Arvedi AST

Responsible Water Resources Management Plan
Financial Year 2025



Arvedi

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2025 plan

Arvedi AST and the value of water

Water links Arvedi Acciai Speciali Terni's activities to the local area in which it operates. It is an **essential resource** for production and forms part of a water system shared with communities, ecosystems and other users. Its management therefore also concerns **the people who live and work in this area, who have a stake in preserving its availability and quality.**

For AST, looking after water means making practical choices: reusing it, recovering it where possible, maintaining efficient infrastructure and controlling discharges. This commitment is reflected in the day-to-day work of our staff and in improvement initiatives, designed to **support the development of industrial activities whilst minimising water consumption and managing the impact on rivers and groundwater.**

This document is the public version of *the Environmental Sustainability Plan – Management, Monitoring and Control of Water Resources*.[1]

It presents the contents in a form accessible to all stakeholders, whilst ensuring the consistency of the information and its traceability in relation to the relevant technical documentation.

The Plan outlines the water context, water uses, impacts and management measures. It sets out the objectives, actions taken and planned, the results, and the methods for monitoring and updating. It thus provides a basis for knowledge and discussion regarding decisions concerning water resources and the plant's relationship with the local area.

The information is selected and, where appropriate, aggregated, whilst retaining the content necessary to understand management, impacts and performance. Technical and plant-related details not required for public purposes, as well as personal or commercially confidential information, remain within Arvedi AST's internal documentation. Any exclusions are justified as part of the review of content intended for publication.

This document does not replace environmental authorisations, the Monitoring and Control Plan or other communications required by environmental legislation. Its publication complies with the requirements of *Principle 12* of *the ResponsibleSteel™ International Production Standard*.

[1] Tubificio di Terni S.r.l. is excluded from the scope as it is an autonomous organisation and is not involved in Arvedi AST's ResponsibleSteel™ certification.

1

Scope, boundaries and commitments

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1. Purpose, scope and commitments

The Water Resources Management Plan covers water resource management activities carried out at the AST steelworks on Viale Benedetto Brin and at the Terni Service Centre, situated in the Sabbione industrial area.

The operational scope includes activities directly managed or controlled by Acciai Speciali Terni relating to:

- supply, abstraction and distribution;
- water use, recirculation and reuse;
- wastewater treatment and discharge;
- quantitative and qualitative monitoring;
- maintenance of water infrastructure;
- prevention and management of faults, leaks and accidental incidents.

The **scope of operations** includes activities directly managed or controlled by Acciai Speciali Terni relating to:

- supply, abstraction and distribution;
- water use, recirculation and reuse;
- wastewater treatment and discharge;
- quantitative and qualitative monitoring;
- maintenance of water infrastructure;
- prevention and management of faults, leaks and accidental incidents.

The analysis also considers the water influence area, within which the site's water abstractions, uses and discharges may interact with water bodies, ecosystems, communities and other water users. It therefore encompasses the relevant catchment area, the surface and groundwater bodies concerned, and relations with relevant stakeholders.

The final figures relate primarily to the 2025 financial year, unless otherwise stated. The progress of actions and information subject to change are updated as at the date of approval of the public version of the Plan. Historical data used to illustrate trends are accompanied by details of the year, scope and source.

The organisation's commitments

Acciai Speciali Terni integrates water resource management into its environmental and industrial planning and is committed to:

- **keep** its analysis of the water context up to date, taking into account the availability and quality of the resource, seasonal variations, extreme events and the effects of climate change;
- maintain a water balance based on traceable data and use consistent indicators to measure withdrawals, usage, discharges, recirculation, reuse and water intensity;

- operate in compliance with applicable regulatory and authorisation requirements and monitor compliance with them;
- **improve** water use efficiency, reduce losses and promote recirculation and reuse where technically and environmentally appropriate, through objectives and time-bound targets;
- **prevent and minimise** the impacts of discharges on communities and the environment, and set time-bound targets relating to water quality;
- **contribute**, within the scope of its responsibilities and capacity for action, to the management of shared water challenges in the catchment and adopt appropriate measures in relation to any water sources that may be scarce or under stress;
- **involve** relevant stakeholders in the development and maintenance of the Plan, documenting the contributions received and the resulting decisions;
- **monitor** results against targets, analyse deviations, update the Plan where necessary, and publish information that is understandable, accurate and verifiable.

The **objectives, indicators, targets and actions** through which these commitments are implemented are set out in Chapter 6. The **results and related trends** are presented in Chapter 7.

2

Water context and sphere of influence

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2. Water context and catchment area

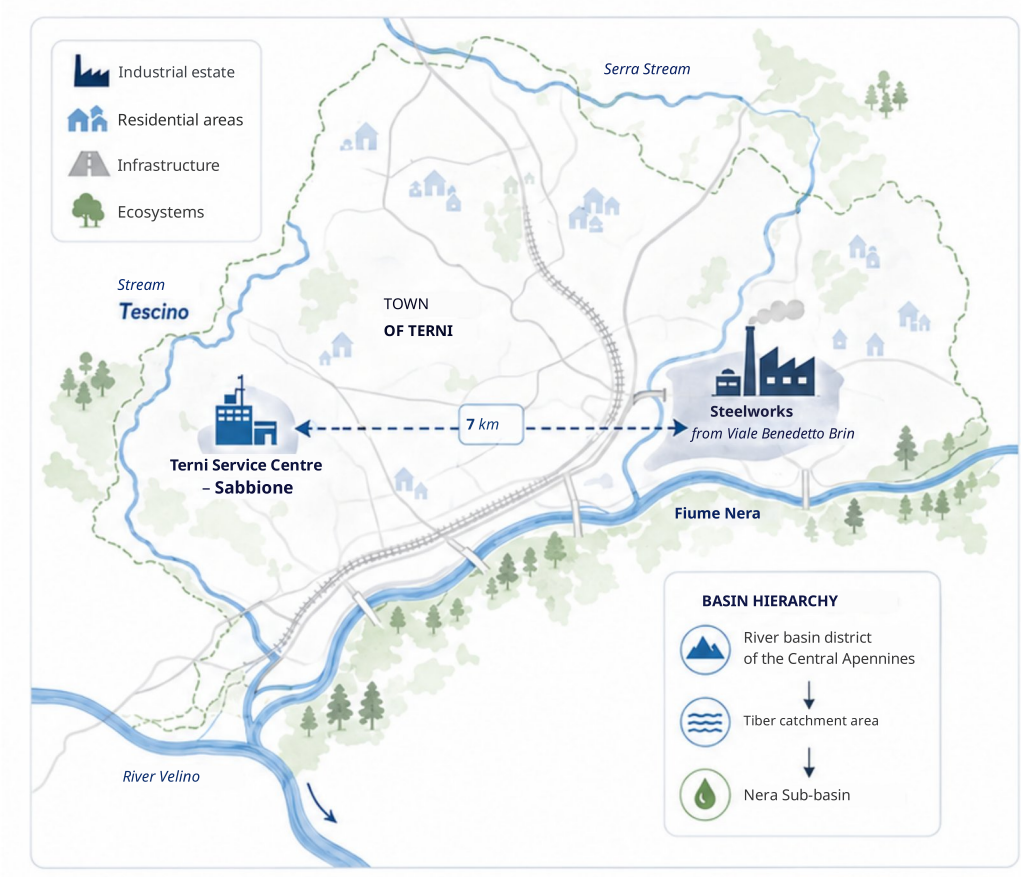
Territory and catchment area

The steelworks complex on Viale Benedetto Brin is situated in the eastern part of **the municipality of Terni**, in an area characterised by industrial and residential developments, infrastructure and watercourses. The site is bounded to the south by **the River Nera** and to the north and west by **the Serra and Tescino streams**. The Terni Service Centre is situated in the Sabbione industrial area, approximately seven kilometres from the steelworks.

Both sites fall within **the Central Apennines River Basin District**, the Tiber catchment area and the Nera sub-basin.

To describe the context in which the two sites are situated and to assess aspects relating to water resource management, the following are taken into account:

- the rivers Nera and Velino and the streams Serra and Tescino;
- the Conca Ternana groundwater body;
- the infrastructure for diversion, conveyance, use and return;
- ecosystems, communities and other users of the resource.



The Nera-Velino system is subject to regulation and diversion works, including for hydroelectric purposes. Water availability therefore depends on natural conditions, flow regulation, the state of the infrastructure, competing uses and the applicable regulations.

The area of water influence does not coincide with the entire Nera catchment. It comprises the water bodies, ecosystems, communities and other users potentially affected by the water abstractions, uses and discharges of Acciai Speciali Terni. The assessments are based on regional and district planning, monitoring data from the **Umbria Region** and **ARPA Umbria**, and information from the company's environmental management system.

Water availability, quality and water stress

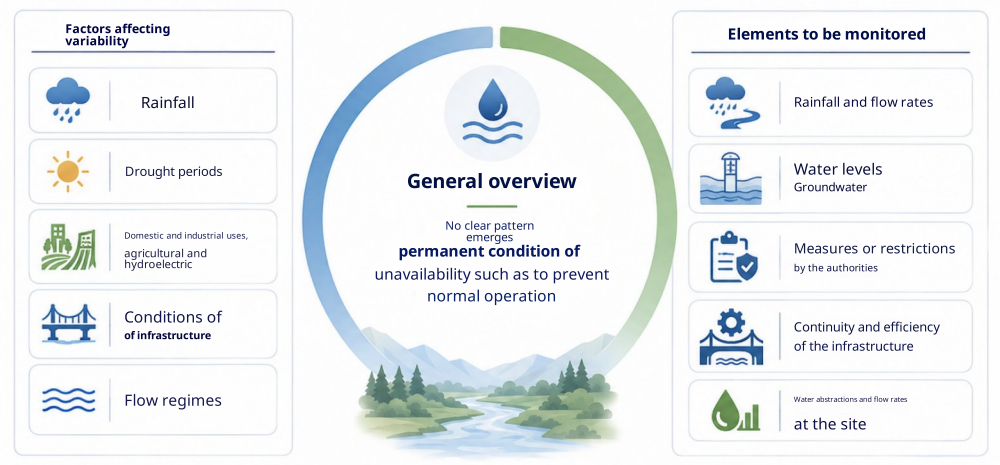
Acciai Speciali The water context is assessed by considering:

1. quantitative availability;
2. the quality of surface and groundwater;
3. exposure to water stress, seasonal variability and drought.

The presence of water resources and diversion infrastructure does not preclude conditions of water stress. Nor does the return of part of the water abstracted, in itself, equate to the absence of consumption or impact. The assessment therefore takes into account abstractions, returns, losses, evaporation, water quality and competing uses.

Quantitative availability

The Nera catchment area has surface and groundwater resources and a comprehensive system for their regulation and use. However, availability varies throughout the year and is influenced by rainfall, periods of drought, domestic, industrial, agricultural and hydroelectric uses, and the condition of the infrastructure. The information reviewed at the time of approval of the public version of the Plan does not indicate a permanent state of unavailability such as to prevent normal operation.



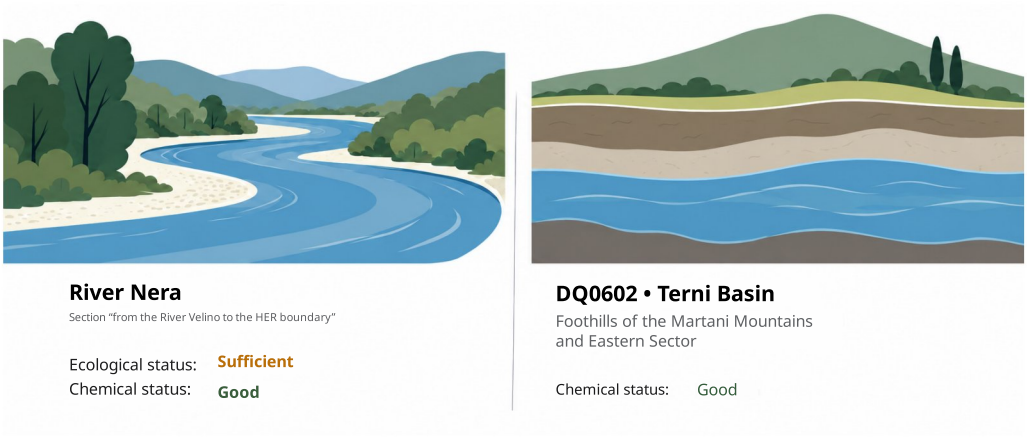
However, dependence on water supply systems and flow regimes means that the following must be monitored through company and institutional sources:

- rainfall and flow rates;
- groundwater levels;
- measures or restrictions imposed by the authorities;
- the continuity and efficiency of infrastructure;
- water abstractions and the site's water intensity.

Quality of water bodies

For the 2015–2020 monitoring cycle, the classification adopted by the Umbria Region assigns the section of **the River Nera known as 'from the River Velino to the HER boundary'** a **sufficient** ecological status and a **good** chemical status.

For the groundwater body **DQ0602, 'Conca Ternana – foothills of the Martani Mountains and eastern sector'**, the regional classification for the same cycle indicates a good chemical status.



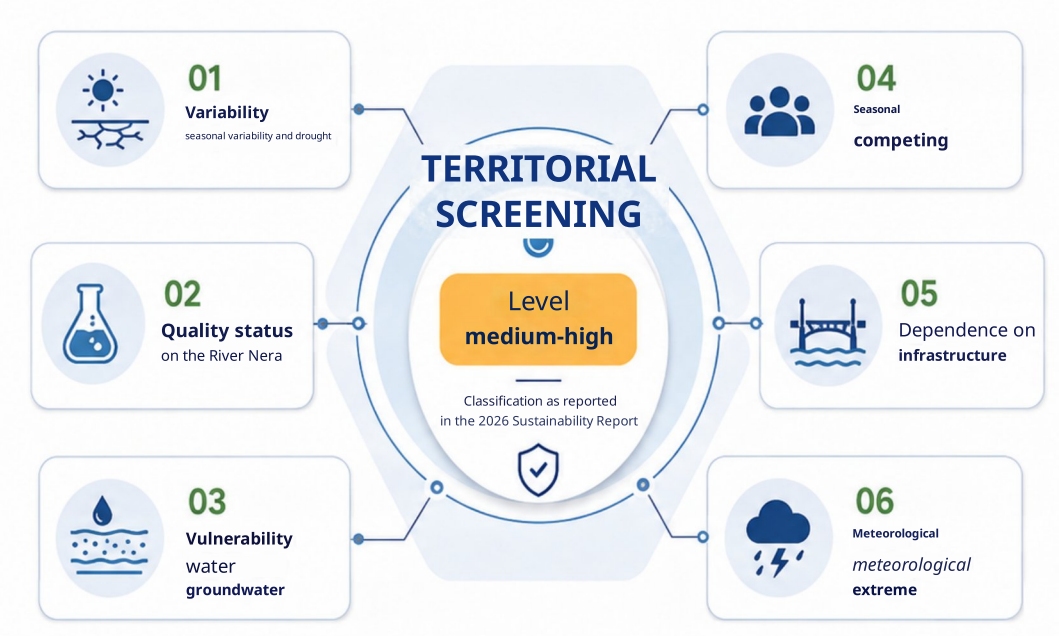
These classifications describe the overall status of water bodies and do not, on their own, constitute an assessment of the impact of Acciai Speciali Terni. They are supplemented by the company's data on water abstraction and discharge, self-monitoring, checks carried out by the authorities and information on pressures within the catchment area.

Official updates are incorporated into the review of the Plan. Any changes to the classification, new pressures or instances of deterioration lead to a reassessment of the impacts, objectives and company actions.

Assessment of water stress[2]

Water stress is assessed by considering availability, demand, quality, seasonal variability, drought, the status of water bodies and dependence on infrastructure. Territorial screening tools, including the *WRI Aqueduct Water Risk Atlas*, provide an initial overview of the area's exposure. As these tools operate at a sub-basin scale and do not fully represent all local conditions, the results are supplemented with data from the relevant authorities and company information. The territorial screening reported in **the 2026 Sustainability Report – Financial Year 2025** classifies the area as having a medium-to-high level of water stress. This classification does not indicate a permanent state of water scarcity, but it does require a prudent approach and the monitoring of the following factors: seasonal variability and drought; the water quality of the River Nera; groundwater vulnerability; competing water uses; dependence on infrastructure; and extreme weather events.

2 *Main sources*: Umbria Region Water Protection Plan; Umbria Regional Council Decision No. 1311 of 13 December 2023 – classification of water bodies; 2021–2027 Water Management Plan for the Central Apennines District; WRI Aqueduct 4.0; 2026 Sustainability Report (financial year 2025); data from Acciai Speciali Terni's environmental management system.



The assessment is reviewed at least annually and in the event of significant changes to the conditions of the catchment area, official classifications, applicable requirements or site activities.

Climate change and scenarios[3]

Climate change may alter the availability, quality and temporal variability of water resources. Relevant scenarios include:

- a possible increase in the duration and intensity of droughts;
- more irregular and concentrated rainfall;
- variations in river flows and groundwater levels;
- rising temperatures and increased evaporation;
- potential effects on water quality;
- increased exposure to flooding and extreme weather events.

These scenarios are used to assess the resilience of the company's water system and to define prevention and adaptation measures. The main implications concern:

1. continuity of supply;
2. water efficiency and recycling;
3. reliability of treatment systems;
4. stormwater management;
5. infrastructure protection;
6. prevention of abnormal discharges;
7. response to constraints and emergencies.

Acciai Speciali Terni incorporates these elements into its context review, risk assessment, objective setting and action planning.

[3] *Main sources:* National Climate Change Adaptation Plan; Umbria Region Water Protection Plan; RIMU-CLIMA regional project; data from the Umbria Region Hydrographic Service.

The information is updated on the basis of data from the Regional Hydrographic Service, river basin planning and the regional adaptation strategy.

The findings of the RIMU-CLIMA regional project, relating to drought, heavy rainfall and extreme weather events, will be taken into account in updates to the Plan as they become available.

3

Stakeholders and shared water challenges

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3. Stakeholders and shared water challenges

Relevant stakeholders

The stakeholders relevant to water resource management are identified by considering:

- **the responsibilities** they hold in the governance and control of the resource;
- **dependence** on the same water bodies and related infrastructure;
- **the potential** for them to be affected by water abstraction, use or discharge from the site;
- **knowledge** of the local area and its environmental conditions;
- **the capacity** to contribute to the understanding and management of shared challenges.

Relevance refers specifically to water-related issues and does not automatically coincide with the broader mapping of the organisation's stakeholders.

CATEGORY	REPORT ON THE MANAGEMENT OF WATER RESOURCES
Umbria Region, Central Apennines District Water Authority and ARPA Umbria	Planning, authorisation, monitoring, control and classification of water bodies
Umbrian Waste and Water Authority, Integrated Water Service and infrastructure operators	Drinking water supply, networks, continuity of service and assessment of alternative solutions
Local authorities, local communities, committees and local associations	Knowledge of local needs, perception of impacts and contributions to the setting of priorities
Other commercial water users and operators of regulation and diversion works	Competing uses, dependence on the same resources and assessment of cumulative effects
Workers, employee representatives and companies operating on site	Knowledge of operating conditions and the identification of anomalies, leaks and opportunities for improvement
Scientific bodies, schools, universities and environmental and cultural associations	Contributing to knowledge, dissemination and raising awareness of the value of the resource

The mapping is reviewed at least annually and whenever there are significant changes to activities, water sources, discharges or the local context.

Involvement in the development and maintenance of the Plan

The information used to develop the Plan is derived from:

- **institutional and technical dialogue with the relevant authorities**, including in the context of authorisation procedures, monitoring activities and inspections;

- **operational consultation with those responsible** for managing water resources and infrastructure;
- **information and dialogue initiatives** aimed at local communities, associations and other local stakeholders.

Activities already carried out include the meetings initiated in 2024 with the **Integrated Water Service**, discussions with the authorities on water demand and supply methods, and public initiatives focusing on the relationship between water, the local area and industrial activities. These include participation**in the local initiative 'Il potere delle acque'** and the **exhibition 'La Grande Opera'**, curated by Arvedi AST.



These activities have contributed to an understanding of the context and to the dissemination of information on the site's water management. However, these predominantly informative initiatives are distinct from the consultation activities on the Plan and are not, in themselves, considered evidence of stakeholder involvement in its development. With the publication of the public version, a structured engagement process is launched, aimed at:

- making the context, impacts, objectives, actions and results accessible;
- gather comments, information and proposals from relevant stakeholders;
- assess the contributions received in relation to shared risks, impacts and challenges;
- document the decisions taken and the reasons behind them;
- incorporating, where relevant, the contributions into the Plan's objectives, actions or updates;
- communicate the outcomes through the next public version or by means of specific feedback, where necessary.

For each contribution, at least the date, the stakeholder category, the issue raised, the assessment carried out and the resulting decision are recorded. Contributions are examined as part of the annual review or earlier if they highlight a risk, an impact or a significant change.

The absence of comments or objections is not considered proof of the absence of critical issues. The assessment is based jointly on stakeholder contributions, monitoring data, information from the competent authorities and evidence from the environmental management system. The procedures for submitting comments and receiving feedback are described in Chapter 9.

Shared water challenges within the catchment

A SHARED CHALLENGE	ACCIAI SPECIALI TERNI'S CONTRIBUTION
Availability of the resource, seasonal variability and water stress	Reducing fresh water withdrawals, increasing recirculation and reuse, monitoring water intensity and taking any restrictions into account in operational planning.
Quality of the River Nera and other receiving waters	Maintain treatment and monitoring systems, comply with applicable limits, prevent abnormal discharges and set measurable improvement targets.
Groundwater protection	Reduce unnecessary use of drinking water, identify and repair leaks, evaluate alternative sources and collaborate with the authorities on characterisation and monitoring procedures.
Infrastructure efficiency and resilience	Replace or make critical networks inspectable, ensure maintenance, prevent leaks and assess vulnerability to flooding, drought and extreme events.
Competing uses and cumulative effects	Share relevant information with the authorities, promote dialogue with other commercial users and contribute, as far as possible, to understanding cumulative impacts.
Transparency and participation	Publish the Plan and its results, gather input from stakeholders and ensure that decisions taken are traceable in subsequent updates.

Shared water challenges are conditions affecting multiple parties that cannot be effectively managed by a single water user. They are identified by considering catchment planning, the status of water bodies, the classification of the area as having medium-to-high water stress, climate change, competing uses and information gathered through consultation with stakeholders.

Acciai Speciali Terni's contribution is defined within the scope of its own responsibilities and capacity for action. It does not replace the remit of the authorities nor the responsibilities of other water users.

The actions and targets through which these contributions are implemented are set out in Chapter 6; the results are presented in Chapter 7.

4

Water use and water balance

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4. Water use and water balance

Sources and main uses

Acciai Speciali Terni's water supply comes from surface water, groundwater and the public water mains. The sources and uses differ between the Viale Brin steelworks and the Terni Service Centre.

SOURCE	SCOPE OF USE	MAIN USES
Surface waters of the River Velino	Viale Brin steelworks	Production processes, plant cooling, production of demineralised water and other industrial services.
Groundwater	Terni steelworks and Service Centre	Domestic uses within the steelworks; sanitary and hygiene uses, and limited authorised industrial uses within the Terni Service Centre.
Public water supply	Areas served by the network	Sanitary and domestic uses, services and supplementary or emergency water supplies.
Rainwater	Areas within the perimeter	Managed via collection networks; in 2025, no volumes were collected and recorded as a source of supply.

Surface water is the main source and is used primarily for the direct and indirect cooling of plant and for other requirements of the production cycle. Some of the water used is recirculated within the same process or reused in subsequent stages before final discharge.

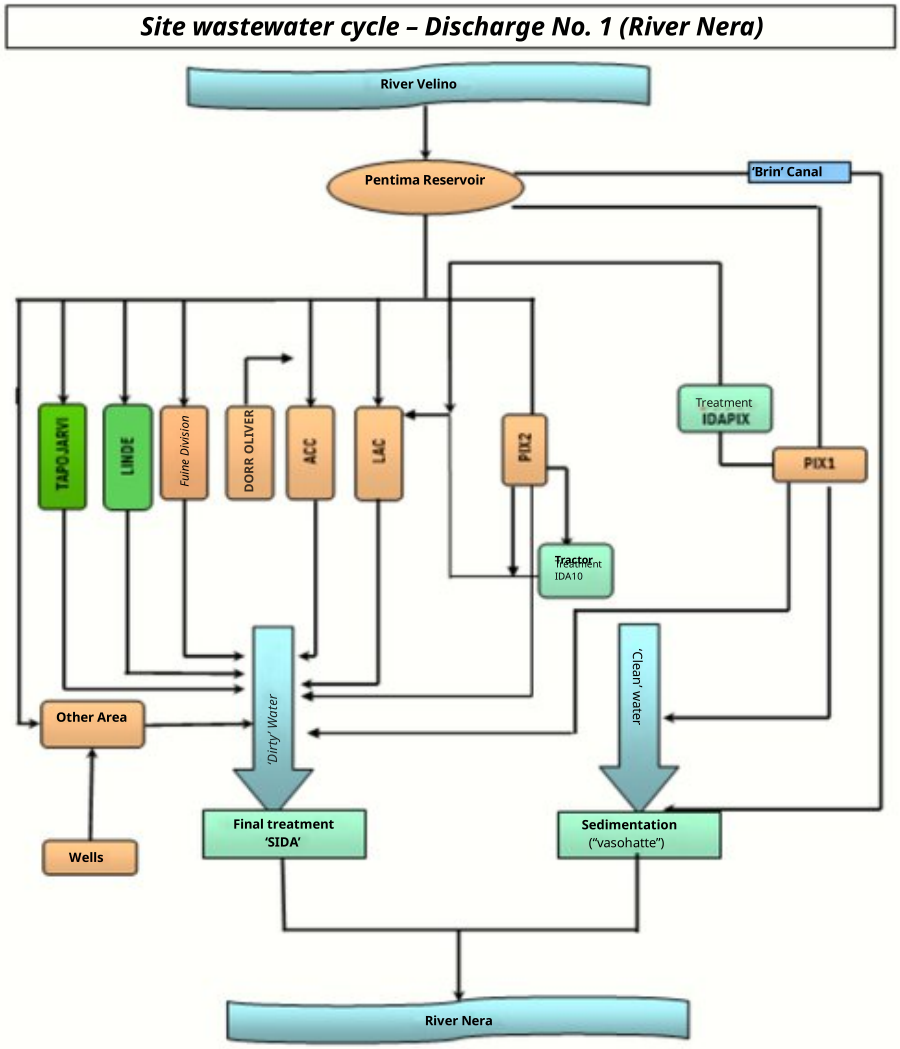
The water flow and energy generation

The steelworks' water supply system connects the River Velino to the Pentima reservoir and the plant via tunnels, pipelines and other infrastructure. The differences in elevation across the terrain allow water to be transported and distributed by gravity and used for electricity generation. The table below outlines the main characteristics of the system, from abstraction to discharge.

SYSTEM COMPONENT	CHARACTERISTICS AND DATA
Diversion from the River Velino	State concession for industrial use comprising 50 hydraulic modules, equivalent to 18,000 m^3/h. Elevation of the intake point: 367 m above sea level.
Supply to Pentima	The water reaches the Pentima reservoir, situated at approximately 186 m above sea level, via tunnels and penstocks that utilise the difference in elevation, without the need for pumping at this stage.

Hydroelectric power generation at Pentima	A Francis turbine owned by Edison uses the diverted water to generate electricity. Edison holds the hydroelectric concession and returns the entire flow to AST at the Pentima reservoir.
Distribution to the plant	Five pipelines distribute the water to the plant, situated at approximately 136 metres above sea level. The head provides a pressure of 5 bar without the need for electricity during this distribution stage.
Use in production processes	The flow rate used is approximately 14,000 m^3/h, corresponding to around 75–80 per cent of the available water.
Water not used in processes	The remaining volume, amounting to approximately 4,000 m^3/h, is returned to the River Nera without passing through the SIDA treatment plant, flowing through another power station for electricity generation.
Energy recovery upon return	A hydroelectric power station installed by a third party at the outlet into the River Nera enables further energy recovery. The system utilises the available and authorised head along the water's course.

The main stages of the water system: water usage and flow paths within the departments



At the steelworks, **wastewater** is collected, treated according to its characteristics and discharged mainly into the River Nera.

Authorised effluent discharges are directed to the Serra and Tescino streams and into the public sewerage system. At the Terni Service Centre, industrial and domestic wastewater is channelled into the public sewerage system, following treatment where required. Within the plant, water flows vary depending on the processes and cooling methods used. The system comprises closed circuits, recirculation, reuse, on-site treatment and the conveyance of flows requiring treatment to the treatment plant.

The flow rates shown in the table are indicative and vary depending on the plants in operation and the processes underway.

DEPARTMENT	WATER USE AND MANAGEMENT	INDICATIVE FLOW RATES
ACC	Cooling via closed-circuit evaporative cooling towers. The secondary circuits of the continuous casting lines use direct cooling; the water, containing suspended solids, is sent to the treatment plant before being returned to the River Nera.	**Approximately 11,000 m^3/h recirculated and 2,500 m^3/h sent to the treatment plant.**
LAC	Part of the water is recirculated via an evaporative cooling tower; the flows containing suspended solids are sent to the treatment plant and subsequently returned to the River Nera.	**Approximately 6,000 m^3/h , of which: 2,000 m^3/h is recirculated and 4,000 m^3/h is sent to the treatment plant.**
PIX1	Indirect cooling water, which is free from contamination, is discharged directly into the river. The other flows undergo local treatment and are fully reused in the processes.	**Approximately 4,500 m^3/h , comprising: 3,000 m^3/h for indirect cooling and 1,500 m^3/h treated locally and reused.**
PIX2	Part of the water from the indirect cooling systems is recirculated into the processes; the remainder, which may be contaminated, is sent to the treatment plant.	**Approximately 3,500 m^3/h total: 1,500 m^3/h recirculated and 2,000 m^3/h sent to the treatment plant.**
SDF	The water used in direct cooling systems is sent to the treatment plant before being discharged into the River Nera.	**Approximately 1,000 m^3/h.**

Water balance

The water balance reconciles withdrawals, usage, recirculated or reused volumes, discharges and water consumption. The data are collected via the company's metering systems and consolidated within the framework of the environmental management system, the Integrated Environmental Authorisation and the Monitoring and Control Plan.

To interpret the system correctly, it is necessary to distinguish between the authorised withdrawal volume, the water actually withdrawn, the water used in processes, the recirculated or reused flows, and the water returned. A portion of the diverted water is not used in production processes and is returned to the River Nera for hydroelectric generation.

Water abstractions

Over the three-year period, total water abstraction fell by approximately 2.8 million cubic metres, equivalent to 1.9 per cent. The reduction mainly concerns surface water, which in 2025 accounted for over 99 per cent of total abstraction. Other sources account for a limited proportion. The use of the public water supply increased compared with 2023, but remains marginal in relation to the total volume.

Water intensity

Water intensity per unit of production is calculated by dividing total water abstraction by the reference production figure.

For 2025, the denominator – equal to 1,061,470 tonnes – comprises in-house production and slabs purchased from external suppliers and introduced into the production cycle from the heating and hot-rolling stages onwards.

Between 2024 and 2025, total water withdrawal decreased, whilst the intensity per tonne rose from 132 to 135 m^3/t as a result of the reduction in the **production** volume **used as the denominator**. The two indicators must therefore be interpreted in conjunction with one another.

Summary table 2025

Quantity	Value 2025	Criterion
Total withdrawal	143,210,843 m^3	Total water abstraction from surface water, groundwater and the water supply network
Recirculated and reused water	129,267,068 m^3	Total internal flows recirculated or reused and accounted for
Total discharges	150,750,524	Volumes discharged by receiving body and into the public sewerage system

The volume of discharges cannot be directly compared with that of withdrawals without taking into account rainfall inflows and the uncertainty of the measuring instruments. Rainwater collected from the site's surfaces may, in fact, flow into the discharges without constituting a withdrawal.

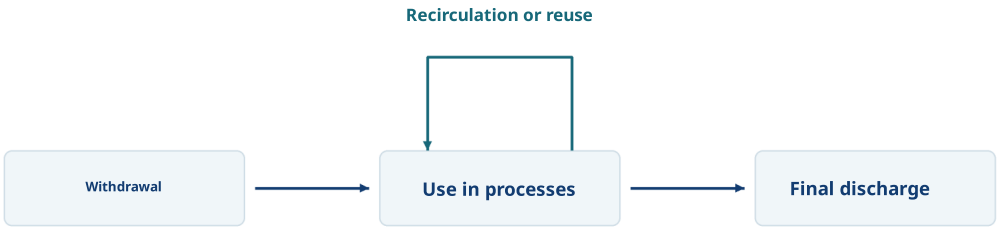
Water consumption is therefore not determined simply by the difference between total inflows and outflows. The calculation takes into account the returns actually attributable to the water abstracted, losses due to evaporation and rainfall.

The return of a large proportion of the water abstracted does not equate to the absence of consumption or impact. The assessment also takes into account the different locations of abstraction and return, the residence times within the system, the quality of the discharged water and other users of the resource.

Efficiency, recirculation and reuse

Acciai Speciali Terni employs two complementary approaches to reduce the need for new water abstraction:

- **recirculation**, whereby water is used several times within the same process or circuit;
- **reuse**, whereby water from one process is used in a subsequent stage with compatible quality requirements.



The main areas of application include:

- closed-loop systems for plant cooling;
- cascade reuse of cooling water;
- recovery of treated water for subsequent production applications;
- replenishment of circuits using reclaimed water;
- reduction of losses and optimisation of drinking water use.

These measures form part of an efficiency programme developed over the years. Whilst increased recirculation entails higher energy and maintenance costs, it is in line with the decision to limit the need for new water abstractions associated with future business projects.

Recirculated and reused water

Over the three-year period, the volume recorded as recirculated and reused water increased by approximately 3.8 million cubic metres, whilst total water abstraction decreased.

The ratio of recovered flows to water abstraction rose from 85.9 per cent in 2023 to 90.3 per cent in 2025.

Indicator	2023	2024	2025
Recirculated and reused water (m^3)	125,449,718	127,378,870	129,267,068
Total water abstraction (m^3)	146,032,149	144,845,615	143,210,843
Ratio of recirculated or reused water to water withdrawn	85.9%	87.9%	90.3%

Recirculated and reused water and total water abstraction

This indicator is calculated by dividing **the sum of internal flows that are recirculated or reused by the total volume abstracted**. As water can be used multiple times within the circuits, the figure does not represent a proportion of abstraction that has been eliminated, nor is it a measure of net consumption; rather, it reflects **the production system's ability to keep the resource in use prior to its final discharge**.

Ratio of recirculated or reused water to water abstracted

As water can be used multiple times within the circuits, this figure does not represent a proportion of the withdrawal that has been eliminated, nor is it a measure of net consumption.

The measures implemented include the recovery of effluent from treatment systems for the replenishment of cooling circuits, the transfer of cooling water and treated effluent between different production stages, and the use of closed-loop systems in areas with the highest demand.

The possibility of recirculating or reusing water is assessed by considering:

- the quality characteristics of the flow;
- the requirements of the end-use process;
- reliability and continuity of supply;
- energy consumption and other associated environmental impacts;
- prevention of the accumulation of substances or the transfer of contaminants;
- technical and regulatory feasibility.

Recirculated and reused water

ASSESSMENT OF THE FEASIBILITY OF RECIRCULATION OR REUSE

1. Quality characteristics of the flow

Requirements of the end-use process

2. Reliability and continuity of supply

Energy consumption and other associated environmental impacts

3. Reliability and continuity of supply

Energy consumption and other associated environmental impacts

4. Prevention of the accumulation of substances or the transfer of contaminants

Technical and regulatory feasibility

The reduction in water abstraction is not achieved by shifting impacts to other environmental media or by compromising the quality of effluents. Measures are therefore assessed in conjunction with treatment requirements, plant safety and the condition of the water bodies concerned.

The design of new plants is geared towards prioritising recirculation, **water recovery, reduction of lost water, efficiency of cooling systems and energy recovery** wherever technically feasible. These criteria support production growth through improved water efficiency, with the aim of **avoiding, as far as technically possible, a proportional increase in water demand.**

In line with the above, for the new Zmill 10 rolling mill, currently being installed in the PIX1 department, Arvedi AST has decided to supply the new plant via a closed-loop system using a modular evaporative cooling tower, capable of recirculating softened feed water at a rate of approximately **800 m³/h**.

This closed-loop system provides for the replenishment of up to **12 m³/h** of softened water, in order to recover the evaporated water and the induced carry-over.

Even the most recent works have been carried out in accordance with the principles of recovery and reuse, with a view to avoiding further consumption of water resources.

Reuse of effluent from the Dorr Oliver plant

The wastewater previously discharged from the Dorr Oliver plant (the on-site wastewater treatment plant) is now reused as make-up water to partially replace evaporation losses in the closed-loop cooling system of the evaporative cooling towers serving the ACC area. This measure has resulted in a water saving of **50 m³/h** and the consequent decommissioning of the partial discharge, which now serves solely as an emergency discharge in the event of a failure to recover water at the ACC cooling tower.

Reuse of indirect cooling water from certain plants in the PX2 area and reuse of effluent from the IDA10 plant

With the installation of the new Zmill 11 rolling mill at the PIX2 department, the existing recirculation system for returning effluent from PIX2 to LAC has been further upgraded to a capacity of **2,300 cubic metres per hour**, increasing the capacity of the existing pumps.

As part of this project, the discharge from the IDA10 wastewater treatment plant has also been modified; under normal conditions, this discharge feeds the recirculation system from PIX2 to LAC, and is activated only as an emergency discharge under specific conditions

Update to the wastewater cycle in the LAC department (new Walking Beam furnace)

The indirect cooling water from the furnaces in the LAC department (Walking Beam slab heating furnace, roughing mill holding furnace and passive annealing furnaces) is recirculated via a closed-loop system fitted with 'FAS' evaporative cooling towers. From October 2025, the LAC department will benefit, for the direct cooling of rolled products, from a system for reusing effluent from the PIX1 treatment plant at a flow rate of up to **1,400 m³/h**.

The objectives and targets relating to water abstraction, water intensity, recirculation and reuse are set out in Chapter 6. The results and variances are presented in Chapter 7.

5

Quality, discharges and impacts

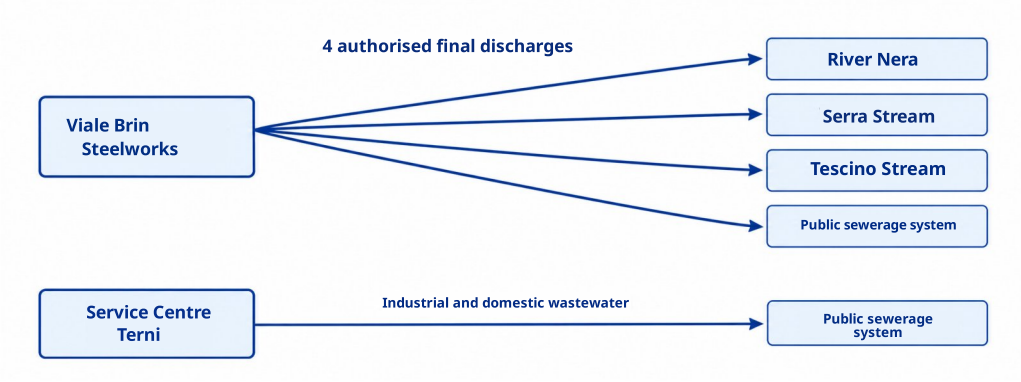
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5. Quality, discharges and impacts

Quality and discharge management

Wastewater is managed according to its source, quality characteristics, the treatment required and the authorised discharge point. The system includes process water, cooling water, rainwater and domestic wastewater. Below is a diagram of the authorised discharges and discharge points:



There are four authorised final discharge points within the steelworks: one into the River Nera, two into the Serra and Tescino streams, and one into the public sewerage system. There are also partial discharges and internal flows, which are monitored before they enter the main network. **At the Terni Service Centre, industrial and domestic wastewater is channelled into the public sewerage system.** Where required, the effluent is treated prior to discharge, in accordance with the conditions set out in the Single Environmental Authorisation.

Scope	Management methods
Process water	Treatment at departmental plants or within the centralised system, depending on the characteristics of the effluent.
Cooling water	Recirculation, reuse or discharge to authorised outlets.
Rainwater	Collection via dedicated or combined drainage networks and management in accordance with the terms of the authorisation.
Domestic wastewater	Discharge into the public sewerage system or management via authorised systems.
Abnormal or accidental discharges	Interception, possible suspension of discharge and activation of emergency procedures.

The treatment of industrial effluent relies on local treatment plants, situated near the main production areas, and on a centralised system of chemical-physical treatment. This configuration makes it possible to monitor the effluent flows before they join the main sewerage network and to reduce the load sent for final treatment.

The treatment plant is subject to continuous monitoring and control by the organisation responsible for water management. The collection and treatment system ensures that effluents requiring treatment are managed before being discharged back into the river.

Monitoring includes:

- continuous measurements of flow rate and the specified operational parameters;
- automatic sampling at points specified in the authorisation;
- chemical and physical analyses at varying frequencies;
- periodic characterisation of effluents;
- checks on the efficiency of treatment plants;
- verification and calibration of measuring and sampling instruments;
- recording, assessment and management of deviations.

The frequency of these checks depends on the discharge point, the parameter being analysed and the applicable regulations. **Continuous monitoring and periodic checks are carried out on a daily, monthly, quarterly, half-yearly or annual basis.** The results are recorded in the environmental management system and reported to the relevant authorities in accordance with the provisions*of the Integrated Environmental Authorisation* and *the Monitoring and Control Plan*.

Monitoring extends to the infrastructure that enables the supply and distribution of water. Trained staff continuously monitor the system using dedicated technologies, tracking water levels in watercourses, reservoirs and tanks, flow rates in the main pipelines, the operation of transfer systems and the condition of the infrastructure. This monitoring also includes CCTV systems.

2025 Emissions Profile

The 2026 Sustainability Report details the annual loads of substances discharged into water.
The main trends observed between 2024 and 2025 are set out in the table below.

Emissions of substances into water	Unit of measurement	2024	2025
Arsenic and compounds (as As)	kg/y	262.2	n.a.
Cadmium and compounds (as Cd)	kg/y	79.5	n.r.
Chromium and compounds (as Cr)	kg/y	853.9	747.2
Copper and compounds (as Cu)	kg/y	605.7	n.r.
Mercury and compounds (as Hg)	kg/y	36.7	n.r.
Nickel and compounds (as Ni)	kg/y	1,121.20	1,306
Lead and compounds (as Pb)	kg/y	163.9	n.r.
Zinc and compounds (as Zn)	kg/y	999.2	1,300.80
Total organic carbon (TOC) (as total C or COD/3)	kg/y	221.1	145.2
Cyanides (as total CN)	kg/y	892.5	n.r.
Fluorides (as total F)	kg/y	59,408	60,292
Total nitrogen	kg/y	n.a.	n.a.
Total phosphorus	kg/y	n.a.	n.a.
Chlorides (as total Cl)	kg/y	n.a.	n.a.

The annual loads, expressed in kg/year, represent the total mass emitted and do not replace the compliance assessment. The latter is carried out by comparing each measurement, for each individual parameter and discharge point, with the relevant concentration limit and other applicable authorisation conditions.

For arsenic, cadmium, copper, mercury, lead and cyanides, the 2025 emissions are classified in the Report as 'not significant'. This classification indicates values below the reporting thresholds set by the European E-PRTR Register or parameters which, in the monitoring carried out, were found to be below the limit of analytical determination. It does not, therefore, automatically equate to a zero value. The Report highlights a decrease in total organic carbon and chromium, and an increase in nickel and zinc, specifying that the concentrations of the latter remain well within regulatory limits.

Actual and potential impacts

The abstraction, use, treatment and return of water constitute interactions with the environment. Their significance is assessed by considering volumes, quality, duration, location, the condition of water bodies, competing uses and cumulative effects. The presence of an interaction does not, in itself, imply the occurrence of environmental damage.

Water infrastructure and its associated operational procedures are already subject to risk assessment and management. The safeguards described in this chapter therefore form part of the management of risks associated with the operation of the system.

Scope	Potential interaction or effect	Management measures
Availability of the resource	Temporary reduction in availability for other users, particularly during periods of drought or water restrictions	Control of water abstraction and usage intensity, recirculation, reuse, reduction of losses and monitoring of the context
Quality of receiving bodies	Input of substances or changes in the chemical and physical characteristics of the water	Treatment, self-monitoring, compliance with limits, maintenance and improvement targets
Abnormal discharges	Accidental discharge of non-compliant effluent or overloading of treatment plants	Warning thresholds, flow interception, possible suspension of discharge, alarms and emergency procedures
Groundwater	Quantitative pressure due to abstraction and potential qualitative alteration of the aquifer	Measurement of water abstraction, reduction of unnecessary use, leak detection, monitoring and implementation of applicable environmental procedures
Ecosystems, communities and users	Possible effects on environmental quality, resource uses and the usability of water bodies	Monitoring, communication with the authorities, stakeholder engagement and management of reports
Cumulative effects	Combination of pressures exerted by different users and infrastructure within the catchment area	Assessment of spatial data, consultation with the authorities and review of shared water challenges

Scope	Interaction or potential effect	Management measures
Extreme weather events	Reduced water availability, flooding, surface runoff and variations in inflow loads to treatment plants	Stormwater management, infrastructure protection, emergency planning and adaptation measures

The assessment takes into account the status of water bodies as described in Chapter 2. Compliance with discharge limits is a necessary condition, but does not exhaust the analysis of impacts. The sensitivity of the receiving water body, the variability of flow rates, the location of abstraction and discharge, and other pressures present in the catchment are also considered. Impacts are reassessed in the event of:

- new facilities or modifications to existing installations;
- changes to sources, abstractions or discharges;
- significant changes to the production cycle;
- new limits or authorisation requirements;
- changes in the status of water bodies;
- anomalous events or non-compliant monitoring results;
- new information from the authorities or stakeholders.

Compliance and environmental procedures

The management of discharges from the steelworks is governed*by the Integrated Environmental Authorisation*, adopted by *Executive Decision No. 12812 of the Umbria Region dated 12 December 2019, as subsequently amended*. The Terni Service Centre is subject to its own *Single Environmental Authorisation*. Compliance is verified through:

- compliance with the limits and other conditions laid down by legislation and the authorisations;
- the carrying out of self-monitoring at the specified intervals;
- the operation and maintenance of treatment systems;
- the suitability and accessibility of sampling points;
- the recording and evaluation of results;
- the transmission of information to the competent authorities;
- the prompt management of anomalies, exceedances and accidental events.

The main documented procedural or improvement-related situations are as follows.

Topic	Documentary evidence	Context
Concession for the internal wells of the steelworks	In the internal technical plan, the procedure for granting the concession was still in progress	The procedure concerns the water abstraction licence and the associated water requirements. It is distinct from the compliance assessment of discharges and is accompanied by measures to reduce water abstraction and water losses

Topic	Documentary evidence	Context
Aquifer in the 'Terni-Papigno' Site of National Importance (SIN)	For the "Stabilimenti" area, the procedure relating to soil was declared concluded in 2015; the procedure relating to the aquifer was still ongoing as at 21 May 2025	Activities are managed as part of the SIN proceedings on the basis of monitoring and the requirements set by the competent authorities

The existence of an ongoing administrative procedure or an improvement measure does not automatically constitute a non-conformity. The assessment distinguishes between the authorisation, the applicable obligations, the status of the procedure, the results of the checks and the actions taken.

6

Objectives, targets and action plan

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6. Objectives, targets and action plan

Objectives and time-bound targets

The Plan's objectives are defined on the basis of the water context, the performance recorded over the three-year period 2023–2025, actual and potential impacts, and consultation with stakeholders. **2025 is the reference year for monitoring the period 2026–2027.** The targets set out below represent the Plan's management objectives and will be verified through monitoring data and periodic reviews.[4]

The guiding principle for the plant's development is to support production growth by improving water efficiency and increasing water recirculation, with the aim of keeping water abstraction within current levels. Water recovery and process optimisation therefore play a central role in limiting the water requirements associated with new activities.

Area of intervention	Baseline 2025	Indicator	Target	Deadline	Responsible department
Reduction in water abstraction	143,210,843 m^3	Total annual withdrawal	Full return downstream of the process, net of evaporation	31 December 2027	Technical and production areas
Use of groundwater	767,265 m^3	Annual groundwater abstraction	Maintenance of current withdrawal levels	31 December 2027	Technical Department – Fluid Distribution
Quality of effluent	Compliance with the limits for the reported parameters	Measurements compliant with applicable limits	100% of measurements comply	Annual	Ecology, Environment and Safety
Implementation of the Monitoring and Control Plan	Current authorisation programme	Self-inspections carried out compared to those planned	100%	Annual	Ecology, Environment and Safety
Prevention of abnormal discharges	Active control systems and operating procedures	Accidental incidents affecting external locations	Zero incidents	Annual	Technical and production areas
Stakeholder engagement	Structured process initiated with the publication of the Plan	Consultation initiatives and contributions assessed	At least one structured initiative each year and 100% of contributions received assessed	Annual	Sustainability and External Relations

[4] *Main sources:* Internal technical plan; 2026 Sustainability Report; Monitoring and Control Plan; investment and maintenance programmes; data from Acciai Speciali Terni's environmental management system.

Area of focus	Baseline 2025	Indicator	Target	Deadline	Responsible department
Review of the water situation	Assessment 2025	Update on availability, quality, water stress and climate risks	A documented review every year	Annual	Ecology, Environment, Safety and Sustainability

From the 2025 baseline to the 2027 targets

Total water abstraction and water intensity are assessed jointly: the former measures the absolute volumes used, whilst the latter considers efficiency in relation to production and allows for variations in production levels to be taken into account.

The ratio of recirculated or reused water to water abstracted describes the system's capacity to reuse the resource within its internal circuits. It does not correspond to net consumption or to the amount of abstraction avoided, as the same water may be used multiple times.

The achievement of these objectives must take place without transferring impacts to other environmental sectors, increasing operational risk or reducing the effectiveness of treatment systems.

Actions completed

In the period prior to the publication of the Plan, measures were implemented aimed at water recovery, reducing leaks, improving networks and rationalising water use; see the table below:

Action	Period	Result	Contribution to objectives
Recovery of treated effluent from the Dorr Oliver plant for use in cooling circuits	From 2022	Savings of approximately 50 m^3/h of fresh water; partial discharge is used only in emergency situations	Reduction in water abstraction and increase in reuse
Recovery of cooling water and treated effluent between the PIX2 and LAC areas	2022–2025	Upgrading of the recirculation system to 2,300 m^3/h	Increase in recirculation and reduction in fresh water requirements
Reuse of water from the IDAPIX plant in the LAC department's processes	2025	Recovery of a flow rate of up to 1,400 m^3/h, avoiding an increase in demand associated with new production activities	Reduction in new water withdrawals and cascade reuse
Use of closed-loop systems for cooling the ACC and LAC areas	Established activities	Recirculation of approximately 12,500 m^3/h	Containment of industrial demand

Action	Period	Result	Contribution to objectives
Mapping of drinking water usage, closure of unnecessary connections, repair of leaks and replacement of obsolete equipment.	2021–2025	Reduction in groundwater abstraction from approximately 1.4 million m^3 per year to 767,265 m^3 by 2025	Reduction in pressure on the aquifer and improved efficiency
Public information on the relationship between water, the local area and industrial activities.	2024–2025	Organisation of the exhibition “La Grande Opera” and participation in the “Il potere delle acque” initiative	Transparency and dissemination of knowledge about the water system

The use of closed-loop systems, the recovery of process water and the improvement of cooling systems are part of a process developed over the years. These measures make it possible to extend the use of water and limit the need for new abstractions.

Quantitative results of the completed measures

Over the three-year period 2023–2025, total water abstraction **fell by 1.9 per cent**, whilst the volume recorded as recirculated and reused water **increased by approximately 3.8 million cubic metres**.

The ratio of recirculated or reused water to water abstracted rose from 85.9 per cent to 90.3 per cent.

These results form the baseline for the period 2026–2027. Their progress will be monitored alongside the effectiveness of individual measures and any changes in production levels or operating conditions.

Ongoing and planned actions

The programme includes measures that have been approved or incorporated into the company’s planning. Solutions still undergoing technical or economic assessment are not considered part of the Plan until they are approved.

For new plants, the design approach is to prioritise recirculation, water recovery, the reduction of water lost to the environment and the efficiency of cooling systems, incorporating energy recovery where technically feasible, despite higher operating costs.

These criteria guide the development of plant engineering solutions in relation to production requirements and the availability of water resources.

Action	Period	Outcome	Contribution to objectives
New Zmill 10 rolling mill	2027	Recirculation of softened feed water at a rate of approximately 800 m^3/h via a modular evaporative cooling tower	Next installation
Maintenance of treatment plants, networks and measurement systems.	100% completion of scheduled inspections and maintenance	Annual inspection	Ongoing
Implementation of the Monitoring and Control Plan	100% of scheduled self-checks carried out and compliance with applicable limits	Annual inspection	Ongoing
Annual update of the assessment of water stress and climate risks	Documented review of the catchment's condition and the implications for the site	Annual	Ongoing
Consultation with relevant stakeholders	At least one structured initiative each year and a documented assessment of the contributions received	Annual	Ongoing
Discussions with the authorities regarding groundwater abstraction and water supply solutions	Alignment of abstraction practices with permit conditions and reduction of dependence on the aquifer	In accordance with the timetable for the procedure	Ongoing

The following table provides a summary of the programme by status:

SCOPE	MANAGEMENT METHODS
IN PROGRESS	• Replacement of drinking water networks • Optimisation of PIX2/LAC/IDAPIX recovery • Consultation with the authorities regarding groundwater abstraction
ONGOING	• Pressure monitoring and leak detection • Maintenance of plant, networks and metering systems • Monitoring and Control Plan • Review of water stress and climate risks • Stakeholder consultation

Programme monitoring and review cycle

Progress is reviewed at least annually on the basis of monitoring data, activities carried out and any deviations from targets. The review also takes into account changes in production, new regulations, variations in catchment conditions and input from stakeholders.

Actions may be updated when results are not consistent with the objectives or when the feasibility, effectiveness or priority of the measures changes. Any deviations and corrective measures are described in Chapter 7.

7

Results, monitoring and deviations

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7. Results, monitoring and variances

Water performance for the three-year period 2023–2025

The consolidated data for the three-year period 2023–2025 show the evolution of the organisation's key water performance indicators and form the baseline for the 2026–2027 Plan implementation period.

Indicator	2023	2024	2025	Trend 2023–2025
Total withdrawal (m^3)	146,032,149	144,845,615	143,210,843	A decrease of approximately 1.9%
Water withdrawal per unit of production (m^3/t)	155	132	135	An improvement on 2023, but a slight increase compared with 2024
Recirculated and reused water (m^3)	125,449,718	127,378,870	129,267,068	An increase of approximately 3.8 million m^3 compared with 2023
Ratio of recirculated or reused water to water abstracted	85.9%	87.9%	90.3%	An increase of 4.4 percentage points
Groundwater abstraction (m^3)	760,825	772,949	767,265	Figures remain broadly stable, with a slight reduction compared with 2024
Withdrawal from the public water supply (m^3)	1,368	3,150	3,335	An increase in relative terms, with a still marginal impact on total water abstraction

The analysis of the data takes into account the various water pathways described in Chapter 4: use in processes, recirculation and reuse, treatment and return, including the diverted volume that is not used in production activities. Distinguishing between these flows enables an understanding of the relationship between total water abstraction and the plants' water requirements.

During the period under review, total water abstraction fell by 2,821,306 m^3, equivalent to approximately 1.9 per cent. Over the same period, the volumes of water recirculated or reused increased by 3,817,350 m^3. As a combined result of these trends, the ratio of recirculated or reused water to water abstracted rose from 85.9 per cent in 2023 to 90.3 per cent in 2025.

These results indicate a greater ability to retain the resource within production processes and represent a positive development in terms of efficiency and reducing dependence on newly abstracted water.

Water intensity fell from 155 m^3/t in 2023 to 135 m^3/t in 2025. The 2025 figure is, however, 3 m^3/t higher than the 132 m^3/t recorded in 2024.

This figure must be interpreted whilst also taking into account the volume and mix of production: a reduction in production, whilst certain process requirements remain unchanged, may in fact lead to an increase in the indicator per unit produced. For this reason, water intensity is assessed in conjunction with absolute water abstraction, production levels and the characteristics of the manufacturing processes.

The flow rates used in the departments vary depending on the plants in operation and the processes underway. The indicative values expressed in m^3/h in Chapter 4 describe the system's operating conditions and must be related to the corresponding operating times in order to be compared with the annual volumes.

Groundwater abstraction remained between 760,825 m^3 and 772,949 m^3 per year. In 2025, the figure stood at 767,265 m^3, a reduction of 5,684 m^3 compared with 2024, corresponding to approximately 0.7 per cent. Overall, the three-year period does not show any further structural reduction. Achieving the 2027 target will therefore require the continuation of measures relating to drinking water networks, the detection and repair of leaks, and the rationalisation of unnecessary water use.

Withdrawal from the public water supply increased from 1,368 m^3 in 2023 to 3,335 m^3 in 2025. Although this represents a significant increase in percentage terms, the volume remains marginal in relation to total withdrawal and accounts for approximately 0.002 per cent of the 2025 total.

As regards the quality of effluents, the discharge profile set out in Chapter 5 shows varying trends. Between 2024 and 2025, the annual loads of chromium and total organic carbon decreased, whilst those of nickel, zinc and, to a lesser extent, fluorides increased. An increase in the annual load does not automatically mean that authorisation or regulatory limits have been exceeded. The load depends, in fact, on both the concentration of the substance and the total volume discharged. However, this trend is a factor to be monitored, alongside the results of individual measurements, the volumes discharged, operating conditions and the state of the receiving water bodies.

Starting point in relation to the 2027 targets

The year 2025 serves as the baseline for the Plan and does not represent a year of final assessment of the targets set for 2027. The 2026–2027 implementation cycle is, in fact, intended to produce the final results by 31 December 2027. Consequently, the figures reported describe the starting point and do not yet allow for an assessment of whether the final objectives have been achieved.

The objectives relating to effluent quality, the carrying out of self-monitoring, the prevention of accidental incidents, stakeholder engagement and the review of the water context are assessed annually during the Plan's implementation period.

The review considers, in particular:

- the number of self-monitoring tests planned and those actually carried out;
- the compliance of each measure with the applicable limits and conditions;
- any accidental incidents affecting external recipients;
- structured initiatives for dialogue with stakeholders;
- the contributions received, their assessment and the resulting decisions;
- the update of the assessment regarding the availability and quality of the resource, water stress and climate risks.

The annual results are compared with the baseline, the targets and the operating conditions that may have influenced their performance. The analysis distinguishes, as far as possible, the effects of the company's actions from those linked to production levels, the mix of processes, weather conditions and changes in the water environment.

With regard to production trends, one aspect to assess is the capacity of recovery and recirculation measures to offset the additional water requirements of new plants. The interpretation of the results therefore also takes into account the relationship between business growth and trends in water abstraction, in line with the approach described in Chapter 6.

Warning signs, deviations and response measures

BASELINE 2025 = starting point for the 2026–2027 programme; not a deviation.

As 2025 constitutes the baseline, the gap between the recorded values and the 2027 targets is not classified as a deviation. It represents the starting point against which to measure the progress of the 2026–2027 action programme. Analysis of the available data, however, highlights some warning signs.

Observed trend	Assessment	Management response
Increase in water intensity between 2024 and 2025	Absolute water abstraction decreases, but the figure per tonne increases, partly due to the reduction in production volume	Joint analysis of water abstraction, production and production mix; assessment of the effectiveness of measures to recover water and reduce leaks
Substantial stability in groundwater abstraction	No further structural reduction is evident over the three-year period compared with the levels already achieved	Continued replacement of networks that cannot be inspected, leak detection and rationalisation of drinking water use
Increase in annual nickel and zinc loads by 2025	The increase does not in itself imply that limits will be exceeded, but requires attention to be paid to concentrations, discharge volumes and causes	Verification of data by discharge point, monitoring of treatment efficiency and analysis of causes should the trend persist
Slight increase in the annual fluoride load	The variation is modest, but must be assessed within the context of long-term trends and operating conditions	Continued monitoring and comparison with process data and the applicable authorisation conditions
Initial gap from reduction and recirculation targets	The 2025 figures define the starting point for the 2026–2027 programme	Implementation of the actions set out in Chapter 6 and periodic review of progress

A deviation is recorded when an annual or final result fails to meet the applicable target, or when the observed trend indicates a real risk of the objective not being achieved. For each deviation, the following are documented:

1. the indicator concerned, the reference period and the scope of the analysis;
2. the recorded result and the applicable target;
3. verification of the reliability, completeness and traceability of the data;
4. an analysis of the technical, production-related, organisational or external causes;
5. an assessment of the effects on the environment, water bodies and stakeholders;
6. corrective or remedial actions, specifying responsibilities and deadlines;
7. verification of the effectiveness of the measures adopted;
8. any update to the objective, duly justified and approved in accordance with the Plan's governance procedures.

In the event of a limit being exceeded, an abnormal discharge or an accidental incident, the applicable operational and emergency procedures are activated, including the required communications and root cause analysis. These situations are managed separately from the mere failure to achieve an improvement target, as they may require immediate and specific action.

The results, any deviations, the causes identified and the measures taken are examined during the annual review. The outcomes of the review contribute to the updating of the Plan's objectives, action programme and priorities.

8

Governance, accountability and review

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8. Governance, accountability and review

Roles and responsibilities

Water resource management requires the coordinated contribution of several organisational functions. Each operates within its own remit and contributes to the implementation, monitoring and updating of the Plan.

Entity or function	Key responsibilities relating to the Plan
Senior Management	Approves the Plan, objectives and targets; ensures the necessary resources are made available; reviews the results of the review and approves the most significant changes
Ecology, Environment and Safety	Coordinates environmental matters; oversees compliance, the monitoring of discharges, the management of anomalies and technical dealings with the authorities
Technical Department	Designs and carries out work on networks, recovery and treatment plants, and measuring instruments; coordinates maintenance
Fluid Distribution	Manages networks, monitors pressures and water withdrawals, identifies leaks and promotes a more efficient use of drinking water
Production Areas	Manages water usage in processes, checks that circuits are functioning correctly and reports faults and opportunities for recirculation or reuse
Sustainability and External Relations	Oversees the publication and updating of the Public Report and collects and organises contributions from stakeholders
Data management functions	They verify that the information used for the indicators and for the review is complete, consistent and traceable
Workers and companies operating on site	They apply the relevant procedures, use the infrastructure correctly and report leaks, anomalies or other relevant conditions

Chapter 6 links operational responsibilities to individual objectives and the related actions. The departments involved also collaborate on data collection, the interpretation of results and the definition of any corrective measures. When the company's organisational structure changes, these responsibilities are updated in internal documentation. This ensures the continuity of activities even during periods of reorganisation.

Information management and monitoring

The Plan is based on information from various sources: measurement systems, environmental monitoring, operational records, laboratory analyses, production data and documentation of interventions. To ensure the data is reliable and comparable, the information is:

- collected in accordance with defined methods and frequencies;
- checked for completeness and consistency;
- compared with the records from instruments and sampling systems;

- organised according to stated scopes and calculation criteria;
- used to calculate indicators;
- compared with reference values, limits, targets and previous results;
- analysed in the event of deviations;
- retained together with supporting evidence;
- approved before being communicated externally.

Scope of information	Main sources	Controls applied	Frequency of consolidation
Recirculation and reuse	Measurements of internal flows and plant data	Verification of flows included in the calculation and checking for any overlaps	Monthly and annual
Discharges and water quality	Sampling, laboratory analysis, continuous monitoring and self-monitoring	Verification of results by discharge point and parameter, in relation to applicable limits and conditions	In accordance with the Monitoring and Control Plan
Status of Actions	Investment programmes, maintenance, work orders and technical reports	Review of progress, deadlines, results and available documentation	At least once a year
Stakeholder input	Meetings, comments, reports and other forms of consultation	Recording of the issue, assessment, decision and feedback	Ongoing and annual
Water context and climate risks	Institutional sources, catchment planning, regional data and company information	Verification of the date, source and relevance to the catchment area	At least annually

The calculation criteria are kept as stable as possible over time. If there are changes to the scope, tools, sources or criteria used, the change is recorded and its effect on the comparability of the data is assessed.

Estimates are shown separately from direct measurements and accompanied by a description of the method used. Information that is still incomplete or has not been sufficiently verified is not used to draw definitive conclusions regarding compliance, the achievement of targets or the absence of impacts.

Records are retained in accordance with the company's document management system and may be made available for internal checks, inspections by the authorities and audits.

Review of the plan and public disclosure

The Plan is reviewed at least once a year. The review serves to verify whether the objectives remain appropriate, whether the actions are proceeding according to plan and whether the results achieved are consistent with expectations.

The following are considered in particular:

- trends in water abstraction, water intensity, recirculation and reuse;
- results relating to discharges;
- compliance with requirements and the implementation of the Monitoring and Control Plan;
- any anomalies, exceedances or accidental events;
- the progress of works;
- the results of completed actions;
- the condition of networks and facilities;
- changes in water availability and quality;
- available information on water bodies and water stress;
- extreme weather events and climate risks;
- changes to regulations or authorisations;
- the results of audits, inspections and checks;
- comments and proposals from stakeholders.

Depending on the results of the review, the following may occur:

- objectives and targets may be confirmed or updated;
- indicators or monitoring methods may be amended;
- priorities and deadlines may be revised;
- new actions introduced;
- responsibilities may be updated;
- defined corrective measures;
- allocated additional resources;
- updated the information contained in the public version of the Plan.

The decisions taken are documented together with the evidence considered, the reasons, those responsible, the necessary resources and the deadlines.

Updating and monitoring changes

The Plan is updated when there are changes to activities, facilities, available data or environmental and regulatory conditions. The public version is reviewed and updated when significant changes occur. An early update may be necessary in the event of:

- significant changes to activities or facilities;
- changes to supply sources or receiving bodies;
- new limits or requirements;
- significant changes in the status of water bodies;
- droughts, restrictions or extreme weather events;
- anomalies or events with potential off-site effects;
- significant deviations from targets;
- new information from the authorities or stakeholders;
- substantial changes to the action programme.

For each revision, the following are recorded: the date, the sections concerned, the reason for the update, the evidence considered, the decisions taken, and the person responsible for approval.

Changes do not retroactively alter data that has already been published. If a correction is necessary, it is identified and justified, so as to maintain a clear history of the information and allow for comparison between different periods.

The procedures for accessing the public version of the Plan, submitting comments and reporting updates are described in Chapter 9.

9

Publication, participation and contacts

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9. Publications, participation and contacts

Access to the public version of the Plan

The public version of *the Responsible Water Management Plan* is available on the Acciai Speciali Terni website, in the sections dedicated to sustainability and ResponsibleSteel™. The document sets out:

- scope, commitments and responsibilities;
- the water context, area of influence and stakeholders;
- water supply, usage, abstraction, recirculation and reuse;
- discharges and key impacts;
- objectives, actions, results and variances;
- monitoring and review procedures;
- channels for enquiries and comments.

Each version states the reference period, the date of approval and the main changes. Data already published are not amended retrospectively. The public version does not include technical or commercially confidential information or personal data. This publication does not replace authorisations, mandatory notifications, data submitted to the authorities or emergency procedures.

Comments provided by stakeholders should indicate, where available, the issue concerned, the area or activity involved, the facts observed, any supporting documents and contact details for a reply. In the event of immediate danger, emergency numbers must be dialled or the relevant authorities contacted.

To request information, submit observations or make proposals regarding water resource management, you may use the following contact channels:

Channel	Contact details	Use
External Relations	relazioni.esterne@acciaiterni.it	Information, comments and suggestions regarding the Plan
AST freephone number for the environment	800 063 966 Monday to Saturday, 9.00 am–1.00 pm and 2.00 pm–5.00 pm	Information and environmental reports
Postal address	Acciai Speciali Terni S.p.A., Viale Benedetto Brin 218, 05100 Terni	Submission of written environmental communications
Company contacts	www.acciaiterni.it/contatti	Up-to-date company contact details

Management of comments

Relevant communications are recorded, assessed by the relevant department and, where necessary, incorporated into the review or update of the Plan.

The assessment takes into account:

- relevance to water-related impacts and challenges;
- the potential severity and duration of the effects;
- the water bodies and stakeholders affected;
- reliability of the information;
- the responsibilities and competences of the parties involved;
- feasibility of any response measures.

Reports concerning significant risks, abnormal discharges, non-compliance or potential external effects are dealt with promptly in accordance with the applicable procedures. Where the matter falls within the remit of authorities, operators or other parties, Acciai Speciali Terni assesses the actions within its own remit and, where appropriate, forwards the information to the responsible party. Where contact details are available, feedback is provided on the outcome of the assessment or on any actions taken.

Outcomes and protection of information

The main issues identified and the resulting actions may be reported in subsequent public versions of the Plan, in aggregated form. The following are protected:

- **personal data;**
- **confidential information;**
- **the identities of stakeholders, unless consent or another legal basis exists;**
- **technically or commercially sensitive information.**

Personal data is processed in accordance with applicable legislation and the privacy notices available on the company's website. Stakeholder participation helps to improve the Plan, but does not transfer decision-making responsibility to them; this remains with Acciai Speciali Terni.

Arvedi AST TERNI

Environmental Sustainability Plan – Management, monitoring and control of water resources.

Public version
October 2026

