

# Energy and Climate Change Policy

This policy confirms Siderom's approach to be a part of the global effort to tackle climate change. As significant consumers of both non-renewable and renewable energy, Siderom is committed to buying and using energy in a responsible, efficient and cost-effective manner with the aim to reduce its carbon footprint. The policy has been developed taking into consideration the interests of key stakeholders of Siderom, and applies to all employees, officers, directors, contractors, and agents as well as all entities and subsidiaries controlled by the company. The policy applies to all operations and business activities, regardless of the country in which each company operates, as well as the upstream and downstream value chain of Siderom.

This policy is developed to address energy and climate related material negative impacts such as the consumption of non-renewable energy and GHG emissions, as well as material positive impacts such as the provision of key products enabling the energy transition and decarbonization. The policy incorporates technology and legal transition risks, acute and chronic physical climate related risks, as well as opportunities related to products and services.

Siderom is committed to:

## **1. Compliance with climate and energy legislation**

Siderom will comply with all applicable energy and carbon-related legislation, including EU climate directives, ESRS standards, and other national and international regulations. The company commits to international climate related frameworks such as the Paris Agreement and Sustainable Development Goals #7 and #13. Siderom adheres to mandatory reporting frameworks ensuring transparent and accurate disclosure of greenhouse gas (GHG) emissions, energy consumption, and climate-related risks.

## **2. Continuous improvement in energy efficiency**

Siderom will continuously improve energy efficiency by implementing and maintaining robust energy management. These energy efficiency systems will aim to reduce energy consumption, optimize resource use, and integrate renewable energy sources, all while maintaining a safe and comfortable working environment. Regular energy audits will be conducted to ensure improvements and compliance with best practices.

## **3. Evaluation of investments based on energy and carbon impact**

All new investments in infrastructure, equipment, and production processes (new equipment, refurbishing of existing equipment) will be evaluated based on their energy consumption and carbon footprint. Siderom will prioritize technologies and practices that contribute to decarbonization and minimize its environmental impact, ensuring that the carbon intensity of new projects aligns with the company's climate goals.

## **4. Carbon Footprint reduction strategy**

Siderom will develop and implement strategies to identify and reduce the direct (Scope 1) and indirect (Scope 2 and Scope 3) carbon emissions associated with its operations. This includes setting targets for GHG reductions and developing decarbonization pathways that support EU and global climate goals. At the same time Siderom commits to transition to Renewable energy when economically and technologically feasible.

#### **5. Engagement in value chain climate change mitigation initiatives**

Siderom will actively engage with industry-wide initiatives and collaborate with stakeholders across the value chain to reduce carbon emissions. This includes working with suppliers, customers, and partners to create and implement carbon reduction programs, ensuring that efforts to reduce GHG emissions extend beyond direct operations.

#### **6. Climate change adaptation**

Siderom commits to perform robust climate and vulnerability risk assessments to identify potential areas of hazard and consequent actions to be followed with specific adaptation solutions.

#### **7. Training and awareness on energy management**

Siderom will ensure that employees receive adequate training and guidance on energy management practices, tailored to their roles and areas of influence. Training and guidance shall promote awareness of energy conservation, carbon footprint reduction, and environmental sustainability throughout the organization.

#### **8. Stakeholder engagement and advocacy for best practices**

Siderom will engage with public and industry bodies to promote and implement best practices in energy efficiency, carbon reduction, and climate change mitigation. The company will actively participate in industry coalitions, advocating for improved regulations and policies that support sustainable business practices and energy transitions.

#### **9. Regular monitoring, reporting, and continuous improvement**

Siderom will regularly review, monitor, and report on their energy and carbon performance. This includes publishing detailed reports on energy consumption, GHG emissions, and climate-related risks, ensuring transparency and accountability. Siderom will also set measurable targets for continuous improvement and monitor progress against climate objectives, ensuring alignment with global and EU climate goals.

#### **Governance and accountability**

Responsibility for implementing this Energy and Climate Change Policy lies with the most senior executives responsible for the company. These executives will ensure that energy and climate considerations are fully integrated into corporate strategy and operations, with regular oversight by the Administrators.

Siderom will establish governance mechanisms to monitor, assess and manage climate-related impacts, risks and opportunities. Climate-related performance will be reported annually as part of the company's broader sustainability reporting obligations, ensuring compliance with both ESRS and applicable national and international standards.

#### **Distribution and communication**

It falls into the responsibilities of Siderom management to communicate the content and the spirit of this document to all personnel, direct and associated, also to stakeholders. This policy is published and posted on the company's intranet and website. The policy will be reviewed annually to ensure compliance with legal requirements and any other relevant updates.