

# 2025 SUSTAINABILITY REPORT



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# Letter to stakeholders

Dear Stakeholders,

For APE Raccorderie, 2025 represents the first year in which sustainability has been addressed and reported within a structured framework based on the ESRS and the principle of double materiality. In the sector in which the company operates, product quality, operational continuity, specialist technical skills, workplace safety and supply chain reliability are all integral to the creation of sustainable value. In this context, sustainability is embedded in the way the business is managed and provides a framework for understanding the factors that underpin the long-term resilience of its business model.

The collection of 2025 data has enabled the company to establish a robust initial baseline covering energy consumption, emissions, raw materials, waste, training and workforce composition. These data have enabled the company to move beyond a purely qualitative approach and develop an assessment based on tangible evidence. Building on this information, APE Raccorderie has identified the areas that have the greatest influence both on the company's impacts on the environment and people and on the economic and financial strength of the business.

The analysis confirmed that the Company operates in a context in which climate change and energy, resource use and chemical management are particularly significant, alongside social matters relating to occupational health and safety, the workforce model, product quality and the value chain. Governance, assessed through the lenses of ethics, business conduct, whistleblowing, data protection and business continuity, also emerges as a material topic rather than merely an administrative function.

This Sustainability Report is not intended to portray an ESG framework that is already fully developed or mature. Rather, it provides stakeholders with a transparent, consistent and analytical overview of the company at the outset of its sustainability journey, clearly highlighting both the measures already in place and the areas where data collection, the formal allocation of responsibilities and the further development of processes need to be strengthened. In this respect, the Report serves both as a reporting tool and as a robust foundation for ongoing organisational improvement.

The belief underpinning this journey is that, for an industrial SME such as APE Raccorderie, sustainability cannot be measured solely by the existence of policies or certifications. Above all, it lies in the ability to make better decisions: decisions that are more informed about their impacts, more rigorous in managing risks, and more focused on strengthening long-term relationships with customers, employees, suppliers and local communities.

This Report has been prepared with precisely this perspective in mind.

# 02

## Methodological note and reporting scope

This Sustainability Report has been prepared in alignment with the European Sustainability Reporting Standards (ESRS), using the principle of double materiality as the guiding criterion for selecting its content and interpreting the most relevant ESG matters. The Report has been prepared on a voluntary basis and covers the period from 1 January to 31 December 2025.

The organisational reporting boundary coincides with APE Raccorderie, with a focus on the Sarezzo and Rovato sites. In line with the structure of the business, the Report also considers the most significant aspects of the upstream and downstream value chain where these have a material bearing on the Company's impacts or risks.

The information used to prepare the Report includes corporate documentation, the Company Register extract, certifications, internal 2025 datasets covering energy consumption, emissions, transport, raw materials, waste, workforce, training, commercial practices, overdue receivables and average payment terms, as well as governance documents and the final version of the double materiality assessment. Where available, data are reported in full; where data are not yet available, the relevant area is identified as a priority for the further development of the ESG information system.

The process comprised several stages: data collection, organisation of the supporting evidence, analysis of the business model and value chain, definition of the long list of topics, scoring of impact materiality and financial materiality, classification of the material topics, and preparation of this Report. The analysis was conducted as a documentary desktop assessment, with the aim of establishing an initial management and reporting baseline to be further developed in subsequent reporting cycles.

The assessment considered three time horizons: short term (0-2 years), medium term (3-5 years) and long term (over 5 years). This enabled the company to differentiate between topics with an already evident operational impact, such as energy, waste and occupational health and safety, and topics whose relevance may increase over time in response to regulatory, technological or market developments, such as data privacy, cybersecurity and supply chain due diligence.

Given that this is APE Raccorderie first structured ESG reporting cycle, particular emphasis has been placed on transparency. No estimated figures have been included unless supported by sufficiently robust information, and the current limitations of the ESG information system are openly acknowledged within the Report. This approach was adopted to prioritise the reliability and verifiability of the information over a presentation that might appear more complete without being equally robust.

In 2025, the Company also carried out an initial Scope 3 estimate for screening purposes and to establish a baseline. The assessment prioritised the categories supported by quantitative company data: purchased raw materials and freight logistics, with waste generated included on a qualitative basis. For raw materials, an average-data approach was applied, based on purchased/consumed quantities and secondary cradle-to-gate emission factors; for logistics, the calculation was based on data obtained in accordance with ISO 14083:2023.

The Report therefore provides a solid foundation for sustainability reporting while recognising that the process will continue to evolve. It offers a sufficiently detailed picture of the Company's current ESG profile and is intended to be progressively enhanced through historical data series, new KPIs, and internal and external validation mechanisms in future reporting periods.

| Item                         | Scope / criterion adopted                                                       |
|------------------------------|---------------------------------------------------------------------------------|
| Reporting period             | 1 January 2025 – 31 December 2025                                               |
| Organisational scope         | APE Raccorderie – Sarezzo and Rovato sites                                      |
| Value chain scope activities | Upstream, operations e selected downstream                                      |
| Methodological approach      | ESRS-aligned approach, including double materiality assessment and IRO register |
| Information basis            | 2025 internal data, corporate documentation, certifications and final DMA       |
| Treatment of missing data    | Disclosure of data gaps, without artificial data integration                    |



# 03



## Company profile, corporate identity and business model

Founded in 1964 as “Minuterie Metalliche di Pe Angelo”, an artisan business manufacturing components for the wine industry, APE Raccorderie has been operating for over 60 years.

Initially engaged in brass processing, the company now manufactures the full range of components required for integrated plumbing, heating and sanitary systems. In the early 2000s, it developed its pipe-and-fitting solution and brought the first of four multilayer pipe production lines into operation, thereby evolving from a ‘single-product manufacturer’ into an ‘integrated systems company’.

APE Raccorderie designs, manufactures and markets fittings, valves, manifolds, multilayer pipes and accessories for residential and industrial plumbing, heating and sanitary systems.

SAREZZO  
PIPE PRODUCTION DEPARTMENT







SAREZZO – PRODUCTION



ROVATO – LOGISTICS



ROVATO – ASSEMBLY







“APE RACCORDERIE SRL” has been registered with the Chamber of Commerce under its current company name since 1985. The Company’s registered office is located in Sarezzo (BS), and it operates two local units in Rovato, respectively used as a warehouse and an operational site.

Over the years, the company has experienced significant production growth, leading to the expansion of its facilities from the 500 sqm of the original site to more than 52,000 sqm at its current premises. The site is also located in the Brescia area and is divided into several production facilities.

APE Raccorderie has always been characterised by a strong connection between the company and its local area, a relationship that contributes to shaping its identity day after day.

Another distinctive feature of the Company is its ongoing investment in research and the development of new technologies aimed at improving its production system, human capital and technical expertise.

APE Raccorderie has always been committed to quality and, since 1998, has implemented a Quality Management System certified according to UNI EN ISO 2002:1994.

The system was subsequently renewed and improved, achieving compliance with UNI EN ISO 9001:2000. Finally, in 2018, APE Raccorderie's Quality Management System was certified according to the latest UNI EN ISO 9001:2015 standard.

APE Raccorderie's strong commitment to maintaining high production quality standards is further demonstrated by the fact that some of its products have obtained certifications from recognised international third-party bodies, including: DVGW in Germany, Kiwa in the Netherlands, PZH in Poland, AFNOR in France, ATG in Belgium, AENOR in Spain and WRAS in the United Kingdom.

Since 2013, the Company has undertaken a structured programme to strengthen quality control activities and product performance validation through continuous investments in equipment, testing capabilities and laboratory expertise.

In 2013, the first test tanks equipped with dedicated machinery for internal pressure resistance testing were installed, marking the beginning of an internal product performance verification system. In the same year, the company also acquired the equipment required to carry out PEX cross-linking degree verification tests, further strengthening the monitoring of the quality parameters of the materials used.

The enhancement programme continued in 2021 with the purchase of a new internal pressure resistance testing machine, which increased the laboratory's overall capacity to 10 operational test stations.

## SAREZZO QUALITY LABORATORY



In 2023, a further technological advancement was introduced through the purchase of a MITUTOYO optical measurement system, designed to verify the dimensional characteristics of multilayer pipe structures. This investment enabled the company to further improve the precision and reliability of its product metrology controls.

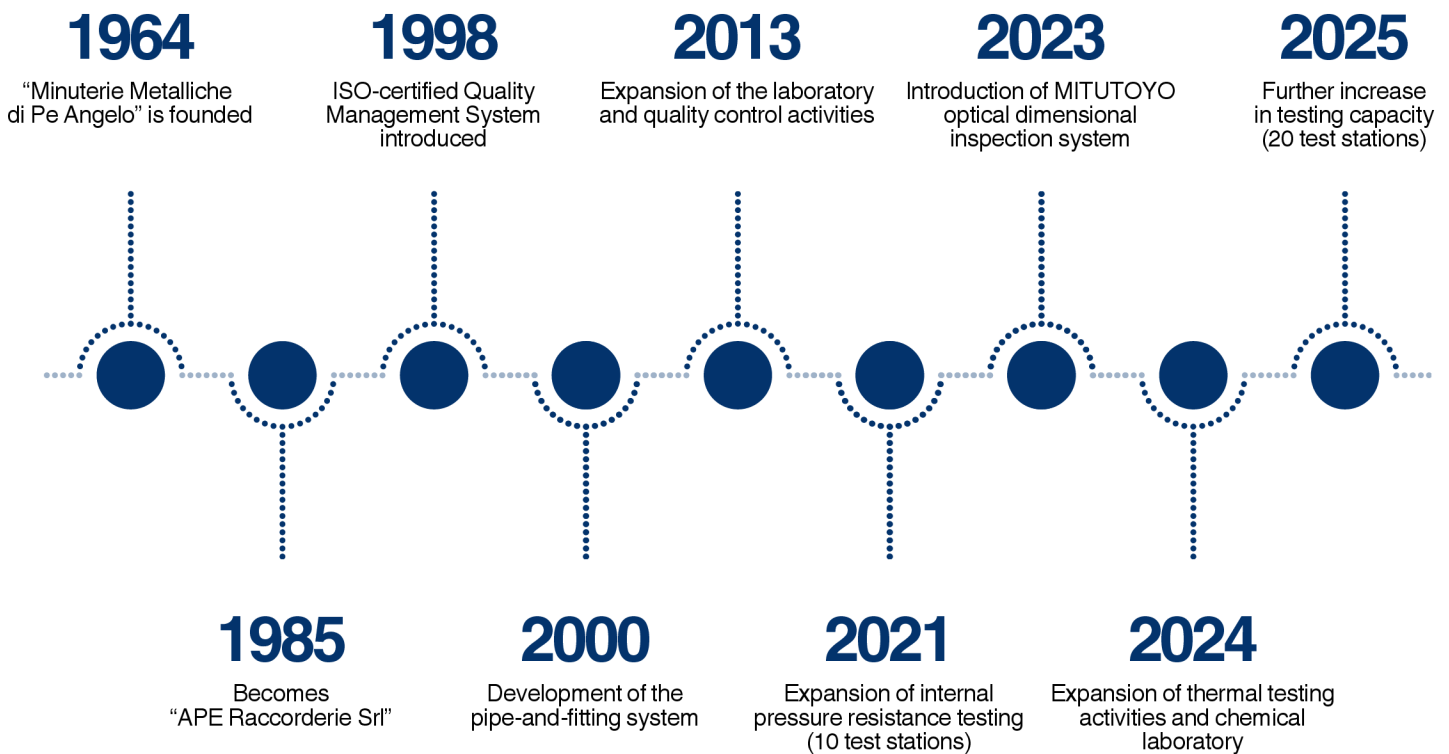
In 2024, the company further expanded its testing capabilities through the introduction of equipment dedicated to thermal cycling resistance tests. At the same time, the area dedicated to internal pressure resistance testing was further strengthened through the purchase of a new test tank, bringing the total number of test stations to 15.

In the same year, the chemical laboratory dedicated to PEX cross-linking degree verification tests was completely renewed,

with the aim of ensuring even higher standards in terms of analytical accuracy, reliability of results and continuity of quality controls.

In 2025, the laboratory development programme continued with the introduction of a new line for thermal cycling resistance tests and a further increase in capacity dedicated to internal pressure resistance testing, reaching a total of 20 operational test stations.

The investments made over time demonstrate the company's ongoing commitment to strengthening quality assurance throughout the entire production process, promoting innovation, product reliability and compliance with the technical standards applicable to the sector.





Although APE Raccorderie's production footprint is entirely based in Italy, its commercial profile is clearly international.

The customer portfolio is predominantly B2B, and the company operates within supply chains where the products supplied must ensure reliable performance, service continuity and compliance with applicable regulations. In this context, the sustainability of the business model depends on a set of closely interconnected factors: product quality, availability of raw materials, process efficiency, supply chain resilience, occupational health and safety, and the ability to respond to increasingly market-driven requirements for traceability and transparency.

From an economic perspective, 2025 recorded revenues of €92.19 million, with exports accounting for 58.6% of total sales.

The company operates in a production environment characterised by high material and energy intensity: in 2025, 13,940 tonnes of raw materials were consumed, together with more than 5.7 million kWh of electricity and 261,769.5 Sm<sup>3</sup> of natural gas. These figures highlight that sustainability cannot be considered separately from the company's industrial structure: efficiency and sustainability are largely linked to the ability to manage inputs, waste, risks and performance effectively.

The presence of 487 active suppliers during 2025 and a total workforce of 131 employees further confirms the importance of managing operational relationships and ensuring organisational continuity. The sustainability of the business model therefore depends not only on the performance of the direct operational perimeter, but also on the quality of relationships with the stakeholders contributing to the company's day-to-day operations.



#### TURNOVER

**€ 92,189,161**

(Sales revenue + Revenue adjustments)

**Sales invoices:**

**€ 91,555,526**

**Export sales invoices:**

**€ 53,656,768**



#### EXPORT SHARE

**58.6 %**



#### ACTIVE CUSTOMERS

**429**

Pipe

**444**

Fittings



#### WORKFORCE

**131**

People

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### 3.1 The industrial model and its ESG drivers

APE Raccorderie's industrial model creates value through the combination of technical expertise, material sourcing, manufacturing capabilities and a strong focus on quality.

For this reason, the company's key ESG drivers are not abstract concepts but are closely aligned with the core aspects of its business: energy, raw materials, chemicals, waste, occupational health and safety, training, business conduct and operational continuity.

The double materiality assessment showed that environmental and social topics cannot be viewed as separate domains. The use of chemicals, for example, is both a potential source of pollution and an occupational health and safety issue; energy dependence affects both the climate dimension and the company's economic performance; and product quality has a direct impact on customer relationships as well as on the company's financial resilience.

This interdependence is one of the defining characteristics of APE Raccorderie's ESG profile.

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# 04



## Value chain, markets and stakeholders

Analysing the value chain makes it possible to view APE Raccorderie not as a collection of separate departments, but as an integrated system in which inputs, processes and outputs are closely interconnected:

- upstream, the business depends on the procurement of metals, polymers, adhesives, packaging materials, chemicals, energy, logistics services and temporary agency labour;
- within operations, activities are centred on manufacturing, assembly, maintenance, material handling, quality control and waste management;
- downstream, customer relationships are supported through product quality, responsible business conduct and continuity of service.

The company worked with 487 active suppliers, reflecting a broad supply base that is not dependent on a limited number of counterparties. This provides flexibility and contributes to risk diversification, while also increasing the complexity of coordination and reinforcing the need to assess the supply chain not only in terms of cost and quality, but also with regard to reliability, continuity and compliance across the value chain.

For the purposes of this Report, the priority stakeholder groups have been identified as: shareholders and governing bodies, senior management and functional managers, direct employees and temporary agency workers, customers, suppliers, and other parties involved in operational continuity and compliance oversight.

The 2025 Sustainability Report therefore also provides a foundation for developing a more systematic stakeholder engagement approach in future reporting cycles.

| Value chain stage | Main elements                                                                               | ESG topics         |
|-------------------|---------------------------------------------------------------------------------------------|--------------------|
| Upstream          | Brass, PEX, aluminium, adhesives, packaging, chemicals, energy, transport, temporary labour | E1, E2, E5, S2, G1 |
| Operations        | Production, assembly, maintenance, warehousing, handling, quality, waste, support systems   | E1, E2, E5, S1, S4 |
| Downstream        | Distribution, product quality, commercial practices, customer data, service continuity      | S4, G1, E1         |

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## 4.1 Markets, customers and commercial resilience

A distinctive feature of the company’s profile is the significance of its international business, with export markets accounting for almost 60% of total revenue in 2025. For an industrial SME, this represents both an opportunity and a source of complexity: while it broadens commercial opportunities, it also increases exposure to more demanding market expectations regarding ESG data, security of supply, product quality and governance practices.

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# Sustainability governance and corporate oversight

APE Raccorderie has a governance structure comprising a Board of Directors with four members, five shareholders and a Sole Statutory Auditor. This structure supports streamlined decision-making, close oversight of the business and a rapid response to operational issues. At the same time, the first ESG reporting cycle has highlighted the need to further formalise information flows and responsibilities relating to sustainability matters.

Responsibility for ESG matters is currently shared across senior management, operations, quality and human resources. Accordingly, this Report adopts an approach that recognises and builds on the governance mechanisms already in place, while supporting their evolution towards greater clarity in roles, KPIs, flows and responsibilities.

The company's ISO 9001:2015 certification is an important indicator of organisational maturity.

It demonstrates that APE Raccorderie has established formal quality control and operational management processes, which are particularly significant in a business where product reliability and compliance have a direct impact on customer complaints, business continuity and corporate reputation. The next step is to extend the same level of systematic management to ESG areas that are not yet governed with an equivalent degree of formalisation, including customer and end-user data protection, supply chain due diligence, and integrated reporting of environmental and social KPIs.

From a business conduct perspective, the company has adopted a Code of Ethics and a whistleblowing system, both of which are particularly relevant to the topic G1. These tools are important not only from a compliance perspective, but also as mechanisms through which the company makes its standards of conduct explicit to employees, customers, suppliers and other stakeholders.

| Role / Function                | Current contribution to ESG topics                                                                 | Expected development                                                     |
|--------------------------------|----------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------|
| Management / Board of Director | Overall direction, approval of priorities, sponsorship of the sustainability journey               | Formalise periodic ESG reviews and accountability for material topics    |
| Operations                     | Consumption, processes, facilities, business continuity, waste, operational safety                 | Consolidate KPIs and improvement targets                                 |
| Quality                        | Compliance, ISO 9001 oversight, product reliability                                                | Integrate quality indicators and product sustainability                  |
| Administration / Finance       | Overdue receivables, payment terms, commercial risks, support for financial materiality assessment | Strengthen the integrated assessment of ESG-related financial risks      |
| Procurement / Logistics        | Suppliers, transport, materials, contribution to the value chain scope                             | Supplier segmentation and ESG due diligence processes                    |
| Human Resources Management     | Workforce, training, temporary labour relationships                                                | Structure social KPIs and strengthen people-related management practices |

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## **5.1 Compliance, ethics and control framework**

The company's approach to business integrity is considered in its broadest sense, encompassing not only the prevention of improper conduct but also the effective management of contractual relationships, payment collection, whistleblowing reports and reputational risk. From this perspective, outstanding receivables and average payment collection periods are not merely administrative metrics, but indicators of the overall quality of customer relationships and the effectiveness of the company's governance framework.

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# Double materiality assessment

The double materiality assessment is the process through which the company identified the ESG topics most relevant to its business model by jointly considering both impact materiality and financial materiality. Impact materiality relates to the company's actual or potential impacts on people and the environment, while financial materiality considers the extent to which ESG matters may influence financial performance, operational continuity, reputation, the cost of resources and commercial relationships.

The assessment was carried out in line with the ESRS requirements and within the reporting boundary of this Sustainability Report. The analysis covered the company's direct operations, its sites in Sarezzo and Rovato, and the key stages of the upstream and downstream value chain where these are relevant to the assessment of impacts or risks.

## 6.1 Methodological approach

The assessment was based on a long list of twelve ESG topics, aligned with the ESRS and assessed through the IRO framework (Impacts, Risks and Opportunities). For each topic, the analysis considered the relevant stakeholders or business areas, the applicable time horizon, the available quantitative and qualitative evidence, and its potential connection with the company's business model.

| Methodological element          | Adopted criterion                                                                                                                                                                           |
|---------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Analysis universe               | 12 ESG topics assessed through the IRO register and ESRS mapping                                                                                                                            |
| Impact materiality              | Score calculated as the weighted average of severity, scope and irremediable character, adjusted for probability                                                                            |
| Financial materiality           | Score calculated as a function of financial magnitude, probability and speed of occurrence of the potential effect                                                                          |
| Impact materiality threshold    | 3.5 on a 1-5 scale                                                                                                                                                                          |
| Financial materiality threshold | 3.0 on a 1-5 scale                                                                                                                                                                          |
| Rule                            | A topic is considered material if it exceeds at least one of the two thresholds; very high severity is retained as an area of attention even when overall scores are close to the threshold |
| Time horizons                   | Short term, medium term and long term, in line with the current or potential nature of impacts                                                                                              |

The results of the assessment should not be interpreted as an absolute ranking, but rather as a management tool for identifying priorities. In particular, material topics are those considered to be significant in terms of impacts, financial risks and opportunities, or both dimensions.

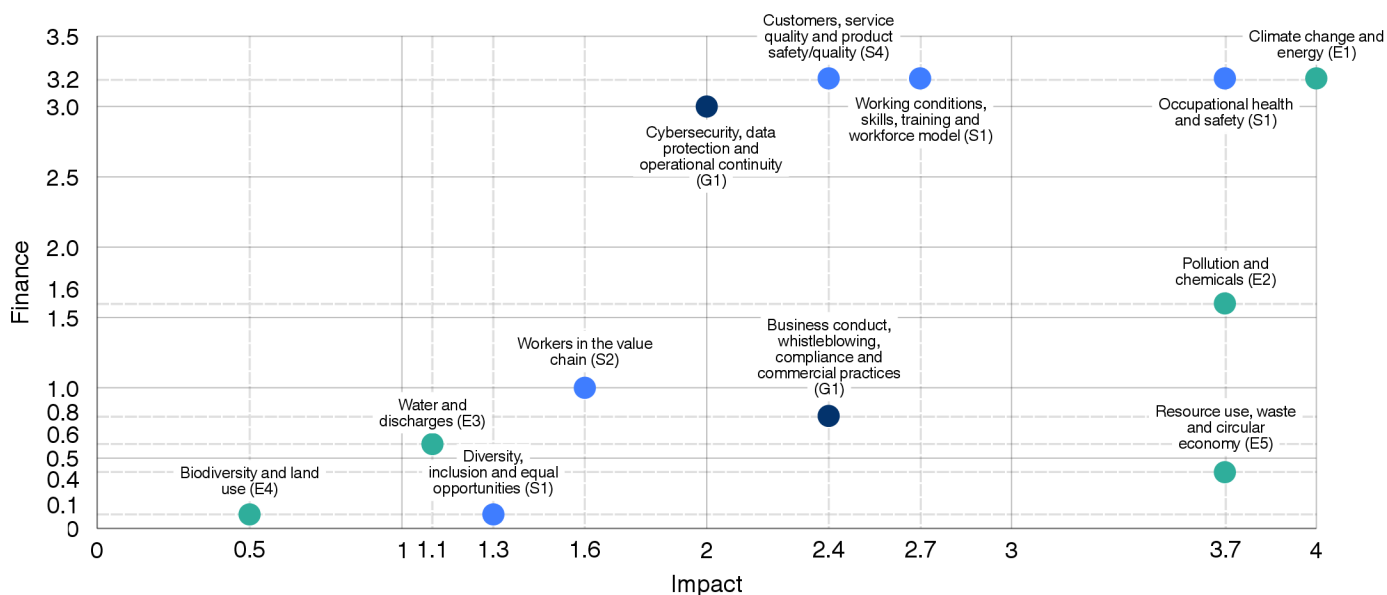
## 6.2 Summary of results

The 2025 assessment identified seven material topics out of the twelve topics evaluated. Of these, four were identified as material from an impact perspective, five as material from a financial perspective, and two were found to exhibit full double materiality. The remaining five topics did not meet the materiality thresholds in the current reporting cycle. However, they will continue to be monitored in view of evolving regulatory requirements, improvements in data quality and the ongoing development of the company's ESG management system.

| KPI                                   | 2025 value | Meaning                                                                              |
|---------------------------------------|------------|--------------------------------------------------------------------------------------|
| Topics assessed                       | 12         | ESRS long list subject to scoring                                                    |
| Material topics                       | 7          | Exceed at least one of the two thresholds                                            |
| Material from an impact perspective   | 4          | Primarily relevant due to effects on the environment and people                      |
| Material from a financial perspective | 5          | Primarily or jointly relevant to performance, business continuity and economic risks |
| Impact threshold                      | 3.5        | Parameter adopted for the 2025 cycle                                                 |
| Financial threshold                   | 3.0        | Parameter adopted for the 2025 cycle                                                 |

## 6.3 Matrix of ESG topics assessed

The table below summarises the positioning of the twelve topics analysed. The matrix indicates whether each topic is material for both dimensions, only from an impact perspective, only from a financial materiality perspective, or whether it should remain under monitoring.





## 6.4 Material topics identified

The seven topics identified as material through the assessment cover a range of environmental, social and governance areas. Specifically, they relate to the following topics:

- **Climate change and energy**
- **Pollution and the use of chemicals**
- **Resource use, waste and circular economy**
- **Occupational health and safety**
- **Working conditions, skills, training and workforce model**
- **Customers, service quality and product safety/quality**
- **Cybersecurity, data protection and operational continuity**

## 6.5 Non-material topics in the current reporting cycle

Five topics did not meet the materiality thresholds in the 2025 reporting cycle. Their exclusion from the scope of material topics does not imply that they are irrelevant from a management perspective. These areas will continue to be monitored, particularly in light of regulatory developments, changes to the operating model, evolving customer expectations or increased data availability.

| Topic to monitor                                                      | ESRS | Impact | Finance |
|-----------------------------------------------------------------------|------|--------|---------|
| Water and wastewater                                                  | E3   | 1.1    | 0.6     |
| Biodiversity and land use                                             | E4   | 0.5    | 0.1     |
| Diversity, inclusion and equal opportunities                          | S1   | 1.3    | 0.1     |
| Workers in the value chain                                            | S2   | 1.6    | 1       |
| Business conduct, whistleblowing, compliance and commercial practices | G1   | 2.4    | 0.8     |

## 6.6 Overall interpretation of materiality

The double materiality assessment confirms that APE Raccorderie's sustainability approach does not sit separately from industrial management, but rather aligns with the key elements of its operating model: energy, raw materials, chemicals, waste, health and safety, skills, product quality and information system continuity. Environmental topics are closely linked to production efficiency and input management; social topics influence organisational quality and the continuity of expertise; governance and data-related topics are relevant as enabling mechanisms for reliability, compliance and resilience.

The 2025 classification therefore represents an initial baseline. In subsequent reporting cycles, the materiality matrix should be reviewed in light of evolving data availability, increasing stakeholder engagement, customer requirements and the strengthening of internal KPIs.

# Sustainability strategy and action plan

The double materiality assessment provides a clear identification of the priorities that will guide the first phase of sustainability consolidation at APE Raccorderie. At this stage, the strategy must be pragmatic: before defining particularly sophisticated long-term objectives, the company is committed to strengthening responsibilities, data management, KPIs and monitoring mechanisms.

The DMA identified six first-level priorities:

1. **formalise a minimum sustainability governance framework;**
2. **consolidate the GHG inventory with a clearly defined boundary for Scope 1, Scope 2 and Scope 3;**
3. **introduce intensity KPIs for energy, emissions, waste, training and accidents;**
4. **launch an ESG supplier due diligence programme for the most relevant suppliers;**
5. **formalise a privacy and customer/end-user data protection policy;**
6. **improve data collection on water, near misses, product incidents and supply chain social audits.**

The aim is not to immediately build a complex ESG system, but rather to integrate sustainability into the existing operational governance framework. In an industrial SME such as APE Raccorderie, sustainability becomes truly effective when the functions already responsible for managing processes – operations, quality, procurement, administration and human resources – are assigned clear responsibilities, supported by simple but robust indicators and regular review sessions involving senior management.

| Area                       | Priority actions 2026-2027                                                                   | Initial KPIs to monitor                                                                            |
|----------------------------|----------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------|
| Climate and energy         | Energy audit, efficiency roadmap, consolidation of renewable energy and logistics monitoring | kWh, Sm <sup>3</sup> , tCO <sub>2</sub> e, % renewable energy, logistic-related tCO <sub>2</sub> e |
| Pollution and chemicals    | Substance reduction/replacement plan, review of permits and monitoring activities            | Chemical inventory, number of substances with relevant H-statements, emission monitoring results   |
| Circularity and waste      | Analysis of material yield, reduction of waste, recovery of packaging and waste streams      | t of raw materials, t of waste, recovery rate, kg of waste per unit                                |
| Workers                    | Integrate H&S plan also covering temporary workers, skills mapping and training              | Injuries, lost days, training hours, % agency workforce                                            |
| Supply chain               | Supplier segmentation, minimum ESG clauses, due diligence on critical suppliers              | % of critical suppliers assessed, completed audits/questionnaires                                  |
| Governance e cybersecurity | Policy privacy, whistleblowing review, access controls and backup checks                     | Number of reports, data incident log, backup test results                                          |

# 08

# Environmental performance

APE Raccorderie's environmental profile is typical of a metalworking manufacturing company: high energy consumption, intensive use of raw materials, the presence of chemicals, waste generation and a significant contribution from logistics to indirect emissions.

The analysis of 2025 data provides, for the first time, an integrated view of this profile, with a level of detail sufficient to identify the main environmental drivers of the business.

From an ESRS perspective, the environmental topics identified as material are three:

- **climate change and energy (E1)**
- **pollution and chemicals (E2)**
- **resource use, waste and circular economy (E5)**

**Water and discharges (E3) and biodiversity/land use (E4)** did not exceed the materiality threshold in the current reporting cycle, but will continue to be monitored and included in the development of the data set in future reporting periods.

## 8.1 Energy, climate change and emissions profile

2025 energy consumption clearly highlights the relevance of this topic for APE Raccorderie. Electricity consumption during the reporting period amounted to 5,844,006 kWh, while natural gas consumption totalled 261,769.5 Sm<sup>3</sup>. The ratio between electricity consumption and revenue corresponds to approximately 63,390 kWh per million euro of revenue. This indicator should not be interpreted as a precise sector benchmark, but rather as an initial internal energy intensity measure, useful for monitoring efficiency trends over time.

Scope 1 emissions amounted to 580.6 tCO<sub>2</sub>e, while Scope 2 emissions totalled 1,238.6 tCO<sub>2</sub>e using the location-based approach and 652.9 tCO<sub>2</sub>e using the market-based approach. These figures are complemented by 194.68 tCO<sub>2</sub>e related to logistics activities. The total emissions considered therefore amount to 2,013.88 tCO<sub>2</sub>e using the location-based approach and 1,428.18 tCO<sub>2</sub>e using the market-based approach. When expressed in relation to revenue, the two profiles correspond respectively to approximately 21.84 and 15.49 tCO<sub>2</sub>e per million euro of revenue. In this case too, the key value does not lie in external comparison, but in the possibility of using them as a baseline for monitoring performance in future reporting periods.

The DMA also highlights that the share of self-consumed renewable energy remains limited, accounting for approximately 1.4% of total electricity consumption. In absolute terms, this corresponds to around 83 MWh of electricity. This figure clearly highlights an initial area for development: while no defined decarbonisation targets were established in 2025, the limited contribution of renewable energy can be considered a concrete area of potential improvement from both an environmental and economic perspective.

The implications of the climate and energy topic are multiple. From an environmental perspective, they concern the Company's direct and indirect carbon footprint. From an economic perspective, they reflect exposure to energy market prices and potential future mechanisms for the transfer of carbon-related costs.

To provide a more complete representation of its emissions profile, APE Raccorderie has prepared an initial Scope 3 estimate for 2025. The calculation is based on two components: (i) indirect emissions from purchased raw materials, calculated by applying average cradle-to-gate emission factors to 2025 consumption of brass, PEX, aluminium and adhesive; and (ii) logistics emissions amounting to 194.68 tCO<sub>2</sub>e, calculated based on 77 journeys and 1,431.22 tonnes transported. The estimated total Scope 3 emissions amount to 65,472 tCO<sub>2</sub>e. The largest contribution comes from raw materials, particularly brass, PEX and aluminium, while logistics accounts for less than 1% of the total estimate. This figure should be considered an initial baseline: the priority for future reporting cycles will be to progressively replace average emission factors with primary supplier data, Product Carbon Footprints or EPDs for purchased materials.

## E1 indicator

**5,844,006 kWh**

Electricity consumed

**65,278 tCO<sub>2</sub>e**

Scope 3 emissions – Purchased raw materials

**261,769.5 Sm<sup>3</sup>**

Natural gas consumed

**194.68 tCO<sub>2</sub>e**

Scope 3 emissions – Freight logistics

**580.6 tCO<sub>2</sub>e**

Scope 1 emissions

**65,472 tCO<sub>2</sub>e**

Scope 3 emissions – Total

**1,238.6 tCO<sub>2</sub>e**

Scope 2 emissions – LB

**~1.4%**

Self-consumed renewable energy share

**652.9 tCO<sub>2</sub>e**

Scope 2 emissions – MB



## 8.2 Pollution, air emissions and chemical substances

At APE Raccorderie, the topic of pollution is primarily assessed through two main perspectives: air emissions and the management of chemicals and technical gases used in production processes.

Both aspects represent structurally relevant areas. On the one hand, the nature of the company's manufacturing activities requires continuous monitoring of emissions; on the other, the quantities of certain substances and their hazardous properties make this topic also highly relevant from an occupational health and safety perspective.

The 2025 periodic checks on air emissions from the E2 point confirmed compliance with authorised limits for particulate matter, VOCs, acrylonitrile, phosphine and ammonia.

This represents an important element: the Report does not describe a non-compliant situation, but rather an effective management framework that mitigates an inherently significant risk.

The materiality of this topic is therefore not linked to known exceedances or environmental incidents, but rather to the nature of an industrial activity that requires permits, monitoring and rigorous management of substances.

The chemicals inventory highlights significant quantities of materials and additives. In addition to the 80,000 kg of Taborex TA 1132 HD and the combined 36,000 kg of the two Plexar product types, the available documentation shows the presence of further products used for circuits, maintenance, laboratory activities and furnace start-up, with safety data sheets indicating H-statements related to flammability, corrosivity, inhalation toxicity and aquatic toxicity.

## 8.3 Resource use, raw materials, waste and circular economy

Resource use is one of the most representative environmental topics for APE Raccorderie's business model.

In 2025, total raw materials consumed amounted to 13,940 tonnes. The composition of these materials reflects a production model combining metals and polymer-based components, with related implications both in terms of cost and the environmental pressure associated with sourcing and processing activities.

| Business Unit<br>Raw materials 2025 | Tonnes        | Share of total |
|-------------------------------------|---------------|----------------|
| Fittings                            | 6,000         | 43.04%         |
| Pipe                                | 7,940         | 56.96%         |
| <b>Total</b>                        | <b>13,940</b> | <b>100%</b>    |

Waste generated in 2025 amounted to approximately 847.1 tonnes. When compared with the total volume of raw materials consumed, this corresponds to a waste-to-input ratio of approximately 6.1%.

This indicator does not represent a process yield measure in the strict sense, but it provides an initial summary indication of the material pressure generated by the company's activities. For a more advanced assessment, future reporting cycles will require the development of more detailed waste accounting by EWC code, waste type, destination and share sent for recovery.



**~ 847.1 t**

**TOTAL WASTE  
GENERATED**



**6.1 %**

**WASTE /  
RAW MATERIALS**



**571.18 t**

**UNSPECIFIED  
WASTE**



**61.9 t**

**PLASTIC  
WASTE**

Circular economy therefore represents a concrete area for development for APE Raccorderie. In 2025, the Report does not yet identify a formalised circularity strategy; however, the available data already provides a clear basis for defining an action plan focused on key areas: improving material yield, reducing waste, enhancing waste stream classification, recovering metals, optimising packaging and developing simple but traceable KPIs for inputs, outputs and recovery rates.

The adoption by APE Raccorderie of a formalised operational and documentary procedure, shared with its waste management partner, represents strong evidence of the Company's commitment in this area.

Specifically, the procedure defines the operational methods for the segregation, storage and transfer for disposal or recovery of waste generated by the company's activities.

With regard to the performance of the Pipe Production department, in 2025 the company maintained high levels of operational efficiency across its four production lines, recording an average operating rate of 90.29% of available time.

The average non-operating time stood at 9.71%, reflecting the effectiveness of production planning, maintenance activities and plant management.

This performance confirms the company's commitment to ensuring production continuity, optimising resources and reducing operational inefficiencies, contributing to improved competitiveness and the sustainability of industrial processes.

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## **8.4 Environmental topics monitored but not identified as material**

### **WATER AND DISCHARGES (E3)**

The topic was considered as part of the materiality assessment; however, due to the characteristics of the company's activities, it did not emerge as relevant for the purposes of this Report.

It nevertheless remains subject to monitoring within the framework of environmental management and compliance with applicable regulations.

### **BIODIVERSITY AND LAND USE (E4)**

The Company assessed the potential impacts, risks and opportunities related to biodiversity and land use as part of the materiality assessment process.

Considering the nature of the activities carried out, the absence of production sites or operational activities located in protected natural areas or areas of high ecological value, as well as the limited impact on land consumption and transformation, the topic was not considered material for the purposes of this Sustainability Report.

The organisation nevertheless maintains oversight of this topic by monitoring regulatory developments and any potential indirect impacts across the value chain.





# 09

# Social performance

Within APE Raccorderie's industrial model, the social dimension focuses primarily on four areas: occupational health and safety, skills and training, workforce structure and the quality of relationships with customers and the supply chain. The manufacturing nature of the business and the presence of technical production activities mean that human capital is not merely a production factor, but a key element in ensuring quality, operational continuity, safety and the ability to respond to market requirements.

The 2025 data shows a total workforce of 131 people. The presence of temporary agency workers is not merely an organisational figure: it is a structural characteristic of the operating model, influencing training, safety, knowledge transfer and the ability to maintain consistent standards across daily activities.

Within this framework, the double materiality assessment identified the following topics as material:

- **occupational health and safety;**
- **working conditions, skills, training and workforce model;**
- **customers, service quality and product safety/quality.**

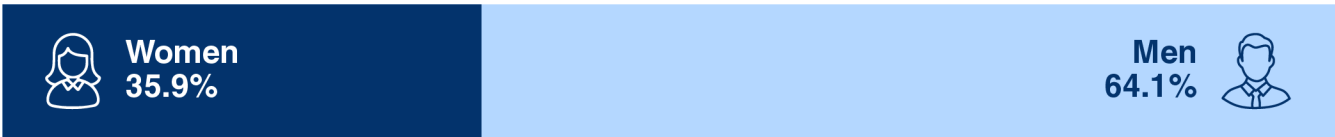
Diversity and inclusion and Workers in the value chain did not exceed the materiality threshold in the current reporting cycle. However, they remain topics to be monitored over time, also considering workforce composition and increasing market expectations in these areas.

9.1  
Workforce,  
composition and  
organisational  
model

At the end of 2025, the company's workforce consisted of 131 people.

The female workforce amounted to 47 people, representing approximately 35.9% of the total workforce. These figures do not indicate critical issues that would make the D&I topic material in 2025, but rather describe a profile consistent with the company's manufacturing context.

| Social indicator         | 2025 value | Interpretation                    |
|--------------------------|------------|-----------------------------------|
| Total workforce          | 131 people | Overall scope including APE + MAW |
| Women in total workforce | 47 (35.9%) | Overall workforce composition     |



9.2  
Occupational  
health and  
safety

Occupational health and safety is the most relevant social topic for APE Raccorderie, with one of the highest impact materiality scores across the entire DMA (3.7 out of 5). It is also the only topic with a Severity score of 5.

This relevance is inherent to the company's operational profile: industrial processes, material handling, machinery, the presence of chemicals and the need to integrate direct employees and temporary agency workers within consistent prevention and control procedures.

Over the 2024-2025 two-year period, a total of five workplace accidents involving APE and MAW personnel were recorded, resulting in 24 total days of absence. These accidents were subject to internal analysis and review in accordance with the company's established procedures. The assessments carried out did not identify any issues attributable to structural, organisational or procedural shortcomings on the part of the company. There is an ongoing legal dispute relating to a workplace accident that occurred prior to this period.

The managerial assessment of this topic cannot be limited to the number of events recorded. In an industrial company of this size, every accident has effects that extend beyond the individual event: loss of operational continuity, impacts on colleagues, the need for replacement personnel, insurance costs and potential reputational implications. For this reason, safety must be considered not only as a compliance requirement, but also as a factor contributing to organisational quality and the resilience of the production model.

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### 9.3 Training, skills and development

In 2025, APE Raccorderie provided 1,948 hours of training, with a total investment of €54,106.16.

When calculated against the year-end workforce, this corresponds to approximately 14.9 training hours per person and an average investment of around €413 per person. These figures provide an important indication: training is already a tangible area of investment for the company and not merely a formal commitment.

Within the context of APE Raccorderie, the value of training is primarily linked to its industrial role. Training contributes to reducing errors, increasing operational autonomy, facilitating the integration of temporary agency workers, improving compliance with quality and safety procedures, and strengthening the company's technical skills base. The materiality of this topic therefore derives not only from organisational well-being, but also from the direct relationship between skills and business continuity.

 **1,948**  
training hours

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### 9.4 Customers, service quality and product safety/quality

The Company operates a Quality Management System certified according to ISO 9001:2015, an international standard defining the requirements for the structured management of business processes and the continuous improvement of performance.

The certification represents a fundamental framework for ensuring high quality standards in the design, production and distribution of multilayer pipes and fitting systems, ensuring production process control, traceability, compliance monitoring and the reliability of product performance.

Through documented procedures, quality controls and periodic verification activities, the company monitors the entire production chain with the aim of reducing the risk of non-conformities, improving safety and ensuring continuity and reliability of the solutions provided to customers.

The approach based on continuous improvement and customer satisfaction also contributes to strengthening service quality, responsiveness in managing requests and the ability to meet the technical and regulatory standards of the sector.

 **ISO 9001:2015**

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## 9.5 Workers in the value chain and social supply chain

Although the Company relies on a significant number of active suppliers and uses temporary agency workers, the topic of workers in the value chain was assessed within the DMA as not being a priority compared with the other material topics identified, while its potential relevance across the supply chain is acknowledged.

The social impacts associated with the value chain are mainly indirect and mediated through contractual relationships with suppliers and temporary employment agencies operating in compliance with applicable legislation.

The topic is therefore monitored within supply chain management processes, including through the extension of the principles set out in the Code of Ethics to suppliers.

As of the reporting date, structured ESG due diligence systems or supply chain social audit programmes have not yet been implemented.

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# 10 Governance, ethics and operational continuity

APE Raccorderie's governance should be understood in the context of the Company's nature: an industrial SME with a lean ownership and governance structure, strong integration between management and operations, and control frameworks focused on the areas most closely linked to business continuity.

In this context, governance does not correspond to a complex bureaucratic structure, but rather to the organisation's ability to make consistent decisions, manage risks and ensure integrity in relationships with customers, suppliers, employees and shareholders.

From a corporate governance perspective, the company has four directors and a sole statutory auditor. This structure is appropriate for the size of the Company; however, in light of the ESG journey undertaken, it will benefit over time from greater formalisation of reporting flows, KPIs to be brought to management attention and coordination responsibilities for material topics. This will enable a transition from an implicitly distributed ESG governance model across different functions to a more transparent and repeatable sustainability governance framework.

In 2025, with reference to topic G1, Cybersecurity, data protection and operational continuity were identified as material topics. Conversely, Business conduct, whistleblowing, compliance and commercial practices were not considered material.

## 10.1 Business ethics, whistleblowing and compliance

In 2025, APE Raccorderie strengthened its ethics and compliance framework through the introduction of a dedicated whistleblowing channel, accessible via the company website. The channel is available to employees, suppliers, customers and, more generally, all third parties interacting with the organisation, confirming an inclusive approach focused on transparency.

The reporting channel enables the submission of concerns regarding potential violations or conduct that may not comply with the company's ethical and regulatory principles, with particular reference to the following areas: abuse of power, corruption, fraud, mistreatment, harassment, racism, violence and other behaviours inconsistent with the principles of integrity and fairness.

The introduction of this tool represents a further strengthening of the internal control system and of a corporate culture based on ethics, accountability and respect for people. The reporting channel has been designed to ensure confidentiality, protection of the whistleblower and structured management of received reports, in line with best governance practices and applicable whistleblowing regulations.

The initiative forms part of a broader programme to consolidate the company's compliance framework, aimed at enabling the timely identification of potential issues and promoting a safe, inclusive and respectful working environment.

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## 10.2 Commercial practices, receivables and credit risk

APE Raccorderie adopts a prudent and structured approach to managing commercial relationships and credit risk, based on principles of fairness, transparency and reliability towards customers and suppliers.

During the reporting year, unpaid receivables were recorded, confirming the effectiveness of the company's internal credit assessment and monitoring procedures.

Average collection times are aligned with the contractual terms agreed, while average payment times towards suppliers consistently comply with established agreements. This demonstrates balanced liquidity management and a responsible approach throughout the value chain.

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## 10.3 Data protection, cybersecurity and business continuity

Although no significant actual or potential impacts on people or the environment directly attributable to the company's activities were identified in relation to this topic, the management of cybersecurity risks and data protection represents a relevant factor for the company's economic and financial stability.

In particular, potential security incidents, data breaches or operational disruptions could generate significant economic consequences, including recovery costs, regulatory penalties, reputational damage and loss of service continuity.

For these reasons, the organisation maintains a structured approach to this topic, based on technical and organisational security measures, monitoring activities and business continuity plans, with the aim of ensuring the resilience of information systems and the protection of corporate information assets.

In this regard, it should be noted that in June 2025 the server infrastructure was upgraded with next-generation systems to improve cybersecurity, operational reliability and energy efficiency.

The new server performs backups through three different methods:

- NAS
- Server-to-server
- Cloud

ensuring immediate restoration of stored data.

With regard to cybersecurity, APE Raccorderie relies on an external company composed of a specialised team of analysts who monitor, detect, analyse and respond to security threats 24/7.

Through the use of artificial intelligence, continuous monitoring is maintained across the organisation's networks, systems and applications, ensuring proactive protection against cyber threats.

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# Development objectives and priorities for 2026-2028

## 11.1 From double materiality assessment to the improvement plan

The double materiality assessment carried out in 2025 enabled APE Raccorderie to identify more clearly the ESG topics that are most relevant to its business model, operating context and relationships with key stakeholders.

In particular, the assessment highlighted the central importance of the following areas:

- climate change and energy;
- pollution and chemicals management;
- resource use, waste and circular economy;
- occupational health and safety;
- working conditions, skills, training and workforce;
- customers, service quality and product safety/quality;
- cybersecurity, data protection and operational continuity.

Based on these findings, the company intends to develop a progressive pathway over the 2026-2028 period to consolidate its ESG system, with the aim of strengthening organisational frameworks, improving data availability and integrating sustainability into management processes.

The plan outlined below should not be interpreted as a set of fully defined quantitative targets, but rather as an evolving roadmap aligned with the current maturity level of the system and with the priorities identified through the assessment.

## 11.2 Cross-cutting system objectives

In the short to medium term, one of APE Raccorderie's main priorities is to strengthen the organisational and information infrastructure required to support a more structured approach to sustainability management.

The objective is not only to expand reporting, but above all to build a system that enables the company to:

- collect data on an ongoing and verifiable basis,
- assign clear responsibilities across the different ESG areas,
- monitor the evolution of performance over time,
- make information available for management and decision-making purposes.

In this context, the company intends to progressively formalise its ESG governance framework and introduce a more structured set of monitoring indicators.

| Area           | Objective                                                   | Time horizon | Expected evidence                            |
|----------------|-------------------------------------------------------------|--------------|----------------------------------------------|
| ESG Governance | Formalise an internal structure for coordinating ESG topics | 2026         | Identification of roles and responsibilities |
| Reporting      | Strengthen structured ESG data collection                   | 2026–2027    | Expanded and more stable KPI set             |
| Monitoring     | Define a dashboard of periodic indicators                   | 2026–2027    | Recurring internal reporting                 |
| Integration    | Connect ESG topics with key business functions              | 2026–2028    | Greater integration into processes           |

## 11.3 Environmental objectives

### 11.3.1 Energy and emissions

The 2025 data highlighted the significant relevance of energy consumption and emissions, both direct and indirect. In particular, the contribution of Scope 2 emissions and the overall level of energy consumption indicate the opportunity to further develop a more advanced approach to energy and climate management.

Over the 2026–2028 period, APE Raccorderie therefore intends to focus on three main areas:

- improving monitoring quality;
- strengthening the management interpretation of energy data;
- assessing potential efficiency improvement actions.

The initial approach will focus on establishing the baseline and understanding the main drivers, enabling the subsequent definition of quantitative targets based on more robust foundations.

| Area       | Objective                                                            | Time horizon | Expected evidence                                        |
|------------|----------------------------------------------------------------------|--------------|----------------------------------------------------------|
| Energy     | Strengthen monitoring of consumption by site and/or operational area | 2026         | Improving data granularity                               |
| Emissions  | Consolidate the calculation of Scope 1 and Scope 2 emissions         | 2026         | More robust methodology                                  |
| Climate    | Assess emission and energy intensity indicators                      | 2026–2027    | KPI's related to revenue, production output or workforce |
| Efficiency | Identify potential energy efficiency improvement areas               | 2027–2028    | Internal analysis of opportunities                       |



### 11.3.2 Chemical substances and air emissions

The presence of chemical substances that are significant in terms of quantity and hazard classification, together with the existing management of air emissions, makes it a priority to further strengthen monitoring and management capabilities in this area.

Over the medium term, the company intends to focus on improving:

- the traceability of chemical products;
- the usability and transparency of ESG-related data;
- the connection between environmental management and safety.

| Area          | Objective                                                       | Time horizon | Expected evidence                                |
|---------------|-----------------------------------------------------------------|--------------|--------------------------------------------------|
| Chemicals     | Improve the structuring of data on use and risk                 | 2026         | Clearer overview of relevant substances          |
| Air emissions | Maintain and strengthen compliance with regulatory requirements | Ongoing      | Continuity of controls and checks                |
| Prevention    | Gradually assess potential actions to reduce chemical risks     | 2027–2028    | Technical analysis of alternatives or priorities |

### 11.3.3 Resource use, waste and circular economy

The consumption of raw materials and the generation of waste represent one of the main environmental aspects of APE Raccorderie's industrial model. In this area, the improvement pathway will initially focus on:

- improving the quality and level of detail of available data;
- achieving a more accurate understanding of material and waste flows;
- identifying efficiency improvement and recovery opportunities.

| Area          | Objective                                                                           | Time horizon | Expected evidence                             |
|---------------|-------------------------------------------------------------------------------------|--------------|-----------------------------------------------|
| Raw materials | Strengthen monitoring of material flows                                             | 2026–2027    | Greater level of detail by type or process    |
| Waste         | Waste Leverage data through more analytical categories                              | Ongoing      | Clearer distinction of the main waste streams |
| Circularity   | Assess opportunities to reduce waste and enhance the recovery of residual materials | 2027–2028    | Internal analysis of improvement levers       |

## 11.4 Social objectives

### 11.4.1 Occupational health and safety

Occupational health and safety remains one of the most relevant areas of the company's ESG profile.

For this reason, APE Raccorderie intends to strengthen its approach not only from an operational perspective, but also in terms of measurement and monitoring.

The priorities do not solely concern risk reduction, but also the ability to analyse performance trends in a more structured manner and to promote a widespread culture of prevention.

| Area           | Objective                                                    | Time horizon | Expected evidence                                         |
|----------------|--------------------------------------------------------------|--------------|-----------------------------------------------------------|
| Safety         | Structure a more comprehensive set of health and safety KPIs | 2026         | Indicators on incidents, frequency, severity or lost days |
| Prevention     | Strengthen monitoring of key events and risk factors         | 2026–2027    | Improved traceability of information                      |
| Safety culture | Consolidate awareness initiatives and preventive measures    | 2027–2028    | Continuity of training and organisational initiatives     |

### 11.4.2 Training and human capital development

Training represents a key factor in supporting quality, safety, production continuity and skills development. Over the next three years, the company intends to strengthen both its ability to measure training pathways and the usability of related information from a management perspective.

| Area        | Objective                                                          | Time horizon | Expected evidence                                                |
|-------------|--------------------------------------------------------------------|--------------|------------------------------------------------------------------|
| Training    | Improve the classification of training hours by topic and category | 2026         | Clearer overview of training delivered                           |
| Skills      | Strengthen the link between training, technical needs and safety   | 2026–2027    | Greater alignment between training paths and business priorities |
| Development | Gradually assess the inclusion of ESG and managerial content       | 2027–2028    | Expansion of training content                                    |

### 11.4.3 Workforce and organisational model

The composition of the workforce requires increasing attention to skills continuity, organisational integration and the quality of working conditions.

| Area         | Objective                                                                        | Time horizon | Expected evidence                                              |
|--------------|----------------------------------------------------------------------------------|--------------|----------------------------------------------------------------|
| Workforce    | Improve reporting on workforce composition and dynamics                          | 2026         | More structured data by category, gender or contract type      |
| Integration  | Strengthen the understanding of the workforce model, including temporary workers | 2026–2027    | More complete data set                                         |
| Organisation | Support the continuity of critical skills                                        | 2027–2028    | Internal analysis of areas with greater dependence on know-how |

### 11.4.4 Customers and quality

Product quality and service reliability are central elements of the company's competitive positioning. In line with the findings of the DMA, APE Raccorderie intends to improve its ability to analyse and manage quality-related indicators.

| Area     | Objective                                                                  | Time horizon | Expected evidence                                  |
|----------|----------------------------------------------------------------------------|--------------|----------------------------------------------------|
| Quality  | Strengthen the link between quality indicators and operational improvement | 2026–2027    | More structured analysis of non-conformity drivers |
| Customer | Improve the visibility of service performance                              | 2027–2028    | More advanced data analysis system                 |

## 11.5 Governance objectives

### 11.5.1 ESG Governance and decision- making processes

The evolution of the ESG system requires the progressive strengthening of governance, understood as the company's ability to define clear roles, responsibilities and information flows for material topics.

| Area                 | Objective                                                | Time horizon | Expected evidence                             |
|----------------------|----------------------------------------------------------|--------------|-----------------------------------------------|
| ESG Governance       | Formalise internal responsibilities for ESG topics       | 2026         | Greater organisational clarity                |
| Management reporting | Structure periodic ESG data review and analysis sessions | 2026–2027    | Recurring internal reporting                  |
| Integration          | Link material topics with key business functions         | 2027–2028    | Greater integration into management processes |

### 11.5.2 Privacy, data and business continuity

The documentary assessment shows that the company has already implemented structured procedures to safeguard cybersecurity and data protection, also supported by the recent upgrade of the server infrastructure to next-generation solutions. In this context, a further consolidation opportunity is identified in the formalisation of a dedicated policy or procedure for the protection of customer and user data. This would further strengthen the governance of this area and ensure full traceability and consistency of processes over time.

| Area    | Objective                                                                         | Time horizon | Expected evidence   |
|---------|-----------------------------------------------------------------------------------|--------------|---------------------|
| Privacy | Prepare a formal policy or procedure for the protection of customer and user data | 2026         | Formalised document |



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## 11.6 A phased roadmap

The development pathway outlined by APE Raccorderie for the 2026–2028 period is intentionally progressive.

At this stage, the main objective is not to define ambitious quantitative targets without an adequate information base, but rather to build a credible, verifiable system that is effectively integrated into the company's operations.

This approach enables the company to:

- avoid formal targets that are not supported by data;
- consolidate the information framework;
- make future targets more robust and measurable;
- link sustainability to concrete decisions rather than reporting activities alone.

Over the medium term, once data availability and the ability to analyse relevant trends have been strengthened, the company may consider introducing:

- quantitative environmental targets;
- more structured social indicators;
- cross-functional objectives linked to sustainability governance.

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## 11.7 Commitment to continuous improvement

Through this Report, APE Raccorderie does not simply provide an overview of its current status, but also defines a development direction aligned with the topics identified through the double materiality assessment.

The company's commitment for the next three years will therefore focus on:

- strengthening internal frameworks and management practices;
- improving data availability and quality;
- consolidating the governance of material topics;
- progressively integrating sustainability as a structural component of business management.

# ESRS framework and priority disclosures

| Material topic                                | Relevant ESRS | Initial disclosures / KPIs to be structured                                                                                                                                                                                                                        |
|-----------------------------------------------|---------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Climate change and energy                     | E1            | Scope 1, Scope 2 location-based and market-based emissions, Scope 3 based on raw materials and logistics, kWh, Sm <sup>3</sup> , energy intensity, renewable energy share, emissions intensity per million euros of revenue, Scope 3 data quality improvement plan |
| Pollution and chemicals                       | E2            | Chemical inventory, monitoring results, non-conformities, substitution plans                                                                                                                                                                                       |
| Resource use, waste and circular economy      | E5            | Raw materials by category, waste by EWC code, recovery rate, material yield                                                                                                                                                                                        |
| Health and safety / working conditions        | S1            | Injuries, lost days, training                                                                                                                                                                                                                                      |
| Workers in the value chain                    | S2            | Supplier segmentation, ESG questionnaires, audits and clauses                                                                                                                                                                                                      |
| Customers / product quality related incidents | S4            | Non-conformities, any product-related incidents                                                                                                                                                                                                                    |
| Corporate conduct and cyber/data security     | G1            | Whistleblowing channel, litigation, privacy policy, backup testing                                                                                                                                                                                                 |

The ESRS mapping presented above does not yet represent a fully comprehensive disclosure index, but identifies the core information that, based on the 2025 materiality assessment, will need to be consolidated in future reporting cycles.

The approach adopted is based on a progressive methodology: first consolidating essential metrics and data governance, and then extending reporting towards more sophisticated indicators and comparable historical data series.

# 13



## 2025 quantitative tables

| Area        | Indicator                                                                  | 2025 Value                 |
|-------------|----------------------------------------------------------------------------|----------------------------|
| Economic    | Revenue                                                                    | € 92,189.161               |
| Economic    | Export share                                                               | 58.6%                      |
| Value chain | Active suppliers                                                           | 487                        |
| Customers   | Active pipe customers                                                      | 429                        |
| Customers   | Active fittings customers                                                  | 444                        |
| Environment | Electricity                                                                | 5,844.006 kWh              |
| Environment | Natural gas                                                                | 261,769.5 Sm <sup>3</sup>  |
| Environment | Scope 1                                                                    | 580.6 tCO <sub>2</sub> e   |
| Environment | Scope 2 LB                                                                 | 1,238.6 tCO <sub>2</sub> e |
| Environment | Scope 2 MB                                                                 | 652.9 tCO <sub>2</sub> e   |
| Environment | Total raw materials                                                        | 13,940 t                   |
| Environment | Waste generated                                                            | ~ 847.1 t                  |
| Environment | Scope 3 - purchased raw materials, estimated using the average-data method | 65,278 tCO <sub>2</sub> e  |
| Environment | Scope 3 - goods logistics                                                  | 194.68 tCO <sub>2</sub> e  |
| Environment | Total Scope 3                                                              | 65,472 tCO <sub>2</sub> e  |
| Environment | Total S1+S2 LB+S3                                                          | 67,291 tCO <sub>2</sub> e  |

|             |                          |              |
|-------------|--------------------------|--------------|
| Environment | Total S1+S2 MB+S3        | 66,706 tCO2e |
| Social      | Final workforce          | 131 people   |
| Social      | Women in total workforce | 47           |
| Social      | Training                 | 1,948 h      |
| Social      | Training budget          | € 54,106.16  |
| Social      | Injuries 2024-2025       | 5            |
| Social      | Recorded absence days    | 24           |

| Sub-indicator                        | Value          | Note                                     |
|--------------------------------------|----------------|------------------------------------------|
| Self-consumed renewable energy       | ~83 MWh        | Estimate based on 1.4% of kWh consumed   |
| Total LB emissions (S1+S2+logistics) | 2,013.88 tCO2e | 2025 baseline                            |
| Total MB emissions (S1+S2+logistics) | 1,428.18 tCO2e | 2025 baseline                            |
| LB emissions intensity               | 21.84 tCO2e/M€ | Ration calculated on revenue             |
| MB emissions intensity               | 15.49 tCO2e/M€ | Ration calculated on revenue             |
| Rifiuti / materie prime              | 6.1%           | Synthetic indicator of material pressure |
| Training hours per person            | 14.9 h         | Based on final workforce                 |
| Training budget per person           | € 413          | Based on final workforce                 |

## Methodological appendix – double materiality assessment process

The double materiality assessment was developed through a structured methodological sequence. Firstly, the Company's business model was described, distinguishing core activities, the structure of the upstream and downstream value chain, the relevance of international markets and the main operational drivers. Secondly, a documentary information base was established, consisting of 2025 quantitative data and qualitative documentation relating to corporate structure, certifications, processes, emissions, chemicals, workforce, quality, legal disputes, overdue receivables and policies. Thirdly, a long list of potentially relevant ESRS topics was developed. Finally, the topics were assessed through impact and financial materiality scoring.

For impact materiality, the assessment considered the severity of the potential or actual impact on people and the environment, its scope, its irremediable nature and the likelihood of occurrence. For financial materiality, the assessment considered the potential financial magnitude of the effect, the likelihood of occurrence and the speed at which it could affect financial performance, reputation or operational continuity.

| Process stage                        | Description                                                            | Output                                |
|--------------------------------------|------------------------------------------------------------------------|---------------------------------------|
| 1. Business mapping involved         | Analysis of the business model, sites, value chain and functions       | Organisational and value chain scope  |
| 2. Evidence collection documentation | Organisation of 2025 data and available corporate documentation        | Traceable information base            |
| 3. Long list                         | Development of the initial universe of ESRS topics                     | 12 topics subject to scoring          |
| 4. Impact scoring                    | Assessment of severity, scope, irremediable character and probability  | Impact score                          |
| 5. Financial scoring                 | Assessment of financial magnitude, probability and speed of occurrence | Financial score                       |
| 6. Final classification              | Comparison with materiality thresholds                                 | Material topics and topics to monitor |



## 14.1 Stakeholder considered

| Stakeholder                         | Reason of inclusion                                                     | Main related topics |
|-------------------------------------|-------------------------------------------------------------------------|---------------------|
| Shareholders and Board of Directors | Governance, strategic direction and performance oversight               | G1, E1, E5          |
| Management and functions            | Production, quality, finance, procurement, logistics, people management | All material topics |
| Direct employees                    | Safety, training, working conditions and organisational well-being      | S1                  |
| Temporary workers                   | Operational relevance within the workforce model                        | S1, S2              |
| B2B customers                       | Product quality, service continuity, ESG requirements                   | S4, E1, G1          |
| Suppliers                           | Supply continuity, rights, quality and materials                        | S2, E5, G1          |

# Thematic in-depth sheets

## E1 – Climate change and energy

Primary stakeholders/area: operations, customers, financial stakeholders. Priority: High.

Impact and rationale: Energy consumption, Scope 1 and Scope 2 emissions, logistics-related emissions, limited share of renewable energy.

Financial risks/opportunities: Energy price volatility, customer requests for GHG data, need to improve emissions traceability.

Development pathway: Consolidate energy and emissions intensity indicators, define a site energy audit, assess efficiency improvement opportunities and evaluate options to increase the share of renewable energy.

## E2 – Pollution and chemical substances

Primary stakeholders/area: Employees, local communities, authorities. Priority: Medium.

Impact and rationale: Relevant chemicals inventory and compliant emissions monitoring activities.

Financial risks/opportunities: Sanction and reputational risks in the event of improper chemical management or accidental events.

Development pathway: Develop a structured chemicals dashboard distinguishing quantities, hazard classes, uses and potential substitution plans, while maintaining alignment with authorised monitoring requirements.

## E5 – Resource use, waste and the circular economy

Primary stakeholders/area: operations, suppliers, customers. Priority: High.

Impact and rationale: 13,940 tonnes of raw materials and approximately 847 tonnes of waste generated in 2025.

Financial risks/opportunities: Exposure to raw material costs, process waste, disposal costs, market expectations regarding circularity.

Development pathway: Establish periodic indicators on material yield, waste by category/EWC code, recovery rates and opportunities for packaging improvements.

## S1 – Occupational health and safety

Primary stakeholders/area: Direct employees and agency workers. Priority: High.

Impact and rationale: 5 workplace accidents recorded in the 2024-2025 period, resulting in 24 days of absence, and one ongoing legal dispute.

Financial risks/opportunities: Direct and indirect costs arising from workplace accidents, reputational and organisational impacts, need to ensure consistent H&S practices across the extended workforce.

Development pathway: Introduce more structured safety reporting, including frequency and severity rates, near misses and preventive activities, systematically incorporating the MAW workforce component.

## S1 – Working conditions, skills and workforce model

Primary stakeholders/area: Management, employees, operations. Priority: Medium.

Impact and rationale: 1,948 hours of training delivered.

Financial risks/opportunities: Risks related to operational continuity, reliance on external skills, onboarding costs and replacement costs.

Development pathway: Develop a skills matrix, assess training needs and classify training activities by type, in order to better link investment to operational performance.

## S4 – Customers, service quality and product safety/quality

Primary stakeholders/area: B2B customers, commercial function, quality. Priority: Medium.

Impact and rationale: Generic complaints management system.

Financial risks/opportunities: Costs associated with poor quality, risk of customer loss, reputational impacts and commercial consequences.

Development pathway: Develop a complaints management system with classification by severity, recurrence, root cause and closure time, supporting process improvement plans.

## G1 – Cybersecurity, data protection and business continuity

Primary stakeholders/area: Customers, management, IT partners. Priority: Medium.

Impact and rationale: Absence of a formalised policy for the protection of customer and user data.

Financial risks/opportunities: Risk of data loss, operational disruption, privacy-related penalties and reputational impacts.

Development pathway: Formalise policies and responsibilities, define a minimum set of controls, and establish backup and operational continuity testing procedures.

# Operational glossary and data notes

**Scope 1:** direct emissions generated from sources owned or controlled by the company, in the case of APE Raccorderie mainly related to the use of natural gas and diesel fuel.

**Scope 2:** indirect emissions associated with purchased and consumed electricity. The Report includes both the location-based and market-based figures, providing a more comprehensive view of the emissions profile.

**Scope 3:** indirect emissions generated along the value chain.

**Final workforce:** APE Raccorderie employees and agency workers present as of 31 December 2025.

Data not yet fully structured: water, discharges, near misses, product incidents, social audits across the value chain and a formalised privacy policy for customers and users remain areas to be further consolidated in future reporting cycles.











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