2022



JACQUET METALS



A leader in the distribution of special metals

Table of contents

1	CSR approach	04
	1.1 Commitment at the highest level	04
	1.2 Committees	04
	1.3 Non-financial reporting process	05
	1.4 Business model	05
	1.5 Description of main non-financial challenges	06
	1.6 Non-Financial Statement	07
2	Environmental responsibility	08
	2.1 Carbon footprint	80
	2.2 Promotion of renewable energy	09
	2.3 Recycling and the circular economy	09
	2.4 A demanding supply chain	10
3	Societal responsibility	12
	3.1 Human resources management	12
	3.2 Health and safety at work	14
	3.3 Corporate philantropy	14
4	Ethics and compliance	15
	4.1 Respect for Human rights	15
	4.2 Prevention of corruption	15
	4.3 Prevention of tax evasion	15
5	Application of the European Taxonomy to Group activities	16
	5.1 Overview of the European Taxonomy	16
	5.2 Eligibility and alignment of Group activities with the European Taxonomy	17
6	Independent verifier's report on a selection of non-financial information	20

1 CSR approach

1.1 Commitment at the highest level

Corporate Social Responsibility ("CSR") is a part of the JACQUET METALS Group strategy and aims to preserve resources and limit the impact of its activities and development. The CSR approach is supervised by Senior management, which monitors its implementation and progress on a quarterly basis.

The CSR policy is shared annually with the Board of Directors.

1.2 Committees

The Group has established two operational committees to implement its CSR policy: a CSR committee and a Compliance committee. These two committees are steered by Senior management, which harmonizes and stimulates a collective and participatory approach.

These committees meet on a monthly basis and report on their work to Senior management each quarter, which in turn reports to the Board of Directors.

CSR committee

- Division operating management
- Procurement department
- Internal audit department
- Finance department
- Legal department
- IT department

Compliance committee

- Legal department
- Internal audit department

CSR committee

The CSR committee is responsible for developing and promoting the implementation of the CSR approach within the Group.

The CSR committee relies on two key elements of the Group's organizational structure in the performance of its mission:

- the division operating management, responsible for developing the divisions within the framework of the strategic options and objectives defined by Senior management;
- the central functions (procurement department, internal audit department, finance department, legal department, IT department), responsible for providing relevant recommendations and functional support to the subsidiaries for the implementation of the CSR approach.

Compliance committee

The Compliance committee implements preventive procedures within the Group to avoid exposure to risks related to non-compliance with regulations, notably with regard to corruption.

1.3 Non-financial reporting process

The data included in the non-financial reports covers all of the Group's activities and corresponds to the Group's scope of consolidation.

The period used for the annual reporting of non-financial information is the calendar year (January 1 to December 31).

To comply with legal requirements, consulting firm EY et Associés has verified the compliance and fairness of the non-financial performance presented in this document.

1.4 Business model

JACQUET METALS is a European leader in the distribution of special metals. The Group's main activity consists of:

- buying and trading in special metals, for which production times can be long (from 2 to 12 months depending on the type of metal bought);
- storing these metals close to the customers, in the Group's 108 distribution centers located in 24 countries; and
- selling these metals to a large customer base of industrial players within short timeframes (generally less than a week).

The Group supplies over 60,000 customers a year in 60 countries with an average invoice amount of €3,000.

JACQUET METALS provides the following value-added between the producer and the end-customer:

- a wide range of products stored and delivered to customers within short time frames;
- security of supply and product traceability;
- managing requirements on a just-in-time basis (customized inventories, defined supply strategies, etc.);
- competitive sale prices;
- managing price fluctuations on the customer's behalf;
- cutting and finishing services.

The Group's business model is also described in the §3 of 1-Overview of the Group of the Universal Registration Document and is detailed in the table below:

		8
1	Description of the Group's business	
	Description of business activity and divisions	1-Overview of the Group §3 Group's activity
	Key figures	5-2022 Results - Group
	Organization chart of main entities	1-Overview of the Group §5 Organization chart
	Product descriptions	1-Overview of the Group §3 Group's activity
2	Description of the business model	
	Market positioning	1-Overview of the Group §3 Group's activity
	Key resources / production factors used	1-Overview of the Group §3 Group's activity
	Value contributed to the various customer segments and other stakeholders	1-Overview of the Group §3 Group's activity
	Profit analysis	1-Overview of the Group §3 Group's activity

1.5 **Description of main non-financial challenges**

To identify the main non-financial risks and opportunities and to meet the requirements of the Non-Financial Statement, the Group has used a risk mapping (see methodology described in **3-Risk Management** of the Universal Registration Document).

The table below provides a summary of the main challenges identified and the approaches implemented by the Group to address them:

Field	Non-financial challenges	Approaches implemented	Main data	§ CSR
	Environmental responsibility and climate change*	Mitigating the Group's impact on climate change through:	- greenhouse gas emissions (scopes 1, 2 and 3) - energy consumption	§2.1
		- the promotion of renewable energy	 number of sqm of solar panels commissioned electricity production from solar panels installed (in MWh) 	§2.2
Environmental		- the recycling of scrap metals and consumables and the circular economy	percentage of supplies coming from the electrical industry (recycled steel) percentage of scraps recovered and recycled	§2.3
				§2.4
		- supply requirements	 percentage of adherence to the Group Supplier Policy 	
	Quality of product supplies	Purchasing and distributing high-quality metals that comply with local/international standards and meet customers' expectations	- supplies traceability	§2.4
Societal	Human resources *	Managing headcount and skills	- number of subsidiaries with minority shareholders managers - number of employees who received training - number of training hours - joining and leaving - breakdown female / male of headcount	§3.1
	Health and safety at work *	Protecting and ensuring employee health and safety through a training and prevention policy	- industrial accident frequency rate - industrial accident severity rate - brief absenteeism rate	§3.2
	Sponsorship	Supporting social and cultural actions and initiatives		§3.3
	Respect of Human rights*	In the course of its business activities: - ensuring respect for Human rights	- percentage of adherence to the Group Supplier Policy	§4.1
Ethics and compliance	Prevention of corruption*	- ensuring ethics and transparency and respect for the law	- percentage of adherence to the Group Anti-Corruption Policy	§4.2
	Prevention of tax evasion	- ensuring compliance with tax regulations and obligations in all countries where the Group operates		§4.3

^{*} These challenges represent the main risks assessed in the risk mapping prepared by the Company (see 3-Risk Management of the Universal Registration Document).

1.6 **Non-Financial Statement**

Pursuant to Articles L. 225-102-1 and L. 22-10-36 of the French Commercial Code, the Company is required to prepare a Non-Financial Statement ("NFS"). This NFS provides information on how the Group addresses the social, societal and environmental consequences of its activities.

Given the nature of its business and the working conditions inherent to handling operations, the Group considers that (I) the prevention of food waste and food insecurity, (II) the respect for animal welfare and (III) the responsible, fair and sustainable food mentioned in Article L. 225-102-1 paragraph III of the French Commercial Code do not constitute major non-financial risks and do not warrant further discussion in this document.

The main elements of the NFS are listed in the table below:

	§ CSR
Business model	§1.4
Description of the main non-financial risks	§1.5
Overview and results of the policies applied to these risks	§2 to 4

The detailed NFS cross-reference table is provided below:

Non-Financial Statement	§ CSR
Business model	§1.4
Description of the main risks associated with the business of the company or Group, including, where relevant and proportionate, risks stemming from business relationships, products or services	§1.5
Information on the way in which the company or the Group takes into account the social and environmental consequences of its business, and the impact of this business on respect for Human rights and the fight against corruption (description of the policies applied and due diligence procedures implemented to prevent, identify and mitigate the main risks associated with the business of the company or Group)	§2 to 4
Results of policies applied by the company or Group, including key performance indicators	§2 to 4
Staff information (employment, work organization, health and safety, labor relations, training, equal treatment)	§3
Environmental information (general environmental policy, pollution, circular economy, climate change)	§2
Societal information (social commitments to sustainable development, subcontracting and suppliers, fair practices)	§2 to 4
Information on the fight against corruption	§4.2
Information on actions in favor of Human rights	§4.1
Specific information: - technology risk prevention policy implemented by the company; - capacity of the company to cover its civil liability with respect to property and persons as a result of the operation of these facilities; - means provided by the company to manage victim compensation in the event of an accident incurring its liability.	n.a.
Collective agreements within the company and their impact on the company's economic performance as well as on employees' working conditions	§3
Independent verifier certification of the information contained in the NFS	§6

n.a.: Not applicable.

2 Environmental responsibility

The Group's main business activity is the storage and distribution of special metals, either unprocessed or cut to size. In order to limit the impact of its operations on the environment and contribute towards climate change mitigation, the Group implements a policy comprising the following key elements:

- the monitoring of greenhouse gas ("GHG") emissions;
- the promotion of renewable energy;
- the systematic recycling of scrap metals and consumables and the circular economy;
- high standards in terms of supply and quality.

2.1 Carbon footprint

Since 2021, the Group has performed an annual carbon footprint to estimate GHG emissions, of which there several types:

- scopes 1 and 2: emissions related to energy consumed by the Group's distribution centers (electricity, gas, fuel oil);
- scope 3: emissions generated upstream and downstream of the Group's activity (metals production by plants and transport by specialist companies).

In 2022, the total estimated GHG emissions (scopes 1, 2 and 3) represent around 2 million tons of CO_2 equivalent. Emissions related to energy consumed by the Group's distribution centers represent 1.2% of total emissions:



Upstream activities **97.8%** Production 94.1% Transport 3.7%

Group activities **1.2%**Distribution centers

Downstream activities **1%**Transport

Energy consumed by the Group's distribution centers mainly relates to the use of finishing equipment and machinery, as well as heating and lighting.

In 2022, reporting on energy consumption was extended to all Group subsidiaries (compared to 86% of sales covered in 2021).

This annual energy consumption reporting provides a detailed overview of the Group's consumption by type and source of energy and by subsidiary, and thus to define levers for reducing GHG emissions by country, region and / or subsidiary in line with specific local requirements.

Group energy consumption

MWh	2022	2021 ¹	Change	Change (excluding scope effect) ²
Electricity	38,909	38,651	+0.7%	-0.6%
Gas	18,138	19,131	-5.2%	-8.2%
Fuel oil, diesel	1,470	1,060	+38.7%	+38.7%
Total	58,517	58,842	-0.6%	-2.4%

¹ Estimation extrapolated on the basis of 86% of sales. The main variation in fuel oil and diesel is related to the extrapolation of 2021 data.

The Group has notably implemented the following initiatives to reduce its carbon footprint:

- Promotion of renewable energy: the work achievements of recent years are detailed in §2.2 of this document;
- Recycling and the circular economy: the various initiatives are described in §2.3 of this document;
- **Demanding and quality supply chain:** the periodic assessment of the main suppliers and the quality of supplies are detailed in §2.4 of this document;
- **Transport of metals:** regarding the transport of metals (typically outsourced to independent carriers), the Group's action is based on two pillars:
 - improving the loading rate of transportation units: each subsidiary seeks to optimize transportation unit capacity,
 - selecting cleaner modes of transport/vehicles;
- Business travel: the Group encourages videoconferencing to reduce GHG emissions generated by staff travel.

2.2 Promotion of renewable energy

The Group is committed to developing renewable energies in its distribution centers wherever possible, i.e. in fully-owned buildings and where the project is technically feasible.

Capital expenditure in programs related to the energy transition consist mainly of solar panels.



↑ Drachten, The Netherlands

The Group currently has approximately 8,000 sqm of solar panels, enabling the sites equipped to produce 1,200 MWh of electricity.

In 2022, capital expenditure fell short of expectations due to raw material shortages experienced by solar panel suppliers. The Group nonetheless commissioned about 2,000 sqm of solar panels in Italy.

In 2023, the Group intends to equip 12 of its distribution centers, in Italy, Germany, Austria and Sweden.

2.3 Recycling and the circular economy

Steel can be produced in electric arc furnaces using recovered steel (recycled steel) or in gas-fired blast furnaces (steel produced from iron ore and coke).

Not all steels can be produced through the electrical industry; currently, **approximately 75% of the Group's supplies come from this industry.**

² Excluding Fidelity PAC Metals acquired in May 2022.

This rate should increase in the coming years, with progress in the European production sectors to increase the proportion of green steel production (i.e. in the electrical industry, expanding the range of products and for blast furnaces, replacing gas with hydrogen technology in particular).

Furthermore, the Group carries out initial processing operations for its customers as part of its business activities. These services usually involve light finishing operations such as cutting and folding, which may generate scrap metals. These scrap metals are systematically and completely recovered and sold to recycling companies, which re-inject it into the steel production process.

Management monitors the volumes of scrap generated for the entire Group on a regular basis. In 2022, scrap metals amounted to around 28,000 tons. The quantity generated depends on the activity as well as the complexity of the finishing operations.

In addition, some cutting machines consume a certain amount of oils, water and sand, which are systematically recovered and recycled.



↑ Stock in Bochum, Germany

2.4 A demanding supply chain

Periodic assessment of the main suppliers

While ensuring a balance between cost, quality and availability of metals, the Group is committed to incorporating CSR criteria into its procurement policy.

Suppliers are selected through a process designed to assess their competitiveness and ability to meet the Group's requirements in terms of quality, availability and compliance with the Group CSR approach.

The Group periodically assesses its main metal suppliers in order to measure their exposure to environmental risk and assess the integration of CSR criteria within their organization.

The assessment mainly involves ensuring that suppliers adhere to the Group Supplier Policy and obtaining copies of their CSR reports, where applicable. Supplier adherence is renewed every three years.

The Group has assessed producers that together represent approximately 75% of 2022 supplies; 92% have adhered to the Group Supplier Policy.

As part of the CSR committee's diligence, the procurement department aims to strengthen the supplier assessment process in 2023, notably by establishing a specific CSR criteria analysis grid, which will be filled out by suppliers and verified during site visits.

Quality of supplies

The Group seeks to maintain an excellent quality of supplies (product traceability, ISO standards, etc.) as a guarantee of product reputation for the end-customer.

The nature of the Group's business activities is such that it only purchases products that fulfill strict predefined standards. Each supplier must ensure that the material delivered corresponds to the product certificate (including the heat number showing the origin of the products). All Group supplies are therefore traceable.

The aim is to maintain and even improve this high standard each year.



↑ Marking on a plate

3 Societal responsibility

3.1 Human resources management

With operations in 24 countries and an average headcount of around 40 employees per subsidiary, the Group's human resources policy is implemented at individual company level by subsidiary managers in order to take local requirements, conditions and regulations into account. The following issues are covered:

- the organization of working time, training and industrial relations;
- health and safety at work;
- respect for Human rights and children's rights;
- elimination of discrimination.

There is no system for centralizing agreements signed with staff representative bodies in each subsidiary at the Company level. However, major agreements are brought to the Company's attention prior to their signature.

The Group is not aware of any material breach of its staff obligations.

3.1.1 Performance-related compensation

The Group has opted for a results-based variable remuneration system at all of its subsidiaries and divisions. As such, variable compensation awarded to corporate officers and other staff members is primarily based on the results of the subsidiary or division that employs them.

Similarly, variable compensation awarded to the Company's corporate officers is based on a number of criteria including Group earnings (ratio of Net income (Group share) to sales).

3.1.2 Shareholder structure

Wherever possible, the Group's subsidiary managers hold a stake in the entities they run. These managers invest and receive an equity interest ranging from 10 to 49% (see §4.3 of 1-Overview of the Group of the Universal Registration Document). As of December 31, 2022, the managers of 12 subsidiaries were minority shareholders.

3.1.3 Skills development, training and internships

Training is a key tool for developing employee skills, safeguarding expertise and improving safety and working conditions. Training is provided through various formats (via external training entities, in-house training, e-learning, etc.).

In 2022, 38% of employees received training over a total of 15,892 training hours:

Training	2022	2021
Number of employees trained	1,150	778
Number of training hours	15,892	12,910

The Group also promotes internships and work-study programs. At the end of 2022, 104 interns were working in subsidiaries in Germany and France (that account for around half of the Group's workforce).

3.1.4 Breakdown of headcount

By function

As of December 31, 2022, Group headcount amounted to 3,060 full-time equivalent (FTE) employees including 2,782 under permanent contracts.

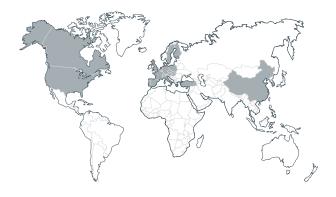
During 2022, 585 people joined the Group and 476 left.

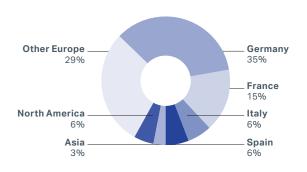
The change in FTE (full-time equivalent) headcount by function is as follows:

	2022	2021
Year-end	3,060	2,951
Support (IT, administration)	443 14%	447, 15%
Sales, Procurement	1,154 38%	1,119 38%
Warehousing and logistics	1,463 48%	1,385 47%

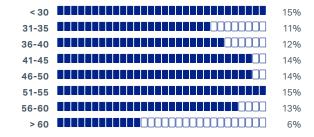
By region

The Group operates in 24 countries. As of December 31, 2022 the headcount breakdown by region was as follows:





By age



In 2022, the median age of Group employees was 45.

By gender

The male-female ratio is balanced in the "IT, administration" support functions (52% women and 48% men) and in the "Sales, Procurement" departments (59% men and 41% women). Women are under-represented at warehouses (5% of headcount).

Total headcount comprises 25% women and 75% men.

	Male	Female
Support (IT, administration)	48%	52%
Sales, Procurement	59%	41%
Warehousing and logistics	95%	5%
Total	75%	25%

Health and safety at work 3.2

The Group strives to safeguard its employees' health and ensure safety at work. As such, it applies a training and prevention policy aimed at reducing the number and severity of industrial accidents.

Measures to improve safety are implemented on a regular basis. For example:

- periodic dissemination of safety rules and instructions;
- regulatory controls of machinery and equipment by external bodies;
- identifying and assessing industrial accidents, followed by corrective measures, procedures and additional training where required;
- upgrading workstations;
- the appointment of a safety manager at distribution center level.

Industrial accidents are monitored locally under the responsibility of the subsidiary managers.

The frequency and severity rates of industrial accidents are set out below:

	2022 ³	2021
Frequency ¹	27.18	20.15
Severity rate ²	0.70	0.39

Furthermore, a monitoring of short-term absenteeism (less than three days) on a half-yearly basis is implemented within the Group. It allows to implement corrective measures where required.

	2022	2021
Short-term absenteeism rate *	0.79%	0.58%

^{*} Short-term absenteeism rate = (no. of days absent < 3 days/no. of days worked during the year) \times 100

Corporate philantropy 3.3

The Group is involved in the local communities surrounding its sites and subsidiaries and participates in initiatives alongside local associations. These initiatives take one of two forms:

- social initiatives: the Group supports charitable organizations, notably those whose aim is to improve the lives of children;
- cultural initiatives: as a means of communication and outreach, the Group supports contemporary artistic events and projects. For example, the Group sponsors the Lyon Contemporary Art Biennial (France).

¹ Industrial accident frequency rate = (no. of accidents with stoppage / hours worked) × 1,000,000. ² Industrial accident severity rate = (no. of days lost by temporary incapacity / hours worked) × 1,000. ³ Calculated based on actual hours worked (versus a theoretical hours worked basis for 2021). The frequency and severity rate recalculated on this new basis are estimated at 21.79 and 0.42 respectively for 2021.

4 Ethics and compliance

4.1 Respect for Human rights

Each subsidiary manager is responsible for ensuring that Human rights are respected in accordance with local legislation.

With regard to supplies, the Group periodically assesses its main metal suppliers in order to measure their exposure to the risk of non-compliance with respect for Human rights within their organization (see §2.4 of this document, on adherence to the Group Supplier Policy).

To date, 92% of the suppliers to whom the code has been presented have adhered to it.

For suppliers that have not yet adhered, additional measures are implemented (request for information, on-site visits, etc.).

4.2 Prevention of corruption

The tightening of the French anti-corruption regulation has been an opportunity for the Group to strengthen its own Anti-Corruption Policy.

These values are set out in an Anti-Corruption Policy (set up in 2019) that defines the behavior to be adopted by each Group subsidiary with all of its partners, customers, suppliers and service providers. For example, suppliers must be selected on the basis of objective criteria such as quality, reliability, price, performance or service. An anti-corruption e-learning module was also deployed throughout the Group, and an internal whistleblowing system was set up at each subsidiary to report situations or behavior in breach of the Group Anti-Corruption Policy.

Furthermore, the risk of exposure to corruption was mapped out using a risk assessment approach tailored to specific business activities and regions. Risk is assessed as follows:

- periodic assessment of main metal suppliers;
- adherence to the Group Anti-Corruption Policy by the selected suppliers. Supplier adherence is renewed every three years. In 2022, the percentage of adherence to the Group Anti-Corruption Policy among selected suppliers (representing approximately 75% of the Group's supplies) was 92%.

4.3 Prevention of tax evasion

The Group has no operations or holding companies in countries blacklisted as tax havens by the European Commission.

5 Application of the European Taxonomy to Group activities

5.1 Overview of the European Taxonomy

The European Taxonomy, provided for by the EU Taxonomy Regulation 2020/852, is a classification system for environmentally "sustainable" economic activities. This regulation is a key element of the European Commission's action plan for sustainable finance, which aims to direct capital flows toward the activities that it has identified as priorities according to their ability to contribute to one of six environmental objectives, outlined below:



Climate change mitigation



Sustainable use of water and marine resources



Circular economy



Climate change adaptation



Pollution prevention



Protection and restoration of ecosystems

An economic activity is considered "eligible" if it is included in the list of activities set out in the delegated acts of the Taxonomy Regulation, which is constantly being updated.

Thus, in order to be considered sustainable within the meaning of the European Taxonomy, an "eligible" activity must be "aligned", i.e. it must meet the requirements set out in Article 3 of the Taxonomy Regulation:

- it makes a substantial contribution to one of the six environmental objectives, i.e. meets the technical criteria specified in the delegated regulations;
- it does not harm the other five objectives (principle of Do No Significant Harm); and
- it complies with minimum safeguards.

In accordance with the Taxonomy Regulation and the delegated regulations, for the 2022 financial year, the Group is required to disclose:

- the proportion of its sales (I);
- the proportion of its capital expenditure (Capex) (II);
- the proportion of its operating expenses (Opex) (III).

associated with eligible and aligned economic activities for the European Taxonomy on the first two environmental objectives relating to climate change (mitigation and adaptation).

The financial information presented below relates to the scope of Group's consolidated financial statements.

5.2 Eligibility and alignment of Group activities with the European Taxonomy

(I) Sales

The list of eligible activities for the European Taxonomy does not include the distribution of metals. As such, Group sales are not currently eligible and therefore not aligned under the Taxonomy Regulation. Depending on future changes to the list of eligible activities, the Group may need to review the classification of sales.

				Substa	Substantial contribution criteria Do No Significant Harm criteria															
Economic activities	Code	Absolute sales	Proportion of sales	Climate change mitigation	Climate change adaptation	Water and marine resources	Circular economy	Pollution	Biodiversity and ecosystems	Climate change mitigation	Climate change adaptation	Water and marine resources	Circular economy	Pollution	Biodiversity and ecosystems	Minimum safeguards	Taxonomy aligned proportion of sales, year N	Taxonomy aligned proportion of sales, year N-1	Category (enabling)	Category (transitional)
		€m	%	%	%	%	%	%	%	y / n	y / n	y / n	y / n	y / n	y / n	y / n	%	%	e/t	e/t

A - Taxonomy eligible activities

A1 - Taxonomy aligned														
Sales of Taxonomy aligned activities (A1)		0	0%								0%	n.a.	n.a.	n.a.
A2 - Taxonomy eligible b	ut not	Taxono	my alig	ned act	ivities									
Sales of Taxonomy eligible but not Taxonomy aligned activities (A2)		0	0%											
Total A (A1 + A2)		0	0%								0%	n.a.	n.a.	n.a.

B - Taxonomy non-eligible activities

Sales of Taxonomy	2,683	100%	
non-eligible activities			
(B)			

		683 100%	12.0	tal A + B
--	--	----------	------	-----------

y/n:yes/no. e/t:enabling/transitional. n.a.: Not applicable.

(II) Capital expenditure (Capex)

"Individually eligible" economic activities have been identified within the Group, including the purchase of products resulting from eligible activities and individual measures enabling certain activities to become less carbon-intensive or to result in greenhouse gas emission reductions, thereby contributing to the climate change mitigation objective. These activities are presented in the table below:

Eligible economic activity	Description of the activity within the Group	Type of capital expenditure (Capex)
6.5 Transport by motorbikes, passenger cars and light commercial vehicles	Capex for the acquisition of the fleet of leased or owned company vehicles	Capital expenditure related to an eligible activity
7.2 Renovation of existing buildings	Capex for the renovation of existing or acquired buildings	Capital expenditure related to an eligible activity
7.6 Installation, maintenance and repair of renewable energy technologies	Capex related to the installation and maintenance of renewable energy technologies (LEDs, solar panels)	Capital expenditure related to individual measures to improve the Group's environmental performance
7.7 Acquisition and ownership of buildings	Capex related to the acquisition and ownership of buildings	Capital expenditure related to an eligible activity

The proportion of eligible Capex is defined as European Taxonomy-eligible Capex (numerator) divided by total Capex (denominator). This definition is applied in the same way to calculate the proportion of European Taxonomy-aligned Capex, by simply replacing the amount of eligible Capex in the numerator with the amount of aligned Capex; the denominator remains the same.

Total eligible 2022 capital expenditure amounted to €8.3 million out of a total of €41 million and mainly corresponds to vehicles and property investments. The total Capex (€41 million) can be reconciled with the financial statements (see §2.4.2 Intangible assets (€0.4 million), §2.4.3 Property, plant and equipment (€29.2 million) and §2.4.4 Rights of use - Lease liabilities (€11.4 million) of 5-2022 results - Group of the Universal Registration Document). It corresponds to the total of the "increase" transaction type.

In view of its metal distribution activity, the main purpose of the warehouses is to store metals that do not require temperature control. Capital expenditure related to optimizing energy consumption is therefore limited.

The economic activities eligible for the European Taxonomy are detailed in the table below:

				Substa	antial c	ontribu	tion cri	teria		Do No	Signific	ant Harı	m criter	ia						
Economic activities	Code	Absolute Capex	Proportion of Capex	Climate change mitigation	Climate change adaptation	Water and marine resources	Circular economy	Pollution	Biodiversity and ecosystems	Climate change mitigation	Climate change adaptation	Water and marine resources	Circular economy	Pollution	Biodiversity and ecosystems	Minimum safeguards	Taxonomy aligned proportion of Capex, year N	Taxonomy aligned proportion of Capex, year N-1	Category (enabling)	Category (transitional)
		€m	%	%	%	%	%	%	%	y / n	y / n	y / n	y / n	y / n	y / n	y / n	%	%	e/t	e/t

A - Taxonomy eligible activities

	tivities													
A1 - Taxonomy aligned														
Transport by motor- bikes, passenger cars and light commercial vehicles	6.5	0	0%								0%	n.a.	n.a.	n.a.
Renovation of existing buildings	7.2	0	0%								0%	n.a.	n.a.	n.a.
Installation, maintenance and repair of renewable energy technologies	7.6	0	0%								0%	n.a.	n.a.	n.a.
Acquisition and ownership of buildings	7.7	0	0 %								0 %	n.a.	n.a.	n.a.
Capex of Taxonomy aligned activities (A1)		0	0%								0%	n.a.	n.a.	n.a.
A2 - Taxonomy eligible bu	ut not '	Taxono	my aligi	ned act	ivities									
Transport by motor- bikes, passenger cars and light commercial vehicles	6.5	4.0	9.7%											
Renovation of existing buildings	7.2	1.5	3.7%											
Installation, maintenance and repair of renewable energy technologies	7.6	0.1	0.2%											
Acquisition and ownership of buildings	7.7	2.7	6.7%											
Capex of Taxonomy eligible but not Taxonomy aligned activities (A2)		8.3	20.3%											
Total A (A1 + A2)		8.3	20.3%								0%	n.a.	n.a.	n.a.

B - Taxonomy non-eligible activities

|--|

Total A + B	41.0	100%

y/n:yes/no. e/t:enabling/transitional. n.a.: Not applicable.

(III) Operating expenses (Opex)

Opex as defined by the Taxonomy Regulation include direct non-capitalized costs related to research and development, building renovation measures, short-term rentals, maintenance and repairs and any other direct expenses related to the day-to-day maintenance of property, plant and equipment.

Given the nature of the Group's business activities, Opex as defined by the Taxonomy Regulation are not significant (€20 million, less than 10% of Group's total Opex, which amounted to €369 million).

				Substa	antial c	ontribu	tion cri	teria		Do No	Signific	ant Har	m criter	ria						
Economic activities	Code	Absolute Opex	Proportion of Opex	Climate change mitigation	Climate change adaptation	Water and marine resources	Circular economy	Pollution	Biodiversity and ecosystems	Climate change mitigation	Climate change adaptation	Water and marine resources	Circular economy	Pollution	Biodiversity and ecosystems	Minimum safeguards	Taxonomy aligned proportion of Opex, year N	Taxonomy aligned proportion of Opex, year N-1	Category (enabling)	Category (transitional)
		€m	%	%	%	%	%	%	%	y / n	y / n	y / n	y / n	y / n	y / n	y / n	%	%	e/t	e/t

A - Taxonomy eligible activities

A1 - Taxonomy aligned														
Opex of Taxonomy aligned activities (A1)		0	0%								0%	n.a.	n.a.	n.a.
A2 - Taxonomy eligible b	ut not	Taxono	my alig	ned act	ivities									
Opex of Taxonomy eligible but not Taxonomy aligned activities (A2)		0	0%											
Total A (A1 + A2)		0	0%								0%	n.a.	n.a.	n.a.

B - Taxonomy non-eligible activities

Opex of Taxonomy non-eligible activities (B)	0	0%	
Total A + B	0	0%	

The Group will continue to adapt its alignment and eligibility analysis and methodology in light of changes to the regulations (particularly with the publication of future delegated acts), listed activities, technical review criteria relating to the European Taxonomy and market practices.

y / n : yes / no. e / t : enabling / transitional. n.a.: Not applicable.

6 Independent verifier's report on a selection of non-financial information

EY et Associés

Tour First • TSA 14444 92037 Paris-La Défense cedex

JACQUET METALS • Year ended December 31, 2022

This is a free translation into English of the original report issued in the French language and it is provided solely for the convenience of English speaking users. This report should be read in conjunction with, and construed in accordance with, French law and professional standards applicable in France.

To the General Assembly,

In our quality as an independent third party, accredited by the COFRAC under the number n° 3-1681 (scope of accreditation available on the website www.cofrac.fr), and as a member of the network of one of the statutory auditors of your entity JACQUET METALS (hereinafter "entity"), we conducted our work in order to provide a conclusion expressing a limited level of assurance on the compliance of the consolidated non-financial statement for the year ended December 31, 2022 (hereinafter the "Statement") with the provisions of Article R. 225-105 of the French Commercial Code (*Code de commerce*) and on the fairness of the historical information (whether observed or extrapolated) provided pursuant to 3° of I and II of Article R. 225-105 of the French Commercial Code (hereinafter the "Information") prepared in accordance with the entity's procedures (hereinafter the "Guidelines"), included in the management report pursuant to the requirements of articles L. 225-102-1, R. 225-105 and R. 225-105-1 of the French Commercial Code (*Code de commerce*).

Conclusion

Based on the procedures performed, as described in "Nature and scope of the work", and on the elements we have collected, we did not identify any material misstatements that would call into question the fact that the consolidated non-financial statement is not presented in accordance with the applicable regulatory requirements and that the Information, taken as a whole, is not presented fairly in accordance with the Guidelines, in all material respects.

Preparation of the non-financial performance statement

The absence of a generally accepted and commonly used framework or established practices on which to base the assessment and measurement of information allows for the use of different, but acceptable, measurement techniques that may affect comparability between entities and over time.

Therefore, the Information should be read and understood with reference to the Guidelines, the significant elements of which are presented in the Statement.

Limitations inherent in the preparation of the Information

The information may be subject to uncertainty inherent in the state of scientific or economic knowledge and the quality of external data used. Certain information is sensitive to the methodological choices, assumptions and / or estimates made in preparing it and presented in the Statement.

The entity's responsibility

It is the responsibility of the Board of Directors to:

- select or establish appropriate criteria for the preparation of the Information;
- prepare a Statement in accordance with legal and regulatory requirements, including a presentation of the business model, a description of the main non-financial risks, a presentation of the policies applied with regard to these risks as well as the results of these policies, including key performance indicators and, in addition, the information required by Article 8 of Regulation (EU) 2020/852 (green taxonomy);
- and to implement the internal control procedures it deems necessary to ensure that the Information is free from material misstatement, whether due to fraud or error.

The Statement has been prepared in accordance with the entity's Guideline as mentioned above.

Responsibility of the independent verifier

On the basis of our work, our responsibility is to provide a report expressing a limited assurance conclusion on:

- the compliance of the Statement with the requirements of article R. 225-105 of the French Commercial Code;
- the fairness of the information provided in accordance with article R. 225-105 I, 3° and II of the French Commercial Code, i.e. the outcomes, including key performance indicators, and the measures implemented considering the principal risks.

As it is our responsibility to form an independent conclusion on the Information as prepared by management, we are not permitted to be involved in the preparation of the Information, as this could compromise our independence. However, it is not our responsibility to comment on:

- the entity's compliance with other applicable legal and regulatory requirements, in particular the information required by Article 8 of Regulation (EU) 2020/852 (green taxonomy), the French duty of care law and anti-corruption and tax avoidance legislation;
- the fairness of the information required by Article 8 of Regulation (EU) 2020/852 (green taxonomy);
- the compliance of products and services with the applicable regulations.

Regulatory provisions and applicable professional standards

The work described below was performed in accordance with the provisions of articles A. 225-1 et seq. of the French Commercial Code, as well as with the professional guidance of the French Institute of Statutory Auditors ("CNCC") applicable to such engagements and with ISAE 3000 (revised)¹.

Independence and quality control

Our independence is defined by the requirements of article L. 822-11-3 of the French Commercial Code and the French Code of Ethics (*Code de déontologie*) of our profession. In addition, we have implemented a system of quality control including documented policies and procedures regarding compliance with applicable legal and regulatory requirements, the ethical requirements and French professional guidance.

¹ ISAE 3000 (révisée) - Assurance engagements other than audits or reviews of historical financial information.

Means and resources

Our verification work mobilized the skills of three people and took place between November 2022 and March 2023 on a total duration of intervention of about twenty weeks.

To assist us in carrying out our work, we called on our specialists in sustainable development and social responsibility. We conducted interviews with the persons responsible for the preparation of the Statement including in particular the General Management, Administration and Finance, Human Resources, Internal Audit and Purchasing.

Nature and scope of the work

We planned and performed our work taking into account the risks of material misstatement of the Information.

In our opinion, the procedures we have performed in the exercise of our professional judgment enable us to provide a limited level of assurance:

- we obtained an understanding of all the consolidated entities' activities and the description of the principal risks associated;
- we assessed the suitability of the criteria of the Guidelines with respect to their relevance, completeness, reliability, neutrality and understandability, with due consideration of industry best practices, where appropriate;
- we verified that the Statement includes each category of social and environmental information set out in article L. 225-102-1 III of the French Commercial Code as well as compliance with human rights and anti-corruption and tax avoidance legislation;
- we verified that the Statement provides the information required under article R. 225-105 II of the French Commercial Code, where relevant with respect to the principal risks, and includes, where applicable, an explanation for the absence of the information required under article L. 225-102-1 III, paragraph 2 of the French Commercial Code;
- we verified that the Statement presents the business model and a description of principal risks associated with all the consolidated entities' activities, including where relevant and proportionate, the risks associated with their business relationships, their products or services, as well as their policies, measures and the outcomes thereof, including key performance indicators associated to the principal risks;
- we referred to documentary sources and conducted interviews to:
- assess the process used to identify and confirm the principal risks as well as the consistency of the outcomes, including the key performance indicators used, with respect to the principal risks and the policies presented, and
- corroborate the qualitative information (measures and outcomes) that we considered to be the most important presented in Appendix 1; concerning certain risks (anti-corruption, responsible procurement), our work was carried out on the consolidating entity, for the others risks, our work was carried out on the consolidating entity and on the entity listed below: JACQUET Deutschland GmbH;
- we verified that the Statement covers the scope of consolidation, i.e. all the consolidated entities in accordance with article L. 233-16 of the French Commercial Code;
- we obtained an understanding of internal control and risk management procedures the entity has put in place and assessed the data collection process to ensure the completeness and fairness of the Information;
- for the key performance indicators and other quantitative outcomes that we considered to be the most important presented in Appendix 1, we implemented:
- analytical procedures to verify the proper consolidation of the data collected and the consistency of any changes in those data:
- tests of details, using sampling techniques, in order to verify the proper application of the definitions and procedures and reconcile the data with the supporting documents. This work was carried out on a selection of contributing entities and covers between 2% and 6% of the consolidated data selected for these tests (2% of the workforce, 6% of material scrap);
- we assessed the overall consistency of the Statement based on our knowledge of all the consolidated entities.

We believe that the work carried out, based on our professional judgement, is sufficient to provide a basis for our limited assurance conclusion; a higher level of assurance would have required us to carry out more extensive procedures.

Paris-La Défense, April 11, 2023

Independent third party

French original signed by:

EY et Associés

Christophe Schmeitzky • Partner, Sustainable Development

Appendix 1 The most important information

Social Information

Quantitative Information (including key performance indicators)

- FTE end of period.
- Frequency and severity rate of accidents at work.
- $\bullet\, Short\text{-}term\, absentee is m\, rate.$

Environmental Information

Quantitative Information (including key performance indicators)

- Energy consumption (gas, oil, electricity).
- Greenhouse gas emissions scope 1 and 2.
- Volumes of waste generated during the cutting process (scraps).

Societal Information

Quantitative Information (including key performance indicators)

- Share of suppliers exposed to environmental risk who have signed the Group's supplier code of conduct.
- Share of suppliers exposed to human rights risks who have signed the Group's supplier code of conduct.
- Share of suppliers exposed to the risk of corruption who have signed the Group's anti-corruption code of conduct.

Qualitative Information (actions or results)

- Employment (attractiveness, retention).
- $\bullet \ {\bf Organization} \ {\bf of} \ {\bf work} \ ({\bf organization}, {\bf absenteeism}).$
- Health and safety (prevention actions).
- Training.

Qualitative Information (actions or results)

- Circular economy (raw materials, waste management).
- Climate change (significant emission sources due to activity).
- Greenhouse gas emissions scope 3 (significant scope 3 emission sources due to activity i.e. production of purchased steel, upstream and downstream transport).

Qualitative Information (actions or results)

 $\bullet \, \text{Subcontracting and suppliers (environmental and social issues)}.$



JACQUET METALS is a European leader in the distribution of special metals.

The Group develops and operates a portfolio of three brands:

JACQUET stainless steel quarto plates - **STAPPERT** stainless steel long products - **IMS group** engineering steels

With a headcount of 3,060 employees, JACQUET METALS has a network of 108 distribution centers in 24 countries in Europe, Asia and North America.

JACQUET METALS: Thierry Philippe - Chief Financial Officer - comfi@jacquetmetals.com **NEWCAP:** Emmanuel Huynh - T +33 1 44 71 94 94 - jacquetmetals@newcap.eu



