

**SUSTAINABILITY
REPORT**

**2022
2023**

**S U S T A I N A B I L I T Y
R E P O R T
2 0 2 2 - 2 0 2 3**





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1.1 LETTER FROM THE CEO

After publishing our first sustainability report, in which we officially declared our commitment and awareness regarding current environmental, social and governance sustainability issues, I am pleased to present our second sustainability report.

I want to share this important document with all of you, as key stakeholders in determining the success of our initiatives and shaping our decisions.

This report not only accounts for the initiatives and activities carried out in these areas during the 2022-2023 biennium, but also serves as a renewed declaration of our commitment to a more sustainable future.

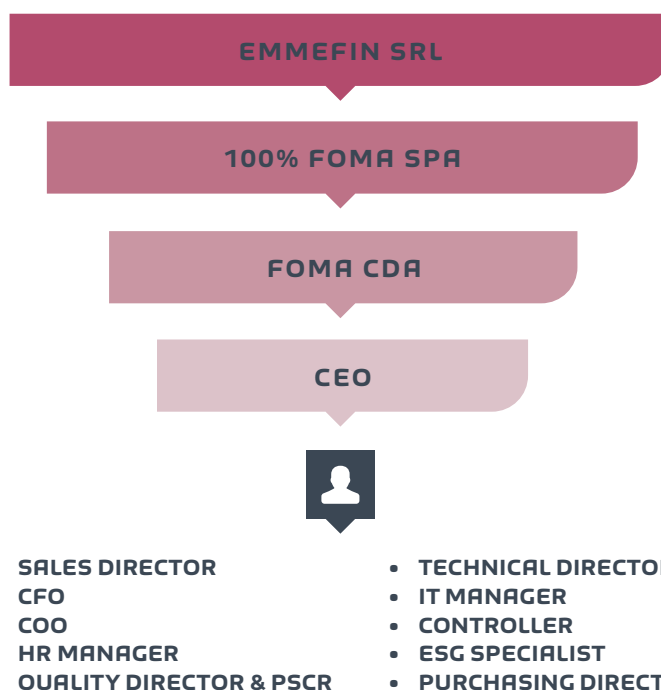
Today, as in all sectors — industrial and otherwise — our industry continues to face a period of uncertainty, due on the one hand to persistent geopolitical tensions and on the other to the urgency of leading the world and society, as we know them, toward a radical transformation.

We therefore believe it is the responsibility of each of us, as a company and as individuals, to acknowledge the situation we are in and, through cultural change, to adapt our behavior so that our actions have a positive impact on the environment and people.





In this new report, all the topics identified as most relevant to our company are listed and addressed one by one. These include both topics previously covered in the last report and new issues that have emerged thanks to the adoption of a new analysis methodology (CSRD). This methodology allows us to explore various issues from perspectives that were not previously addressed.

CEO

ORGANIZATION AND PROPERTY STRUCTURE





1.2	MISSION AND VALUES	
	Our mission and values remain steadfast as those declared in 2021, but they are continuously redefined and adapted to the context in which we operate.	
1.2.1	MISSION	
	Our family business' tradition is to transform our castings into highly technological products, ensuring the satisfaction of all stakeholders while promoting an eco-sustainable system.	
1.2.2	VALUES	
	ORGANIZATION	
	The growth and development of our employees drive management's daily decisions, ensuring a workplace that is both safe and stimulating. Motivation, a sense of belonging and transparency in relationships are the pillars of the FOMA organization. We are committed to embracing change as an opportunity for improvement.	
	PASSION	
	FOMA's success stems from the daily satisfaction our employees derive from their work, driven by passion and the desire to constantly push boundaries. Every achievement is a starting point for new goals.	
	INNOVATION	
	FOMA has always been dedicated to improving its production processes and pioneering technological innovations essential for business development and sustainability. Our Clients' success is our driving force.	
	SUSTAINABILITY	
	FOMA embraces its responsibility to all stakeholders with unwavering commitment and a forward-looking perspective. Our goal is to create a better world for future generations.	

1.3 INFORMATION SHEET



FOMA SPA - SOCIETÀ PER AZIONI
VIA KENNEDY 20 - PRALBOINO (BRESCIA) ITALIA



FOMA represents nearly seventy years of family tradition, spanning three generations of the Montini family. Founded in the late 1950s in Lumezzane (BS) as a mold manufacturer, in the 1970s it moved to Pralboino (BS), where it significantly increased its capacity for producing die-cast aluminum parts. Starting in the 1990s, the company was managed by the second generation, which focused heavily on expanding the business in the field of mechanical processing and shifted away from the white goods sector to fully embrace the automotive industry. In the mid-2010s, the third generation began to join the company and it has recently launched a rebranding campaign to make FOMA more appealing to the millennial generation and has accelerated the transformation process while keeping the strong cultural link to the founding tradition.

FOMA is committed to strengthening its leading position in the European and American markets as a supplier of die-cast aluminum components, which are produced in raw form, processed and assembled, with a particular focus on the automotive sector. Over the years, it has developed specific expertise in aluminum die-cast components and manages the following production activities in-house:

- Aluminum casting
- Aluminum die - casting
- Shot blasting of die – cast parts
- Mechanical processing of die – cast parts

Within our stakeholder ecosystem, suppliers and customers are strategic partners for our business. Our suppliers, primarily based in Italy and Europe, provide us with raw materials, components, energy and essential services. We maintain long-term, trust-based relationships with our key suppliers.

Our clients include major international car manufacturers and their suppliers. We are proud to collaborate with them to meet their needs.

The production site in Lumezzane, where molds required for production in Pralboino are produced and maintained, is an integral part of our financial balance sheet. Managed directly by the Pralboino plant, the Lumezzane site enables efficient and timely management of mold maintenance and construction.



<p>1.4</p>	<p>GENERAL INFORMATION ON THE PREPARATION OF THE REPORT</p>
<p>1.4.1</p>	<p>DEFINITION OF SHORT, MEDIUM AND LONG TERM HORIZONS</p>
	<p>The company has evaluated the specific characteristics of its sector, such as financial flows or economic cycles, the expected duration of capital investments, the time horizons on which users of sustainability statements base their assessments and the planning horizons generally used for decision-making processes. It has therefore decided to adopt the following definitions:</p> <ol style="list-style-type: none"> Short-term time horizon: one year, which corresponds to the period adopted by the company as the reference period for its financial statements. Medium-term time horizon: up to five years from the end of the short-term reference period defined in point a). Long-term time horizon: beyond five years. <p>In certain cases, where the company has determined that the long-term time horizon is not appropriate for its policies and the planning of necessary actions, the time horizon has been extended to 20-30 years, as seen in the assessment of climate risks.</p>
<p>1.4.2</p>	<p>GOVERNANCE</p>
	<p>While preparing the first sustainability report, the company established a Governance system, which was completed during the process of writing the second sustainability report. At the beginning of the process, in 2021, two working groups were defined:</p> <ul style="list-style-type: none"> Strategic group – Composed of the ownership, CEO, CFO and other key figures within the company, this group plays the crucial role of aligning the sustainability strategy with the business strategy, making decisions and validating strategic choices and providing support to the operational group. Operational group – Its members are the heads of the company divisions involved in sustainability improvement objectives. The group is responsible for analyzing, providing technical guidance, preparing project initiatives and implementing the decisions made. <p>In 2023, a new role was introduced: the “ESG Specialist”, who acts as the project manager for sustainability initiatives. This role reports to the company’s top management and has been specifically trained by FOMA for their scope of work. The ESG Specialist’s explicit responsibility is to ensure that the actions outlined in the sustainability strategy are implemented by the individual “process owners.” The ESG Specialist interacts with all company managers to coordinate operational activities, facilitate strategic decisions and reports directly to the two groups.</p>
	<p>The strategic group meets periodically, at least three times a year, to review the progress of initiatives and make any necessary strategic decisions and eventually replanning. The members of the operational group coordinate monthly to monitor the achievement of the set objectives. The ESG Specialist ensures the coordination of all key figures and groups, keeping senior management consistently informed, tracking progress on goals, ensuring that any deviations from the planned targets are promptly analyzed by the decision-making bodies and acting potential countermeasures.</p> <p>The members of the Board of Directors are directly involved in the development of the sustainability strategy, the definition of objectives and the planning of the sustainability report.</p>

ESRS 2
BP-2
9 A
9 B
E1.IRO-1
AR 11B
AR 13
AR 14
GRI 2-14 | 2-6

ESRS 2 GOV-1
19|20|21|22|23
GRI 2-9 | 2-14 | 2-17

ESRS 2 GOV-2
24 | 25 | 26
GRI 2-13 | 2-16
2-12 | 2-14



	<p>Currently, no decisions have been made regarding incentives linked to performance achievements (e.g., MBO). The reward system does not include decisions or objectives related to sustainability.</p>	<p>ESRS 2 GOV-3 27 28 29 GRI 2-19 2-20</p>
	<p>The company began developing a sustainability strategy in 2020, which led to the creation of the first sustainability report (for the 2020/2021 period) following the GRI Standards. This plan has been monitored over time and was reviewed and updated in 2024 in accordance with the EFRAG guidelines, aligning with the framework defined by the ESRS.</p> <p>The due diligence process was carried out according to a phased methodology. In the first phase, through the analysis of the functioning of the “company system,” significant (material) impacts were identified. Their severity was assessed by the two working groups (strategic and operational). At the same time, an analysis of stakeholders who could provide expert and/or informed opinions on the impacts of FOMA was conducted. Once the strategic stakeholder map was defined, these stakeholders were consulted to validate the impacts already identified by the company and subsequently to gather information on any other unidentified impacts.</p> <p>At the same time, risks and opportunities (financial materiality) were analyzed, mainly with the strategic working group. To define materiality, the general framework of ESRS 2 was used (for details, see paragraph 1.4.4. Double materiality – results).</p>	<p>ESRS 2 GOV-4 30 31 32 33 GRI 2-23</p>
	<p>Currently, the integration of corporate risk management with sustainability issues is underway. The analysis of financial materiality has highlighted the topics that FOMA needs to monitor and address. The sustainability plan takes into account financial risks, which are monitored by the project manager and periodically overseen by the CEO and CFO.</p> <p>Regarding the material topics of ‘own workers’ and ‘affected local communities’ and the related improvement objectives, the company has an Organizational Model pursuant to Legislative Decree 231/2001 and is aligned with whistleblowing regulations.</p> <p>An internal information system has been set up to bring any significant ESG non-compliance issues to the attention of senior management.</p>	<p>ESRS 2 GOV-5 34 35 36 GRI 2-14</p>
<p>1.4.3 STAKEHOLDER</p>		
	<p>Following the internal assessment of the company’s impacts, a process for involving relevant stakeholders was established. To determine the importance of individual stakeholders, an influence analysis tool ‘inside/out and outside/in’ was prepared, which allowed for the selection of the group of individuals to ask for their opinion on the impacts.</p> <p>Based on:</p> <ul style="list-style-type: none"> • relevance by influence • pertinence to impacts <p>each (group of) stakeholder(s) was assigned the objective of validating and/or assessing the impacts of FOMA and the methods of involvement, identified as follows:</p> <ul style="list-style-type: none"> • online interview • focus group • questionnaire. 	<p>ESRS 2 SBM-2 45A (I-IV) AR 16 GRI 2-29</p>



	<p>The results were compared with those from the company’s assessment to verify:</p> <ul style="list-style-type: none"> • any gaps that required significant modifications • information that complemented the company’s perspective from different viewpoints • considerations that enriched the overall framework. <p>The findings from the stakeholder engagement were then discussed internally to complete the impact assessment and guide the development of the sustainability plan.</p> <p>The stakeholders involved include companies that can influence FOMA, customers and suppliers, beneficiaries of FOMA’s territorial policies, partners, consulting firms specializing in specific sectors, particularly relevant institutional entities and other relevant corporate entities.</p> <p>The interviews and discussions with various stakeholders were conducted by a third party collaborating with FOMA for the preparation of the sustainability report, to ensure the necessary impartiality in the company’s assessments and stakeholder opinions. The analysis revealed that FOMA directly organized the engagement activities, arranging logistics and facilitating initial contact with everyone.</p>	<p>ESRS 2 SBM-2 45A (I-IV) AR 16</p> <p>GRI 2-29</p>
	<p>The interviews allowed for the investigation not only of the relevance of the impacts but also of the consequences of the impacts on some interviewees. Employment agencies highlighted how FOMA integrates temporary workers in the same way as internal employees, ensuring all protective measures as well as development and training for those working on a fixed-term basis within the company. In their opinion, this helps maintain a high-quality standard in the process and also contributes to the development of workers’ skills and the labor market.</p> <p>Support for skill development in the labor market, particularly among the younger generations, is a theme that emerges from the collaboration with high schools. This is the result of discussions with representatives of high schools who emphasized how the ongoing collaboration with FOMA allows for the development of young professionals already prepared for the labor market.</p> <p>In general, all the interviewed stakeholders found that the company’s analysis of its impacts was accurate.</p>	<p>ESRS 2 SBM-2 45B</p> <p>GRI 2-29</p>
<p>1.4.4 DOUBLE MATERIALITY - PROCESS</p>		
<p>1.4.4.1 DEFINITION OF THE COMPANY’S MATERIALITY PROFILE</p>		
	<p>a. Assessment of Impacts in the Doughnut Economics Approach: during the materiality definition process, the first step was the analysis of the company’s system (view image pag 11), connecting and analyzing the areas of impact. The process took into account the company’s operations and their commercial relationships, as well as the connections with the UN Sustainable Development Goals, incorporating the concepts of doughnut economics. It focused on specific activities, commercial relationships, geographical areas and other factors that could generate a higher risk of negative impacts. This methodology allowed for the exploration of the company’s activities’ effects on the planet’s ecological limits, such as climate change, biodiversity loss, sustainable water resource management and others. It also examined how the company’s activities support the fundamental needs of the communities in which the company operates. The introduction of a detailed analysis in the company’s report broadened the perspective, facilitating the identification of long-term and less obvious impacts that affect daily work and activities.</p>	<p>ESRS 2 IRO-1 53 A 53 B I 53 B II</p> <p>GRI 2-14 3-1</p>

	<p>b. Application of the Analysis Key to the Company System: this analysis method was applied to explore each segment of the company system, identifying key actions and direct outcomes. This led to compiling an initial list of impacts, both positive and negative, potential and actual, direct and indirect; as well as a list of risks and opportunities.</p>	<p>ESRS 2 IRO-1 53 A 53 B I 53 B II</p> <p>GRI 2-14 3-1</p>
<p>1.4.4.2</p>	<p>IDENTIFICATION, ASSESSMENT, PRIORITIZATION AND MONITORING OF POTENTIAL AND ACTUAL IMPACTS ON PEOPLE AND THE ENVIRONMENT</p>	
	<p>The severity of the impacts was assessed by the central working group in collaboration with relevant stakeholders (including external and internal experts in key sectors¹ to ensure a holistic evaluation). The parameters considered for assessing the severity of the impacts were:</p> <p>a. Intensity of impacts: This parameter assesses the severity of a negative impact or the extent of the benefits of a positive impact for people or the environment. An in-depth analysis of this aspect allows for understanding the real impact and its immediate implications.</p> <p>b. Scale of impacts: Measures the distribution of positive or negative effects. For environmental impacts, this can include the extent of the geographical area affected or the magnitude of the environmental damage. In social terms, it reflects the number of people influenced, positively or negatively, by the effects in question.</p> <p>c. Irremediability of negative impacts: Analyzes whether and how it is possible to mitigate negative impacts. It focuses on the feasibility of restoring the environment or improving the condition of affected people to their original state, thus assessing the permanence of the harmful effects.</p> <p>Additionally, for the impacts identified as potential, the likelihood of occurrence was also assessed.</p> <p>Subsequently, a final list was compiled that groups all impacts judged to be above the materiality threshold, classified as ‘critical,’ ‘significant,’ and ‘important.’ The impacts that, in light of the parameters described above, emerged as ‘informative’ or ‘minimal’ were considered below the relevance threshold and therefore excluded from this report and the sustainability plan planning. The final list is presented in the following sections of the document.</p>	<p>ESRS 2 IRO-1 53 B 53 B III 53 B IV</p> <p>GRI 2-14 3-1</p>
<p>1.4.4.3</p>	<p>EVALUATION OF THE FINANCIAL MATERIALITY - ANALYSIS OF ESG RISKS AND OPPORTUNITIES</p>	
	<p>A thorough assessment of financial materiality was conducted, carefully examining the risks and opportunities related to environmental, social and governance (ESG) aspects. In drafting the list of risks and opportunities to be evaluated, the connections with impacts and dependencies, as well as the risks and opportunities that may arise from such impacts and dependencies, were considered.</p> <p>The process included analyzing the probability of occurrence of such risks or opportunities and assessing their potential financial impact, which can be negative for risks or positive for opportunities. A temporal approach was adopted, divided into three horizons: short, medium and long term, basing the estimation of financial effects on qualitative (severity) and probabilistic criteria. Techniques such as brainstorming, scenario analysis and simulations were used to identify potential risks and opportunities in each time horizon. Additionally, variables such as technological changes, regulatory developments, market trends and environmental impacts, which can vary in intensity and probability over time, were considered.</p>	<p>ESRS 2 IRO-1 53 C 53 C I 53 C II 53 C III</p> <p>GRI 2-14 3-1</p>

¹For the full methodology of STK involvement refer to the specific chapter.



	<p>Finally, sustainability risks were prioritized based on their urgency and impact, also considering the probability of occurrence and the company's ability to mitigate such risks.</p> <p>During this analysis, a materiality threshold was established that covered all risks and opportunities classified as 'critical,' 'significant,' or 'important' in at least one of the considered time scenarios. Consequently, it has been excluded those risks and opportunities that, according to the mentioned criteria, were assessed only as 'informative' or of 'minimal' significance.</p>	<p>ESRS 2 IRO-1 53 C 53 C I 53 C II 53 CIII</p> <p>GRI 2-14 3-1</p>
	<p>Currently, the decision-making process and related internal control procedures, as well as the process of evaluating and managing impacts and risks, are being integrated into the overall risk and opportunity management process.</p>	<p>ESRS 2 IRO-1 53 D 53 E 53 F</p> <p>GRI 2-14 3-1</p>
	<p>The input parameters considered for the analysis of business impacts and risks included:</p> <ul style="list-style-type: none"> • company financial statements, environmental and social data, industry benchmarks; • the geographical and sectoral scope of business activities; • economic growth projections, climate change scenarios, environmental regulations and stakeholder expectations. 	<p>ESRS 2 IRO-1 53 G</p> <p>GRI 2-14 3-1</p>
	<p>The previous sustainability report was prepared following the GRI2016 guidelines. These guidelines required the evaluation and identification of material topics through the materiality matrix.</p> <p>In the current drafting of the sustainability report, the CSRD-EFRAG standard has been adopted, transitioning the reporting process from the old to the new chosen standard.</p> <p>As a result, the methods of materiality analysis have been modified, adopting double materiality, as well as the method of selecting stakeholders (STK).</p> <p>As much as possible and as long as they are still aligned with the new impact and risk & opportunity assessment, the material topics addressed in the previous report have been revisited and reclassified in the current report, according to the CSRD-EFRAG standard.</p>	<p>ESRS 2 IRO-1 53 H</p> <p>GRI 2-14 3-1</p>
<p>1.4.5</p>	<p>DOUBLE MATERIALITY - RESULTS</p>	
<p>1.4.5.1</p>	<p>DEFINITION OF THE MATERIALITY</p>	
	<p>In defining materiality, the company categorized impacts, risks and opportunities that exceed the predetermined threshold according to their thematic relevance. From this grouping, material topics emerged, which are those sustainability elements that are important and, consequently, deserve a prominent position within the sustainability report and the company's strategic plan. A sustainability aspect becomes relevant in terms of impact, risk and opportunity when it aggregates and describes the material, real or potential, positive or negative effects of the company on people and the environment in a short, medium and long-term perspective, as well as the negative and positive financial effects to which the company could reasonably be subjected.</p> <p>From this evaluation, the severity is summarized on a scale from 1 (minimal) to 5 (critical). Impacts, risks and opportunities that scored from 3 (important) to 5 (critical) were considered material.</p>	

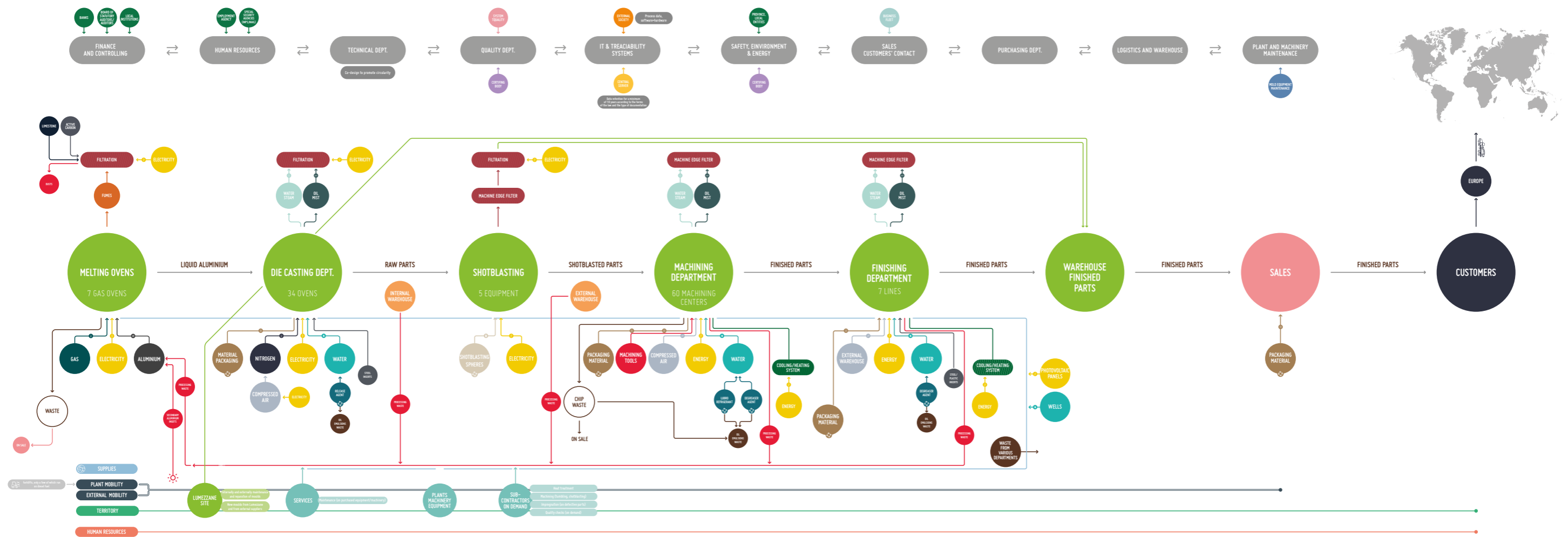
<p>The list of material topics identified is as follows:</p> <ul style="list-style-type: none"> • Climate Change (E1) • Pollution (E2) • Water Resource (E3) • Circular Economy (E5) • Own Work force (S1) • Affected Local Communities (S3) • Governance (G1) <p>For this first report following the CSRD guidelines, it was decided to report on the areas E1, S1, S3 (local) and G1. For the remaining areas, a general framework of impacts, risks and opportunities (IRO) was provided. Efforts were also made to align the material topics from the previous report, based on GRI, with the new framework. The names of the new material topics were standardized to the new standard, modifying and integrating terms only where necessary:</p> <ul style="list-style-type: none"> • Climate Change (E1) • Own Work force (S1) • Affected Local Communities (S3) • Governance (G1) <p>Based on this new structure for managing material topics, the strategic committee has developed an improvement plan integrated into the sustainability strategy.</p> <p>The material topics not covered in this edition will be implemented in future sustainability reports.</p>	
<p>Accurately identifying the impacts, risks and opportunities related to sustainability is essential for the company, not only for drafting an effective report but also for strategically guiding business development.</p> <p>It is increasingly evident that the company's efforts towards sustainability must be intentionally directed towards mitigating or resolving negative impacts, as well as strengthening and monitoring positive ones. Additionally, it is crucial for the company to minimize risks and seize emerging opportunities. While categorizing material topics is useful for organizing work and structuring reporting, maintaining a focus on specific impacts, risks and opportunities remains essential to ensure the clarity and direction of the company's sustainability commitment.</p>	
<p>For the description of the results of the impact and risk & opportunity analysis assessment, please refer to the individual chapters of the material topics.</p> <p>The legend for interpreting the results is as follows:</p> <p>Type of Impact / Risk / Opportunity:</p> <p>(-) negative (+) positive (R) risk (O) opportunity</p> <p>Current/ Potential</p> <p>(!) negative (?) positive</p> <p>Diretto / indiretto</p> <p>(→) direct (-→) indirect</p> <p>Evaluation</p> <p>●●●● critical ●●●● significant ●●● important ●● minimal ● informative</p>	<p>ESRS 2 SBM-3 49</p>



THE "SYSTEMIC" PICTURE OF FOMA



SCAN THIS QR CODE TO OPEN THE "FOMA SYSTEM" MAP



ESRS E1, G1, S1 E S3: HERE ARE SOME OF THE ACTIONS THAT FOMA HAS IMPLEMENTED AND SOME OF THE FUTURE GOALS TO WHICH WE ARE ALREADY COMMITTED.

E1 CLIMATE CHANGE

- Purchase of new generation equipment and machinery for the optimization and maximization of general consumption.
- Implementation of online system for consumption monitoring.
- Development of CO2e emission reduction plan.
- Continuous improvement of environmental communication and commitment.

G1 BUSINESS CONDUCT

- Further adaptation and improvement of our Organizational Model 231 and Code of Ethics.
- Introduction of Whistleblowing platform.
- ASI Certification.

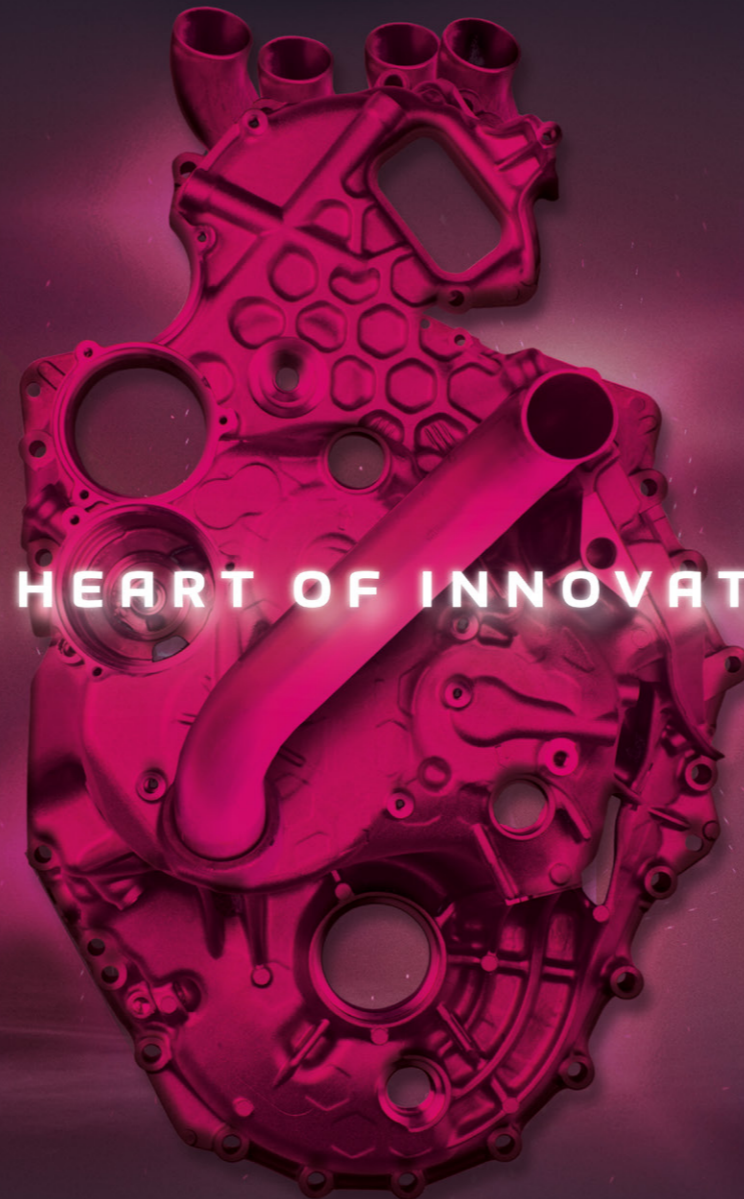
S1 OWN WORKFORCE

- Enhancement of corporate welfare system.
- Introduction of flexible working hours.
- Academy - training plan.
- Optimization of supplier qualification process.

S3 AFFECTED COMMUNITIES

- Welcoming students for school-to-work alternation.
- Proactive collaboration with higher technical institutes and Universities.
- Constant contact with local communities (charity, events, etc.).

THE HEART OF INNOVATION





2.1 GENERAL INFORMATION

2.1.1 GOVERNANCE

Aluminum smelting is an energy-intensive process and this poses a challenge for FOMA in terms of mitigating global warming.

Consequently, governance for defining a greenhouse gas (GHG) reduction plan is crucial to effectively address the challenges of climate change. FOMA is aware that a well-structured governance system ensures that all stakeholders collaborate in a coordinated manner to achieve emission reduction goals.

This process includes analyzing the company’s current status and developing clear policies that support the company in the challenging journey towards low-carbon production or, ultimately, zero-carbon production. This must be accompanied by transparent monitoring and reporting mechanisms and the implementation of innovative and sustainable strategies to create a transition plan for mitigating climate change.

Effective climate governance not only reduces GHG emissions but also promotes resilience and long-term sustainable development.

In the coming years, FOMA is committed to evaluating and organizing an emission reduction plan compatible with the goals of the Paris Agreement. FOMA continues its journey, formalized for the first time in 2020, with the aim of developing a sustainability strategy. In this sustainability report, prepared according to the new guidelines, the company has a series of planned actions compatible with GHG emission reductions. At the same time, it aims to align with the necessary indicators and collect useful data to support more robust plans.

The main levers FOMA intends to use are energy sobriety and energy performance. The planned actions include, on the one hand, usage sobriety through the adoption of behaviors and practices aimed at reducing energy consumption by eliminating waste and using resources consciously. This concept implies not only energy efficiency but also a critical reflection on the actual need and methods of energy use. On the other hand, dimensional sobriety through the purchase of machinery suited to specific needs, avoiding oversizing or overpowering. Additionally, FOMA aims to optimize production processes to improve efficiency.

For details of the planned interventions, see the following paragraph ‘Actions’.

E1-1
14
16A
B
C





2.1.2 STRATEGY

Table 1: risks listed in Section II of the appendix to the delegated acts of the EU Taxonomy

	Temperature-related	Wind-related	Water-related	Solid mass-related
Chronic	Changing temperature (air, freshwater, marine water)	Changing wind patterns	Changing precipitation patterns and type (rain, hail, snow/ice)	Coastal erosion
	Heat stress		Precipitation or hydrological variability	Soil degradation
	Temperature variability		Ocean acidification	Soil erosion
	Permafrost thawing		Saline intrusion	Solifluction
			Sea level rise	
			Water stress	
Acute	Heat wave	Cyclone, hurricane, typhoon	Drought	Avalanche
	Cold wave/frost	Storm (including blizzards, dust and sandstorms)	Heavy precipitation (rain, hail, snow/ice)	Landslide
	Wildfire	Tornado	Flood (coastal, fluvial, pluvial, ground water)	Subsidence
			Glacial lake outburst	

To prepare for and adapt to the impacts of climate change, Foma conducted an in-depth analysis of the risks and opportunities of climate change through a resilience analysis. The assessment methodology included the analysis of both physical and transition risks.

Physical risks refer to those caused by acute events, such as the increased severity of extreme weather events (e.g., cyclones, droughts, floods and fires) or by long-term (chronic) changes in precipitation and temperature and increased variability in weather patterns (e.g., sea level rise).

Transition risks, on the other hand, refer to those associated with the shift towards a global low-carbon economy. The most common of these involve political and legal actions, technological changes, market responses and compliance (reputation considerations, regulations, etc.).

The physical risks considered were those listed in Section II of the appendix to the delegated acts of the EU Taxonomy¹ and visible in Table 1.

**E1.SBM-3
18
E1.IRO-1
20C
AR12A
B
C
AR 13
AR 14**
GRI 3-2 | 201-2 | 202-2





The resilience analysis included:

- The identification of climate risks through the recognition of the main climate risks specific to the area of interest. These can include events such as floods, droughts, heatwaves, tornadoes, sea level rise and others. This was assessed using historical data and climate projections to identify the frequency and severity of these events. This initial analysis is conducted based on the forecast information of the RCP 4.5 scenario², which represents a stabilization scenario where mitigation policies and actions manage to keep greenhouse gas concentrations at a medium level. This was considered useful for evaluating a future where mitigation actions are partially effective, providing a realistic framework compared to extreme scenarios.

**E1.SBM-3
19A
AR 6
E1.IRO-1
21
AR 13
AR 14
AR 15**
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<ul style="list-style-type: none"> • The climate risks assessment under RCP 4.5 that helps develop robust adaptation strategies against a wide range of moderate climate conditions, avoiding over- or under-investment in adaptation measures. RCP 4.5 is particularly useful for assessing medium- to long-term climate risks (2050), a relevant time horizon for many political and economic decisions. It provides indications of how climate conditions might change in more manageable times compared to long-term scenarios (2100). • The vulnerability assessment, which evaluated the extent to which a territory, its community and its activities are susceptible or unable to cope with the adverse effects of climate change, including climate variability and extremes. To assess the vulnerability of a system, it is necessary to examine its exposure and sensitivity to a given climate change hazard and the adaptation capacities already acquired. 	<p>E1.SBM-3 19A AR 6 E1.IRO-1 21 AR 13 AR 14 AR 15</p> <p>GRI 2-19</p>
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The elements considered for the assessment of physical and transition risks are classified based on the category of climate risk, the category of value chain risk, the type of natural event and the element of the value chain affected. Each risk is assigned a score for the extent of the expected damage, the probability of the damaging event occurring and the vulnerability of the company site, according to specific methodologies and scales.

- 
Category of climate risk:
 physical, indirect physical, infrastructural, market, regulatory
- 
Category of value chain risk:
 procurement, process, management, related to demand and sales
- 
Typ of natural event:
 see table 1
- 
Affected element of the value chain :
 clients, employees, suppliers, transport infrastructure, IT and communication, management and compliance, goods stored in warehouse

As for the assessment of opportunities, this identifies a series of opportunities classified based on the category of climate opportunity, the category of value chain opportunity, the element of the value chain affected and the key driving factor of the opportunity.

For each opportunity, a score is assigned for the extent of the expected benefit and the probability of the advantageous event occurring, according to specific methodologies and scales.

E1.SBM-3
19B
AR 7A
AR 11A
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AR 13
AR 14





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¹COMMISSION DELEGATED REGULATION (EU) 2021/2139 of June 4, 2021 - climate change mitigation or adaptation to climate change.

²Climate scenarios or Representative Concentration Pathways (RCPs) are climate scenarios expressed in terms of concentrations of greenhouse gases rather than in terms of emission levels. The number associated with each RCP indicates the magnitude of anthropogenic climate change by 2100 compared to the pre-industrial period.



<p> Category of climate opportunity: energy efficiency, resource efficiency, market opportunities, products and services</p> <p> Category of value chain opportunity: procurement, process, management, related to demand and sales</p> <p> Affected element of the value chain: water supply, energy supply, transport infrastructure, suppliers, land and buildings, management and compliance</p> <p> Key driving factor of the opportunity: energy efficiency, resource efficiency, market opportunities, products and services</p> <p>The assignment of the risk/opportunity level is conducted by multiplying the probability of occurrence (P) of the climate event/return time (frequency) by the extent of the damage (D)/expected benefit (B). The assessment of P and B/D, in this initial analysis, is based on the forecast information of the RCP 4.5 scenario, a stabilization scenario (significant reductions). In the case of risks, as required by the EU Taxonomy, an additional multiplicative factor, Vulnerability (V), is added according to the formula:</p> <div style="background-color: #f2f2f2; padding: 5px; margin: 10px 0;"> <p>RISK=PROBABILITY X DAMAGE X VULNERABILITY (1)</p> <p>OPPORTUNITY=PROBABILITY X BENEFIT (2)</p> </div> <p>Where:</p> <ul style="list-style-type: none"> • extent of damage / benefit - measurement or assessment of the severity and extent of the negative/positive consequences resulting from a harmful/beneficial event • probability of occurrence - a measure that indicates how likely it is that a certain event will happen • return period - the frequency with which an extreme event can be expected to occur. It is generally defined as the inverse of the probability that the event will occur in a given year • vulnerability - the degree to which a territory, its community and its activities are susceptible or unable to cope with the adverse effects of climate change, including climate variability and extremes. To assess the vulnerability of a system, it is necessary to examine its exposure and sensitivity to a given climate change hazard and the adaptive capacities already acquired. <p>The climate risk analysis has led to the following results (only risks and opportunities that exceeded the threshold are reported):</p>	<p>E1.SBM-3 19B AR 7A AR 11A 11C AR 13 AR 14</p> <p>GRI 2-19</p>
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RISK CATEGORY	INITIATIVE
Regulatory risk	
Increased demands on management: The growing complexity and challenges that executives and business leaders face in today's economic and social context are increasing due to rising risks and changes in economic and social conditions. This increases management challenges.	Training to ensure managers are well-prepared and knowledgeable about ESG issues – ESG specialist training.
Costs for CO2 emission certificates: With the increasing effects of climate change, the number of available CO2 emission allowances may decrease and their price may consequently rise.	Reducing CO2 emissions to limit future costs for potential non-compliance.

Market risk	
Reputational risks: Customers and the public demand that companies take social and environmental responsibility and adopt ambitious measures (including investments) to protect the climate and the environment.	Sustainability report with concrete and credible goals - dialogue with stakeholders.
Direct and indirect physical risks	
<p>Pralboino and Lumezzane sites Damage to company property and buildings related to storm events caused by strong winds, especially to roofs and facades.</p> <p>Pralboino site Damage to buildings/structures related to hail events. Damage to sensitive components (e.g., skylights and photovoltaic system).</p> <p>Lumezzane site Moisture penetration and damage to the building structure. Deterioration of the building fabric due to moisture penetration into the masonry.</p> <p>Lumezzane site Damage to buildings due to landslides. Under certain conditions (soil, slope), heavy and persistent rainfall can lead to landslides, which can cause damage to buildings.</p>	<p>Structural measures to reduce the risk have already been implemented sufficiently.</p> <p>Insurance coverage</p>
Infrastructural risk	
<p>Pralboino site Power outages: Climate change poses risks to energy infrastructure.</p> <p>Pralboino site The limited availability of water resources, such as process water for industry and failures of water cooling systems, along with fluctuations in the quality of water available for industry caused by seasonal contamination due to low groundwater levels, represent significant challenges for the company.</p>	<p>Organizational measures aimed at managing and minimizing risks.</p> <p>Proactively monitor and manage water resources to prevent shortages and seasonal contamination.</p>
Energy efficiency	
Energy - anticipation of the adverse effects of climate change - reduction of operating costs (through improvements in energy use efficiency).	Invest in new technologies, improve energy efficiency levels and reduce operating costs.
Resiliency	
Increase in demand for a product with a low carbon footprint (and a low environmental footprint in general). Maintaining the relevance of business activities through the ability to offer the market products and/or services with a low footprint.	Future definition of an emissions reduction plan.
Resource efficiency	
Use of secondary raw materials (e.g., materials from recycling, materials from cascading systems from other production processes).	Use of secondary raw materials.
Financial benefit	
The use of low-carbon energy sources allows organizations to save on annual energy costs, reduce exposure to the risk of fossil fuel price fluctuations and benefit from the trend towards decentralized clean energy.	Expand the photovoltaic park. Increase the share of renewable energy purchased from energy providers.





2.1.3 IMPACTS, RISKS AND OPPORTUNITIES

The process of identifying and evaluating impacts, risks and opportunities was conducted as described in the introductory chapter.
The results obtained for the topic of Climate Change are reported below:

E1.IRO-1
20A
AR 9
AR 10
E1.IRO-1
20B
AR 13
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Positive and negative impact	(+/-)	Related to	Current / Potential	Direct / Indirect	Evaluation
Contribution to global warming	(-)	Production and/or use of electricity Purchase of electricity from an external provider Methane Trigeneration	(!)	(→)	●●●●●
	(-)	Fuel use for internal transportation	(!)	(→)	●●●●
		Employee commuting		(→)	●●●●●
		Fuel use for freight transport both to and from FOMA		(→) (→)	●●●●●
		Methane consumption for aluminium melting		(→) (→)	●●●●●
	(-)	Purchase of nitrogen and auxiliary materials (salt), hydraulic oil from the supply chain	(!)	(→)	●●●●●
	(-)	Purchase of auxiliary elements from the supply chain (plastic and steel inserts)	(!)	(→) (→)	●●●●●
	(-)	Purchase of plastic, cardboard, metal and wood packaging	(!)	(→) (→)	●●●●
Recovery of produced waste		(→)		●●●●	
Trigger	(R/O)	Risk / Opportunity	Evaluation Short term	Evaluation Medium term	Evaluation Long term
Contribution to global warming new regulations	R	Need for significant efforts to seek alternative solutions for powering plants and/or new alternative technologies in order to stay in line with European regulations regarding the reduction trajectory.	●●●●	●●●●●	●●●●●
Global conflicts, geopolitical instability and conflicts in geographic areas of market interest	R	Disruptions in energy supply: Conflicts in key areas for energy production or transit, such as the Middle East or strategic maritime routes, can cause disruptions in the supply of oil, natural gas and other fuels.	●	●●●	●●●
Global conflicts, geopolitical instability and conflicts in geographic areas of market interest	O	Reducing dependence on traditional sources through the diversification of energy sources and investments in new technologies: geopolitical tensions can incentivize investments in new energy technologies, such as solar, wind and hydroelectric power.	●	●	●●●
Technological innovation in support of sustainability	O	Increase in energy performance resulting from the adoption of new plant technologies.	●●●	●●●	●●●

2.2 POLICIES

The surrounding environment is a component that contributes to determining the quality of our lives. For this reason, it is absolutely essential that FOMA protects the environment and has a long-term vision for environmental policies.

**E1-2
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GRI 3-3

FOMA recognizes that all the organization's activities have an impact on the environment and climate change. We will reduce the environmental and climatic impacts of our operations.

Our process is one of continuous improvement of the company's environmental policies, programs and behavior, taking into account technological progress, scientific knowledge and community expectations. We are committed to reducing greenhouse gas emissions, improving energy efficiency and promoting the use of renewable energy sources to contribute to climate change mitigation.

2.3 ACTIONS

Following the assessment of climate change risks and opportunities and the double materiality analysis, FOMA has evaluated a series of actions aimed at reducing risks and negative impacts and strengthening opportunities and positive impacts.

**MDR-A
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Actions planned for the next two years	Expected advantages	Deadline
1. Online monitoring system for electricity and gas consumption for high-usage facilities.	Operational efficiency with waste reduction. Real-time data that helps quickly identify anomalies and savings opportunities.	EOY 2025
2. Installation of photovoltaic solar panels to increase roof coverage (+2.5 MW).	Self-production of renewable energy. CO2 savings.	EOY 2024
3. Implementation of a trigeneration system with thermal energy recovery for heating and cooling work environments.	Improvement of overall energy efficiency, reducing operational costs and environmental impact.	EOY 2024
4. Adoption of new generation compressors, with water cooling instead of air cooling, using the same water from the trigeneration system.	Reduction of energy consumption.	EOY 2024
5. Purchase of new generation filters for the extraction system in the foundry area.	Reduction of energy consumption.	EOY 2024
6. Introduction of exchangers for melting furnaces.	Reduction of energy consumption.	EOY 2024
7. Purchase of new generation presses with inverters.	Reduction of energy consumption.	EOY 2025
8. Increase in cooling temperature (from 23°C to about 27°C) in some of machining areas.	Reduction of energy consumption.	EOY 2025
9. Analysis of the use and distribution of thermal energy in the air conditioning of the machining areas.	Reduction of energy consumption and greenhouse gas emissions, improving the overall energy efficiency of the plants.	EOY 2025
10. Replacement of the extraction system in the furnace department.	Greater energy efficiency.	EOY 2026
11. Replacement of some department carts with AGV shuttles with automatic guidance that will have lithium batteries.	Higher energy density, longer lifespan and faster charging times compared to lead-acid batteries. Additionally, they are lighter and more compact, have a longer service life and require less maintenance.	EOY 2026



Actions planned for the next two years	Expected advantages	Deadline
12. Promotion of car sharing and soft mobility through promotional initiatives.	Reduction of traffic and greenhouse gas emissions, promoting sustainable mobility.	EOY 2024
13. Strengthening predictive maintenance of presses and shears through regular checks and interventions on equipment and systems to prevent failures and malfunctions.	Operational efficiency, extending the service life of equipment and reducing unexpected costs related to urgent repairs and downtime.	2027
14. Expansion and formalization of the company policy to prioritize purchasing from local suppliers (already informally adopted).	Support for the local economy, reduction of emissions related to transportation.	EOY 2024 (not company policy, but internal purchasing procedure/supplier rating)
15. Improvement of waste sorting: formalization of an ESG-related parameter in the negotiation of the internal contract, adding a third criterion to the current evaluation.	Strengthening the company's commitment to sustainability, reducing costs, including environmental costs, related to waste management.	EOY 2024

2.4 INDICATORS

Energy consumption and energy mix	Reference year 2023
1. Fuel consumption from coal and coal products (MWh).	-
2. Fuel consumption from crude oil and petroleum products (MWh).	-
3. Fuel consumption from natural gas (MWh).	76.286,24
4. Fuel consumption from other fossil sources (MWh).	-
5. Consumption of purchased or acquired electricity, heat, steam, or cooling from fossil sources (MWh).	17.675,62
6. Total energy consumption from fossil sources (sum of lines 1 to 5). Percentage of fossil sources in total energy consumption (%).	93.961,86 83,60%
7. Energy consumption from nuclear sources (MWh). Percentage of energy consumption from nuclear sources in total energy consumption (%).	593,19 0,53%
8. Fuel consumption from renewable sources, including biomass (includes industrial and urban waste of biological origin, biogas, renewable hydrogen, etc.) (MWh).	-
9. Consumption of purchased or acquired electricity, heat, steam and cooling from renewable sources (MWh).	15.042,94
10. Consumption of self-generated non-fuel renewable energy (MWh).	3.395,26
11. Total energy consumption from renewable sources (MWh) (sum of line 8 to 10).	18.438,20
Percentage of renewable sources in total energy consumption (%).	16,40%
Total energy consumption (MWh) (sum of line 6 to 11).	112.400,06

Energy intensity relative to net revenue	Reference year 2023
Total energy consumption of activities in high climate impact sectors relative to net revenues from such activities (MWh/monetary unit-euro).	7,806e-4
Energy intensity relative to total molten aluminum sold	
Natural gas consumption relative to the total molten aluminum sold MWh/ton).	3,902

Greenhouse Gas Emissions	Reference year 2023
GHG emissions Scope 1	
Gross Scope 1 greenhouse gas emissions (tCO ₂ eq).	13591,39
Percentage of Scope 1 GHG emissions from regulated emission trading schemes (%).	-
GHG emissions Scope 2	
Gross location-based Scope 2 greenhouse gas emissions (tCO ₂ eq).	10211,78
Gross market-based Scope 2 greenhouse gas emissions (tCO ₂ eq).	10281,20
Significant Scope 3 GHG emissions	
Total gross indirect GHG emissions (scope 3) (tCO ₂ eq).	
Purchased Goods and services (secondary aluminum).	24670,99
Waste generated in operations (82,55% of weight of the total waste produced).	3025,13
Employee commuting.	383,47
Total GHG Emissions	
Total GHG Emissions (location based) (tCO ₂ eq).	51885,48
Total GHG Emissions (market based) (tCO ₂ eq).	51954,90





3.1 GENERAL INFORMATION

	<p>The Chamber of Commerce certificate of FOMA reports the governing bodies of the company.</p> <p>The communication to all interested parties regarding the role of the administration, management and supervisory bodies in corporate conduct is contained in the Code of Ethics under Article 1 “Duties and Responsibilities of Directors and Managers” and is available on the company’s website. This sustainability report also refers to the responsibilities of the directors. Article 10 of the Code of Ethics regulates the methods by which internal control is exercised, the functioning of the Supervisory Body and the involvement of the Board of Directors. The Board of Directors is responsible for defining the guidelines of the internal control system, which is understood as a set of processes aimed at monitoring the efficiency of business operations, the reliability of financial information, compliance with laws and regulations, and the safeguarding of company assets. The Board of Directors oversees the prevention and management of the company’s identified risks and periodically verifies the adequacy of the system, with the collaboration of the Supervisory Body. The Chief Executive Officers are tasked with identifying typical business risks, in relation to the characteristics of the company’s activities and the sector in which it operates, and implementing the guidelines established by the Board of Directors through the design and monitoring of the internal control system. They do not directly perform the internal control function, which is entrusted to the designated function, but they periodically update the Board of Directors and report to it at least semi-annually on the activities carried out and the adequacy of the internal control. The Supervisory Body also has a similar reporting obligation. The Supervisory Body is collegial and composed of three members with the necessary competencies, one of whom is an internal subject and holds a high position within the company organization.</p>	<p>G1-GOV-1 5A GRI 2-12</p>
	<p>In particular, the directors and the Supervisory Body have expertise in compliance with current laws and regulations, principles of fairness and impartiality, as well as business activities and business ethics, confidentiality and the internal control system.</p>	<p>G1-GOV-1 5B GRI 2-9</p>
	<p>On the company’s website, there is a section dedicated to Whistleblowing for reporting concerns related to illegal behaviors or actions that contradict the Code of Conduct or similar internal rules. This section also outlines the scope and methods for reporting. Additionally, the final section of the Code of Ethics, referred to as “Implementation and Final Provisions,” addresses the reporting of behaviors and conduct that violate the principles and provisions contained in the Code of Ethics, as well as the consequences of such violations.</p>	<p>G1-GOV-1 9 AR1 GRI 3-1</p>
	<p>In the final section of the Code of Ethics, under “reporting violations of the Code,” it states that “FOMA S.P.A.” will act to protect whistleblowers against any form of retaliation, discrimination, or penalization, while also ensuring the confidentiality of the whistleblower’s identity. It also mentions the initiation of “an appropriate investigation by the competent bodies.”</p>	<p>G1-GOV-1 10C/E GRI 2-26</p>



Positive and negative impact	(+/-)	Related to	Current / Potential	Direct / Indirect	Evaluation
Income and work prevention and detection of corruption	(+)	231 e Code of Ethics. Promotion of a culture where integrity and transparency are fundamental values. Disciplinary measures against those who violate anti-corruption policies.	(!)	(→)	●●●●●
Solutions to Global Problems contribution to research for the development of the sector	(+)	Collaboration with customers and suppliers to find solutions for reducing consumption and impacts.	(?)	(→)	●●●●●
Trigger	(R/O)	Risk / Opportunity	Evaluation Short term	Evaluation Medium term	Evaluation Long term
Increasing regulations and expectations in the field of sustainability	O	Increase in Institutional Trust: The organization's trust from institutions has increased following positive audit results.	●●●●●	●●●●●	●●●●●
Relevance of governance practices within the ESG framework - reputation	O	Social and Gender Equity and Diversity and Inclusion: Companies that promote an inclusive work environment can attract and retain diverse talent, providing advantages in human resource management and business competitiveness.	●●●	●●●	●●●
Relevance of governance practices within the ESG framework - reputation	R	Loss of customer trust in the brand: The absence of genuine commitment in these areas can lead to a loss of trust, with potential negative impacts on sales and brand reputation.	●●●	●●●	●●●
Relevance of governance practices within the ESG framework - reputation	O	Gaining customer trust in the brand: The presence and communication of genuine commitment in these areas can lead to an increase in trust, with potential positive impacts on sales and brand reputation.	●●●●●	●●●●●	●●●●●
Management and regulatory compliance	O	Collaboration between Sectors and Stakeholders: Among companies, non-governmental organizations, academic institutions and governments to develop sustainable low-carbon solutions.	●●●●●	●●●●●	●●●●●
Management and markets	R	Risk of Increased Demands on Management: The need for proactive management, including adaptation and mitigation strategies, as well as broader sustainability strategies.	●●●	●●●●●	●●●●●
Transparency of the supply chain regulation and new laws on supply chain transparency	O	Supply Chain Continuity: Following a strong sharing of environmental, health and safety values and objectives.	●●●	●●●	●●●
Regulations on supply chain transparency sanctions and adjustment costs	R	Requirement to analyze and report information regarding the supply chain, up to the most distant supplier.	●	●●	●●●
Financing of the company Changes in regulations towards sustainability - new regulations	R	Risks related to the financing of activities by credit institutions.	●●●	●●●	●●●

Trigger	(R/O)	Risk / Opportunity	Evaluation Short term	Evaluation Medium term	Evaluation Long term
Sustainable and socially responsible investments	O	An increasing number of investors are seeking investment opportunities in companies with strong ESG performance. Companies that demonstrate a commitment to sustainability can attract sustainable and socially responsible investments, improving access to financing.	●●●	●●●	●●●

3.2 POLICIES

<p>The process that led to the preparation of the Management Model according to Legislative Decree 231/2001 and the drafting of the Code of Ethics, which involved all members of the company's Board of Directors, allowed the identification of risk areas related to business activities. Since FOMA has no relationship with Public Administrations regarding its business practices, it was assessed that the risk related to corruption and extortion is not among the most significant. However, the company has equipped itself with a system for detecting possible offenses according to the Whistleblowing Model, which requires the separation of the Supervisory Bodies and any inspection from the company bodies. The Supervisory Body of Legislative Decree 231/2001 is composed of three members, one of whom is internal to the company.</p> <p>The Whistleblowing body is chaired by the Internal Audit Director and consists of two internal company members from the Human Resources and Health, Safety and Environment functions. To ensure adequate impartiality, the reports are handled by reversed functions.</p>	<p>G1 G1-3 18A B AR 5 AR 6</p> <p>GRI 2-26 3-3 205-1</p>
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3.3 ACTIONS/OBJECTIVE

1. Since 2012, FOMA has implemented a Management Model according to Legislative Decree 231/2001, designating the Supervisory Body. The identification of potential risks related to FOMA's activities was conducted together with the company's Board of Directors. Potential risks related to the environmental and occupational safety spheres were particularly identified. Since there are no relationships with Public Administrations, the risks related to corruption and extortion were not considered particularly relevant. Each employee is presented with the Code of Ethics upon hiring and is informed where they can fully consult it; the new hire is also trained on the Management Model according to Legislative Decree 231/2001. The Code of Ethics is made available to stakeholders on the company's website, while the 231 Model is displayed on notice boards in the various departments. The Management Model and the Code of Ethics are continuously updated in accordance with new regulations and the Supervisory Body verifies their dissemination and adoption. The CEO, as the employer, is the reference figure for the internal dissemination of the Code of Ethics and the Management Model according to Legislative Decree 231/2001. In 2024, the company's CEO has initiated periodic meetings with all employees to engage the staff on topics such as legality, with the aim of further developing a culture of good corporate conduct and raising awareness of the specific operational aspects contained in the mentioned tools.
2. To consolidate institutional trust in the company and strengthen continuous dialogue, FOMA is set to certify itself according to the ASI protocol during 2024. This certification meets ESG criteria and allows certification within a group of aluminum processing suppliers.
3. To develop a systematic dialogue with stakeholders and fulfill the principle of transparency and accountability, FOMA intends to publish its sustainability report biennially (second edition) and, from 2026 based on 2025, annually as required by regulations.
4. The company, already in the industrialization phase, collaborates with various stakeholders to identify new solutions aimed at reducing carbon emissions. FOMA intends to promote forms of cooperation with customers and suppliers to initiate new projects aimed at supporting good business practices, joint actions to reduce environmental impacts and respect for workers' rights.
5. An active collaboration with credit institutions by the company has reduced the risk of its activities being unfinanceable and has consolidated the trust of credit institutions in the company, also due to its good capitalization.

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3.4 INDICATORS	
The company has never been convicted of violating anti-corruption and anti-extortion laws.	G1 G1-4 24 A GRI 2-27
The figure among the administrative bodies responsible for overseeing political influence and lobbying activities is the CEO.	G1 G1-5 29 A GRI 2-9
The company has not made any financial and/or in-kind contributions, directly or indirectly, to political bodies or parties.	G1 G1-5 29 A/I AR 9 AR 10 GRI 2-9 415-1
Regarding payment practices, the company defines the terms contractually.	G1 G1-6 33 D
Currently, there are no ongoing legal proceedings for payment delays.	G1 G1-6 33 C



4.1 GENERAL INFORMATION

The company includes in the categories of its workforce the workers of the production plants, the offices and the management. Temporary workers are included and integrated with the same criteria as employees. All collaborators who can be significantly impacted by the company are therefore included in the scope of the disclosure pursuant to ESRS 2. All the workers mentioned are thus subject to evaluation by Foma regarding the impacts, positive and/or negative, that may affect them, directly or indirectly.

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4.1.1 STRATEGY, IMPACTS, RISKS AND OPPORTUNITIES

The types of workers who may be impacted include at least those who, in production, manoeuvre or operate in coordination with forklifts, all those who may suffer physical damage from mechanical overload, all those subject to stress from work overload, those who are potentially exposed to X-rays, those subject to noise pollution, air pollution and chemical agents present in the company and collaborators potentially exposed to legionella. All the aforementioned cases may also include temporary workers.

S1
SBM-3
14A

Positive and negative impact	(+/-)	Related to	Current / Potential	Direct / Indirect	Evaluation
Well-being of people at the local level	(+)	1. Corporate welfare 2. Company surveys (to be reintroduced).	(!)	(→)	●●●
	(+)	Wellbeing - Engagement of employees through recreational and leisure activities. Supplementary Healthcare Assistance.	(!)	(→)	●●●
Income and work flexibility and work-life balance	(+)	Flexibility offered by the company to employees with a work-life balance.	(!)	(→)	●●●
Well-being of people within the company	(+)	Promotion of healthy lifestyles (beyond regulatory requirements).	(!)	(→)	●●●
Health damages to workers (physical, psychological, social) caused by the nature of work and accidents	(-)	Objective risks present (see Risk Assessment Document) that could lead to injuries.	(!)	(→)	●●●●●
Health damages (physical, psychological, social) caused by the nature of work and occupational diseases	(-)	OCCUPATIONAL DISEASE RISKS <ul style="list-style-type: none"> Air pollution and exposure to chemical agents present in the company Biomechanical overload Exposure to X-rays Work-related stress Night work Noise pollution Legionella 	(?)	(→)	●●●
Social and gender equity diversity and inclusion	(+)	Existence of policies (e.g., in the code of ethics) to ensure the protection of diversity and inclusion.	(!)	(→)	●●●



Positive and negative impact	(+/-)	Related to	Current / Potential	Direct / Indirect	Evaluation
Social and gender equity pay equality	(+)	Related to the guarantee of contractual and salary equality within the company. Currently unstructured.	(?)	(→)	●●●
Internal skill development	(+)	Training and development programs offered by the company to its employees (mainly technical, but also others).	(!)	(→)	●●●
Income and work economic stability at the local level	(+)	Welfare as income support.	(!)	(→)	●●●
Health damages (physical, psychological, social) caused by the nature of work and occupational diseases	(-)	Healthy work environment (including mental health) - Wellbeing.	(!)	(→)	●●●
Trigger	(R/O)	Risk / Opportunity	Evaluation Short term	Evaluation Medium term	Evaluation Long term
Depopulation of peripheral areas by young people	R	Risk of being unable to attract qualified young workers willing to settle in peripheral areas, negatively affecting local growth and innovation dynamics.	●●●	●●●	●
Increasing expectations of workers regarding health, wellbeing, culture, flexibility and benefits in general	R	Increase in recruitment and training costs, loss of knowledge and skills associated with employee turnover.	●●●	●●●	●
Increasing expectations of workers regarding health, wellbeing, culture, flexibility and benefits in general	O	Employee engagement and talent retention due to improvements in the internal company climate and increased awareness of safety and health issues in the workplace.	●●●	●●●	●●●
Increasing expectations of young people for sustainability-related jobs - career opportunities	O	The growing focus of companies and governments on sustainability makes this area of development attractive to young people as a promising field for a meaningful and rewarding career.	●●●	●●●●●	●●●●●
Increasing expectations of workers regarding health, well-being, culture, flexibility and benefits in general	O	Reduction of workplace accident risks and associated costs, such as insurance premiums or lost workdays.	●●●	●●●●	●●●●
Increasing expectations of workers regarding health, well-being, culture, flexibility and benefits in general	O	Employee engagement and talent retention driven by the initiation of innovative initiatives in health and safety.	●●●	●●●●	●●●●

Trigger	(R/O)	Risk / Opportunity	Evaluation Short term	Evaluation Medium term	Evaluation Long term
New technologies, laws and new knowledge about products and processes and their effect on workplace safety and health	○	Reduction of accidents through the introduction of safer technological processes.	●●●●●	●●●●●	●●●●●
Social and gender equity Diversity and inclusion reputation	○	Companies that promote an inclusive work environment can attract and retain diverse talent, bringing advantages in human resource management and business competitiveness.	●●●●●	●●●●●	●●●●●
<p>At Foma, the health, safety and psychophysical integrity of people are considered the most precious assets to be protected at all times, whether at work, at home, or during leisure time.</p> <p>To reduce any negative impacts on workers' health, Foma invests in the identification of hazards, qualitative and quantitative risk assessment, planning and in the implementation of prevention and protection measures, as well as verifying their effectiveness, corrective actions and improvements and training of operational teams. This is done through its internationally certified environmental and safety management processes.</p> <p>Foma is proud to have never recorded any occupational diseases among its people. Historical analysis of workplace accidents shows non-serious incidents related to manual handling and equipment use. To further reduce this impact, Foma is increasingly introducing automated processes.</p>					<p>S1 SBM-3 14B</p> <p>GRI 3-3</p>
<p>Activities that can produce positive impacts for the company's collaborators (employees and temporary workers) include:</p> <ul style="list-style-type: none"> Welfare system, both on top and as a reward. Supplementary health care program. Code of Ethics according to Legislative Decree 231/2001. Predominantly technical training paths, both during recruitment and training, during job changes, and as an integration of their duties. <p>The positive impacts and the types of employees and non-employees in the workforce who are positively influenced or could be positively influenced are defined below:</p> <ul style="list-style-type: none"> WELL-BEING OF PEOPLE AT THE LOCAL LEVEL who can benefit from the welfare services provided by the company, supplementary health services, associative activities and the promotion of healthy lifestyles beyond regulatory obligations, which all employees can benefit from. <p>INCOME AND WORK in relation to:</p> <ul style="list-style-type: none"> Flexibility and protection of work-life balance (all employees) Income support measures that offer economic stability at the local level (employees and temporary workers). <p>SOCIAL AND GENDER EQUITY (employees and temporary workers), due to:</p> <ul style="list-style-type: none"> The existence of policies (e.g., in the code of ethics) to ensure the protection of diversity and inclusion The guarantee of contractual and salary equality within the company. 					<p>S1 SBM-3 14C</p> <p>GRI 3-3</p>



<p>The risks, for which the company has already initiated preventive measures, are related to the increase in recruitment and training costs, loss of knowledge and skills due to company turnover and the potential risk of not being able to attract young, qualified workers willing to settle in peripheral areas, negatively affecting local growth and innovation dynamics.</p> <p>The opportunities that the company has identified are:</p> <ul style="list-style-type: none"> • The growing attention of companies and governments to sustainability makes young people see this area of development as promising for a meaningful and rewarding career. • The reduction of the risk of workplace accidents and related expenses, such as insurance costs or lost workdays. • The engagement of workers and the possibility of retaining talent, given the development of innovative health and safety initiatives. • The reduction of accidents thanks to the introduction of increasingly safe technological processes. • The ability to attract and retain diverse talent, bringing advantages in human resource management and business competitiveness, by promoting an inclusive work environment that values diverse contributions. <p>All these opportunities are overseen by the company, which also relies on the analyses carried out for the activation of the sustainability plan.</p>	<p>S1 SBM-3 14D</p>
<p>The company regulates, through the “Human Rights Protection Policy,” the verification that, within its production sites, there is a total absence of forced or compulsory labor and child labor. This is also documented by the current state of the internal workforce as reported by the Human Resources office.</p>	<p>S1 SBM-3 14F(I)-G(I) <small>GRI 409-1 408-1</small></p>
<p>For main suppliers, the company ensures to gather information regarding the management of their supplies in the specifications. Additionally, in the supplier qualification process, the risk related to workers’ rights in the value chain is assessed.</p>	<p>S1 SBM-3 14F(II)-G(II)</p>
<p>The company’s health and safety management system, along with the analysis conducted within the ESG risk framework, has identified the risks of occupational diseases as previously indicated (S3 – SBM-3 – 14b). All collaborators who are potentially and actually exposed to these risks receive basic training in occupational health and safety management. This includes an onboarding period with mentorship and specific training related to the hazards associated with their job duties. To protect young workers joining the company, a tailored mentorship and training process is provided to meet their needs.</p>	<p>S1 SBM-3 15 AR8 <small>GRI 409-1 408-1</small></p>
<p>The disclosure regarding which material risks and opportunities may arise from impacts and dependencies on people within the company’s own workforce, with reference to specific groups of people, is provided through this sustainability report.</p>	<p>S1 SBM-3 16 AR9</p>



4.2	POLICIES	
	<p>For human resource management, Foma has the following in place:</p> <ul style="list-style-type: none"> • The “Human Rights Protection Policy” and the “Human Resource Management Procedure.” <p>The latter, included in the quality management system, contains detailed guidelines on:</p> <ul style="list-style-type: none"> • Definition and assessment of employee competencies and their training • Delivery of training and its effectiveness • Employee motivation and awareness evaluation • All steps related to the selection and onboarding of new staff. 	<p>ESRS 2 MDR P GRI 2-23</p>
	<p>The policies for managing material impacts, risks and opportunities related to the workforce are based on detection screenings, management models and implementation plans derived from the analyses conducted. The management models and plans adopted include the Ethical Code based on Legislative Decree 231, a three-tier welfare system: contractual, incentive-based and “on top.” The system begins with the welfare provided by the national contract, followed by the incentive-based welfare derived from the conversion of the performance bonus and ending with the “on top” welfare, which is provided at the company’s initiative to all employees or specific categories (e.g., birth bonus, marriage bonus, etc.). Additionally, there is an internal policy on rights and gender equality, as well as activities promoting healthy lifestyles. All policies are directed to all employees (including temporary workers). The responsibility for implementing these policies lies with the CEO, while the welfare plan is managed by the HR Director.</p>	<p>S1 S1-1 19 INDAGINE BENESSERE SVOLTA FINE 2024 GRI 2-23</p>
	<p>The company has developed a specific Policy for the respect of human rights. Its formulation is explicitly based, as stated under the “purpose” section, on the “International Bill of Human Rights and the Declaration of Principles and Fundamental Rights of the International Labour Organization (ILO).” The International Bill of Human Rights collectively includes the two Covenants: the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights. In the document, Foma commits to promoting “the treatment of staff with dignity and respect. Where we do not have direct managerial control, we actively seek to promote compliance with this Policy.” This approach specifically applies to the following areas: diversity and inclusion; freedom of association and collective bargaining; freely chosen employment (absence of forced and child labor); contractual and salary treatment; working hours; recruitment, selection and management of personnel. The company’s commitment in these areas is supported by the development of an organizational culture based on values and legality, as well as the commitment to detect, address and eliminate any form of abuse or non-compliance with human rights. For these reasons, the Policy is made available on the company website and the issue of human rights will be one of the topics discussed by the CEO in future “Plant meetings.”</p>	<p>S1 S1-1 20 A B C S1 S1-1 21 S1 S1-1 22 GRI 2-29 2-25 2-23 3-3</p>
	<p>Foma has always been particularly attentive to the health and safety of its workers. For this reason, a management system has been implemented to prevent workplace accidents, allowing for the detection of near misses through a voluntary reporting mechanism.</p> <p>Within the quality system, there is a form (paper document - Incident Event) in the departments next to each first aid kit. The report is collected by the Prevention and Protection Service Manager (RSPP), who categorizes the event and manages the potential risk with corresponding corrective actions.</p>	<p>S1 S1-1 23 GRI 403-1</p>



<p>The company has established a policy dedicated to the elimination of discrimination. In addition to the previously described human rights protection policy, a system for detecting abuses and non-compliant behaviours has been implemented following the company's adoption of the European Whistleblowing Directive 2019/1937. This tool has been communicated to all employees via a specific "whistleblowing notice" through the company app and is directly accessible on the company website.</p> <p>Supervisory Body</p> <p>In accordance with the provisions of Article 6 of Legislative Decree No. 231/2001, which governs, among other things, the administrative liability of legal entities, the company, with a specific resolution from the Board of Directors, has established the Supervisory Body. This body is endowed with independent powers of initiative and control and is tasked with overseeing the correct and effective implementation of the Organizational, Management and Control Model adopted by the company to prevent crimes that could lead to the company's liability under the decree.</p> <p>The Supervisory Body is composed of three members, one of whom is internal to the company, and has its own regulation. It meets periodically, at least twice a year, or at the request of any of its members, whenever deemed necessary. Furthermore, the Supervisory Body may be convened by the Board of Directors or the Board of Statutory Auditors if they deem it necessary, and can in turn make such a request to report on the operation of the Model or specific situations.</p> <p>The minutes of the Supervisory Body's meetings, along with any information, news and documentation collected during verification activities, are kept by the secretary in a special archive. Access to this archive is permitted only to the members of the Supervisory Body. The same confidentiality treatment applies to the data held by the Supervisory Body in electronic form and to all information acquired in its activities. This documentation is made available to the Board of Directors, the Board of Statutory Auditors, and the Auditor upon their request.</p> <p>Foma introduced the Whistleblowing process in 2017 on a voluntary basis and it was optimized in 2023 following the publication of Legislative Decree No. 24 of 2023.</p> <p>Three individuals within Foma are responsible for receiving, evaluating and processing the reports: the Internal Audit Director and two representatives from the Human Resources Department and the Health, Safety and Environment Department.</p> <p>As mentioned earlier, this process has been communicated to all employees (including temporary workers) through a notice on the company app. The notice and the Whistleblowing Policy are also available on the company portal, which provides a freely accessible online platform for reporters.</p> <p>Detailed instructions guide users in making a report, ensuring complete confidentiality. Reports are automatically sent to the Internal Audit Director, who shares the report's subject matter and is supported by the Legal, Human Resources and Health, Safety and Environment functions, while maintaining and guaranteeing the confidentiality of the reporter's identity, unless stated otherwise by the reporter.</p>	<p>S1 S1-1 24 A B C D</p> <p>GRI 3-3 2-23</p>
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<p>The Internal Audit Director is responsible for:</p> <ul style="list-style-type: none"> • Carrying out all investigative activities (preliminary verification of the existence of the grounds for the report, redirecting reports that are not relevant). • Evaluating the necessary verifications, determining which functions to involve in the analysis, requesting additional information or possibly archiving the report. • Ensuring the confidentiality of the information received, including the identity of the reporter. • Preparing periodic reports regarding the received whistleblowing reports. <p>In the event that the subject of the report involves the Internal Audit Director, the reporter may submit the report directly and exclusively (through the tools provided by the company) to the CEO. In this case, the CEO will independently conduct any necessary investigations.</p>	<p>S1 S1-1 24 A B C D</p> <p>GRI 3-3 2-23</p>
<p>To understand the perspectives of its workforce in relation to decisions and activities aimed at managing actual and potential impacts, during the drafting of the sustainability report, Foma conducts an employee engagement process. This takes the form of focus groups for analysis and in-depth evaluation of the impacts that concern employees. At the same time, interviews are conducted with labor agencies to understand how the needs of temporary workers are considered. Periodic meetings are also held with internal union representatives, overseen by the HR Department and the CEO.</p> <p>For the year 2023, engagement occurred through participants in the technical committee for the drafting of the sustainability plan and a focus group with a representative group of workers.</p> <p>The engagement takes place during the definition phase of double materiality (technical committee participants for sustainability), during the validation of impacts (focus group with selected workers), and periodically, on an annual basis, with union representatives. In all these instances, the effectiveness of measures already implemented is reviewed, as well as the impacts that still need to be mitigated and their severity. No specific focus has been placed on disadvantaged categories, as the company is committed to providing equal opportunities through well-structured policies that apply to all workers.</p> <p>The corporate body responsible for ensuring that the engagement occurs and that the results inform the company's approach, both internally and externally, is the HR Department.</p>	<p>S1 S2-1 27 27 A B C E</p> <p>S1 S2-1 28</p> <p>GRI 3-3 2-29 2-12 2-29</p>
<p>Since 2017, the company has adopted the “whistleblowing” system, which was later adjusted to comply with Legislative Decree 24/2023, as per regulations. This system includes a digital platform available to the workforce for raising concerns or needs directly with the company, ensuring that such matters are addressed. Additionally, an internal policy has been established to eliminate all forms of discrimination, including harassment related to race, sexual orientation, disability, age, political opinions, religion and social background.</p> <p>Foma provides an online platform, accessible freely by whistleblowers, dedicated exclusively to submitting reports (Whistleblowing Portal). The portal is accessible via a link on Foma's official website. Access to the Whistleblowing Portal is subject to a “no-log” policy to prevent the identification of the whistleblower wishing to maintain their anonymity. This means that if access is made from a device not connected to the company network, Foma's IT systems cannot identify the access point (IP address).</p>	<p>S1 S1-3 32B C D 33D</p> <p>GRI 2-25</p>



For each report submitted, the portal assigns a unique identification code, allowing the whistleblower to track the progress of their report confidentially. If a report lacks sufficient details, the Internal Audit Director, using the platform, may request further information from the whistleblower via the same code within the platform for a more thorough investigation of the reported issue.

All reports are communicated to the Internal Audit Director, who conducts a preliminary verification to ensure that the report falls under the scope of the Whistleblowing Policy and that sufficient data and information are provided for an initial evaluation. During this phase, the report's subject may be shared and support from other functions (Legal, Human Resources, Health, Safety and Environment) may be requested to assess whether the necessary conditions for further investigation are present, all while ensuring the confidentiality of the whistleblower's identity.

The whistleblower may also be contacted by the Internal Audit Director, through the platform's internal messaging system, for additional information if needed. The Internal Audit Director prepares a summary report at least semi-annually (during the regular meetings of the Supervisory Body) on the received reports, the outcome of analyses conducted and any ongoing investigations, which is shared with the company's Supervisory Body.

Depending on the nature or severity of the received report, the Supervisory Body may request the Internal Audit Director to immediately report to senior management. In such cases, recommendations may be provided, including the potential need for disciplinary actions.

All information and personal data collected are processed in compliance with the GDPR and Legislative Decree No. 196/2003 (Personal Data Protection Code) and subsequent amendments, as well as in accordance with rulings from national and EU data protection authorities.

To ensure the confidentiality of the whistleblower, the person managing the reports is obligated to use them solely for follow-up purposes and is prohibited from revealing the whistleblower's identity or any information that could lead to its identification without the whistleblower's explicit consent, except for those legally authorized to access such information.

The documentation related to the reports must be securely archived in accordance with the company's rules on information classification and processing.

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GRI 2-25



4.3 ACTIONS

<p>In the table below, the actions aimed at preventing or mitigating negative impacts on the workforce and providing or enabling a remedy for the actual material impact are described. The scheme highlights the actions already initiated and in progress, the actions planned for the next two years and the expected benefits in relation to identified impacts, risks and opportunities, as well as the timeframe within which the actions should be completed. The scheme also presents actions intended to produce positive impacts for the workforce.</p>		<p>S1 S1-4 38 A B C AR 42 GRI 3-3</p>	
Actions Already Initiated	Objectives – Actions Planned for the Next Two Years	Expected Benefits in Relation to Impacts, Risks and Opportunities	Deadline for Planned Actions
<p>Consolidated Welfare System managed through a platform, additional bonuses for new births and marriages. Incentive to convert performance bonuses into Welfare services</p>	<p>Verify the effectiveness of the initiatives undertaken and the value proposition for employees through a workplace climate survey.</p>	<p>Improve people's well-being.</p>	<p>2025</p>
	<p>Schedule work-related stress analyses as required by regulations (HSE).</p>	<p>Increase the ability to attract and retain talent in the company.</p>	<p>2024</p>
	<p>Initiate individual coaching paths and sessions.</p>	<p>Enhance the value proposition offered to workers and their satisfaction.</p>	<p>2025</p>
	<p>Extend supplementary health care packages.</p>	<p>Gain greater knowledge of potential risks related to employees' working conditions.</p>	<p>2024</p>
	<p>Initiate Wellbeing and talent attraction policies, including the preparation and dissemination of a policy expressly dedicated to Wellbeing.</p>		<p>2025</p>
<p>Events and activities dedicated to promoting a sense of belonging and engagement among employees and their families</p>	<p>Organization of "Family Day", an initiative aimed at welcoming employees' families to the company.</p>	<p>Offering well-being conditions to employees.</p>	<p>2024 and following years</p>
	<p>Informative evenings for promoting healthy lifestyles, involving the company doctor and/or experts from various sectors. Topics include: nutrition, smoking, sedentary lifestyle, pediatric first aid.</p>	<p>Engaging families and enhancing the sense of belonging.</p>	<p>2025</p>
	<p>Awarding employees' children upon their graduation.</p>	<p>Increasing the ability to retain skilled labor.</p>	
<p>Flexible working hours for employees working daily shifts</p>	<p>Extension of flexible entry hours (7:30/9:00).</p>	<p>Income and work, improving flexibility and work-life balance.</p>	<p>2025</p>



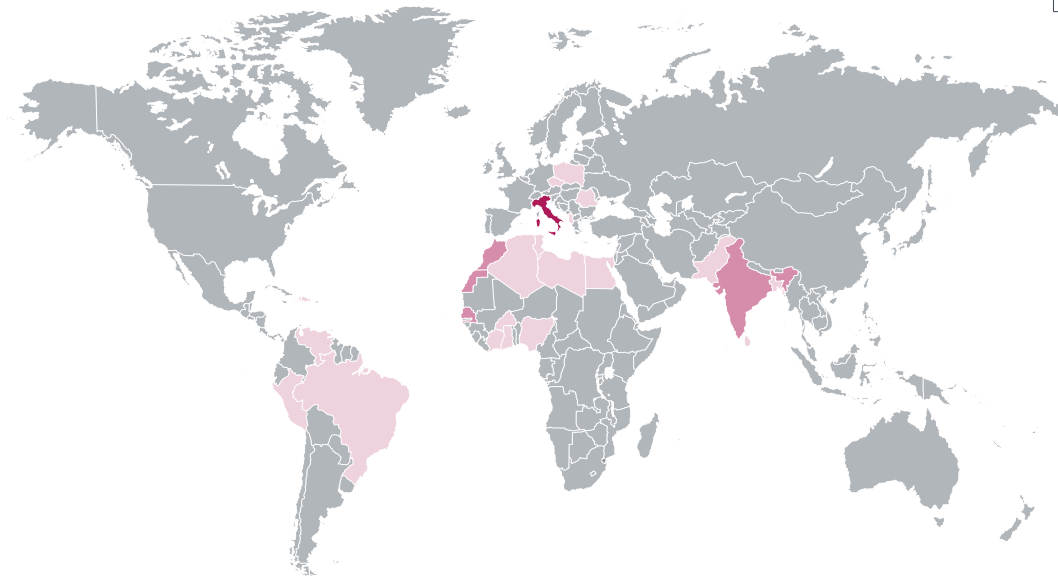
Actions Already Initiated	Objectives – Actions Planned for the Next Two Years	Expected Benefits in Relation to Impacts, Risks and Opportunities	Deadline for Planned Actions
Internal Human Rights Policy	Internal Gender Equality Policy, including dissemination and publication on the website.	Support and improve social and gender equity.	2024
	Define a process for analysis and equalization of pay for gender parity.		2024
	Start the certification process for gender equality.		2025
	Disseminate the policy during “Plant Meetings” held by the CEO and directed to all employees.		2024
Academy - Annual Corporate Training Plan ITS Programs	Consolidate the annual corporate training plan, including the development of customized training paths for key people.	Support quality education oriented towards the labor market.	2024
	Participation in IFTS programs for maintenance workers and mechanical technicians.	Prevent depopulation of the area.	2024
		Reduce the difficulty in recruiting qualified workforce.	
Stability Agreements	Further stability agreements will be implemented.	Income and work, increase stability.	2024
Annual sampling check to verify the possible presence of Legionella among workers. Periodic checks once a year in production and once every two years for office staff, carried out upon request by the Risk Assessment Document and according to the indications of the company doctor		Reduce health risks to workers.	2024
	Automation of Internal Transport Flow of High-Volume Processed Products – AGV vehicles for a portion of the facility - autonomous transport systems.	Reduce harm to worker safety.	2024-2026
	Develop structured training sessions to raise awareness of risks in the department. Promote methods for documenting training interventions within the department.	Promote a culture of prevention.	2024



Actions Already Initiated	Objectives – Actions Planned for the Next Two Years	Expected Benefits in Relation to Impacts, Risks and Opportunities	Deadline for Planned Actions
	<p>Launch of the Improvement Ideas. Collection Project</p> <p>Employees will have the opportunity to submit improvement proposals related to four key areas: safety, quality, environment and process.</p> <p>All approved ideas will be rewarded, with additional recognition for the best idea of the month and the best idea of the year.</p>		2024
	<p>Implementation of the “Safety Walk” Procedure.</p>		2024
<p>Structured supplier qualification process to assess the risk related to workers’ rights in the value chain and the management of supplies in potentially high-risk countries (key suppliers)</p>	<p>Extend the assessment procedure to a broader sample of suppliers.</p>	<p>Raise awareness within the value chain about human rights.</p>	2025
		<p>Reduce the risk of human rights violations across the supply chain.</p>	2025
	<p>Every two years and annually starting in 2026, a verification process is conducted during the preparation of the sustainability report to assess impacts, risks and opportunities both retrospectively and prospectively. This process examines current impacts, actual risks and opportunities in comparison to the previous assessment (gap analysis), the effectiveness of actions taken, the results achieved and new milestones. Objectives are then redefined and initiatives for the following two years are planned accordingly.</p>		<p>S1 S1-4 38 D RR 38 RR 39</p> <p>GRI 3-3</p>
	<p>Foma has established an operational working group, composed of the ESG Specialist and the Quality Systems Manager, to manage actions aimed at preventing and mitigating negative impacts while promoting positive ones (project management). Additionally, a strategic committee has been formed, including the CEO, CFO, HR Management and key company leaders, which meets periodically to monitor results, provide guidance and plan potential investments to achieve the desired outcomes.</p>		<p>S1 S1-4 39</p> <p>S1 S1-4 41 RR 37</p> <p>GRI 3-3</p>
	<p>Resources allocated to the project:</p>		<p>S1 S1-4 43</p> <p>GRI 3-3</p>
<p>Strategic committee</p>		<p>Operational working group</p>	
<p>CEO CFO COO Purchasing Manager Sales Manager Human Resources Manager HSE Manager</p>		<p>Human Resources Office Employee Responsible for Prevention and Protection Service Purchasing Office Employee Administration Office Employee</p>	
	<p>The ESG Specialist and the Quality Systems Manager have been assigned to the project in a cross-functional capacity.</p>		
	<p>The project management includes a part-time resource (ESG Specialist), a 20% allocated resource (Quality Systems Manager) and individual department resources (Human Resources, Sales, Purchasing, Health/Safety/Environment and Administration), who are involved as needed.</p>		<p>S1 S1-4 RR 43</p> <p>GRI 3-3</p>

4.4 OBJECTIVES

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S1-5
47 A



Country of birth	Workforce (end of month) 2	Country of birth	Workforce (end of month) 2
Albania	5	Marocco	19
Algeria	1	N/A	3
Bangladesh	1	Nigeria	2
Brasile	1	Pakistan	6
Burkina Faso	0	Perù	2
Costa d'avorio	1	Polonia	1
Egitto	2	Repubblica Ceca	1
Germania	3	Repubblica Dominicana	1
Ghana	1	Romania	2
India	32	Senegal	25
Italia	351	Sri Lanka	1
Libia	1	Tunisia	0
Macedonia	1	Venezuela	2
Totale			465

Kind of Employment	Type of Employment Contract	December 2022	December 2023	S1 S1-5 47 B GRI 3-3
Employee	Fixed-term contract	3	0	
	Permanent contract	382	395	
	Total	385	395	
Temporary Worker	Fixed-term contract	49	60	
	Permanent contract	6	10	
	Total	55	70	
Grand total		440	465	

% Part Time	December 2022	December 2023	S1 S1-5 47 C GRI 3-3
F.T.	433	459	
P.T.	7	6	
Total	440	465	

4.5 INDICATORS

Description of the indicator	Indicator	DR	Paragraph	Related AR	GRI
Description of the methodologies and assumptions used for the compilation of data (non-employees).		S1-6	50a		2-7 405-1
The number of non-employees is reported as the number of persons/full-time equivalents.		S1-6	50a	AR 57	2-7 405-1
The percentage of employees covered by collective bargaining agreements is within the coverage rate by country (in the EEA).	100%	S1-6	50b		2-7
The percentage of employees covered by collective agreements (outside the EEA) by region.	100%	S1-6	51		2-7
Description of the extent to which the working conditions and employment conditions of non-employees in the workforce are determined or influenced by collective labor agreements.	100%	S1-6	50b 51		2-7
Percentage of employees in the country (EEA) covered by worker representatives.	97%	S1-6	50c	AR 59	401-1
Number of employees (headcount) at the top management level.	8	S1-6	50d (I)		2-7
Percentage of employees at the managerial level.	100% (referring to the previous line)	S1-6	50d (II)		2-7
Number of employees (headcount) under the age of 30.	146	S1-6	50e	AR 58	2-7
Percentage of employees under the age of 30.	32,74%	S1-6	50f		
Number of employees (headcount) aged between 30 and 50 years.	196	S1-6	52		2-7
Percentage of employees aged between 30 and 50 years.	43,94%	S1-6	52a		2-7
Number of employees (headcount) over the age of 50.	104	S1-6	52b		2-7
Percentage of employees over the age of 50.	23,31%	S1-7	55a	AR 61	2-8
Disclosure of the definition of top management used.	Executive contract	S1-7	55a		2-8
All employees are paid a fair salary, in line with the applicable benchmark standards.	Yes	S1-7	55a		2-8
Percentage of employees paid below the applicable fair salary benchmark.	"0 Note: Market analysis on salary ranges conducted through the ODM Compensation & Benefit platform."	S1-7	55b		2-8
Percentage of non-employees paid below the fair salary.	"0 Note: The only 'non-employees' are the temporary staff, to whom the same conditions as employees apply. Market analysis on salary ranges was conducted through the ODM Compensation & Benefit platform."	S1-7	55b (I)		2-8

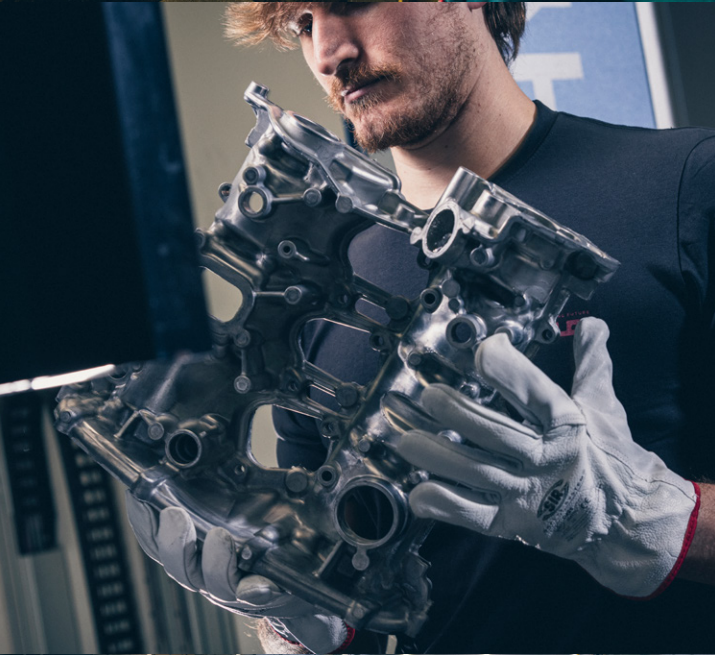
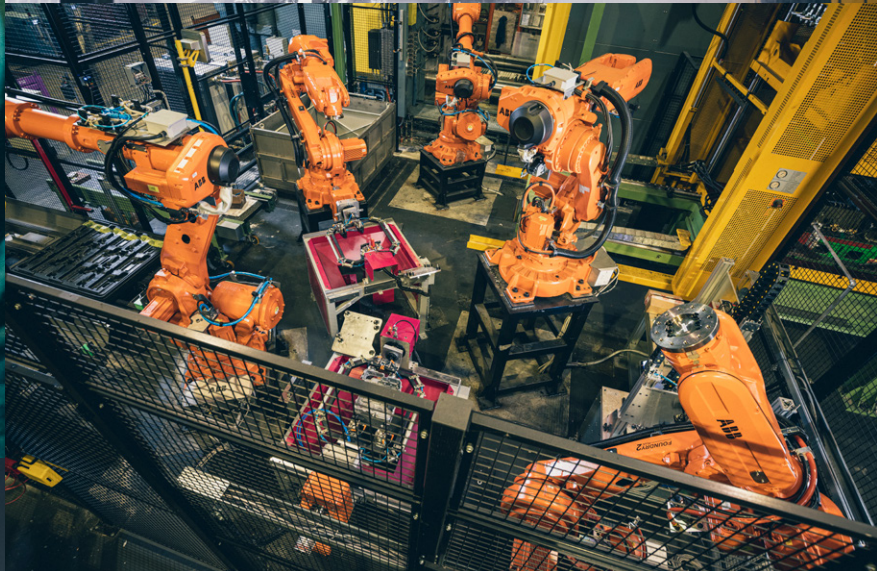
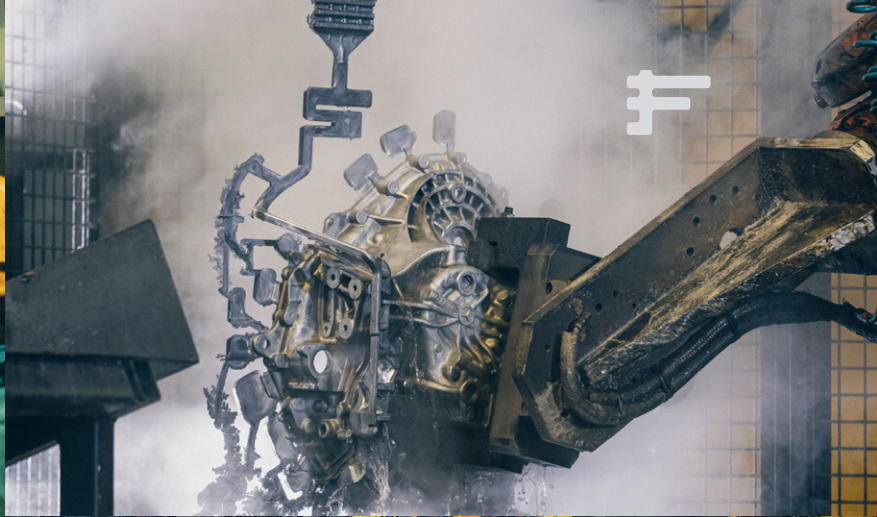


Description of the indicator	Indicator	DR	Paragraph	Related AR	GRI
All employees in the workforce are covered by social protection, either through public programs or benefits offered, against income loss due to illness.	Yes	S1-7	55b (II)		2-8
Due to unemployment, starting from the moment the employee begins working for the company.	Yes	S1-7	55c	AR 64 AR 65	2-8
Due to workplace accidents and acquired disabilities.	Yes	S1-7	57	AR 63	2-8
Due to parental leave.	Yes	S1-8	60a	AR 66	2-30
Due to retirement.	Yes	S1-8	60b		2-30
Social protection employees by country [table] for types of events and types of employees [including non-employees].	The Italian welfare system, through the government, covers income loss and guarantees full coverage for both employees and non-employees.	S1-8	60c		2-30
Disclosure of the types of employees not covered by social protection, either through public programs or benefits offered, against income loss due to workplace accidents and acquired disabilities.	None	S1-8	63a	AR 69	
Number of employees (headcount) at the managerial level.	13	S1-9	66a		405-1
Percentage of employees at the managerial level.	2,62%	S1-9	66a		405-1
Number of employees (headcount) under the age of 30.	146	S1-9	66b		405-1
Percentage of employees under the age of 30.	32,74%	S1-9	66b		405-1
Number of employees (headcount) aged between 30 and 50 years.	196	S1-9	66b		405-1
Percentage of employees aged between 30 and 50 years.	43,94%	S1-9	66b		405-1
Number of employees (headcount) over the age of 50.	104	S1-9	66b		405-1
Percentage of employees over the age of 50.	23,31%	S1-9	66b		405-1
All employees are paid a fair salary, in line with the applicable benchmark standards.	Yes	S1-10	69	AR 72 AR 74	202-1
Adequate salaries by country.	Italy, yes	S1-10	70		202-1
Percentage of employees paid below the applicable fair salary benchmark.	0%	S1-10	70		202-1
All employees in the workforce are covered by social protection, either through public programs or benefits offered, against income loss due to illness.	Yes. Social protections provided by the state welfare system (INPS).	S1-11	74a		401-2
All employees in the workforce are covered by social protection, either through public programs or benefits offered, against income loss due to unemployment, starting from the moment the employee begins working for the company.	Yes. Social protections provided by the state welfare system (INPS).	S1-11	74b		401-2
All employees in the workforce are covered by social protection, either through public programs or benefits offered, against income loss due to workplace accidents and acquired disabilities.	Yes. Social protections provided by the state welfare system (INAIL).	S1-11	74c		401-2
All employees in the workforce are covered by social protection, either through public programs or benefits offered, against income loss due to parental leave.	Yes. Social protections provided by the state welfare system (INPS).	S1-11	74d		401-2

Description of the indicator	Indicator	DR	Paragraph	Related AR	GRI
All employees in the workforce are covered by social protection, either through public programs or benefits offered, against income loss due to retirement.	Yes. Social protections provided by the state welfare system (INPS).	S1-11	74e		401-2
Percentage of employees with disabilities subject to legal restrictions on data collection.	2,81%	S1-12	79		405-1
Disclosure of the contextual information necessary to understand the data and the methods used to compile the data (employees with disabilities).	Disability certificates issued by the relevant government bodies and the outcome of the occupational health physician's visit.	S1-12	76		
Training and skills development indicators by gender.		S1-13	83a	AR 77	404-3
Percentage of employees who have participated in periodic performance reviews and career development assessments.	0,5%	S1-13	83a	AR 77	403-1
Average number of training hours by gender.	M 6,7 F 3,3	S1-13	83b	AR 78	404-1
Average number of training hours per person for employees.	6,3	S1-13	83b	AR 78	404-1
Percentage of people in the workforce covered by a health and safety management system based on legal requirements and/or recognized standards or guidelines.	100%	S1-14	88a	AR 80	
Number of fatalities in the workforce due to work-related injuries and illnesses.	0	S1-14	88b	AR 89-91	403-9 403-10
Number of fatalities due to work-related injuries and occupational diseases of other workers operating at the company's sites.	0	S1-14	88b	AR 89-91	403-9 403-10
Number of recordable workplace injuries for the workforce.	15	S1-14	88c	AR 80	403-8 403-9
Rate of recordable work-related injuries for the workforce.	ASR 0,54 AFR 17	S1-14	88c		403-8 403-9
Number of recordable occupational illness cases among employees.	0	S1-14	88d		403-10
Number of days lost due to work-related injuries and fatalities, work-related illnesses and employee deaths due to illnesses.	639	S1-14	88e	AR 89-91 AR 95	403-9
Percentage of employees entitled to family leave.	100%	S1-15	93a	AR 96 AR 97	401-3
Percentage of eligible employees who have taken family leave.	10%	S1-15	93b		401-3
Percentage of eligible employees who have taken family leave, broken down by gender.	M 100% F 0%	S1-15	93b		401-3
All employees are entitled to family leave due to social policy and collective labor agreements.	Si	S1-15	94		
Number of discrimination incidents.	None	S1-17	103a		406-1
Number of discrimination incidents.	0 No reports received or recorded through the ODV channel or the Whistleblowing channel.	S1-17	103a	AR 103 AR 106	406-1
Number of complaints submitted through channels that allow workforce members to report their concerns.	0 No reports received or recorded through the ODV channel or the Whistleblowing channel.	S1-17	103b	AR 103 AR 106	2-25



Description of the indicator	Indicator	DR	Paragraph	Related AR	GRI
Number of complaints submitted to the national contact points for OECD multinational enterprises.	0	S1-17	103b	AR 103 AR 106	
Amount of material fines, penalties and compensation for damages due to violations of social factors and human rights.	0 No penalties imposed.	S1-17	103c	AR 103 AR 106	2-27
Information on the reconciliation of significant fines, penalties and compensation for damages resulting from violations related to social factors and human rights with the most significant amount presented in the financial statements.	0 No violations contested.	S1-17	103c	AR 103 AR 106	
Disclosure of contextual information necessary to understand the data and how it was compiled (complaints, incidents and grievances related to social and human rights issues linked to work).	Whistleblowing application on the portal (a database is created = archive of any reports).	S1-17	103d	AR 103 AR 106	2-27
Number of serious human rights issues and incidents related to the workforce.	0 No incidents reported or detected.	S1-17	104a	AR 105	3-3
Number of serious human rights issues and incidents related to the workforce that represent cases of non-compliance with the United Nations Guiding Principles and the OECD Guidelines for Multinational Enterprises.	0	S1-17	104a	AR 105	
No serious human rights issues and incidents related to the workforce have occurred.	0	S1-17	104a	AR 105	
Amount of fines, penalties and material compensation for serious human rights issues and incidents related to the workforce.	0 No fines.	S1-17	104b	AR 103 AR 106	2-27
Information on the reconciliation of significant fines, penalties and compensation for serious human rights issues and incidents related to the workforce with the most significant amount presented in the financial statements.	0 No fines.	S1-17	104b	AR 103 AR 106	





5.1 GENERAL INFORMATION

In this edition of the sustainability report, Foma has chosen to report on actions aimed at preventing and mitigating negative impacts, neutralizing risks, and enhancing positive impacts and opportunities related to local communities. Foma has identified the municipalities of Pralboino and Lumezzane, as well as the municipalities of Manerbio, Brescia, and Cremona (high schools and universities) as the communities directly affected by the impacts generated by the company, and therefore the most significantly impacted. Considering that the obligation to report on certain topics, specifically S3, has been postponed, the company has chosen to focus its reporting on the areas and communities neighboring and directly affected by the company's activities, and for which it has carried out support projects for the territory.

S1
SBM-3
14 AR
6
AR7



5.1.1 STRATEGY, IMPACTS, RISKS & OPPORTUNITIES

The reference communities are small and large municipalities located in the provinces of Brescia and Cremona, with the Foma industrial sites positioned along the axis that connects them.

S3
SBM-3
9A
AR 7

The stakeholder categories, related to the affected communities, potentially subject to the impacts of the company's activities, include those who commute, live, or work in the areas surrounding the companies and families with children from school age to university age.

S3
SBM-3
9A (I-IV)



Positive and negative impact	(+/-)	Related to	Current / Potential	Direct / Indirect	Evaluation
Health damage to local populations (where the company operates)	(-)	Presence of the company in the area with production of: <ul style="list-style-type: none"> • Vehicular traffic • Noise pollution • Air pollution • Water pollution (disposal wells) 	(!)	(→)	●●●●
Education development of external skills	(+)	Training and development programs offered by the company to the area (internships, school-work alternation) - raising the cultural level of the community.	(!)	(→)	●●●
Education development of stem skills	(+)	Structured collaboration with technical institutes based on the needs of the school.	(!)	(→)	●●●
Deterioration of the quality of life of nearby communities	(-)	INCREASE IN LOCAL TRAFFIC, related to incoming and outgoing vehicles (partly also due to connections with the Lumezzane site).	(!)	(→)	●●●
Income and work creation and distribution of economic value	(+)	Company activities, redistribution, tax revenue.	(!)	(→) (→)	●●●●●
	(+)	Donations and sponsorships in the area (including to schools and associations).	(!)	(→)	●●●
Income and work economic stability at the local level	(+)	Creation of jobs within the company and salary stability guaranteed by the company's solidity.	(!)	(→)	●●●
Income and work economic stability for nearby companies	(+)	Creation of a market for nearby companies, for example for suppliers and/or outsourcing.	(!)	(→)	●●●
Trigger	(R/O)	Risk / Opportunity	Evaluation Short term	Evaluation Medium term	Evaluation Long term
Well-being brought by the company (economic and other) to local people	○	Increasing the attractiveness of the area as a place to live and work. Preventing the depopulation/abandonment of peripheral areas, resulting in an increase and stability of the workforce.	(!)	●●●●	●●●●
Income and work economic stability for nearby companies	○	Stability of local wealth. Proximity of suppliers, increased collaboration, faster deliveries, networking opportunities.	●●●	●●●	●●●

5.1.1 STRATEGY, IMPACTS, RISKS & OPPORTUNITIES

	<p>The negative impacts, identified through the materiality analysis and validated by the relevant stakeholder panel, are related to the following:</p> <ul style="list-style-type: none"> - Health damage to local populations, linked to the company's presence in the area, including: <ul style="list-style-type: none"> • Traffic congestion, • Noise pollution, • Air pollution, • Water pollution (disposal well). • Deterioration of the quality of life for nearby communities, linked to increased local traffic due to incoming and outgoing vehicles, especially at the Pralboino site, but also partially attributable to the Lumezzane site. The positive impacts generated for the communities involved by Foma are described below. • Education, development of external skills and STEM, due to training and development programs offered by the company to the local area (internships, school-work programs), the cultural growth of the community and structured collaborations with technical institutes for the development of curricula oriented toward the modern job market. • Income and employment, creation and distribution of economic value, local economic stability, related to the company's activities in the area, which facilitate the hiring of local labor, wealth redistribution to families through employment and tax revenues. • Income and employment, local economic stability, resulting from the creation of markets and job opportunities for nearby businesses, such as suppliers or outsourcing services. • Donations and sponsorships made by the company to associations focused on people of all ages. In 2023, donations were made to various associations that support children (nurseries and primary schools), teenagers (local sports clubs) and the elderly (nursing homes). Additionally, several nonprofit associations were supported at the national level. 	S3 SBM-3 9B-C
	<p>Job creation in the area entails the opportunity to increase the attractiveness of municipalities as places to live and work. It helps to prevent and, to some extent, mitigate the potential depopulation and/or abandonment of peripheral areas, such as neighboring municipalities, with respect to large centers of attraction such as the provincial capitals Brescia, Cremona, Bergamo and especially Milan. The stability of the local labor market has the positive effect of enhancing and sustaining local wealth. Furthermore, the creation of a local economy in the selection of suppliers promotes greater collaboration, faster deliveries, ease of networking, with positive impacts on the entire value chain.</p>	S3 SBM-3 9D
	<p>To identify the stakeholder categories most likely to be affected by its industrial processes, the company followed a progressive methodology. Starting with the representation of the company system, its processes and supply sources, this approach allowed for the identification of impacts and the actions that generate them, as well as the significant stakeholder groups linked to those impacts. These stakeholders, whether directly or indirectly, are affected by the identified impacts. Through this methodology, the company was able to identify the stakeholder categories related to each impact.</p>	S3 SBM-3 10 S3 SBM-3 11 AR8



5.2	POLICIES	
	<p>The approach identified by Foma to define projects and communicate its commitment to the affected communities, given the voluntary nature of the initiatives it has chosen to implement for many years, focuses primarily on interventions in the areas surrounding its operational sites. These areas include the municipalities of Pralboino, Seniga, Milzano, Manerbio, Pavone del Mella, Ostiano, Lumezzane and extend to the provincial capitals of Brescia and Cremona. In these areas, the company has already implemented projects to support the local territories, the results of which are presented in the first edition of the sustainability report.</p>	S1 S1-1 19 GRI 2-23
	<p>In 2023, Foma established a specific “Policy for the Protection of Human Rights”, accessible to all interested parties on the company website. The company has committed to promoting the treatment of personnel with dignity and respect throughout the value chain, particularly in adherence to the following principles:</p> <ul style="list-style-type: none"> • Human rights as defined by the International Bill of Human Rights and the ILO Declaration on Fundamental Principles and Rights at Work. 	S1 S1-1 20-20A GRI 2-23
5.3	ACTIONS	
	<p>To prevent, mitigate, or address material negative impacts on local communities, as described in the “Impacts, Risks-Opportunities” section, Foma has initiated several project-based actions.</p> <p>In terms of enhancing positive impacts related to education, increasing the attractiveness of the area as a place to live and work, and preventing the risk of depopulation or abandonment of peripheral areas to improve workforce stability, Foma has implemented the following project-based actions:</p> <ul style="list-style-type: none"> • Establishment of the company “Academy”, offering systematic training to all employees during their onboarding and job training phases, as well as technical updates and when transitioning roles or tasks. This training is extended to all employees, including temporary workers. • Hosting high school students from the provinces of Brescia and Cremona in school-work alternation programs, providing “on-the-job” training and an initial introduction to the company for young students in the area. • Collaboration with Pascal High School in Manerbio, involving classroom training sessions led by Foma managers and guided company visits for students. In the future, Foma plans to expand co-teaching activities with Pascal High School and Torriani High School in Cremona. Additionally, starting in 2024, the company aims to promote and support Higher Technical Education and Training (IFTTS) programs in collaboration with the Don Bosco Salesian Institute. • Pascal High School Project: Industrialization of a deburring cell for aluminum die-cast components using an anthropomorphic robot. The project lasted 60 hours, 10 of which were conducted at Foma, combining classroom sessions and production floor activities. The project involved simulating the removal of burrs from die-cast parts using a medium-to-large robot. • “Girls Code It Better” project: A class of 20 middle school students from the Pralboino Comprehensive Institute created a podcast and a school radio channel for Spotify and YouTube. The project’s goal was to encourage girls to engage with STEM disciplines. 	S3 S3-4 32A AR28-29 AR 36 S3 S3-4 32B S3 S3-4 32C S3 S3-4 34B GRI 3-3 203-2 GRI 3-3 411-1 GRI 3-3



<p>Regarding income and employment impacts in the area and opportunities to generate economic stability for local businesses, it is important to note that Pralboino, a non-industrial zone, benefits from Foma's presence, which directly employs over 500 workers and supports many others indirectly. Key initiatives include:</p> <ul style="list-style-type: none"> • The 2024 hiring plan, budgeting for an increase of 50 employees compared to 2023 and an additional 20 employees planned for 2025. • A proximity supplier engagement policy, as defined in the industrial plan, to strengthen relationships with local businesses. <p>To address negative impacts on the local quality of life, such as increased traffic and air pollution, the company has planned:</p> <ul style="list-style-type: none"> • A major project to improve traffic flow and parking solutions for employees, in collaboration with public administrations. • The launch of an internal car-sharing/pooling initiative. <p>Since its establishment in Pralboino in 1972, Foma has consistently demonstrated tangible support for local communities. In recent years, it has launched a program to support schools, associations and the parish in Pralboino. Moving forward, the company will continue to promote new projects for the community.</p>	<p>S3 S3-4 32A AR28-29 AR 36</p> <p>S3 S3-4 32B</p> <p>S3 S3-4 32C</p> <p>S3 S3-4 34B</p> <p>GRI 3-3 203-2</p> <p>GRI 3-3 411-1</p> <p>GRI 3-3</p>
<p>To monitor and evaluate the effectiveness of projects and actions in delivering results for the communities, the company relies on internal personnel responsible for establishing a systematic and ongoing relationship with stakeholders. Specifically, regarding the development of qualified labor and recruitment potential in the area, the HR department has appointed a dedicated role to manage relationships with schools and monitor recruitment. This allows the company to assess:</p> <ul style="list-style-type: none"> • The alignment between the skills developed in school curricula and the actual needs for professional roles within the company. • Feedback from schools regarding their response to the needs they identify internally. • The results, on a three-year basis, of recruiting new collaborators within the company. <p>Regarding the distribution of wealth in the form of sponsorships and donations, Foma employs a qualitative-quantitative evaluation approach to ensure responsiveness to the actual needs of the communities (as described above).</p>	<p>S3 S3-4 32D AR 31 AR 33</p> <p>GRI 3-3</p>
<p>Foma has adopted a Sustainability Plan by applying a systematic methodology to analyze impacts both within and outside the company, as well as to assess the financial risks and opportunities relevant to its operations.</p> <p>To determine the actual relevance of these impacts, risks and opportunities, the company engaged in a stakeholder involvement process that enabled informed and/or expert opinions on the identified issues.</p> <p>Direct dialogue with schools, as well as other local actors such as Temporary Employment Agencies, facilitated the collection of necessary data to define the described project actions.</p>	<p>S3 S3-4 33A AR26</p> <p>S3 S3-4 33B</p> <p>S3 S3-4 33C</p> <p>GRI 3-3</p> <p>GRI 3-3 411-1</p> <p>GRI 2-25</p>



<p>5.3 ACTIONS</p>	<p>The company recognizes that, given the absence of medium-to-large enterprises in the geographic area where it operates, its relationship with local small businesses is a vital resource that helps sustain wealth within the territory. Specifically, it has analyzed the structure of its sourcing from small local suppliers and subcontractors, as well as the contribution made to their economic stability.</p> <p>The company is therefore aware that the business relationships between Foma and local subcontractors are crucial and that the termination of such industrial and commercial ties could have a significant negative impact.</p>	<p>S3 S3-4 35 AR30</p> <p>GRI 3-3</p>
<p>5.4 OBJECTIVES</p>	<p>The objectives related to the actions outlined above are described below.</p> <ul style="list-style-type: none"> Expand activities with existing high schools. This objective is based on the assumption that starting skills development programs targeted at business needs from secondary school activates a virtuous process that benefits young people, who will be more easily hired after secondary education; businesses, which can more easily recruit qualified personnel; the area and families, because young people are not forced to migrate to find a qualifying job suited to their professional profile. The objective is linked to direct consultation with individual schools. The objective is correlated with the company's recruitment policies. The indicators for measuring its achievement are the hours of co-teaching and the students welcomed in school-work alternation in the school years 2022/2023 and 2023/2024: 13 students with an average of 250 hours/internship. Foma intends to exceed this objective in the school years 2024/2026. To define this objective, the company maintains systematic dialogue with schools to understand their needs, with Public Administrations to have an overview of territorial needs regarding family needs and with employment agencies to enrich the picture of territorial labor market needs. Promote higher technical education and training (IFTS) courses with the Salesiani Don Bosco Institute. This objective, like the previous one, is based on the assumption that fostering good alignment between school curricula and the professional profiles required by companies is an advantage for all actors in the area. The objective is linked to the direct relationship that Foma intends to establish with the Salesiani Don Bosco Institute in Brescia. The objective is correlated with the company's recruitment policies. The indicators for measuring its achievement are determined by the activation of initiatives and the number of young people involved, as well as, in the medium term, the young people recruited by companies. The company intends to achieve this objective from the school year 2024/2025. Achieving the objective will depend on the dialogue relationship established between Foma and the Institutes. 	<p>S3 - S3-5 41 AR 45 - AR 47</p> <p>GRI 3-3</p>

<ul style="list-style-type: none"> • Improve the road network adjacent to the company to reduce the impact on citizens' movements. The objective is based on the assumption that both the movement of goods and employee travel impact the road network, as the roads adjacent to the plant are not suitable for large volumes of movement, especially at certain times of the day. Reducing the volume of movements on one hand and making the road network more suitable on the other, can reduce the impact on local citizens. • To fully understand this objective, an internal survey was conducted among the company's management and the involvement of Public Administration. • The objective is anchored to the company's pollution reduction policies, as well as improving the health conditions of employees and local residents. • The KPIs related to the objective are: the activation of the construction site for road relocation, the activation of the carpooling project. • The KPIs indicating the success of individual projects will be: the reduction of actual trips to and from the company by employees, the consequent reduction of CO2. • The time horizon for achieving the objectives is the biennium 2025/2026. • Establish a working group to evaluate the positive impact (benefit) of sponsorships and donations and, together, activate a coherent policy for determining donations (relevant themes for the area). • To determine the implementation lines of this objective, it is necessary for the CEO and CFO to involve the most significant local actors. • The objective does not have a precise anchor to company policies but responds to a criterion of supporting the well-being of the area and its inhabitants. • The indicators for this objective are: drafting a management policy for the area, resource allocation decisions in line with defined themes. • The discussion will be initiated by the end of 2024 to define relevant themes, policy and allocation decisions for 2025. 	<p>S3 S3-4 35 AR30</p> <p>GRI 3-3</p>
<p>Foma maintains a systematic dialogue with key stakeholders in the area, particularly with schools and Public Administration, on topics beyond business-related activities. The latter has been consulted and involved to fully understand the impacts of road traffic on the well-being of local residents and the needs related to the education of new generations; schools have been involved regarding the alignment between skills developed in school and the needs of the labor market. Contacts are maintained by the project managers: the Administration department handles sponsorships and contacts with Associations and Public Administration.</p> <p>HR, on the other hand, manages collaboration projects with schools, such as project work, IFTS, school-work alternation, career days, company visits and co-teaching. The monitoring process will be determined upon project activation. At that time, the methods for monitoring processes and stakeholder involvement in the continuous improvement of projects will also be established.</p>	<p>S3 S3-5 42A</p> <p>S3 S3-5 42B</p> <p>S3 S3-5 42C</p> <p>GRI 3-3</p>

E2: POLLUTION
E3: WATER AND MARINE RESOURCES
E5: CIRCULAR ECONOMY



	<p>The double materiality analysis for the following ESRS topics can be found below:</p> <ul style="list-style-type: none"> • E2 - Pollution • E3 - Water and Marine Resources • E5 - Circular Economy <p>For these issues, the company currently has no planned actions and specific goal, but it aims to develop a strategy for the next editions of the sustainability report.</p>	
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6.1 E2: POLLUTION - IMPACTS, RISKS AND OPPORTUNITIES

	<p>The process of identifying and evaluating impacts, risks and opportunities was conducted as described in the introductory chapter. Specifically, for this particular topic, the LEAP approach was adopted for the Environmental Relevance Assessment according to the following phases:</p> <p>Phase 1 - Identification of Interactions with Nature: The operational sites (Pralboino and Lumezzane) and points along the upstream and downstream value chain relevant to the topic were mapped. Emission points of pollutants (air, water, soil) and the sectors/operational units involved in the production and release of pollutants were identified.</p> <p>Phase 2 - Assessment of Impacts and Dependencies: Environmental impacts and dependencies were assessed for each site and operational sector, considering the severity and likelihood of impacts on the environment and human health.</p> <p>Phase 3 - Assessment of Risks and Opportunities: Transition risks (political, legal, technological, market and reputational) and physical risks (disruption of natural resources, environmental accidents) were identified. Opportunities for pollution prevention and control (resource efficiency, new markets, green financing, resilience, reputation improvement) were also identified. The results obtained for the Pollution topic are reported below:</p>	<p>E2.IRO-1 11 A AR 1 AR 8</p>
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Positive and negative impact	(+/-)	Related to	Current / Potential	Direct / Indirect	Evaluation
Conservation of natural resources (pollution)	(+)	Development of New Technologies: Investments in research and development to develop new technologies that reduce pollution and increase efficiency.	(!)	(→)	●●●
Pollution	(-)	Disposal/recovery of plastic and cardboard packaging.	(!)	(→) (→)	●●●
Positive and negative impact	(+/-)	Related to	Current / Potential	Direct / Indirect	Evaluation
Pollution	(-)	Direct emissions into the atmosphere (emissions from company chimneys, transportation) e.g., dust.	(!)	(→)	●●●●
Pollution	(-)	Production and disposal of waste (filtration dust, refractory waste, waste oils, sludge).	(!)	(→)	●●●
Chemical pollution	(-)	Emissions into the atmosphere and water (aluminum, steel, plastic, copper, others) from the supply chain.	(!)	(→)	●●●●●
Trigger	(R/O)	Risk / Opportunity	Evaluation Short term	Evaluation Medium term	Evaluation Long term
/	/	/	/	/	/



6.2

E3: WATER AND MARINE RESOURCES - IMPACTS, RISKS AND OPPORTUNITIES

The process of identifying and evaluating impacts, risks and opportunities was conducted as described in the introductory chapter. Specifically, for this particular topic, the LEAP approach was adopted for the Environmental Relevance Assessment according to the following phases:

Phase 1 - Identification of Critical Points: The location of business operations and assets along the upstream and downstream value chain in relation to water risk areas, including those with high water stress, was mapped. The interaction of business activities with surface and groundwater was examined. Marine resources were not considered due to the location of company sites.

Phase 2 - Assessment of Impacts and Dependencies: Business processes that determine impacts and dependencies in terms of environmental assets and ecosystem services related to water were mapped. Impacts and dependencies in terms of water resources along the value chain, considering upstream (suppliers) and downstream (customers and distribution) activities, were identified. The severity and likelihood of positive and negative impacts on water resources were then assessed.

Phase 3 - Assessment of Risks and Opportunities: Political and legal risks, such as new regulations, sanctions, or reporting obligations, technological and market risks related to water consumption were identified. Physical risks, such as disruption of access to clean water, drought and other extreme weather events that could affect business activities, were assessed. Finally, opportunities for resource efficiency, reducing water consumption and improving production processes were identified. New technologies and practices for sustainable water management, such as recycling and reusing wastewater, were explored. Opportunities for accessing green financing and improving corporate reputation through sustainable practices were also evaluated. The results obtained for the Water and Marine Resources topic are reported below:

**E3.IRO-1
8 A
AR 1
AR 15**
GRI 303-1

Positive and negative impact	(+/-)	Related to	Current / Potential	Direct / Indirect	Evaluation
Depletion of fresh water	(-)	Depauperamento della risorsa idrica in situ, ciclo chiuso non scaricata. Reintegro solo di quella che va per evaporazione.	(?)	(→)	●●●
Trigger	(R/O)	Risk / Opportunity	Evaluation Short term	Evaluation Medium term	Evaluation Long term
Depletion of fresh water	○	Anticipation of adverse effects of climate change - Reduction of operating costs (through improvements in water resource use efficiency).	●●●	●●●	●●●

6.3

E5: CIRCULAR ECONOMY - IMPACTS, RISKS AND OPPORTUNITIES

Phases 1 and 2 for ESRS E5 are mainly based on the relevance assessments carried out within the framework of ESRS E1 (including energy consumption), ESRS E2 (pollution), ESRS E3 (marine resources, water consumption) and ESRS E4 (biodiversity, ecosystems, raw materials). In fact, the ultimate goal of the circular economy is to reduce the environmental impact of the use of products, materials and other resources by minimizing waste and the release of hazardous substances, thereby reducing impacts on nature. This application requirement mainly focuses on the third phase of the LEAP approach.

The sub-themes related to resource use and the circular economy, which were the subject of the relevance assessment, concerned incoming resource flows, including circularity in the case of significant incoming flows, and taking into account the optimization of resource use, material and product intensity, and renewable and non-renewable resources, outgoing resource flows related to products and services and waste management, including hazardous and non-hazardous waste, were also considered.

**E5.IRO-1
11 A
AR 1
AR 6**

6.3 E5: RISORSE ED ECONOMIA CIRCOLARE - IMPATTI E RISCHI & OPPORTUNITÀ

Phase 3 - Assessment of Risks and Opportunities: The analysis was structured into the assessment of physical and transition risks and opportunities. For physical risks, the potential **depletion of renewable and non-renewable resources** and the use of virgin and non-virgin resources and their sustainability were considered. Regarding transition risks, **political and legal risks** were analyzed, such as restrictive regulations like bans on the use of non-renewable resources and waste treatment regulations; **technological risks**, such as the introduction of new technologies that can replace current materials and processes; **market risks**, by monitoring changes in supply, demand and access to financing; and **reputational risks**, considering changes in social and community perception regarding business practices. **To identify opportunities, efficient resource use** was considered to promote more efficient processes, eco-friendly design and reuse and recycling practices. **Markets** were considered by developing products and services with lower resource intensity and **reputation**. The results obtained for the Circular Economy topic are reported below:

E5.IRO-1
11 A
AR 1
AR 6

Positive and negative impact	(+/-)	Related to	Current / Potential	Direct / Indirect	Evaluation
Conservation of natural resources	(+)	Waste reduction: Sustainable design: optimization for the benefit of the process (how the product is produced).	(!)	(->)	●●●
Depletion of raw materials	(+)	Production Optimization: Reduction of waste during production and assembly through more efficient processes.	(!)	(->)	●●●
	(+)	Use of Recycled Materials: The company integrates recycled materials into production to reduce dependence on virgin resources. Use of secondary aluminum.	(!)	(->)	●●●●
	(-)	Use of Materials for Product Packaging (intended for customers).	(!)	(->)	●●●●
	(-)	Use of Materials for Packaging of Purchased Products.	(!)	(->)	●●●●●
	(+)	Recovered/Reused Waste from the Production Process.	(!)	(->)	●●●
	(+)	Packaging Waste (returnable packaging).	(!)	(->)	●●●
Trigger	(R/O)	Risk / Opportunity	Evaluation Short term	Evaluation Medium term	Evaluation Long term
Depletion of raw materials price fluctuation	○	Use of Recycled Materials: The company integrates recycled materials into production to reduce dependence on virgin resources. Use of secondary aluminum.	●●●	●●●	●●●
Investments in Research and Development (R&D)	○	R&D can contribute to the development of innovative solutions for the sustainable management of natural resources, such as water, energy and soil, helping to preserve and use them more efficiently.	●●●	●●●●	●●●●

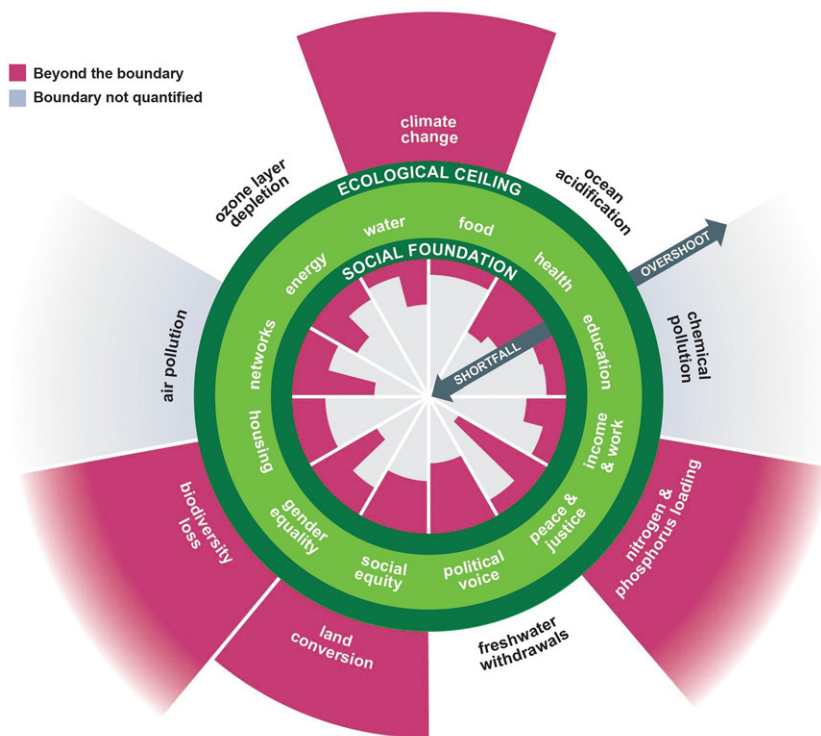




GLOSSARY

Term	Definition
Rainwater	Precipitation.
Wastewater	Any kind of water discharged from buildings or facilities where commercial activities or production of goods are carried out.
Inside/out and outside/in analysis	<p>Part of the double materiality analysis in which sustainability aspects are considered from two different perspectives:</p> <ul style="list-style-type: none"> • Outside-in: the company considers the risks and opportunities arising from managing, correctly or otherwise, a given ESG issue and the impact these might have on its economic-financial performance (i.e., from “outside” to “inside the company”). • Inside-out: The company focuses on the current and potential positive and negative impacts that its management of a specific ESG issue can have on stakeholders (meaning impacts that extend from “inside” to “outside” the company).
CO _{2eq}	The unit of measurement used to assess the global warming potential (GWP) of greenhouse gases. Carbon dioxide (CO ₂) serves as the reference gas, with a GWP value of 1, against which the warming potential of other gases is measured.
CSR	The acronym CSR stands for Corporate Social Responsibility, referring to a company’s social responsibility. In economic and financial contexts, it encompasses the ethical (environmental, social and economic) considerations integrated into the company’s strategic vision. CSR reflects a company’s commitment to effectively managing its social and ethical impact both internally and toward all its stakeholders.
CSRD	<p>The acronym CSRD stands for Corporate Sustainability Reporting Directive, a piece of European Union (EU) legislation that came into force on January 5, 2023. It requires European companies (including qualified EU subsidiaries of non-European companies) to disclose their social and environmental impact, as well as the effects of their environmental, social and governance (ESG) actions on their business.</p> <p>The goal of the CSRD is to provide clarity to help investors, analysts, consumers and other stakeholders better assess the sustainability performance of EU companies, as well as the related business impacts and risks. Introduced as part of the European Commission’s Sustainable Finance Package, the CSRD significantly expands the scope, sustainability disclosure requirements and reporting obligations compared to the previous NFRD (Non-Financial Reporting Directive).</p> <p>CSRD reporting is based on the concept of double materiality. Organizations are required to disclose information about how their business activities impact the planet and people, as well as how sustainability goals, measures and risks affect the financial health of the company. For example, beyond requiring an organization to report its energy consumption and costs, the CSRD mandates the disclosure of emissions metrics that detail the environmental impact of energy use, the targets for reducing that impact and information on how achieving these targets will influence the organization’s financial performance.</p>
Double materiality	Double materiality encompasses both impact materiality and financial materiality. Impact materiality refers to information about the company’s impact on people or the environment concerning a sustainability topic. Financial materiality relates to material information about risks and opportunities associated with a sustainability topic that can affect the company’s financial performance.

Term	Definition
Doughnut economy	Doughnut Economics, a model developed by Kate Raworth, aims to achieve development without harming the Earth. The “doughnut” represents the visual model of this economic approach, with an inner ring representing the “social foundation” and an outer ring representing the “environmental limits”. The goal of Doughnut Economics is to find a balance between the socially just space (where basic human needs are met) and the ecologically safe space (where environmental boundaries are respected), ensuring sustainable and equitable development for all.





Term	Definition
Energy efficiency	Reduction of energy consumption and prevention of waste.
Atmospheric emissions	Emission of atmospheric pollutants. These can be classified as primary, meaning they are released into the environment in their original form and secondary, which are formed later in the atmosphere through chemical and physical reactions.
ESG	ESG stands for Environmental, Social and Governance and refers to three central factors in measuring the sustainability of an investment. These factors help investors evaluate how a company manages risks and opportunities related to environmental impact, social responsibility and corporate governance.
EFRAG	L'EFRAG (European Financial Reporting Advisory Group), is an advisory body of the European Commission in the field of corporate reporting. It has also developed an initial set of indicators (ESRS) that were approved by the EFRAG Sustainability Reporting Board and are used for corporate reporting in line with the CSRD.
ESRS	The acronym ESRS stands for European Sustainability Reporting Standards, which are the European Standards for Sustainability Reporting. There are 12 standards in total, divided into two categories: general (2 transversal standards) and thematic (10 focused on environmental, social and governance issues). These standards were specifically designed to meet the regulatory requirements of the EU under the CSRD.
GHG - Gas serra	Acronym for Greenhouse Gas: gases present in the atmosphere that are transparent to incoming solar radiation but can effectively trap infrared radiation emitted by the Earth's surface, atmosphere and clouds. Greenhouse gases can be of both natural and anthropogenic origin; they absorb and emit radiation at specific wavelengths in the infrared spectrum. This property causes the phenomenon known as the greenhouse effect, which leads to the warming of the Earth's surface and lower atmosphere. Water vapor (H ₂ O), carbon dioxide (CO ₂), nitrous oxide (N ₂ O), methane (CH ₄) and sulfur hexafluoride (SF ₆) are the primary greenhouse gases in the Earth's atmosphere.
GRI	Acronym for Global Reporting Initiative, international guidelines for the preparation of a sustainability report, providing a set of indicators in the economic, social and environmental fields to systematize the reporting of corporate performance.
Impact	The concept of impact refers to the effect that an organization has or could have on the economy, the environment and people, including the effects on their human rights, as a result of the organization's activities or business relationships. Impacts can be real or potential, negative or positive, short-term or long-term, intentional or unintentional and reversible or irreversible. These impacts indicate the organization's contribution, whether negative or positive, to sustainable development.
Energy intensity	A measure used to calculate the degree of energy efficiency. It is calculated as the amount of energy divided by a relevant indicator for the business activities considered, such as the quantity of finished products, revenue, sales volume, etc.
CO _{2e} intensity	A measure used to calculate the degree of efficiency, expressed by relating carbon dioxide emissions to a relevant indicator for the business activities considered, such as the quantity of finished products, revenue, sales volume, etc.
IRO	Acronym for Impacts, Risks and Opportunities.
KPIs	Acronym for Key Performance Indicators: a measurable value that demonstrates the effectiveness with which a company is achieving its set business objectives.
Materiality	A concept introduced with the G4 version of the GRI, which refers to the degree of relevance of specific topics for the preparation of the sustainability report.
Near miss	A "near miss" is defined as any work-related event that could have caused an injury, health damage (illness), or death but, by pure chance, did not result in such an outcome. It is an event that has the potential to cause harm but did not, typically due to luck or timely intervention.
Scope 1	Classification developed by the GHG Protocol that refers to all direct greenhouse gas emissions, meaning those caused by sources owned or controlled by the reporting entity.
Scope 2	Classification developed by the GHG Protocol that refers to all indirect greenhouse gas emissions resulting from the consumption of energy purchased from the grid.
Scope 3	The classification developed by the GHG Protocol that refers to all indirect greenhouse gas emissions not included in Scope 1 and Scope 2, which occur within a company's value chain.



Term	Definition
SDGs	<p>Acronym for Sustainable Development Goals. There are 17 goals, divided into 169 specific “targets” to be achieved by 2030.</p> <p>They were established in 2015 and represent common objectives set by the international community (all 193 UN member countries) to promote the sustainable development of the planet.</p>
STK - Stakeholder	<p>A stakeholder is a party that has an interest in a company and can influence or be influenced by the company’s activities. The primary stakeholders in a typical company are its investors, employees, customers and suppliers.</p> <p>In the context of sustainability, stakeholders include individuals, communities, organizations and governments that are impacted by or involved in the company’s activities. They can play a crucial role in adopting sustainable practices and implementing targeted actions.</p>
STK-engagement / coinvolgimento degli stakeholder	<p>Engagement and listening to the company’s stakeholder groups. For stakeholders with whom a dialogue has been established in this sustainability report, reference is made to employees, customers, the local community and public institutions.</p>
Material topic	<p>It is an aspect, topic, or initiative that is perceived as relevant by stakeholders, as it could significantly influence their expectations, decisions and actions. On the other hand, it is considered important by the organization because it can generate significant economic, social and environmental impacts on its activities.</p>
TOE	<p>Acronym for Tonne of Oil Equivalent. It is a unit of measure for energy.</p>
Trigeneration	<p>It is the combined production of electrical energy, thermal energy and cooling energy through the use of a natural gas-powered engine connected to an electric generator. By pairing an absorption chiller, it is possible to produce cooling energy, utilizing part or all of the thermal energy produced by the engine.</p>



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