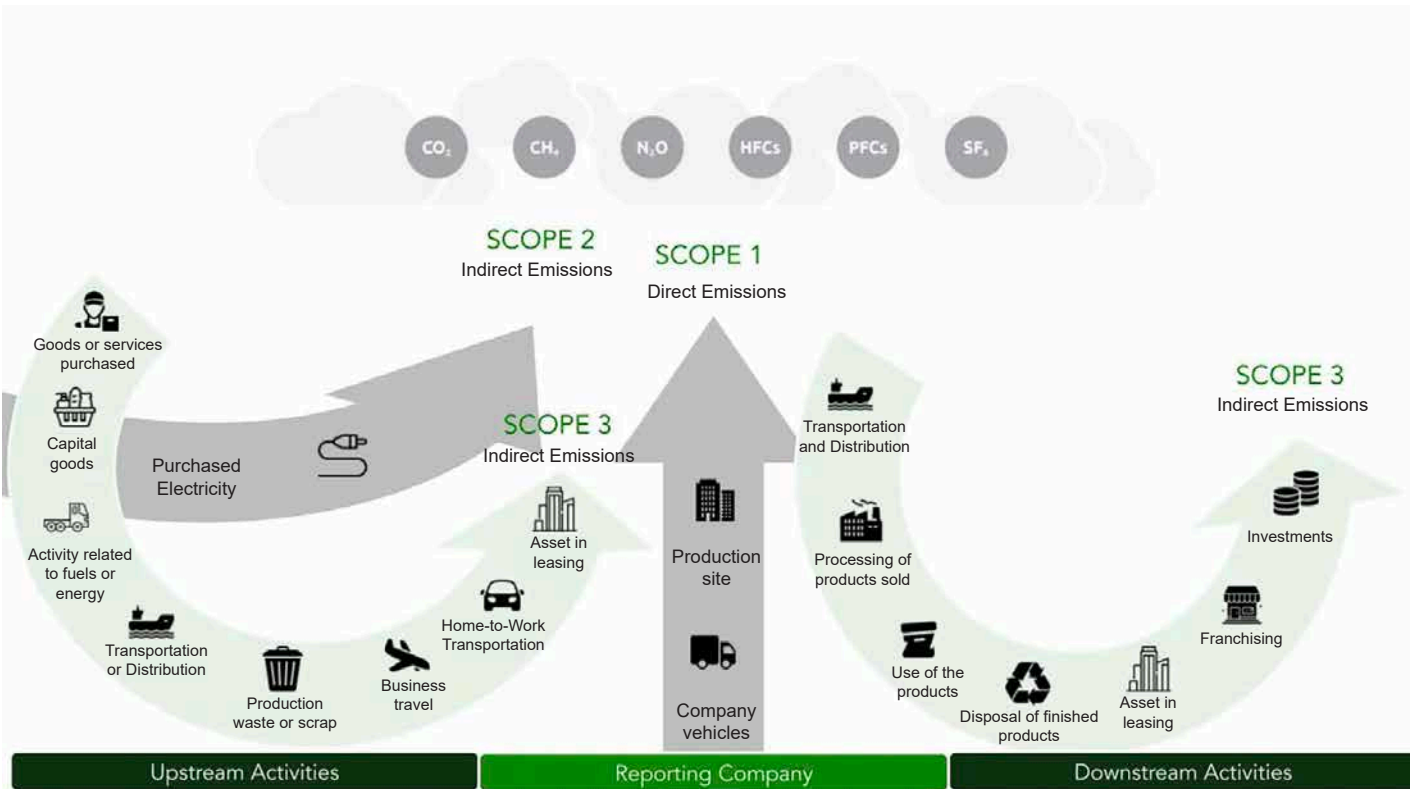
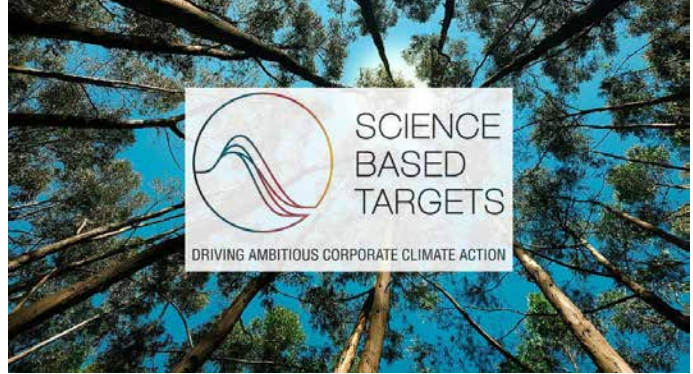
In 2024, Tratos joined the Science Based Targets initiative (SBTi)<sup>33</sup>, by embarking on a decarbonisation roadmap aimed at achieving climate neutrality by 2050, in line with the Paris Agreement.

The plan consists of four phases: calculation of emissions (baseline 2024), definition and validation of climate targets, and implementation of the reduction plan.

The main actions concern:

- Scope 1: reduction of methane gas use and replacement with energy from renewable sources, keeping cogenerators only as a backup;
- Scope 2: procurement of 100% renewable electricity certified by Guarantees of Origin (GO);
- Scope 3: reduction of emissions in the value chain through the use of recycled materials, polymer recycling and sustainable suppliers.

These actions reinforce Tratos' commitment to a circular, sustainable production model that complies with SBTi criteria.



<sup>33</sup> SBTi was created through a global partnership of organisations at the forefront of sustainability and climate action, including the Carbon Disclosure Project (CDP), World Wildlife Fund (WWF), World Resources Institute (WRI) and the United Nations through the Global Compact. Thanks to a team of experts, SBTi is able to calculate the precise amounts of greenhouse gases (GHGs) that need to be reduced in each sector in order to achieve global climate change mitigation targets

### 13.2.1. Emissions produced

The Emissions produced<sup>34</sup> by Tratos<sup>35</sup> in 2024, certified pursuant to UNI EN ISO-14064 "Greenhouse gases" are shown in the following tables.

GHG 2024 EMISSIONS (tonCO2eq)	Tratos Cavi	Tratos HV	Tratos UK
Scope 1	4321	4512	274
Scope 2	2318	1356	62
Scope 3		100123	
<b>TOTAL</b>		<b>112967</b>	

GHG 2024 EMISSIONS CAT CRITERIA (tonCO2eq)	Tratos Cavi	Tratos HV	Tratos UK
CAT.1: Direct emissions	4,321	4,512	274
CAT.2: Indirect emissions from energy consumption	2,318	1. 356	62
Cat.3: Indirect emissions from transport		9,699	
Cat.4: Indirect emissions from raw materials		90,167	
Cat.6: Other indirect emissions		257	
<b>TOT</b>		<b>112,967</b>	

GHG emissions intensity represents the ratio between GHG emissions, direct (Scope 1), indirect from energy consumption (Scope 2) and indirect (Scope 3) within the organisation for cables produced (km and weight) and turnover during the year 2024.

KPI TM <sup>36</sup> : INTENSITY OF GHG EMISSIONS	u.m.	Tratos Cavi	Tratos HV	Tratos UK
Wires produced	Km	83,255	9,443	3,509
	Ton	17,525	2,296	1,854
Turnover	Euro	224,737,653	35,414,681	24,540,072
Scope 1	tonCO2eq	4,322	4,512	274
Scope 2	tonCO2eq	2,318	1,356	62
Scope 3	tonCO2eq		100,123	
Emission intensity Scope 1	tonCO2eq/Km	0.05	0.48	0.08
	tonCO2eq/ton	0.25	1.97	0.15
	KgCO2eq/€	0.02	0.13	0.01
Emission intensity Scope 2	tonCO2eq/Km	0.03	0.14	0.02
	tonCO2eq/ton	0.13	0.59	0.03
	KgCO2eq/€	0.01	0.04	0.00
Emission intensity Scope 3	tonCO2eq/Km		1.04	
	tonCO2eq/ton		4.62	
	KgCO2eq/€		0.34	

<sup>34</sup> For energy conversions: National Standard Parameter Table, Coefficients used for the inventory of CO<sub>2</sub> emissions in the UNFCCC National Inventory (average of values for the years 2019-2021). This data can be used to calculate emissions from 1 January 2024 to 31 December 2024.

<sup>35</sup> The emissions reported for 2024 include the sites of Tratos Cavi spa (Pieve S. Stefano and Catania), Tratos HV spa (Pieve S. Stefano) and Tratos UK Ltd (Knosley, UK).

<sup>36</sup> In compliance with the ESRs E1-6 principle – Gross Scopes 1, 2, 3 and Total GHG emissions, Tratos measures the greenhouse gas emissions generated by the company, considering both direct emissions (Scope 1 and 2) and indirect emissions along the value chain (Scope 3). The intensity indicator is calculated in relation to the kilometres and weight of cables produced and turnover, allowing the company to assess the environmental efficiency of its production and support the definition of emission reduction strategies.

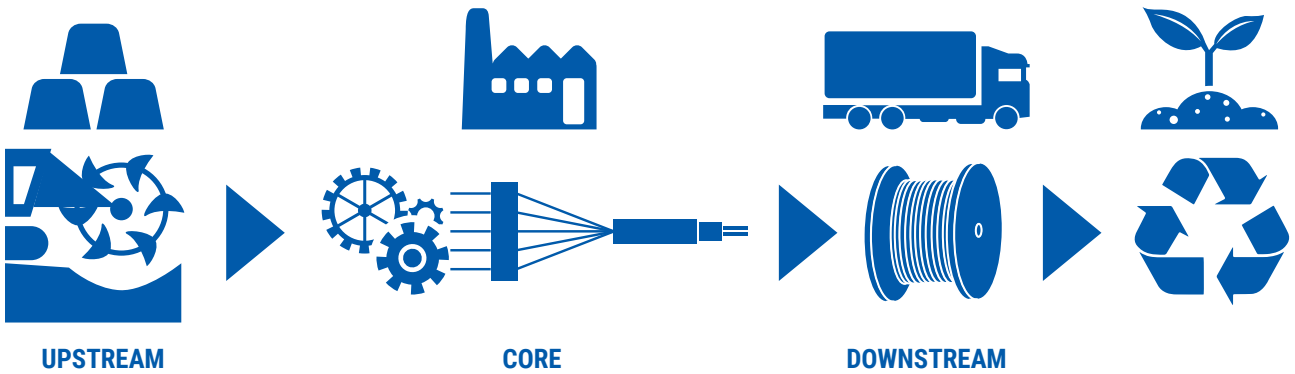
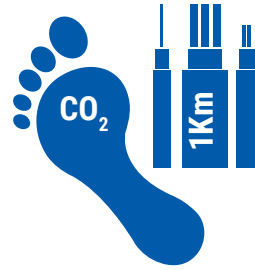
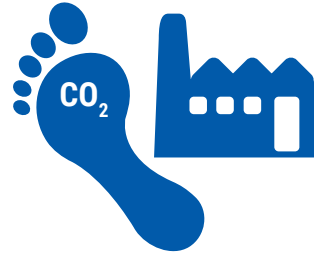
### 13.3 Carbon footprint in Tratos

Since 2019, Tratos has been certified pursuant to the **UNI EN ISO 14067** and **UNI EN ISO 14064-1:2019** standards, which respectively regulate the calculation of the **product carbon footprint (CFP)** and the **reporting of greenhouse gas emissions**.

The company measures **CO<sub>2</sub>eq emissions per kilometre of cable produced**, considering three life cycle stages:

- **Upstream** (upstream processes, e.g. production of raw materials),
- **Core** (internal production processes),
- **Downstream** (downstream stages and transport).

Analyses show that over **90% of emissions** derive from **Upstream** processes, in particular the production of copper, aluminium and polymers. Tratos uses the CFP as a **strategic environmental management tool**, committing to the **continuous improvement** of emissions monitoring and **supply chain transparency** to reduce its climate impact.



UPSTREAM	CORE	DOWNSTREAM
Raw materials (RM) used	Electricity consumption (EE)	Delivery of the product to the customer
Transport of RM to the company	Consumption of methane	Distribution
Packaging of RM	Water consumption	Use
	Production of waste	Disposal
	Transport within the company	Waste disposal

### 13.4 EPD as a sustainability tool

In 2024, Tratos drew up six **Environmental Product Declarations (EPDs)**, one for each cable family. EPDs are standardised documents that objectively and veritably report the environmental impacts of a product throughout its life cycle. They are based on **the Life Cycle Assessment (LCA)**, an internationally recognised methodology that analyses inputs and outputs (raw materials, energy, emissions) and potential environmental impacts at every stage: from raw material extraction to production, distribution, use and disposal of the product.

EPDs are **certified by independent third parties** in compliance with ISO 14025, ensuring transparency, reliability and comparability of information. They are a key tool for environmental communication with customers and stakeholders and reinforce Tratos' commitment to sustainable design and production.

The EPDs issued comply with **EN 50693** – published on **AENOR GlobalEPD**; currently being published on **EPDItaly**, in compliance with PCR EPDItaly007 and EPDItaly016, within the framework of mutual recognition between the two programmes).



<b>KPI TM6<sup>37</sup>: EPD per production unit</b>	No./1000
<b>number of EPDs issued / (Total km of cable produced / 1,000)</b>	0.062

*37 In compliance with the ESRs E5 principle – Use of resources and circular economy, Tratos monitors the number of Environmental Product Declarations (EPDs) issued per million metres of cable produced. This indicator reflects the company's commitment to environmental transparency of products, supporting the communication of impacts throughout the life cycle and promoting continuous improvement with a view to the circular economy.*

# 14 CIRCULAR ECONOMY INNOVATION TMS

## POSITIVE IMPACTS

### For Tratos, innovation is not only a goal, but a responsibility.

In the current global context, marked by energy transition, digitalisation and a growing focus on sustainability, R&D

is a strategic tool for generating positive impacts on the environment, society and the economy.

## NEGATIVE IMPACTS

Despite the challenges – such as the risks related to industrial scale-up, the complexity of the approval processes or the high use of resources – Tratos remains firmly committed to **responsible innovation**. The research process is complex

and not always straightforward, but it is the only way to create lasting value for the environment, customers and future generations.

## STRATEGIES

In 2024, Tratos' R&D teams carried out several high-tech projects (still in progress) including the development of superconducting cables for nuclear fusion energy production and innovative cables made from bio-based or recycled polymer matrices, featuring permanent marking, integrated traceability and high

visibility. Thanks to the integration of smart additives in the sheath, these cables could allow for comprehensive digital monitoring throughout their entire life cycle, including through blockchain technology, facilitating recycling and disposal operations and promoting fully circular management

For Tratos, innovation is not only a competitive advantage, but also a responsibility towards the environment, society and future generations. In a global context marked by energy transition and growing attention to sustainability, Research & Development is the driving force behind the company's strategy to generate lasting value and positive impacts.

The company continues to invest in circular innovation, focusing its activities on the use of recycled and sustainable raw materials, reducing virgin resources and improving product circularity. Collaboration with strategic suppliers and research centres enables the development of new plastic and polymer materials with low environmental impact, expanding the portfolio of solutions for the energy, telecommunications and fibre optics sectors.

Cable design is also constantly evolving to improve efficiency, lightness and durability, while maintaining high safety standards and reducing the environmental footprint. In 2024, R&D teams

launched frontier projects, such as **superconducting cables** for nuclear fusion energy production and **bio-based or recycled cables with digital traceability and monitoring systems based on blockchain technologies**, supporting a fully circular economy. Tratos recognises that sustainable innovation stems from collaboration: this is why it participates in international networks and partnerships that promote the sharing of expertise and the dissemination of responsible practices throughout the entire supply chain.

Despite the challenges posed by technological complexity and industrialisation processes, the company is confidently pursuing its path towards responsible innovation, based on an integrated vision that combines competitiveness, digitalisation and sustainability. In this way, Tratos contributes to the creation of a more circular, efficient and resilient production system, in line with global environmental objectives.

### 14.1 Risk and opportunity analysis TM6

Innovation in the circular economy presents significant challenges that require careful planning, risk management and investment in skills and technologies, and can lead to **risks and opportunities**. Opportunities include access to new markets for sustainable products, increased revenues for goods with low environmental impact, growth in corporate know-how, and the possibility of scaling up products developed through research and development. Other opportunities could be connected to reducing operating costs through the adoption of sustainable practices such as energy efficiency or optimised resource management, and to possible new collaborations with various partners. Risks include increased costs for researching innovative

materials, but also the selection of materials that are technologically unsuitable or the limited availability of suitable materials on the market. Another risk may be linked to the inability to monetise research and development activities and to share intellectual property with other partners. The risks associated with innovation in the circular economy include market loss, difficulty scaling up to industrial level, technical difficulties and increased end-of-life product management costs. It is, therefore, essential that companies proactively address these risks by developing innovation strategies and the appropriate skills to successfully embrace the circular economy.

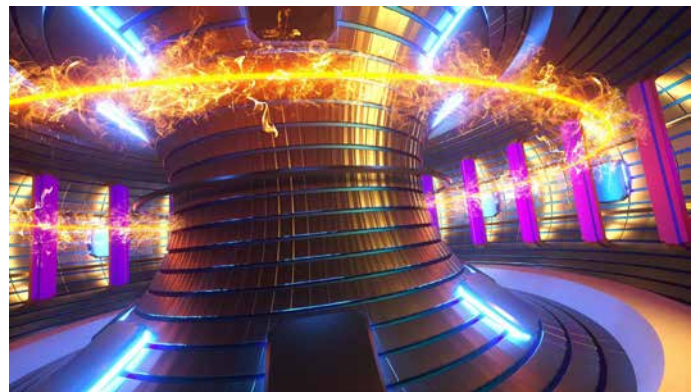
### 14.2 Research and development

In recent years, Tratos has carried out intensive industrial research and experimental development, through multi-year projects, with the aim of developing and improving innovative products, thereby increasing the company's know-how and contributing to sustainability.

Tratos, in collaboration with ENEA, has developed new technologies for **HTS superconducting** cables in the context of **nuclear fusion** projects (ITER, DEMO, DTT). The **BRAST (BRAided Stack of Tapes)** project has optimised the assembly processes of superconducting tapes and prepared the line for larger scale production.

A **high-performance flat cable** for powering safety lighting systems in Swiss railway tunnels was designed in collaboration with Fermann and 2G Srl. The cable guarantees quick installation, continuity of service in the event of a fire and **fire rating B2ca-s1a, d1, a1**.

The **CEC** project funded by the Tuscany Region (PR FESR 2021-2027 Call for Proposals 'Strategic Research and Development Projects' of 2023, in which Tratos participates in partnership with other companies<sup>38</sup>), to develop **electrical cables and data with high circularity and visibility**, including at night, through the use of reflective and phosphorescent additives. The objective is to improve **safety and sustainability** with **recycled or bio-based** materials.



CircularEconomyCable

KPI TM6 <sup>39</sup> : Investments in R&D (Tratos Cavi and Tratos HV) on total turnover	Tratos Cavi	Tratos HV	Tratos Srl <sup>40</sup>	Tratos UK <sup>41</sup>
R&D investments (Euro)	468855.72	60859.5	0	0
KPI investment/turnover	0.21%	0.17%	0	0

38 Total budget for the project: € 2,991,125.95; Budget for Tratos Cavi S.p.A.: € 1,024,733.50. In 2024, no financial support contribution was received.

39 It measures the company's commitment to innovation and the development of sustainable solutions. In line with the **ESRs E5, G1 and SBM** standards, this indicator helps to represent the consistency between the resources allocated to research and the business model oriented towards sustainability, efficiency and product improvement.

40 There are no innovation processes

41 They do not carry out R&D All R&D takes place in Tratos Cavi and Tratos HV.

### 14.3 The production process

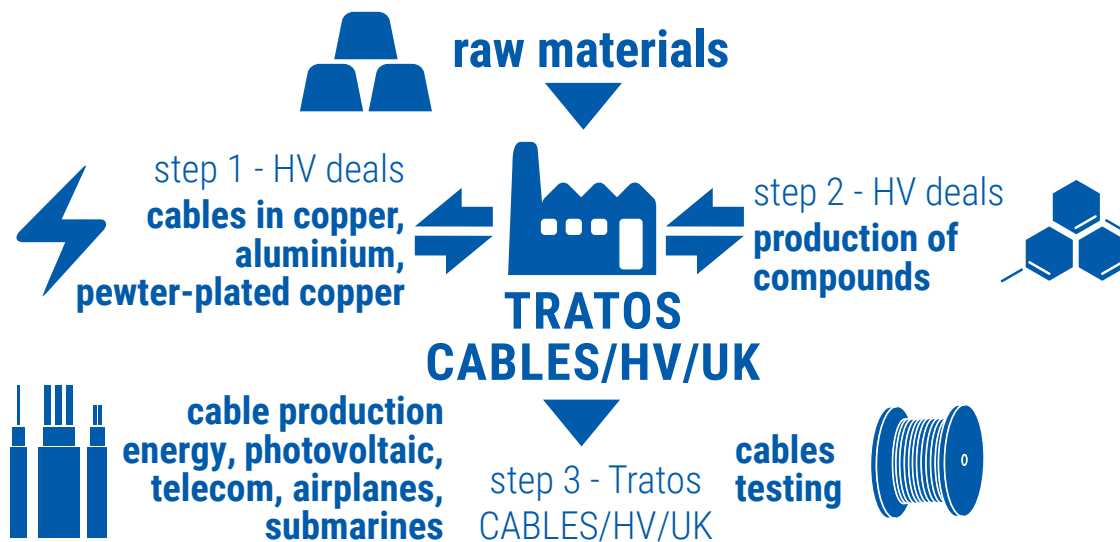
Tratos Cavi and Tratos HV handle all the purchased raw materials. The various components are then sent to specific departments in the company for processing. The MP is also sent to Tratos UK Ltd.

**Production of conductors – in the metallurgy department** metals, in the form of copper, aluminium and tinned copper wire rods are sent to the METALLURGY department to make conductors.

**Compounds department – production of compounds** - sheaths and insulators - mechanically mixing (with Banbury mixers) different components such as plastics and additives (inorganic fillers, antioxidants, anti-UV, etc.).

**Cable production (Energy, telecommunications, Fiber optics, submarines, aircraft...)**

**Testing**



The calculation indicates the ratio between the value of the quantity of discarded material in mass and the mass of compliant finished products.

KPI TM6 <sup>42</sup> : T4a indicator - Production waste (2024)	Tratos Cavi PSS	Tratos Cavi CT	Tratos HV	Tratos UK
%	0.0390	0.0340	0.0530	0.031
% max accepted	0.04	0.035	0.055	0.035

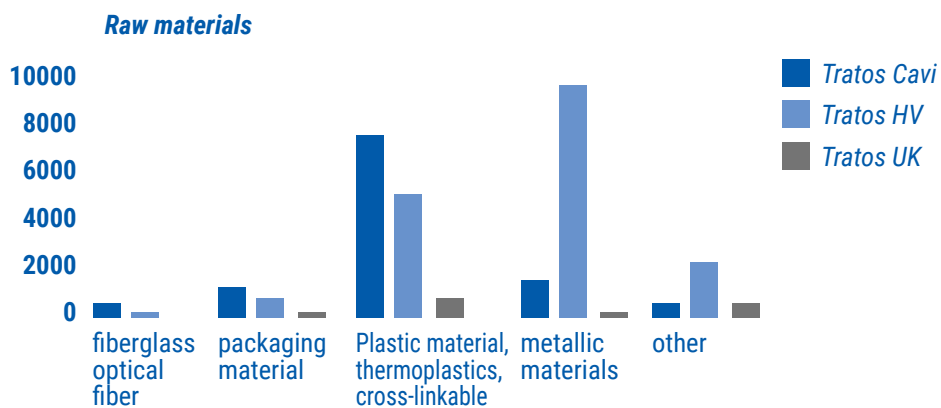
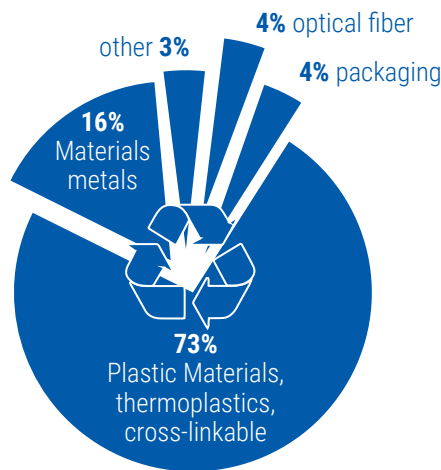
<sup>42</sup> In compliance with the ESRs E5 principle – Use of resources and circular economy, Tratos monitors the amount of waste generated in relation to total production. The indicator allows to evaluate the efficiency of production processes, reduce waste and material losses, and monitor environmental and production performance over time.

# 15 E – ENVIRONMENTAL ASPECTS

Tratos integrates environmental sustainability throughout the entire life cycle of its products, designing cables following the principles of circular economy and environmental responsibility. The company strengthens its supply chain to ensure traceability and sustainable continuity, selecting suppliers who comply with ethical, environmental and social criteria.

## 15.1 Circular Economy

Promotes the use of recycled and renewable materials, internal recycling of water and processing waste, energy efficiency (see "MEASUREMENT OF ENERGY")



Raw materials used (tons) in production, with a breakdown between the various locations

### 15.1.1. The raw materials

Tratos' interest in the environment is reflected in its procurement of raw materials<sup>43</sup>. Tratos is currently researching alternative materials to non-renewable materials<sup>44</sup>, therefore, shifting its

purchases towards recycled materials, materials of biological origin or materials produced using renewable energy sources.

### 15.1.2. Reach and RoHS compliance

TRATOS carries out a systematic control of raw materials and components used in its production processes to ensure compliance with European **REACH (EC Regulation no. 1907/2006)** and **RoHS (Directive 2011/65/EU)** regulations.

In particular, the presence of **SVHC (Substances of Very High Concern)** in raw materials is monitored, with particular attention to plastic compounds and conductive or shielding materials. In the event that restricted substances are present, TRATOS shall:

- promptly inform customers,
- issue official REACH declarations upon request,
- adopt, where possible, safer or low-impact alternative solutions.

With regards to **RoHS compliance**, internal procedures are also applied to ensure that all supplies intended for sectors subject to this directive (e.g. electronics, telecommunications) comply with the concentration limits for prohibited substances (such as lead, cadmium, mercury, etc.). The company has implemented a **traceability system** that allows the conformity of **raw materials and finished products** to be assessed<sup>45</sup>, reinforcing the commitment to safe and sustainable production.

The materials purchased are mainly non-renewable, such as metals, minerals, fibres and plastics of fossil origin. Renewable materials include wood used in packaging. The most commonly used packaging for transporting cables is **reels**. Tratos uses two types of reel: wooden and steel (steel reels are used during internal processes on the company's premises, while wooden reels are used to deliver the finished product)

<sup>43</sup> Analytical data of the weight of materials used for production at Tratos, extrapolated from the Data Processing Centre. Raw materials are purchased externally.

<sup>44</sup> Non-renewable material is a resource that does not regenerate in short periods of time

<sup>45</sup> During the reporting period, TRATOS did not identify any cases of non-compliance with current regulations or self-regulation codes regarding the information and labelling of products and services

2024 [301-1]	Tratos Cavi	Tratos HV	Tratos UK	Tratos SRL
<b>MATERIALS USED FOR THE PRODUCTION OF CABLES (Ton)</b>	9,870	17,751	653	0
<b>Packaging – Wooden reels<sup>46</sup> used in production</b>	3194	169	284	0

### 15.1.3. Attention to recycling and climate change

Wooden reels are used to transport cables to customers and are often **recovered** and **reused**, depending on their condition, and reintroduced into the company's production cycle.

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NO. OF REELS  
RECOVERED AND  
REUSED

**7972**

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WEIGHT OF REELS  
RECOVERED AND  
REUSED

**1017** tonnes

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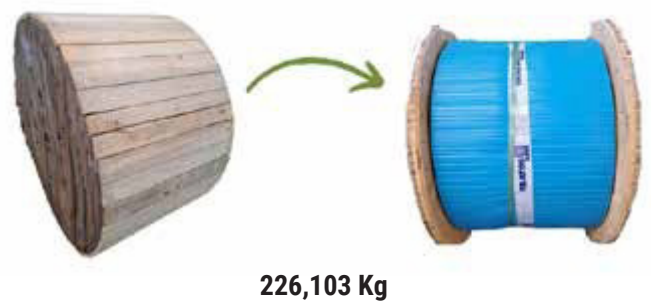
<b>KPI TM6<sup>47</sup> – Reused or recycled resources and avoided waste</b>	Tratos Cavi	Tratos HV	Tratos UK	Tratos SRL
<b>Recovered packaging (%) [301-3]</b>	24	0	36	Na
<b>Recycled plastics on total plastics [301-2]</b>	4	2	Na	Na
<b>Recycled plastics on total raw materials [301-2]</b>	3	1	Na	Na

The plastic materials that Tratos purchased in the current reporting year have a very low weight compared to the weight of metal materials.

One of Tratos' future goals will be to expand the range of recycled materials to include **recycled metal materials**, which will be used in the production of copper and aluminium conductors and lines, in line with the requests made by our customers.

Still at the packaging level, Tratos has also implemented a policy to reduce the use of wood as much as possible in delivering cables to customers. The wooden slats used to protect the cable wound on the reel can be replaced with a recycled material called **Propaflex**.

This innovative material is a sheet of plastic material obtained with recycled and 100% recyclable materials, and has been specifically designed to provide full and high quality protection to those products that are packaged in rolls, such as our cables.



<sup>46</sup> Renewable materials (pursuant to GRI 301 - Material derived from abundant resources that are rapidly replenished through ecological cycles or agricultural processes so that the services provided by these and related resources are not compromised and remain available for future generations).

<sup>47</sup> In compliance with the ESRs E5-4 principle – Reused or recycled resources and waste avoided, Tratos monitors the quantities of materials reused or recycled and initiatives aimed at reducing waste throughout the entire production cycle. The indicator reflects the company's commitment to promoting a circular economy, optimising the use of resources and minimising the environmental impact of industrial processes.

## 15.2 Waste management and recycling

Tratos is committed to applying circular economy practices to reduce its environmental impact, using fewer resources during production and ensuring a longer lifespan for products issued under the Tratos brand, thanks to ongoing research into new technologies.

Tratos has been working on the implementation within its supply chain of recycled materials, from the point of view of both metal materials and materials of plastic origin. The most common difficulties encountered are the high costs associated with these materials and their limited availability on the market.

Relationships with suppliers become essential to ensure the continuous supply of recycled materials, as does joining multi-year innovative research projects to support such advancements.

Materials that Tratos can no longer use are considered waste and can be handled in one of two ways: they can be sent for recovery and thus be recycled, or they can be sent for disposal.

At Tratos, all metal materials are collected for recycling.

According to the EWC (European Waste Code) that identifies the type of waste, and depending on whether it is classified as hazardous, the waste is entrusted to authorised third parties who take care of its management when it leaves the Tratos plant. The whole process is managed by the company management system, and everything is tracked in the annual Environment Statement Form, generally issued at the end of April each year.

Cables may, in some cases, become special waste and must be analysed by external laboratories in order to associate the relevant EWC code with them.

### ORIGIN OF WASTE AND METHOD OF DELIVERY

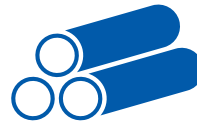
Tratos manages the waste it produces during its manufacturing processes in a precise and correct manner in accordance with Italian Legislative Decree no. 152/06.

### WASTE CYCLE (waste production)



#### RAW MATERIALS

Waste produced relates to the packaging of incoming raw materials.



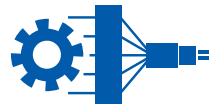
#### METALLURGY

Processes in the metallurgical department can produce metal waste that is recovered, and waste oils used in production that are disposed of



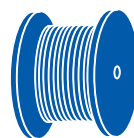
#### COMPOUNDS

Waste produced relates to the packaging of incoming raw materials. Furthermore, waste may be produced as a result of Q&C of the compounds during production.



#### PRODUCTION OF CABLES

Waste can be obtained in production during the extrusion phase of the compounds on the cable (purging)



#### PACKAGING

Waste can be produced from recovered packaging, which does not have sufficient conditions to be reused

	WASTE PRODUCED (KG)	WASTE NOT INTENDED FOR DISPOSAL (KG)	WASTE INTENDED FOR DISPOSAL (KG)
<b>TOTAL WASTE</b>	2,730,442	1,526,460	1,203,982
<b>HAZARDOUS WASTE</b>	57909	5,992	51,917.00
<b>NON-HAZARDOUS WASTE</b>	2672533	1520468	1,152,065

**RECOVERY**

R<sup>48</sup>

<b>COD. CER/ REF.CER</b>	<b>TYPE</b>	<b>Disposal class</b>	<b>COMPARABLE TO</b>	<b>QUANTITY (kg)</b>
<b>070213</b>	Plastic waste	R13	Plastic	177,477
<b>080111</b>	Waste paints and varnishes, containing organic solvents or other dangerous substances	R13	Paints/solvents	15
<b>150101</b>	Paper and cardboard packaging	R13	Paper/cardboard	191,800
<b>150102</b>	Plastic packagings	R13	Plastic	54,270
<b>150103</b>	Wooden packaging	R13	Wood	192,852
<b>150106</b>	Mixed packaging	R13	Mixed Packaging	426,070
<b>150110</b>	Packaging containing residues of or contaminated by hazardous substances	R13	Hazardous	3,602
<b>150202</b>	Filter Materials	R13	Filters	624
<b>160504</b>	gases in pressure vessels (including halons), containing dangerous substances	R13	Hazardous	125
<b>160601</b>	lead batteries	R13	Batteries	181
<b>160604</b>	alkaline batteries (except 16 06 03)	R13	Batteries	50
<b>161002</b>	Aqueous waste solutions, other than those mentioned in item 161001	R13	Water	42,360
<b>170401</b>	Copper, bronze, brass	R13	Copper	203,064
<b>170402</b>	Aluminium	R13	Aluminium	105,714
<b>170405</b>	Iron and steel	R13	Iron/metals	126,510
<b>170406</b>	Tin	R13	Iron/metals	100
<b>200121</b>	Fluorescent tubes and other wastes containing mercury	R13	Fluorescent lamp	192
<b>200135</b>	discarded electrical and electronic equipment, other than those mentioned in items 20 01 21 and 20 01 23, containing hazardous components	R13	Hazardous	1,325

48 R = recovery class

**DISPOSAL**

D<sup>49</sup>

COD. CER/ REF.CER	TYPE	Disposal class	COMPARABLE TO	QUANTITY (kg)
80111	Packaging - PVC Headwaste	D15	Plastic	24,146
080317	Waste printing toner containing hazardous substances	D15	Toner	4
080318	Exhausted printing toners, other than 080317	D15	Toner	40
120104	Dusts and particulates of non-ferrous materials	D15	Inert substances	2,520
120109	Emulsions and solutions for machinery, not cont. COPPER	D15	Paints/solvents	36,840
130208	Other engine, gear and lubricating oils	D15	Oils	4,340
130802	Other emulsions	D15	Oils	40
150102	Packaging - Paper	D15	Paper/cardboard	2,930
150103	Packaging - Plastic	D15	Plastic	1,177
150106	Packaging - Wood	D15	Wood	27,947
150110	Dirty packaging ex paints/oils and miscellaneous products	D15	Paints/solvents	4,735
150111	Metal packaging containing hazardous porous solid matrices (e.g. asbestos), including press containers	D15	Hazardous	550
150202	Absorbent, filter materials (including oil filters not otherwise specified), rags and protective clothing	D15	Textile	2,118
160213	Disused equipment, containing dangerous components (2) other than those referred to in items 16 02 09 and 16 02 12	D15	Hazardous	30
160214	Disused equipment, other than those mentioned in items from 16 02 09 to 16 02 13	D15	Urban	2,231
160216	components removed from app. Disused, other than 160215	D15	Urban	246
160708	Wastes containing oil	D15	Oils	3,260
170401	A - Scrap - BRIGHT COPPER WIRE WITHOUT ANY COVERING MATERIALS	D15	Copper	49,520
170402	F - Scrap - ALUMINIUM CABLE	D15	Aluminium	6,940
170405	E1 - Scrap - SCRAP METAL	D15	Iron/metals	13,002
170411	Cables, other than those mentioned in item 17 04 10	D15	Electrical material	1,021,229
200102	Glass	D15	Glass	137

**KPI TM6<sup>50</sup> - % of rejection on MP acq 2024**

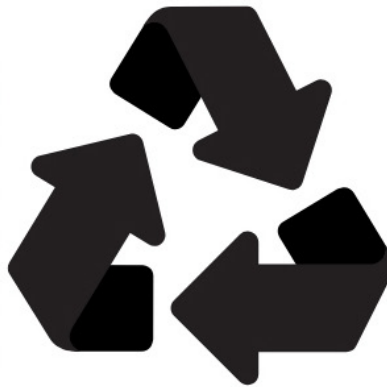
Waste [Kg]	% of rejection on MP acq 2024
<b>Copper</b>	4%
<b>Wood</b>	6%
<b>Plastic</b>	3%
<b>Aluminium</b>	4%

<sup>49</sup> R = recovery class

<sup>50</sup> In compliance with the ESRs **E5 principle – Use of resources and circular economy**, Tratos monitors the **percentage of waste with respect to the raw materials purchased**. The indicator enables the assessment of resource efficiency, waste reduction and improvement of the sustainability of production processes.

Tratos is authorised to apply Regulation (EU) No. **715/2013** establishing the criteria determining when certain types of scrap metal (copper) cease to be considered waste within the meaning of Directive 2008/98/EC of the European Parliament and of the Council (End of Waste).

This regulation therefore makes it possible to transport copper, not considered as waste, to smelters and to obtain recycled wire rod again.



**from scraps  
to rods**



### 15.3 Water consumption

Water is used in the production process mainly in the cooling process of cable extrusions. Water is contained within a closed circuit and is replenished after evaporation.

Water withdrawals [ML]	2022	2023	2024
Tratos Cavi PSS	0.477	1,689	1.411
Tratos Cavi CT	5.042	1,509	2.132
Tratos HV	0.779	0,698	7.766
Tratos UK	n/a	n/a	2.659

# 16 S – SOCIAL ASPECTS

## 16.1 Our people

The company recognises the importance of human resources and believes that a key factor for success and development is the professional contribution of its people.

The company has always placed the professionalism and individual contribution of its people at the centre of its work, giving continuity to a style of relationship that aims to recognise the work of each person as a fundamental element of corporate and personal development.

At the same time, the company places dialogue, the exchange of information - at whatever level -, the enhancement and professional development of its collaborators and the establishment of a corporate identity and sense of belonging at the centre of its daily work.

This value involves:

- The creation of a working environment that encourages the contribution and potential of the individual through the gradual empowerment of staff.
- The forming of a relationship system that encourages teamwork.

- The daily effort to share skills and knowledge also through the use of innovative systems.

The company attaches the utmost importance to those who work within its organisation and contribute to its growth: because it is only through its human resources that the company is able to provide, develop, improve and guarantee optimal management of its services. Without prejudice to legal and contractual provisions on the duties of workers, employees are required to be professional, dedicated to their work, loyal, cooperative, mutually respectful, and have a sense of belonging and morality.

In the management of contractual relationships involving the establishment of hierarchical relations, our company undertakes to ensure that authority is exercised fairly and correctly and that all forms of abuse are avoided: in particular, the company ensures that authority does not turn into the exercise of power detrimental to the dignity and autonomy of the person. These values must, in any case, be safeguarded when making choices about the organisation of work.

Presentation of data on employees by age groups [405-1]	Tratos Cavi PSS	Tratos Cavi CT	Tratos HV	Tratos SRL	Tratos UK Ltd	
<30 years	22	8	14	0	7	
Between 30 and 50 years	86	25	58	5	16	
>50 years	71	29	31	4	16	
<b>Total</b>	<b>179</b>	<b>62</b>	<b>103</b>	<b>9</b>	<b>39</b>	<b>392</b>

Information on the number of employees is obtained directly from the INAZ software.

TRATOS Group Offices	Type of contract:	2022			2023			2024		
		D	M	Tot	D	M	Tot	D	M	Tot
Tratos Cavi	Number of employees	16	207	223	16	217	233	23	218	<b>241</b>
	Number of employees on permanent contracts	16	199	215	16	121	227	20	214	234
	Number of employees with fixed term contracts	0	8	8	0	6	6	3	4	7 <sup>51</sup>
	Number of full-time employees	12	204	216	11	216	227	17	217	234
	Number of part-time employees	4	3	7	5	1	6	6	1	7
Tratos HV	Number of employees	1	89	90	1	92	93	1	102	<b>103</b>
	Number of employees on permanent contracts	1	86	87	1	89	89	1	100	101
	Number of employees with fixed term contracts	0	3	3	0	4	4	0	2	2
	Number of full-time employees	1	88	89	1	92	93	1	102	103
	Number of part-time employees	0	1	1	0	0	0	0	0	0
Tratos SRL	Number of employees	3	6	9	3	7	10	3	6	<b>9</b>
	Number of employees on permanent contracts	3	6	9	3	7	10	3	6	9
	Number of employees with fixed term contracts	0	0	0	0	0	0	0	0	0
	Number of full-time employees	3	6	9	3	7	10	3	6	9
	Number of part-time employees	0	0	0	0	0	0	0	0	0
Tratos UK	Number of employees							6	33	<b>39</b>
	Number of employees on permanent contracts							6	33	39
	Number of employees with fixed term contracts			n/a <sup>52</sup>				0	0	0
	Number of full-time employees							5	32	37
	Number of part-time employees							1	1	2

51 In 2024, part-time employees are only at Tratos Cavi and Tratos UK, and the equivalent full-time employees are FTE = 4 for Tratos Cavi and FTE = 1 for Tratos UK.

52 Data not collected in previous sustainability reports

## Presentation of data on employees Year 2024

## BY GEOGRAPHIC REGION - TRATOS CAVI

	Type of contract:	2022			2023			2024		
		PSS	CT	TOT	PSS	CT	TOT	PSS	CT	TOT
Tratos Cavi	Number of employees	170	53	223	174	59	233	179	62	<b>241</b>
	Number of employees on permanent contracts	162	53	215	169	58	227	173	61	234
	Number of employees with fixed term contracts	8	0	8	5	1	6	6	1	7
	Number of full-time employees	163	53	216	168	59	227	172	62	234
	Number of part-time employees	7	0	7	6	0	6	7	0	7
		Tratos Cavi		Tratos HV		Tratos UK		Tratos SRL		
<b>% vulnerable categories</b>		6.2		6.7		0		0		

## 16.2 New recruits and turnover

## NEW RECRUITS Year 2024

New recruits	TRATOS CAVI	TRATOS HV	TRATOS SRL	Tratos UK	TOT
<b>Total new recruitment</b>	18	18	0	0	36
<b>New recruits</b>					
<b>Reporting year - 2024</b>					
<b>Total new recruitment</b>	<b>New recruitment rate</b>				
<b>36</b>	10.20%				

Tratos Cavi		2022	2023	2024
>50 years	Women	0	0	2
	Men	3	0	3
Between 30 and 50 years	Women	1	0	7
	Men	12	18	0
<30 years	Women	0	1	2
	Men	6	7	4
<b>Total</b>	Absolute	22	26	18

Tratos SRL		2022	2023	2024
>50 years	Women	0	0	0
	Men	0	0	0
Between 30 and 50 years	Women	0	0	0
	Men	0	0	0
<30 years	Women	0	0	0
	Men	0	1	0
<b>Total</b>	Absolute	0	1	0

Tratos HV		2022	2023	2024
>50 years	Women	0	0	0
	Men	2	0	3
Between 30 and 50 years	Women	0	0	0
	Men	4	15	10
<30 years	Women	0	0	0
	Men	2	2	5
<b>Total</b>	Absolute	8	17	18

Tratos UK		2022	2023	2024
>50 years	Women	na	na	0
	Men	na	na	0
Between 30 and 50 years	Women	na	na	0
	Men	na	na	0
<30 years	Women	na	na	0
	Men	na	na	0
<b>Total</b>	Absolute	na	na	0

**TURNOVER** Year 2024

Turnover	TRATOS CAVI	TRATOS HV	TRATOS SRL	Tratos UK	Total
<b>Total new turnover</b>	14	5	0	0	19

**Turnover**  
Reporting year - 2024

Total new turnover	New turnover rate
19	5.38%

Tratos Cavi		2022	2023	2024
>50 years	Women	0	0	0
	Men	6	17	4
Between 30 and 50 years	Women	0	0	0
	Men	0	0	7
<30 years	Women	0	0	0
	Men	2	4	3
<b>Total</b>	Absolute	8	21	14

Tratos SRL		2022	2023	2024
>50 years	Women	0	0	0
	Men	0	1	0
Between 30 and 50 years	Women	0	0	0
	Men	0	0	0
<30 years	Women	0	0	0
	Men	0	0	0
<b>Total</b>	Absolute	0	1	0

Tratos HV		2022	2023	2024
>50 years	Women	0	0	0
	Men	0	4	2
Between 30 and 50 years	Women	0	0	0
	Men	0	0	3
<30 years	Women	0	0	0
	Men	6	3	0
<b>Total</b>	Absolute	6	7	5

Tratos UK		2022	2023	2024
>50 years	Women	na	na	0
	Men	na	na	0
Between 30 and 50 years	Women	na	na	0
	Men	na	na	0
<30 years	Women	na	na	0
	Men	na	na	0
<b>Total</b>	Absolute	na	na	0

### 16.3 Benefits provided for employees

The company makes certain benefits available to employees, providing them without distinction between different types of contract, such as fixed-term or open-ended, and without distinction between different genders.

The benefits paid in 2024 were **fuel coupons**.

Other employee benefits are those envisaged by the Italian national collective bargaining agreement (CCNL), which are itemised in an employee's wages under "Production bonus".



KPI TM9 <sup>53</sup> - Per capita fuel bonus	Tratos Cavi	Tratos HV	Tratos SRL	Tratos UK
/pro capite	334	307	656	Na

### 16.4 National Collective Bargaining Agreement (CCNL Rubber-Plastic)

TRATOS applies the National Collective Labour Agreement (CCNL) for the Rubber, Plastics, Electrical Cables and Related Industries in Italy, which was renewed on 26 January 2023 and is valid until 31 December 2025. The agreement, signed by Federazione Gomma Plastica, Filctem-CGIL, Femca-CISL and Uiltec-UIL, establishes the minimum regulatory and remuneration conditions for all workers in the sector.

The National Collective Labour Agreement envisages minimum wage scales that are updated periodically, representing the **guaranteed minimum wage** for each professional level [202-1]. All TRATOS employees in Italy receive wages equal to or higher than the minimums envisaged by the national collective agreement.

In addition to financial benefits, the National Collective Labour Agreement includes:

- Adherence to the Rubber and Plastic Fund (supplementary pension scheme) and the FASG&P (supplementary health fund), with contributions shared between the company and employees [201-3];
- health, safety and environmental sustainability provisions;
- contractual welfare measures and equal opportunities.

In the United Kingdom, Tratos UK Ltd staff are employed under a Contract of Employment, in line with the National Minimum Wage, consistent with the Group's remuneration and welfare principles.

In Italy, the number of weeks' notice for a general operational change is in compliance with the general national collective agreement [402-1].

### 16.5 Diversity and equal opportunities

Tratos promotes diversity and respect for human rights, guaranteeing equal opportunities and rejecting all forms of discrimination. In compliance with the law, the company protects freedom of association, the right to parental leave for men and women, and promotes social integration. Since 2023,

the holding Tratos SRL has had a Gender Equality management system compliant with UNI/PdR 125:2022 standard and draws up a biennial gender report (2022–2023) in line with current legislation.

	Tratos Cavi	Tratos HV	Tratos SRL	Tratos UK
No. of employees who took parental leave	1	0	0	0

<sup>53</sup> In compliance with the **ESRs S3-5 principle – Affected Communities**, Tratos monitors actions aimed at local communities and the management of social impacts in the territories of activity. The **"Fuel bonus per capita"** indicator measures the average economic value of the support provided to each beneficiary, reflecting the company's commitment to mitigating social impacts through direct support initiatives.

## 17 HEALTH AND SAFETY TM7

### 17.1 Risk and opportunity analysis TM7

The **risks and opportunities** related to health and safety at work can be analysed by considering both the negative and positive aspects. Risks include an increase in accidents and related costs, non-compliance during audits, increased training costs, and costs for upgrading machinery and facilities. Other indirect effects may include a loss of employee engagement. Opportunities include reduced compliance costs, safe business operations and, potentially, an improved corporate reputation.

At TRATOS, health and safety at work are fundamental and non-negotiable values. The company considers protecting the well-being of its employees a strategic priority, integrating it into every operational and decision-making process. Promoting safe, healthy and sustainable work environments means not only complying with current regulations, but above all developing a culture of prevention and shared responsibility, capable of contributing to the continuous improvement of corporate performance.

#### POSITIVE IMPACTS

The health and safety of people is a core value for Tratos. The company is certified pursuant to the ISO 45001 standard, which ensures a structured and procedural system for managing risks related to health and safety at work. This is accompanied by

an approach focused on the overall well-being of employees, which also involves enhancing individual professionalism and creating a positive, liveable and efficient working environment.

#### NEGATIVE IMPACTS

The intensification of production activities and the constant evolution of plants and processes can lead to an increase in the risk to workers' health and safety. Further critical issues may arise from the difficulty in finding new qualified personnel,

partly due to the specific geographical location of the plants. Production peaks and intensified work rhythms also represent risk factors that must be constantly monitored and managed to avoid negative repercussions on staff.

#### STRATEGIES

To address these challenges, Tratos takes a proactive approach, based on continuous monitoring of orders and market trends, in order to plan resources appropriately and anticipate any production needs. Being rooted in the local area allows the company to act quickly when necessary, including when it

comes to recruiting new staff. Furthermore, constant updates on national and international health and safety regulations enable timely intervention in the organisation and processes, ensuring a compliant, safe and resilient working environment.

### 17.2 Occupational Health and Safety Management System

Tratos promotes a strong culture of safety and shared responsibility, supported by the Health and Safety Department, led by Mrs. Elisabetta Bragagni Capaccini, an example of female leadership in the Group.

The safety management system is part of the Integrated Management System (MSGI3), which covers all aspects (quality, safety and environment) and applies to 100% of workers [403-8] and all external persons visiting the plant [403-7] (details 4.3). In compliance with Italian Legislative Decree 81/2008, the company has drawn up a Risk Assessment Document (DVR),

appointed the figures required by law (HSO, occupational physician and first aid officer) and carries out mandatory training and implements preventive measures to ensure a safe and healthy working environment, actively involving the HSO, occupational physician and workers. The document is periodically updated.

Key actions include: replacing hazardous substances, introducing safer technologies, mechanising processes, providing ongoing training and conducting regular audits to monitor regulatory compliance.

### 17.3 Risk assessment

Tratos adopts a systematic approach to risk assessment, based on Operating Procedure PO 725, which defines criteria, responsibilities and preventive measures to ensure safety in all corporate activities. The analyses are updated periodically

and whenever significant changes are made to processes or facilities, ensuring continuous improvement in health and safety conditions.

## 17.4 Worker participation, consultation, and communication on occupational health and safety

The company promotes active participation and consultation with employees on matters relating to occupational health and safety, ensuring constant and transparent dialogue between all parties involved. The Workers' Safety Representative (RLS) participates in the decision-making and approval process relating to risk assessment and prevention and protection measures, collaborating with the employer, the Health and Safety Officer (HSO) and the occupational physician. Consultation with workers is also ensured through their representatives, encouraging discussion and the sharing of observations before decisions on health and safety issues are implemented. The Risk Assessment Document (DVR) is made available for consultation, with a view to transparency and the dissemination of a culture of safety at all levels of the company [403-4].



## 17.5 Safety training provided to employees (Tratos Cavi, SRL and HV) in 2024 by Studio Panichi

**Safety training** is mandatory and differentiated by risk level (high or low) (see 19.2). It is carried out by external experts, in person and during paid working hours. Courses cover topics

such as mechanical, chemical, electrical, work-related stress, emergencies and use of PPE, with final verification of learning.

## 17.6 Prevention and mitigation of the negative impacts regarding occupational health and safety in commercial relationships

Tratos strictly applies the provisions of Italian Legislative Decree 81/2008, also in relations with suppliers and contractors, through the drafting of the DUVRI, which regulates the management of risks from interference and safety during contracted activities.

As reported in (VALUTAZIONE DEI FORNITORI), a supplier qualification system will also be implemented in the case of safety.

## 17.7 Occupational health services

The company also provides occupational health services managed by qualified professionals, guaranteeing privacy and the protection of workers' health. Medical results are disclosed exclusively to the individuals concerned, and only the assessment of fitness is communicated to the company, in

full compliance with confidentiality regulations. The prevention service structure includes an OHS coordinator, health and safety representative, occupational physician, first aiders and fire safety officers [403-3].

## 17.8 Promotion of health

In line with the principles of the **Italian Constitution**<sup>54</sup> and the **National Health Service (SSN)**, Tratos promotes the well-being of its employees also through non-working health initiatives. In 2024, the company offered access to voluntary health promotion programmes aimed at preventing major non-occupational risks. Tratos adheres to the who Workplace Health Promotion (WHP) programme, promoted in Tuscany by the PP03 – Health-

Promoting Workplaces Programme (PRP 2020–2025). The actions concern proper nutrition, smoking and alcohol prevention, promotion of physical activity, road safety, psychosocial well-being and work-life balance, as well as environmental protection and participation in vaccination and screening campaigns.

<sup>54</sup> Art. 32 of the Italian Constitution. The basic principles on which Italy's national health service has been based since its establishment, by Italian Law no. 833 of 1978, are universality, parity and equality.



Regione Toscana  
**WORKPLACE  
 HEALTH  
 PROMOTION**



Figure 7 certificate awarded for recent actions taken in 2024



**HEALTH-PROMOTING WORKPLACES**

**INVITATION for the "Delivery of certificates and stickers to companies that have concluded and participate in the PP03/ WHP (health promotion in the workplace of Tuscany)"**

21 May 2025 09:00 - 13:30  
 Aula Lorenzo il Magnifico c/o Meyer Health Campus  
 Via Cosimo il Vecchio 26 - Florence

### 17.8.1. The commitment of Tratos for the health of workers

Since 2017, Tratos has been participating in the program **WHP – Workplace Health Promotion** e and in 2024, it organised, at the **Tratos Cavi (Tosca)** headquarters, the event **“TestiamoCi per l’Epatite C” (Let’s Test for Hepatitis C)**, offering employees **free HCV screening** in collaboration with local health services (ASL).

The initiative made it possible to carry out **rapid tests directly in the workplace**, promoting **prevention and timely access to treatment**. Tratos considers the **health of workers** a core value and actively supports **awareness and prevention campaigns** to encourage healthy behaviours and contribute to public health.



### 17.9 Accidents and safety indicators

No. of accidents	2021	2022	2023	2024
Tratos Cavi (PSS)	9	4	8	10
Tratos Cavi (CT)	2	2	4	5
Tratos HV	3	6	7	11
Tratos UK	na	na	0	0
<b>TOT</b>	<b>14</b>	<b>12</b>	<b>23</b>	<b>26</b>

KPI TM7 <sup>55</sup> - Safety Indicators (max)		2021	2022	2023	2024
Tratos Cavi PSS	TS5 - Frequency of accidents index	34.17	14.52	26.62	32.72
	TS6 - Accident Severity Index	2.25	0.99	0.48	1.02
Tratos Cavi CT	TS5 - Frequency of accidents index	23.30	21.89	41.94	44.67
	TS6 - Accident Severity Index	0.56	0.32	1.03	1.16
Tratos HV	TS5 - Frequency of accidents index	20.22	38.50	43.30	62.01
	TS6 - Accident Severity Index	0.34	0.79	1.72	0.95
Tratos UK	TS5 - Frequency of accidents index	na	na	0	0
	TS6 - Accident Severity Index	na	na	0	0
Tratos SRL	TS5 - Frequency of accidents index	n/a			
	TS6 - Accident Severity Index	n/a			

<sup>55</sup> In compliance with the ESRs S3-3 principle – Occupational Health and Safety, Tratos monitors occupational health and safety risks to prevent accidents and occupational illnesses and ensure safe working environments. The key indicators used are the **Frequency Index - TS5**, which measures the number of accidents with absence per million hours worked, and the **Severity Index – TS6**, which measures the days lost due to accidents per 1,000 hours worked.

Offices		2021	2022	2023	2024
Tratos Cavi PSS	No. of accidents	9	4	8	10
	Hours worked	263382	275409	300579	305605
	Days of injury	592	273	145	311
Tratos Cavi CT	No. of accidents	2	2	4	5
	Hours worked	85854	91363	95380	111941
	Days of injury	48	29	98	130
Tratos HV	No. of accidents	3	6	7	11
	Hours worked	148391	155850	161658	177400
	Days of injury	50	123	278	168
Tratos UK	No. of accidents	na	na	0	0
	Hours worked	na	na	68486	59696
	Days of injury	na	na	0	0
Tratos SRL	No. of accidents	n/a	n/a	n/a	n/a
	Hours worked	n/a	n/a	n/a	n/a
	Days of injury	n/a	n/a	n/a	n/a

There was an upward trend with respect to the accidents that occurred in the reporting year.

# 18 TRAINING AND SKILLS TM8

## POSITIVE IMPACTS

To aspire to its ambitious innovation goals, Tratos must continually increase its know-how by investing in the training of its specialist, technical personnel. This is not just the idea of “classroom” type training, but involves field activities that are

designed to increase the skills and abilities of employee who specialise in the various sectors in which Tratos operators, and as a consequence, even more efficiently.

## NEGATIVE IMPACTS

The possible risks relating to the expenditure of resources to contribute to training Tratos employees are the lack of growth in corporate know-how and the waste of time and energy.

Furthermore, enhancing individual skills and abilities could lead to discontent in work teams.

## STRATEGIES

There are various training options at Tratos, from “classroom” type training (courses, webinars) to attending trade shows and conferences, to participation in meetings with trade and industry associations.

Tratos, given its strong relationship with its customers, always tries to meet their requests by specialising in the research and

study of innovative products. This is made possible thanks to the field activities carried out by Tratos specialists at customer facilities to view and analyse requests and to put the cables produced into operation. All this translates into growth and the enhancement of the skills and abilities of Tratos employees.



## 18.1 Risks and Opportunities Analysis TM8

Developing employees' skills is a strategic activity that presents both **risks and opportunities** for companies. On the one hand, it can lead to increased productivity, innovation, and employee satisfaction, but on the other hand, if poorly managed, it can generate discontent, talent loss, and additional costs.

Failure to fully leverage employee skills carries several risks, including difficulty adapting to new market demands, high training costs, low engagement, and increased turnover. Furthermore, outdated skills can lead to non-compliance during audits and language barrier issues, as well as increased costs related to remuneration for newly acquired skills.

Enhancing employee skills, on the other hand, is a strategic investment that brings tangible benefits to the company, both in terms of efficiency and competitiveness, as well as promoting the development of more innovative and sustainable products and services. Work optimisation, combined with the growth of digital skills and the use of new technologies (AI), can lead to cost reductions through work optimisation.

Enhancing employee skills is not only an ethical action, but also a strategic investment for business success, leading to a more positive attitude towards company activities and attracting talent.

## 18.2 Training in Tratos

Tratos must continually increase its know-how by investing in resources, both financial and temporal, in the training of its specialist, technical personnel.

The Procedure – Personnel Management – defines the methods for training, instructing and qualifying personnel, with particular attention to quality, the environment, health and safety. The Procedure is structured to ensure that all personnel are trained, assessed and qualified in a traceable manner consistent with quality, safety and company standards.

Training within the company is carried out in the following ways:

- direct training at the workplace, by the manager or supervisor;
- external training by qualified personnel;
- training obtained with company provisions, obligations, prohibitions.

HOURS OF TRAINING	Tratos Cavi			Tratos HV			Tratos SRL			Tratos UK	Total
	Department	F	M	Total	F	M	Total	F	M	Total	
<b>PURCHASE</b>		24	18	42							42
<b>ADMINISTRATION</b>		93	18	111				72	129	201	312
<b>MARKETING</b>		124	40	164							164
<b>MANAGEMENT</b>			221	221							221
<b>IT</b>		381	410	791							791
<b>LABORATORY</b>		79	271	349	75	123	197				546
<b>WAREHOUSE</b>			165	165							<b>Na</b> 165
<b>MAINTENANCE</b>			489	489		169	169				658
<b>BLUE COLLARS</b>		223	5085	5308		2992	2992				8300
<b>QUALITY</b>		34	135	169							169
<b>TECHNICAL OFFICE</b>		21	54	75							75
<b>Total</b>		979	6906	7884	75	3284	3358	72	129	201	11443
<b>TOT EMPLOYEES</b>		20	194	214	1	80	81	3	5	8	303
<b>Average employee</b>		49	36	37	75	41	41	24	26	25	38

Training hours	Tratos Cavi	Tratos HV	Tratos SRL	Tratos UK
Environment	1607	637	151	
Laboratory	163	113	0	
Production/Duties	3464	1864	16	
Quantity	1155	237	16	
Security	1471	498	16	
Report	24	9	0	Na
Social Aspects (Gender Equality)	0	0	2	
Total training hours	7884	3358	201	
Total number of employees	214	81	8	
Average number of hours training per employee (404-1)	37	41	25	

Training Hours	Parameters	2023	2024
Office	No. tot hours	Na	7884
	No. employees	Na	214
	Average number of employees trained	Na	37
Tratos Cavi	No. tot hours	Na	3358
	No. employees	Na	81
	Average number of employees trained	Na	41
Tratos HV	No. tot hours	Na	201
	No. employees	Na	8
	Average number of employees trained	Na	25
Tratos SRL	No. tot hours	Na	
	No. employees	Na	
	Average number of employees trained	Na	
Tratos UK	No. tot hours		
	No. employees		Na
	Average number of employees trained		

Training also includes field activities aimed at enhancing and developing employees' skills by specialising them in the various fields in which Tratos operates. Training in Tratos is represented by the possibility of attending training courses/webinars/lectures for all employees from the various departments (laboratory technicians, R&D, HR, SGA, SGQ, ESG, sales, etc.).

Attending a trade show or conference is another method that Tratos uses in order to be able to learn about the latest innovations on the market and in the field of research, such as more sustainable materials, innovative instruments, or high-performance industrial machinery. Tratos employees are members of trade associations (see AN INTERNATIONAL NETWORK) and attendance at meetings leads to continuous growth of knowledge and allows for continuous updates.

The close relationship that Tratos wishes to cultivate with its customers also involves understanding their specific requests and issues associated with each innovative application. Tratos technical specialists continuously carry out field activities (transfers) to study and resolve specific cases in each cable produced for the customer.

Periodic assessment of employees' performance and professional development is carried out by the quality manager [404-2].

Details on severance indemnity [404-2 b.] are given in Piano pensionistico.

KPI TM8 - No. of employees trained in the ESG field	Tratos Cavi	Tratos HV	Tratos SRL	Tratos UK
No.	4	3	0	0

### 18.3 Remuneration policies

Tratos' remuneration policy is defined by management every three years and is based on the National Collective Labour Agreement for the Rubber and Electrical Cables Industry, which provides for different levels with guaranteed minimum wages. Remuneration is fair and independent of gender, nationality or creed, and proportionate to the level of employment, for both full-time and part-time contracts. The remuneration policy for senior management is set out in 6.1, while for staff there is a fixed component and other possible benefits (see 16.3) After the first three months of employment, an initial pay rise is expected, while subsequent rises are proposed by department or office managers.

A second-level agreement with trade unions allows for increased productivity, providing for the possibility of working up to 12 days of rest per year with additional pay and corporate enhancement funds.

Overtime hours may not exceed 250 per year, monitored through the payroll register and payslips.

Tratos also monitors the pay gap between women and men by professional category, in order to ensure equal opportunities and the absence of wage discrimination.

		D/U remuneration ratio			
Category		Tratos Cavi PSS	Tratos HV	Tratos SRL	Tratos UK
Apprentices	No. women	1	0	0	
	No. men	7	2	1	
	Average D/U	1.19			
White collars	No. women	0	0		
	No. men	4	4		
	Average D/U				
Senior Managers	No. women	0	0		
	No. men	2	2		
	Average D/U				
Employees	No. women	14	0	3	5
	No. men	13	3	1	13
	Average D/U	0.67		0.98	0.59
Workers	No. women	7	0		1
	No. men	114	90		20
	Average D/U	0.58			0.49
Middle Managers	No. women	1	1	0	0
	No. men	16	1	4	0
	Average D/U	1.07	1.16		

### 18.4 Pension Funds

The statutory retirement plan is the one managed by INSP. Another retirement plan provided by Tratos is the industry pension fund, the *Fondo Gomma*. Membership of the *Fondo Gomma* requires Tratos to contribute a certain fixed quota

value. Investment in either fund is at the employee's discretion, depending on market inflation and on whether a more/less aggressive investment is preferred. There are no private supplementary funds.

# 19 SUPPORT FOR THE LOCAL COMMUNITY TMR



*"From the ruins of a Tuscan village rose a global business with a warm heart".*

## POSITIVE IMPACT

Tratos is aware of the importance of its impact on the local area and does everything in its power to increase, directly or indirectly, the economic and social well-being of the local population, aware that this can have a positive impact on the

prospects for Tratos' business. Improving the possibilities of the growth of families and individuals in the local community also means helping people to acquire the technical/professional expertise required to work at Tratos in future years.

## NEGATIVE IMPACT

The strong impact of Tratos on the local community, due to the high percentage of local people working or collaborating, even indirectly, with Tratos, represents a risk during difficult

economic or social times.

One example is the recent pandemic, which could have had a considerable impact on the local area.

## STRATEGIES

Tratos continuously monitors market trends in order to prevent, as far as possible, negative effects on its own business and consequently on the local area.

An early and careful reaction to the signs that may emerge can greatly reduce, if not eliminate altogether, negative consequences for both internal activity and the social fabric.

## 19.1 Risks and Opportunities Analysis TM9

For Tratos, its connection with the local community represents a strategic lever capable of generating social and operational value. Among the main opportunities are staff retention, attracting new talent thanks to the company's positive image, and strengthening relationships with local institutions, schools and suppliers, contributing to the stability of the entire business fabric of the area. Trust-based relationships with local authorities and banks facilitate access to credit and the management of shared investments.

Alongside the advantages, there are also risks linked to the difficulty of quantifying social benefits in economic terms and to local suppliers' dependence on the company, which can reduce their competitiveness. The geographical location and limited territorial mobility also restrict the attraction of highly qualified profiles, while infrastructure dependence on the E45 motorway affects costs and operational continuity.

## 19.2 Value for the Community and Territorial Identity

Tratos is a global company with deep roots in Tuscany. Since its foundation by Egidio Capaccini, who wanted to rebuild Pieve Santo Stefano after the war, the company has served the community by creating jobs and prosperity.

Today, under the leadership of Chairperson Albano Bragagni, Tratos maintains its headquarters in the municipality of Arezzo, continuing to promote socially valuable projects together with schools, institutions and local associations. The principles of fairness, respect and sharing remain the foundation of our corporate culture, inspiring concrete actions for the inclusive and sustainable development of the community.

### 19.2.1. Job Opportunity

In the context of our strategy for a responsible and sustainable supply chain, Tratos recognises the fundamental value of territorial roots. We started from our industrial base in the Valtiberina area, and thanks to our two industrial sites in Pieve S. Stefano, we have had a tangible positive impact on the local economy and surrounding communities. Tratos' policy favours employees from municipalities neighbouring Tratos' offices. This creates stable employment in a context often subject to marginalisation and depopulation. The company is a key player in the growth of the local area, offering skilled professional opportunities and directly and indirectly supporting the local economy, which consists of small and medium-sized enterprises, artisans and service providers.

KPI TM9 - % of workers from neighbouring areas (approximately 30 km)	Tratos Cavi PSS	Tratos Cavi CT	Tratos HV	Tratos SRL	Tratos UK
%	99	95	98	100	78

### 19.3 “Egidio Capaccini” award

The Egidio Capaccini award, a thirty-year tradition generously supported by the Bragagni Capaccini family, continues to promote young students living in Pieve Santo Stefano, in Italy.

For 2024, the Egidio Capaccini award ceremony was held on 16 November 2024 at the Papini Municipal Theatre. The award ceremony was attended by the Chairman of the Tratos Group, Albano Bragagni, the oldest members of the Bragagni family, the mayor, Claudio Marcelli, and local authorities. The ceremony was held to recognise and celebrate young, talented students who distinguished themselves by obtaining the highest grades in the third-year examinations at the lower secondary school and in the final secondary school examinations.



### 19.4 Environmental controls

In compliance with Italian Legislative Decree 152/2006 and the Single Environmental Authorisation (SEA), Tratos adopts a structured system of environmental controls to ensure regulatory compliance and reduce the impact of its activities on air, water and the acoustic environment.

Air emissions are monitored by authorised third-party bodies, which monitor the main company chimneys to ensure compliance with the limits set by the SEA.

Among the environmental indicators monitored by Tratos are atmospheric emissions relating to pollutants emitted in relation to the flow rate of emission stacks, monitored annually in compliance with the SEA.

KPI TM9 <sup>56</sup> - Chimney emission intensity		Tratos Cavi PSS	Tratos HV
A4 <sub>a</sub>	Value	0,354	0,070
	Max accepted <sup>57</sup>	0.5	0,075

The water controls concern sewage, surface<sup>58</sup> and drinking water<sup>59</sup>, periodically analysed by certified laboratories, also for the verification of Legionella<sup>60</sup>.

Acoustic monitoring verifies compliance with the day and night noise limits, in line with the UNI EN ISO 14001 certification, and

provides for any mitigation measures. Lastly, Tratos carries out annual gamma ray checks to ensure environmental safety and monitor the radiation-emitting equipment used in cable quality control.

#### 19.4.1. Management of Chemical Restrictions and Sustainable Innovation

Tratos tackles the challenges associated with European Chemicals Agency (ECHA) restrictions, ensuring compliance with REACH regulations and promoting the responsible use of chemicals in production processes.

The company constantly monitors regulations on fluoropolymers (e.g. ETFE), PVC and paraffins, adopting technical and sustainable solutions to reduce environmental impact and maintain high product performance.

In particular, the fluoropolymers used by Tratos are classified as Low Concern Polymers, while any restrictions on PVC and paraffins require technical assessments and the exploration of more sustainable alternatives.

Tratos has launched a regulatory adaptation and innovation program, aimed at ensuring regulatory compliance, material safety and long-term sustainability.

<sup>56</sup> In compliance with the ESRS S3-4 – Affected Communities principle, Tratos monitors potentially significant environmental impacts on local communities. Among the main indicators, the **the concentration of pollutants emitted in relation to the flow rate of the chimneys**, checked annually in compliance with SEA requirements, allows the emission impact of the plants to be assessed and helps prevent negative effects on the health and environment of the surrounding communities.

<sup>57</sup> Objective under monitoring

<sup>58</sup> Tab. 3 and Tab. 4 Annex Italian Legislative Decree no. 152/2006

<sup>59</sup> pursuant to Italian Legislative Decree no. 18/23

<sup>60</sup> UNI EN ISO 11731:2017

### 19.5 Relations with schools

Tratos organises annual visits from secondary schools and is available to accept interns from secondary schools for various departments (laboratory, IT, mechanical and electrical workshop, administration, human resources office) for Transversal Skills and Orientation Courses (PCTO). These courses aim to develop transferable and professional skills, encourage students to pursue university or professional studies in the future, and introduce them to the world of work.



### 19.6 Charities and sponsors

Since it actively supports the local communities in which it operates, Tratos has always made a concerted effort to ensure that the money it pays through taxes and royalties to governments and local authorities is disclosed transparently.

Tratos ensures that the right amount of money<sup>61</sup> is used for development and other community needs. Among other things, it has sponsored various local community activities in Pieve Santo Stefano, in the province of Arezzo.

Tratos makes contributions to societies and associations in the local community, participating in events that these associations hold during the year.



Association Ready for women



Gruppo Donatori sangue Pieve Santo Stefano

Pieve Santo Stefano Blood Donors' Group



Flag-wavers Sansepolcro

<sup>61</sup> In 2024, about 130,000 Euro were allocated for sponsorship and advertising

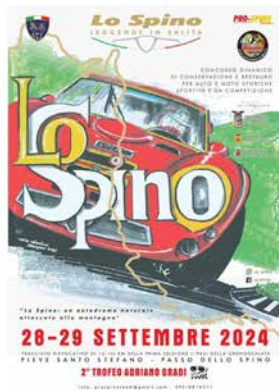
Other sponsorship arrangements focus on supporting the events that these associations run during the year.



National Dairy Archive Foundation, which presents the Pieve Saverio Tutino Award event



Pro Loco Pieve Santo Stefano, which presents the SAGRA DEL PRUGNOLO event



Pro Spino, which presents the uphill time trial event, "Lo Spino"



The M'abbiocco association presents the event ARBARCOLLO MA NON MOLLO BEER FESTIVAL

Tratos also provides a contribution to the sports associations of Pieve Santo Stefano and its surroundings



Betis Santo Stefano



Volleyball San Giustino

KPI TM9: Community/employee donations

Sites of Pieve S. Stefano

€ / employee<sup>62</sup>

447

62 It includes only the offices of Pieve S. Stefano di Tratos, Tratos Cavi PSS, Tratos HV and Tratos SRL.

## 20 METHODOLOGICAL NOTE

This document is the Tratos Group's Sustainability Report.

The reporting scope of the Sustainability Report includes the Tratos companies included in the Italian scope, therefore, Tratos SRL, Tratos Cavi e Tratos HV [Tratos SRL - Tratos Cavi SpA - Tratos HV SpA | Italian VAT number - 02328320516] and Tratos UK Ltd [178830961], located in England. The holding company is Tratos SRL, and the shares of the company are held by private individuals who are members of the Bragagni-Capaccini family. Tratos Cavi and Tratos HV and Tratos UK are joint-stock companies with private partners and shareholders.

The purpose of this document is to explain the organisational model, activities, main risks and performance indicators of Tratos according to ESG principles relating to environmental, social and governance matters during one year (from 1 January to 31 December 2024). The reporting period of this document coincides with the reporting period of the financial statements.

This report contains an update of the 2023 data and specifies any changes that occurred in 2024.

The Sustainability Report aims to provide an understanding of the company's activities, covering the results of these and the effects they have on the environment, people and the economy.

The Sustainability Report was prepared under the "in accordance with" option, in compliance with the "GRI Sustainability Reporting Standard" published in 2016 by the "GRI – Global Reporting Initiative", and updated thereafter (in 2018 and 2021).

The document was drafted taking into account material topics, i.e. topics considered a priority for Tratos, as presented in the chapter "ANALISI DI MATERIALITÀ" The **Content Index** (Appendix 1) can be found at the end of this document. GRI content index in accordance with), as indicated by the reporting standards, which details the indicators reported by Tratos, stating the location and any omissions. Finally, the "Table of correlation between material topics and GRI Standards" shows

the relationship between the material topics and the GRI indicators reported according to the 2024 materiality analysis.

This sustainability report will be made available on our website (<https://tratosgroup.com/>).

The process of collecting the data and information necessary to compile the Sustainability Report was carried out according to the guidelines of the GRI Reporting Standards (GRI 1), ensuring accuracy, balance, clarity, comparability, completeness, sustainability context, timeliness and verifiability. In the case of Tratos, the information was collected directly from the company's internal management system. This section, while independent, is integrated with the company's management system, allowing for accurate, complete and reliable data collection. The data collection, which will be implemented on an annual basis, will make it possible to identify and manage the topics of greatest interest to the company. The Sustainability Committee is responsible for collecting data and preparing this report. The Sustainability Report will generally align with Directive No. 2022/2464 (Corporate Sustainability Reporting Directive – CSRD).

Elisabetta Bragagni Capaccini is in charge of reviewing this sustainability document. The Board of Directors of Tratos approved this document before its revision on 10 September 2025. The approval of the revised document took place on 4 December 2025.

This document has been verified with a limited assurance level by an independent third-party certification body, ICMQ SpA. ([www.icmq.it](http://www.icmq.it)), to verify that the document has been prepared in compliance with the GRI Standards (ASSURANCE STATEMENT)

For comments, requests, opinions and suggestions for improvement on the information in this Tratos document, please contact the:

Sustainability Committee: [sustainability@tratos.it](mailto:sustainability@tratos.it)

# 21 ASSURANCE STATEMENT



Icmq S.p.A. (single shareholder)  
Benefit Enterprises  
Via G. De Castilia, 10 – 20124 Milano  
Tel. 02 7015081 – Fax 02 70150854  
icmq@icmq.org – www.icmq.it  
P.I. 13218350158

**ASSURANCE STATEMENT**

**Sustainability Reporting  
External Assurance report**

To the Board of Directors’ Meeting of Tratos Cavi S.p.A

We have been appointed to carry out an external assurance of the Sustainability Report of Tratos Cavi S.p.A. (hereinafter: “the Organisation”). The following table contains the basic information of the assurance statement.

<b>Organisation</b>	Tratos Cavi S.p.A.
<b>Registered office</b>	Via Stadio 2, 52036 Pieve S. Stefano (AR)
<b>Scope of the activity</b>	Conformity assessment of sustainability reporting – 2024
<b>Scope of the sustainability report</b>	Headquarters - Via Stadio 2, 52036 Pieve S. Stefano (AR) Facilities: Tratos srl - Via Stadio 2, 52036 Pieve S. Stefano (AR) Tratos Cavi Spa - Via Stadio 2, 52036 Pieve S. Stefano (AR) and Strada XIII Zona Industriale Catania Tratos HV Spa – ViaPian DiGuido 45, 52036 Pieve S. Stefano (AR) Tratos UK Ltd – Randles Road, Knowsley Business Park, Prescott, Merseyside, L34 9HX
<b>Reporting period</b>	01/01/2024 – 31/12/2024
<b>Reporting standards</b>	GRI (Global Reporting Initiative) 2021
<b>Standard of reference</b>	ISO 17029: Conformity assessment – General principles and requirements for validation and verification bodies SRC 2030 “Diligentia Guidelines for the certification of the sustainability report”.
<b>Exclusions</b>	The verification excludes any warranty relating to: <ul style="list-style-type: none"> <li>• Sustainability information prior to 1 January 2024 and after 31 December 2024;</li> <li>• Information on sustainability not published in the report under scrutiny;</li> <li>• Statements (expressions of opinion, belief, purpose or future intention) made by senior management and management;</li> <li>• Forward-looking statements or statements of future commitments (objectives, plans and intentions);</li> <li>• Any financial data or cash flow statement.</li> </ul>





<b>Objective of the assignment</b>	Assessment of the sustainability report's compliance "in compliance with" the GRI 2021 standards –.
<b>Valuation Criteria</b>	GRI 1 -2 -3 – 2021 Universal Standard
<b>Warranty Level</b>	Limited
<b>External Warranty (Validation)</b>	Yes – Voluntary
<b>Material aspects</b>	The sustainability report addresses and develops the material aspects to an "acceptable" degree. Note: Range [Very poor - Poor - Acceptable - Good - Very good]
<b>Recipients</b>	Tratos Cavi S.p.A. and all interested parties
<b>Documentation verification dates</b>	November 2025
<b>Head of the Inspection Audit Group (RGVI)</b>	Cesare Saccani
<b>Verification/ validation body</b>	ICMQ S.p.A. Benefit Enterprises



### **Responsibility of the Directors for the Sustainability Report**

The Directors of the Organisation are responsible for the preparation of the Sustainability Report in compliance with the “*Global Reporting Initiative Standards*” defined by the GRI – *Global Reporting Initiative* (“*GRI Standards*”), as described in the “*Methodological Note*” of the Sustainability Report.

The Directors are also responsible for that part of the internal control they deem necessary in order to allow the preparation of a Sustainability Report that does not contain significant errors due to fraud or unintentional behaviour or events.

The Directors are also responsible for defining the Company’s objectives in relation to sustainability performance, as well as for identifying the Stakeholders and material aspects to be reported.

### **Independence of the verification/validation body**

ICMQ S.p.A. Benefit Company is an independent third-party verification/validation body accredited to ISO/IEC 17029 that ensures compliance with the fundamental principles of impartiality, integrity, objectivity, professional competence and diligence, confidentiality and professional conduct.

### **Responsibility of the validation body**

It is the responsibility of the Validation Body to express, on the basis of the procedures carried out, a conclusion on the compliance of the Sustainability Report with the criteria defined by the GRI standards chosen by the Organisation for the preparation of the Report. The assignment was carried out with reference to the requirements contained in the GRI Standards.

The assessment procedures designed and implemented by ICMQ to provide a “limited” level of assurance involve sampling of evidence that is reduced compared to what would be necessary to provide a “reasonable” level of assurance.

Therefore, validation involved less work (sampling and extension of assessment activities at the various sites) than would have been necessary to carry out an assessment with a “reasonable” (“*Reasonable*”) level of assurance and, consequently, does not allow for certainty that all significant facts and circumstances that could be identified in the course of the assessment have been brought to light.

The procedures carried out on the Sustainability Report were based on the professional judgement of the appointed assessors and included a visit to the headquarters of Tratos Srl and Tratos Cavi, via Stadio 2, Pieve S.Stefano (AR), interviews with the organisation’s staff, as well as analysis of documents, recalculations and other procedures aimed at acquiring evidence deemed useful.

In particular, the following procedures were performed:

1. analysis of the process for defining the relevant issues reported in the Sustainability Report, with reference to the methods of identification in terms of their priority for the different categories of Stakeholders and the internal validation of the results of the process;
2. comparisons between the economic and financial data and information reported in the Sustainability Report and the data and information included in the financial statements of the organisation;
3. understanding of the processes underlying the generation, identification and management of the significant qualitative and quantitative information included in the Sustainability Report.

In particular, remote interviews and e-mail exchanges were carried out with the personnel of the Organisation’s Management and documentary checks, 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 function responsible for preparing the Sustainability Report.



Furthermore, with regard to material information, taking into account the activities and characteristics of the Organisation:

- at an Organisational level:
  - a) with reference to the quantitative information contained in the Sustainability Report, interviews were conducted and supporting documentation was acquired to verify its consistency with the available evidence;
  - b) With reference to quantitative information, both analytical procedures and limited checks were carried out to verify, on a sample basis, the correct aggregation of data.
- For the Pieve S. Stefano (AR) site, selected on the basis of its activities, its contribution to company-level performance indicators and its location, the documentation useful to all companies included in the scope was acquired. Thanks to a number of telephone interviews and repeated e-mail exchanges with managers, documentary evidence was obtained regarding the correct application of the procedures and calculation methods used for the indicators.

### Conclusions

Based on the work carried out, no elements have come to our attention that would suggest that the Sustainability Report of Tratos Cavi S.p.A. for the financial year as at 31 December 2024, has not been prepared, in all material respects, in compliance with the requirements of the GRI Standards, as described in the “Methodological Note” section of the Sustainability Report.

The opinion is expressed with limited assurance on the information contained in the Sustainability Report.

Milan, 17 December 2025

ICMQ S.p.A.  
Benefit Enterprises  
The Chairman and General Manager  
Lorenzo Orsenigo  
Digitally signed by  
**Lorenzo Orsenigo**

# 22 APPENDIX 1. GRI CONTENT INDEX IN COMPLIANCE WITH

<b>Statement of use</b>	Tratos has submitted a report in compliance with the GRI Standards for the period 01/01/2024 to 31/12/2024.				
<b>Using GRI 1</b>	GRI 1 – Foundation – version 2021				
<b>Relevant GRI sector standards</b>	N.A (GRI standards for our sector have not yet been published)				
Standard GRI	Disclosure	Description	Location	Omission	
				Requirements omitted	Reason
GRI 2: General disclosures 2021					
1. The organisation and its reporting practices	2-1	Organisational details	OUR COMPANY, HISTORY, Tratos' activities and products, Tratos in the world, METHODOLOGICAL NOTE		
	2-2	Entities included in the organisation's sustainability reporting	OUR COMPANY, METHODOLOGICAL NOTE		
	2-3	Reporting period, frequency and point of contact	METHODOLOGICAL NOTE		
	2-4	Review of information	METHODOLOGICAL NOTE		
	2-5	External assurance	METHODOLOGICAL NOTE, Assurance Statement		
2. Activities and workers	2-6	Activities, value chain and other business relations	Tratos' activities and products, System certifications, SUSTAINABLE SUPPLY CHAIN – TM1 Local Purchases, TM2 CUSTOMER SATISFACTION, CATEGORIES OF STAKEHOLDERS, METHODOLOGICAL NOTE		
	2-7	Employees	Tratos in the world, CATEGORIES OF STAKEHOLDERS, OUR PEOPLE		
	2-8	Non-employees		Not pertinent	There are no non-employees who work exclusively for Tratos
3. Governance	2-9	Governance structure and composition	G – GOVERNANCE ASPECTS , Organisation Chart, THE STRUCTURE OF CORPORATE GOVERNANCE AS AT 31/12/2024, METHODOLOGICAL NOTE		
	2-10	Appointment and selection of the highest governing body	G – GOVERNANCE ASPECTS , THE STRUCTURE OF CORPORATE GOVERNANCE AS AT 31/12/2024		
	2-11	Chairperson of the highest governing body	G – GOVERNANCE ASPECTS , THE STRUCTURE OF CORPORATE GOVERNANCE AS AT 31/12/2024		
	2-12	Role of the highest governing body in impact management control	G – GOVERNANCE ASPECTS , THE STRUCTURE OF CORPORATE GOVERNANCE AS AT 31/12/2024		
	2-13	Delegation of responsibility for impact management	G – GOVERNANCE ASPECTS , THE STRUCTURE OF CORPORATE GOVERNANCE AS AT 31/12/2024		
	2-14	Role of the highest governing body in sustainability reporting	G – GOVERNANCE ASPECTS , THE STRUCTURE OF CORPORATE GOVERNANCE AS AT 31/12/2024		
	2-15	Conflicts of interest	G – GOVERNANCE ASPECTS , THE STRUCTURE OF CORPORATE GOVERNANCE AS AT 31/12/2024		
	2-16	Communication of issues	G – GOVERNANCE ASPECTS , THE STRUCTURE OF CORPORATE GOVERNANCE AS AT 31/12/2024		
	2-17	Collective knowledge of the highest governing body	G – GOVERNANCE ASPECTS , THE STRUCTURE OF CORPORATE GOVERNANCE AS AT 31/12/2024		
	2-18	Performance evaluation of the highest governing body	G – GOVERNANCE ASPECTS , THE STRUCTURE OF CORPORATE GOVERNANCE AS AT 31/12/2024		
	2-19	Rules concerning remuneration	G – GOVERNANCE ASPECTS , THE STRUCTURE OF CORPORATE GOVERNANCE AS AT 31/12/2024		
	2-20	Procedure for determining remuneration	G – GOVERNANCE ASPECTS , THE STRUCTURE OF CORPORATE GOVERNANCE AS AT 31/12/2024		
	2-21	Annual total remuneration ratio	G – GOVERNANCE ASPECTS , THE STRUCTURE OF CORPORATE GOVERNANCE AS AT 31/12/2024		

4. Strategy, policies and practices	2-22	Sustainable Development Strategy Statement	CEO LETTER, SUSTAINABLE DEVELOPMENT PURSUANT TO THE SDGS United Nations Global Compact, Science Based Targets initiative (SBTi), Rating ESG ECOVADIS	
	2-23	Policy commitments	COMPANY POLICY	
	2-24	Integration of policy commitments	COMPANY POLICY	
	2-25	Processes to remedy negative impacts	ETHICS AND INTEGRITY, Whistleblowing Procedure	
	2-26	Mechanisms for requesting clarifications and raising concerns	ETHICS AND INTEGRITY, Whistleblowing Procedure	
	2-27	Compliance with laws and regulations	COMPLIANCE AND NON-COMPLIANCE	
	2-28	Membership of associations	AN INTERNATIONAL NETWORK	
	5. Involvement of stakeholders	2-29	Approach to the involvement of stakeholders	MATERIALITY ANALYSIS, OUR CUSTOMERS AND THE CUSTOMER CARE APPROACH
2-30		Collective agreements	National Collective Bargaining Agreement (CCNL Rubber-Plastic)	
Information on material topics	3-1	Process of determining material topics	MATERIALITY ANALYSIS, – TM1 SUSTAINABLE SUPPLY CHAIN, TM2 CUSTOMER SATISFACTION, TM3 CYBERSECURITY, TM4 - ENERGY CONSUMPTION, TM5 GREENHOUSE GAS EMISSIONS (GHGs), TM6 CIRCULAR ECONOMY INNOVATION, TM7 HEALTH AND SAFETY , TM8 TRAINING AND SKILLS, TM9 SUPPORT FOR THE LOCAL COMMUNITY	
	3-2	List of material topics	MATERIALITY ANALYSIS, – TM1 SUSTAINABLE SUPPLY CHAIN, TM2 CUSTOMER SATISFACTION, TM3 CYBERSECURITY, TM4 - ENERGY CONSUMPTION, TM5 GREENHOUSE GAS EMISSIONS (GHGs), TM6 CIRCULAR ECONOMY INNOVATION, TM7 HEALTH AND SAFETY, TM8 TRAINING AND SKILLS, TM9 SUPPORT FOR THE LOCAL COMMUNITY	
	3-3	Management of material topics	MATERIALITY ANALYSIS, – TM1 SUSTAINABLE SUPPLY CHAIN, TM2 CUSTOMER SATISFACTION, TM3 CYBERSECURITY, TM4 - ENERGY CONSUMPTION, TM5 GREENHOUSE GAS EMISSIONS (GHGs), TM6 CIRCULAR ECONOMY INNOVATION, TM7 HEALTH AND SAFETY , TM8 TRAINING AND SKILLS, TM9 SUPPORT FOR THE LOCAL COMMUNITY, TM1 SUSTAINABLE SUPPLY CHAIN, - Risks and opportunities analysis TM1, Impact, Risk and Opportunity Analysis TM2, Risks and Opportunities Analysis TM3, Risk and Opportunity Analysis TM4, Impact, Risk and Opportunity analysis TM5, Risk and opportunity analysis TM6, Risk and opportunity analysis TM7, Risk and opportunity analysis TM8, Risk and opportunity analysis TM9	
GRI 200: Economic performance	GRI 201: Economic performance	201-1	Direct economic value generated and distributed	Economic PERFORMANCE,
		201-2	Financial implications and other risks and opportunities due to climate change	Risks and opportunities analysis TM1, Impact, Risk and Opportunity Analysis TM2, Risks and opportunities analysis TM3, Risks and opportunities analysis TM4, Impact, Risk and Opportunity analysis TM5, Risks and opportunities analysis TM6, Risks and opportunities analysis TM7, Risks and opportunities analysis TM8, Risks and opportunities analysis TM9, Natural disaster insurance
		201-3	Defined benefit plan obligations and other retirement plans	Pension plan, National Collective Bargaining Agreement (CCNL Rubber-Plastic), PENSION FUNDS
		201-4	Financial assistance received from government	Economic and financial results
	GRI 202: Presence on the market	202-1	Ratios between the standard salary of a new recruit by gender and the local minimum wage	National Collective Bargaining Agreement (CCNL Rubber-Plastic)
		202-2	Proportion of senior managers hired from the local community	Senior Manager

GRI 200: Economic performance	GRI 203: Indirect economic impacts	203-1	Infrastructure investments and services supported	Economic and financial results, CIRCULAR ECONOMY INNOVATION TM6 Risks and opportunities analysis TM6 Research and Development		
		203-2	Significant indirect economic impacts	Risks and opportunities analysis TM1, Impact, Risk and Opportunity Analysis TM2, Risks and opportunities analysis TM3, Risks and opportunities analysis TM4, Impact, Risk and Opportunity analysis TM5, Risks and opportunities analysis TM6, Risks and opportunities analysis TM7, Risks and opportunities analysis TM8, Risks and opportunities analysis TM9, Natural disaster insurance		
	GRI 204: Procurement practices	204-1	Proportion of spending on local suppliers	SUSTAINABLE SUPPLY CHAIN - TM1, RESPONSIBLE PROCUREMENT Local Purchases		
		205-1	Transactions assessed for risks related to corruption	ETHICS AND INTEGRITY,		
		205-2	Communication and training on anti-corruption policies and procedures	ETHICS AND INTEGRITY,		
		205-3	Confirmed incidents of corruption and actions taken	ETHICS AND INTEGRITY,		
		206-1	Legal actions for anti-competitive behaviour, antitrust and monopolistic practices	ETHICS AND INTEGRITY, Code of Ethics and Conduct		
	GRI 207: Tax		207-1	Approach to tax	TAX STRATEGY, economic PERFORMANCE	
			207-2	Tax governance, control and risk management	TAX STRATEGY, economic PERFORMANCE	
			207-3	Stakeholder engagement and management of concerns related to tax	TAX STRATEGY, economic PERFORMANCE	
			207-4	Country-by-Country Reporting	TAX STRATEGY, economic PERFORMANCE	
	GRI 300: Environmental performance	GRI 301: Materials	301-1	Materials used by weight or volume	RAW MATERIALS	
			301-2	Recycled input materials used	RAW MATERIALS, FOCUS ON RECYCLING AND CLIMATE CHANGE	
			301-3	Reclaimed products and their packaging materials	RAW MATERIALS, FOCUS ON RECYCLING AND CLIMATE CHANGE	
GRI 302: Energy			302-1	Energy consumption within the organisation	ENERGY CONSUMPTION, MEASUREMENT OF ENERGY	
			302-2	Energy consumption outside of the organisation	ENERGY CONSUMPTION, MEASUREMENT OF ENERGY	
			302-3	Energy intensity	ENERGY CONSUMPTION, MEASUREMENT OF ENERGY	
			302-4	Reduction of energy consumption	ENERGY CONSUMPTION, MEASUREMENT OF ENERGY	
			302-5	Reductions in energy requirements of products and services	ENERGY CONSUMPTION, MEASUREMENT OF ENERGY	
GRI 305: Emissions			305-1	Direct (Scope 1) GHG emissions	GREENHOUSE GAS EMISSIONS (GHGs), Emissions produced	
			305-2	Energy indirect (Scope 2) GHG emissions	GREENHOUSE GAS EMISSIONS (GHGs), Emissions produced	
			305-3	Other indirect (Scope 3) GHG emissions	GREENHOUSE GAS EMISSIONS (GHGs), Emissions produced	
			305-4	GHG emissions intensity	GREENHOUSE GAS EMISSIONS (GHGs), Emissions produced	
			305-5	Reduction of GHG emissions	Science Based Targets initiative – SBTi,	
		305-6	Emissions of ozone depleting substances (ODS)		Information not available/incomplete There is currently no control of the emission levels of these substances	
		305-7	Nitrogen oxides (NOX), sulphur oxides (SOX), and other significant air emissions	ENVIRONMENTAL CONTROLS		

GRI 300: Environmental performance	GRI 306: Waste	306-1	Waste generation and significant waste-related impacts	WASTE MANAGEMENT AND RECYCLING		
		306-2	Management of significant waste-related impacts	WASTE MANAGEMENT AND RECYCLING, Risks and opportunities analysis TM1, RESPONSIBLE PROCUREMENT, Risks and opportunities analysis TM6		
		306-3	Waste generated	WASTE MANAGEMENT AND RECYCLING		
		306-4	Waste diverted from disposal	WASTE MANAGEMENT AND RECYCLING		
		306-5	Waste directed to disposal	WASTE MANAGEMENT AND RECYCLING		
	308-1	New suppliers that have been evaluated using environmental criteria	SUPPLIER ASSESSMENT	Information not available/incomplete	The reporting system, which will start in 2025 or 2026, has not yet been implemented.	
	308-2	Negative environmental impacts in the supply chain and actions taken	SUPPLIER ASSESSMENT			
GRI 400: Social	GRI 401: Employment	401-1	New employee hires and employee turnover	NEW RECRUITMENT AND TURNOVER		
		401-2	Benefits provided to full-time employees that are not provided to temporary or part-time employees	BENEFITS PROVIDED FOR EMPLOYEES, DIVERSITY AND EQUAL OPPORTUNITIES		
		401-3	Parental leave	DIVERSITY AND EQUAL OPPORTUNITIES		
	GRI 402: Relations between workers and management	402-1	Minimum notice period for operational changes	National Collective Bargaining Agreement (CCNL Rubber-Plastic)		
	GRI 403: Occupational health and safety	403-1	Occupational Health and Safety Management System	HEALTH AND SAFETY TM7, System certifications-Occupational Health and Safety Management System		
		403-2	Hazard identification, risk assessment, and incident investigation	Risks and opportunities analysis TM7, RISK ASSESSMENT		
		403-3	Occupational health services	OCCUPATIONAL HEALTH SERVICES		
		403-4	Worker participation, consultation, and communication on occupational health and safety	Worker participation, consultation, and communication on occupational health and safety		
		403-5	Worker training on occupational health and safety	SAFETY TRAINING		
		403-6	Promoting the health of employees	Promotion of health		
		403-7	Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	PREVENTION AND MITIGATION OF THE NEGATIVE IMPACTS REGARDING OCCUPATIONAL HEALTH AND SAFETY IN COMMERCIAL RELATIONSHIPS		
		403-8	Workers covered by an occupational health and safety management system	HEALTH AND SAFETY TM7		
		403-9	Work-related injuries	INJURIES		
		403-10	Work-related ill health		Not pertinent	No cases were recorded in 2024
	GRI 404: Training and education	404-1	Average hours of training per year per employee	TRAINING AND SKILLS, Training in Tratos		
		404-2	Programs for upgrading employee skills and transition assistance programs	Training in Tratos		
		404-3	Percentage of employees receiving regular performance and career development reviews	TRAINING AND SKILLS, Training in Tratos		
	GRI 405: Diversity and equal opportunity	405-1	Diversity of governance bodies and employees	THE STRUCTURE OF CORPORATE GOVERNANCE AS AT 31/12/2024, OUR PEOPLE		
		405-2	Ratio between the basic salary and remuneration of women compared to men	REMUNERATION POLICIES		
	GRI 406: Non-discrimination	406-1	Incidents of discrimination and the corrective measures taken	ETHICS AND INTEGRITY, Code of Ethics and Conduct, Procedura di Whistleblowing, Protection of human dignity and human rights		
GRI 408: CHILD LABOUR	408-1	Activities and suppliers at significant risk of child labour incidents	HEALTH AND SAFETY TM7, National Collective Bargaining Agreement (CCNL Rubber-Plastic)			

GRI 400: Social	GRI 410: Safety practices	410-1	Security personnel trained in human rights policies or procedures	HEALTH AND SAFETY TM7, SAFETY TRAINING, Worker participation, consultation, and communication on occupational health and safety SAFETY TRAINING		
	GRI 413: Local communities	413-1	Operations with local community engagement, impact assessments, and development programs	SUPPORT FOR THE LOCAL COMMUNITY, Risks and opportunities analysis TM9, ENVIRONMENTAL CONTROLS, MATERIALITY ANALYSIS		
		413-2	Operations with significant actual and potential negative impacts on local communities	SUPPORT FOR THE LOCAL COMMUNITY, Risks and opportunities analysis TM9, ENVIRONMENTAL CONTROLS, MATERIALITY ANALYSIS		
	GRI 414: Social assessment of suppliers	414-1	New suppliers who have been assessed using social criteria	SUPPLIER ASSESSMENT	Information not available/incomplete	The reporting system, which will start in 2025 or 2026, has not yet been implemented.
		414-2	Negative social impacts on the supply chain and actions taken	SUPPLIER ASSESSMENT		
	GRI 417: Marketing and labelling	417-1	Requirements for product and service information and labelling	Labelling and compliance with CPR requirements, REACH and RoHS compliance, Management of Chemical Restrictions and Sustainable Innovation		
		417-2	Incidents of non-compliance with regard to product and service information and labelling	Labelling and compliance with CPR requirements, REACH and RoHS compliance		
		417-3	Non-compliance cases regarding marketing communications	REACH and RoHS compliance		
	418: Customer privacy	418-1	Substantiated complaints concerning breaches of customer privacy and losses of customer data	OUR CUSTOMERS AND THE CUSTOMER CARE APPROACH		
	GRI 419: Socio-economic Compliance	419-1	Non compliance with social and economic laws and regulations	COMPLIANCE AND NON-COMPLIANCE		

Material topics for Tratos	Standard GRI	Chapter
- TM1 SUSTAINABLE SUPPLY CHAIN	2 - 6	Tratos' activities and products, SUSTAINABLE SUPPLY CHAIN - TM1, RESPONSIBLE PROCUREMENT Local Purchases, TM2 CUSTOMER SATISFACTION, CATEGORIES OF STAKEHOLDERS, METHODOLOGICAL NOTE
	2 -7	CATEGORIES OF STAKEHOLDERS, OUR PEOPLE Tratos in the world
	2-28	AN INTERNATIONAL NETWORK
	2-29	MATERIALITY ANALYSIS, OUR CUSTOMERS AND THE CUSTOMER CARE APPROACH
	3-1	
	3-2	MATERIALITY ANALYSIS, SUSTAINABLE SUPPLY CHAIN - TM1, Risks and opportunities analysis TM1
	3-3	
	201-2	Risks and opportunities analysis TM1
	203-2	Risks and opportunities analysis TM1
	204-1	SUSTAINABLE SUPPLY CHAIN - TM1, RESPONSIBLE PROCUREMENT Local Purchases
	301-1	RAW MATERIALS
	301-2	RAW MATERIALS, FOCUS ON RECYCLING AND CLIMATE CHANGE
	301-3	
	305-5	Science Based Targets initiative – SBTi
	306-1	WASTE MANAGEMENT AND RECYCLING
	306-2	WASTE MANAGEMENT AND RECYCLING, Risks and opportunities analysis TM1, RESPONSIBLE PROCUREMENT, Risks and opportunities analysis TM6
	306-3	
	306-4	WASTE MANAGEMENT AND RECYCLING
	306-5	
	308-1	SUPPLIER ASSESSMENT
308-2		
CLIENT SATISFACTION - TM2	2-15	G – GOVERNANCE ASPECTS , THE STRUCTURE OF CORPORATE GOVERNANCE AS AT 31/12/2024
	2-25	ETHICS AND INTEGRITY, Whistleblowing Procedure
	2-27	COMPLIANCE AND NON-COMPLIANCE
	2-29	MATERIALITY ANALYSIS, OUR CUSTOMERS AND THE CUSTOMER CARE APPROACH
	3-1	
	3-2	MATERIALITY ANALYSIS, CUSTOMER SATISFACTION- TM2 Impact, Risk and Opportunity Analysis TM2
	3-3	
	201-1	Economic PERFORMANCE,
	201-2	Impact, Risk and Opportunity Analysis TM2,
	201-4	Economic and financial results
	203-2	Impact, Risk and Opportunity Analysis TM2
	403-1	HEALTH AND SAFETY TM7, System certifications- Occupational Health and Safety Management System
	417-1	Labelling and compliance with CPR requirements, REACH and RoHS compliance, Management of Chemical Restrictions and Sustainable Innovation
	417-2	Labelling and compliance with CPR requirements, REACH and RoHS compliance
	417-3	REACH and RoHS compliance
419-1	COMPLIANCE AND NON-COMPLIANCE	
CYBERSECURITY TM3	3-1	
	3-2	MATERIALITY ANALYSIS, Risk and Opportunity Analysis TM3
	3-3	
	201-2	Risks and Opportunities Analysis TM3
	203-2	Risks and Opportunities Analysis TM3

ENERGY CONSUMPTION TM4	3-1	
	3-2	MATERIALITY ANALYSIS, ENERGY CONSUMPTION TM4
	3-3	
	201-2	Risk and Opportunity Analysis TM4
	203-2	Risk and Opportunity Analysis TM4
	302-1	
	302-2	
	302-3	ENERGY CONSUMPTION, MEASUREMENT OF ENERGY
	302-4	
	302-5	
GREENHOUSE GAS EMISSIONS (GHGs) TM5	3-1	
	3-2	MATERIALITY ANALYSIS, Impact, Risk and Opportunity Analysis TM5
	3-3	
	201-2	Impact, Risk and Opportunity analysis TM5
	203-2	Impact, Risk and Opportunity analysis TM5
	301-2	RAW MATERIALS, FOCUS ON RECYCLING AND CLIMATE CHANGE
	301-3	
	302-5	MEASUREMENT OF ENERGY
	305-1	
	305-2	GREENHOUSE GAS EMISSIONS (GHGs), Emissions produced
305-3		
305-4		
305-5	Science Based Targets initiative – SBTi	
CIRCULAR ECONOMY INNOVATION TM6	2-22	CEO LETTER, SUSTAINABLE DEVELOPMENT PURSUANT TO THE SDGS United Nations Global Compact, Science Based Targets initiative (SBTi), Rating ESG ECOVADIS
	3-1	
	3-2	MATERIALITY ANALYSIS, TM6 CIRCULAR ECONOMY INNOVATION, Risk and Opportunity Analysis TM6
	3-3	
	201-1	Economic PERFORMANCE
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