



Sustainability Review 2025

Stalatable Group

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INTRODUCTION

For more than 50 years, Stalatube has focused on building durable solutions, long-term partnerships, and trust. Sustainability has been embedded in our values since the 1970s, and we have consistently been a frontrunner in our industry.

This Sustainability Review represents an important next step forward for us: it is the first time in our history that we have brought our sustainability work together in a single, transparent report.

While Stalatube is not subject to the EU's Corporate Sustainability Reporting Directive (CSRD), we have chosen to voluntarily report on sustainability to promote transparency. Sustainability is not a compliance exercise for us – it is a business driver. Using the European Sustainability Reporting Standards (ESRS) as a reference, this report reflects our ambition to lead our industry with responsibility, performance, and transparency.

Our approach to sustainability is practical and impact-driven. We focus on what matters most: reducing emissions across the value chain, advancing circular economy solutions, investing in our people, and operating with integrity. High-strength, long-lasting stainless steel solutions, science-based climate targets, and a strong, people-centred culture are at the core of how we create value for our customers and society.

This first Sustainability Review is a starting point. We will continue to strengthen our sustainability work step by step – guided by our strategy, supported by our partners, and driven by the goal of building a more sustainable future for Stalatube and our customers.

For Stalatube, sustainability is not an obligation – it is a source of strength.

**Sami Packalén, CEO
Stalatube Group**

OUR MISSION

The world's leading sustainable and customer-oriented manufacturer of high-strength stainless steel hollow sections and the world's leading supplier of high-strength products in the transport industry.

OUR VISION

Stalatube is the best stainless solutions provider in its branch.

OUR VALUES

- Value-added services to our partners and customers
- Honesty
- Yes we can
- Harmonious relationship with nature, society and individuals
- Family entrepreneurship
- Profitability



GENERAL DISCLOSURES

Basis for Preparation

General Basis for Preparation of the Sustainability Review

Stalalube Group’s sustainability review for the financial year 2025 has been prepared in accordance with the reporting requirements and framework of the European Sustainability Reporting Standards (ESRS). The report has been prepared by the Group’s parent company, Stalalube Oy, and covers the Stalalube Group as a whole, corresponding to the scope of the consolidated financial statements. The data in this report covers the period from 1 January to 31 December 2025.

The content of the reporting is based on a double materiality assessment, the results of which were approved by The Board of Directors in September 2024. In addition to the company’s own operations, the assessment included mapping and evaluating sustainability impacts, risks, and opportunities across the upstream and downstream value chain. For material topics in the value chain, the reporting covers the required disclosures in accordance with the standards. The outcome of the materiality assessment is reviewed annually, and the content of the reporting is updated accordingly. This is Stalalube’s first sustainability review.

Sustainability Risk and Impact Management

We recognize that managing sustainability risks is an essential part of sustainable business and long-term value creation. The objective of our risk management is to identify and address the company’s sustainability impacts by strengthening positive impacts and preventing negative ones. Our objectives for identifying sustainability impacts are described in publicly available policy documents, and the identification process covers both our own operations and the upstream and downstream value chains.

OUR POLICIES



Sustainability Risk and Impact Management

We manage sustainability risks as part of strategic risk management. The purpose is to identify, assess and manage factors that may affect our business or cause significant environmental and social impacts. These impacts are identified through various sources such as stakeholder feedback, assessments by management and experts, and reviews of the value chain. The basis of the materiality assessment is used to evaluate the scale and materiality of impacts. Assessment work is continuous, and impacts are regularly reviewed between The Management Team and process owners. Impacts are documented.

Responsibility for managing sustainability risks lies with The Management Team together with the EQHS organization. After identification, risks and mitigation measures are addressed with the responsible topic owners. The mitigation hierarchy is applied in managing negative impacts: first, we seek to prevent negative impacts to the extent possible; if prevention is not fully possible, we aim to limit the extent of the impact; as a last resort, we restore or remediate negative impacts. The effectiveness of mitigation measures is evaluated through reassessments.

Roles of Governance Bodies and Sustainability Data

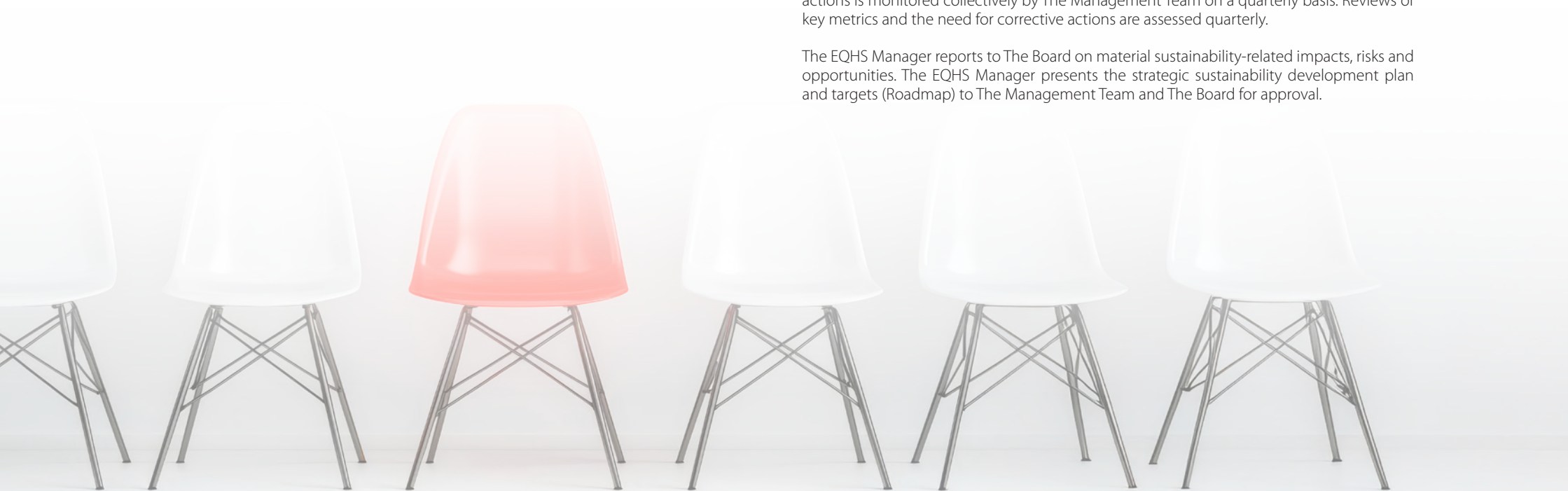
The highest governance body for sustainability matters at Stalal Tube is The Board of Directors, which guides and supervises the company's executive management. The Board's main duties are described in the company's governance principles.

The Board meets six times per year and, when necessary, more frequently to address both standing agenda items and topics defined in the annual cycle. Progress in sustainability work is discussed in at least two meetings per year. The most significant business risks and their financial impacts are reviewed at every meeting.

The Board approves the company's Code of Conduct, the strategic sustainability development plan and targets (Roadmap), and sustainability-related policies.

The Management Team is responsible for implementing operational activities. The Management Team meets regularly and addresses sustainability topics as needed. The CEO is responsible for implementing the sustainability targets approved by the Board across the company. Functional leaders and process owners are responsible for assessing and monitoring sustainability impacts, risks and opportunities within their areas of responsibility, as well as for related management actions. Progress against targets and management actions is monitored collectively by The Management Team on a quarterly basis. Reviews of key metrics and the need for corrective actions are assessed quarterly.

The EQHS Manager reports to The Board on material sustainability-related impacts, risks and opportunities. The EQHS Manager presents the strategic sustainability development plan and targets (Roadmap) to The Management Team and The Board for approval.



Strategy, Business Model and Value Chain

Vision

Stalalube is the world’s leading sustainable and customer-oriented manufacturer of high-strength stainless steel hollow sections and the world’s leading supplier of high-strength products in the transport industry.

Strategy and Business Model

Our strategy is based on sustainable, customer-centric and competitive manufacturing, where climate change mitigation, resource efficiency and customer focus are key objectives. We are committed to the Science Based Targets initiative and have set emission reduction targets aligned with the Paris Agreement and the 1.5°C pathway. Our strategy includes investments in material and energy efficiency, the use of fossil-free energy sources, and increased use of recycled materials.

Our business model is based on developing and manufacturing high-quality stainless steel products. Our products serve the needs of industry and infrastructure, and their long service life and maintenance-free characteristics support sustainable development. We manufacture high-strength stainless steel hollow sections and fabricated products used, among others, in the bus industry and demanding structural applications. We also provide expert services, including materials engineering support and optimization of product solutions. Our customers include bus industry operators, construction and infrastructure companies, and industrial component manufacturers that value sustainability, strength, and durability.

Sustainability is integrated into product development: we develop solutions that reduce our customers’ material needs and lower their carbon footprint. Reviews of key metrics and the need for corrective actions are assessed quarterly.

Our strategic objectives support this overall approach:

- Grow as the world’s leading supplier of high-strength stainless steel hollow sections.
- Grow as the world’s leading supplier of high-strength products in the bus industry. Creating a new, lighter body concept for bus body manufacturers enables up to a 30 % weight reduction compared to traditional body structures.
- Become the world’s most responsible and cleanest manufacturer of hollow sections, and leverage sustainability work at the business level (setting SBTi targets for 2021–2050; producing sustainability communication content for marketing).
- Customer orientation in everything we do.
- A great workplace and the best employer in the region.
- Skilled and motivated employees.
- Continuous development of productivity and profitability.
- Safety in all operations.
- Competitive and responsible global sourcing that meets our sustainability objectives.

These objectives guide investments, product development and people development, and they are aligned with the principles of sustainable business.

INPUTS

Raw Materials stainless steel, energy (electricity and heat), water, chemicals, and packaging materials.

OUTPUTS

Finished Products hollow sections and fabricated products, side streams (material losses, recyclable materials), and emissions (GHG).

SBM-1

Value Chain Description

Our value chain covers raw material procurement, our own production, and customer solutions. The most significant environmental impacts occur upstream, particularly in raw material production, energy use in our production facilities, and transportation. We manage these through supplier cooperation, emission reduction targets, and energy efficiency programs. Downstream, we focus on customer solutions that support low-carbon outcomes.

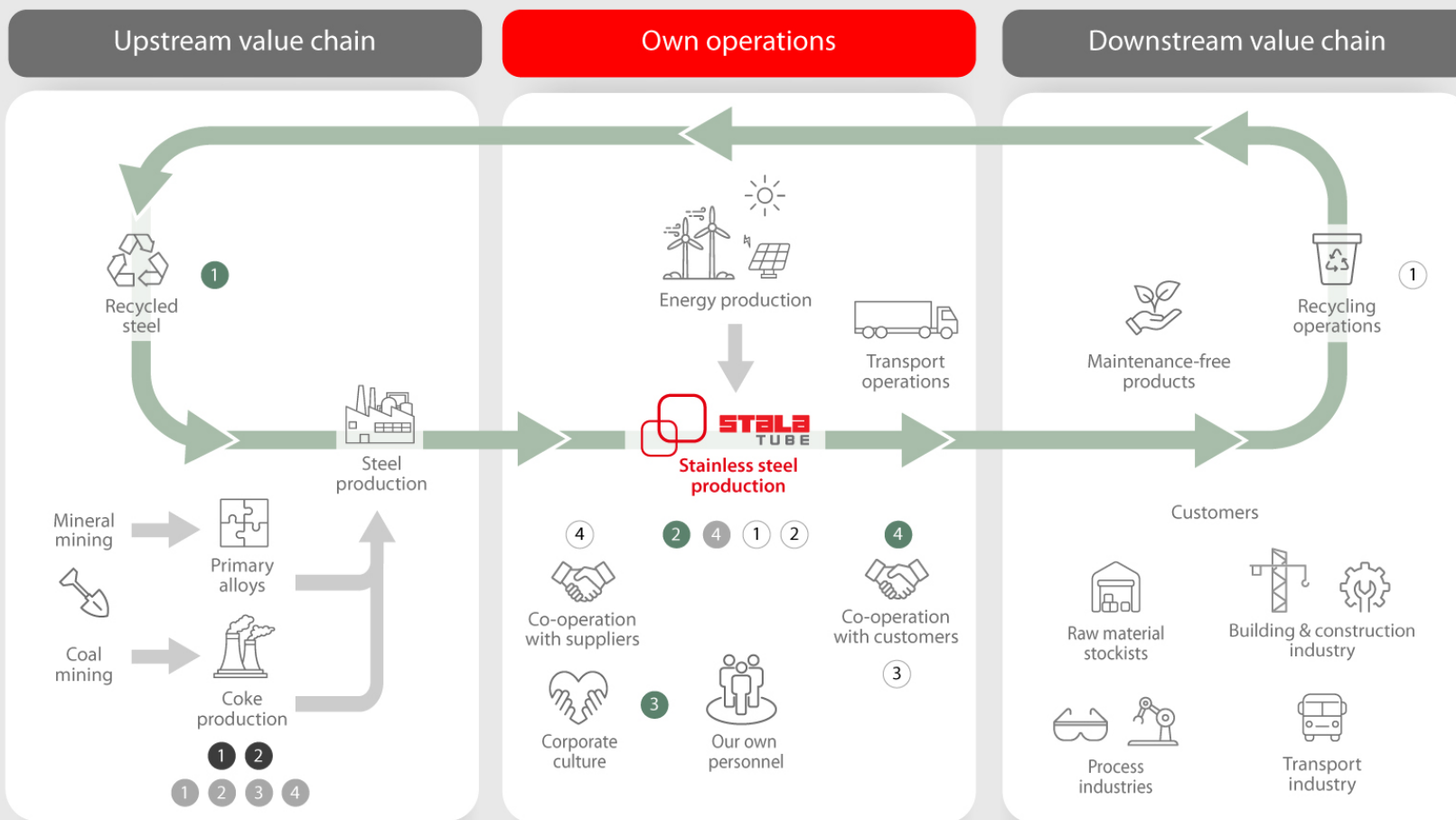
Upstream activities, such as mineral extraction and primary alloy production, consume energy and natural resources, while the use of recycled steel reduces the need for primary raw materials. The steel industry's value chain faces climate risks, emissions, dependence on critical raw materials, and ethical challenges, including labor conditions and human rights. On the positive side, stainless steel is fully recyclable, and our company culture and supplier relationships support sustainable sourcing and collaboration.

Our own operations focus on employee well-being and equality by providing development opportunities, fair compensation, flexible work arrangements, and a safe working environment, supporting high satisfaction and secure employment. Corporate culture and partnerships promote sustainable sourcing and collaboration. In manufacturing, material efficiency and increased recycling rates reduce the use of primary raw materials and lower the carbon footprint, while energy efficiency and the use of fossil-free energy support emission reduction targets. We monitor transport emissions and are committed to climate change mitigation and circular economy principles.

Downstream, products are distributed to customers and used in their applications. We support customers' sustainability goals through maintenance-free products, lifecycle management, and engagement in sustainable practices. Recycling products and collecting scrap steel enable resource reuse and reduce the need for primary raw materials.

Stalatube is the world's leading sustainable and customer-oriented manufacturer of high-strength stainless steel hollow sections and the world's leading supplier of high-strength products in the transport industry.

Stalatube Value Chain



Positive impacts

- 1 Recycling & Circular Economy:** Stainless steel is 100% circular, reducing need for primary raw materials and energy use.
- 2 Energy & Emission Reduction:** Material efficiency, increased recycling, and investments in fossil-free energy lower carbon footprint.
- 3 Social Sustainability:** High employee satisfaction, protection of social dialogue, equal and fair treatment, work-life balance, preventive occupational, health and safety culture and grievance mechanisms.
- 4 Customer Collaboration:** Supporting customers' sustainability goals and offering long-life, maintenance-free products.

Negative impacts

- 1 Environmental Impact:** Mining and raw material production cause emissions and resource depletion.
- 2 Supply Chain Issues:** Dependence on critical raw materials and ethical challenges (human rights, working conditions).

Sustainability-related risks

- 1** Climate change disrupting raw material supply.
- 2** Scarcity of critical raw materials.
- 3** Ethical and social risks in supply chain.
- 4** Regulatory pressure for emission reductions.

Sustainability-related opportunities

- 1** Expanding recycling and circular economy practices.
- 2** Innovation in material design and energy efficiency.
- 3** Supporting customers in emission reduction and lifecycle management.
- 4** Strengthening sustainable procurement and supplier relationships.

Key Sustainability Targets

Topic	Detailed Description	Metric	2025 Performance	Target
Climate change <i>E1 Climate change</i>	<ul style="list-style-type: none"> Climate change mitigation by reducing emissions from own operations and the value chain Energy efficiency and energy sources 	<ul style="list-style-type: none"> Scope 1–3 emissions Energy intensity 	<ul style="list-style-type: none"> Scope 1+2: 1580 t CO2e Scope 3: 42860 t CO2e Energy intensity improvement: <ul style="list-style-type: none"> 9.5 % / year 20.5 % / 3 years 	<ul style="list-style-type: none"> Paris Agreement–aligned 2030 target; carbon neutrality by 2050
Resources and circular economy <i>E5 Circular economy</i>	<ul style="list-style-type: none"> The most responsible and cleanest manufacturer of hollow sections 	<ul style="list-style-type: none"> Recycled content of steel raw material Low-emission end product 	<ul style="list-style-type: none"> 93 % Emission factor of the end product EN 1.4301/1.4307: 1.61 t CO2e/t EN 1.4003: 1.3 t CO2e/t EN 1.4404: 1.83 t CO2e/t EN 1.4571: 1.74 t CO2e/t EN 1.4162: 1.68 t CO2e/t 	<ul style="list-style-type: none"> Min. 75 % End product: lowest emission factor on the market
Skilled and motivated employees A great workplace and the best employer in the region Health and safety <i>S1 Own workforce</i>	<ul style="list-style-type: none"> Employee competence, skills development and training opportunities High retention rate Target of zero accidents and a safe working environment 	<ul style="list-style-type: none"> Average hours of training per employee / year Employee attendance in annual development discussions Employee retention Lost time incident frequency rate (LTIFR) 	<ul style="list-style-type: none"> 19 h 78 % 97 % 0 	<ul style="list-style-type: none"> ≥20 h ≥95 % ≥90 % 0
Corporate culture <i>G1 Business conduct</i>	<ul style="list-style-type: none"> Fostering corporate culture High employee satisfaction rate Customer satisfaction 	<ul style="list-style-type: none"> Employee satisfaction (employee experience survey result average) * Net Promoter Score (NPS) 	<ul style="list-style-type: none"> 4.09 / 5* 88 	<ul style="list-style-type: none"> ≥4/5 ≥70
Responsible procurement <i>G1 Business conduct</i>	<ul style="list-style-type: none"> Responsible procurement practices 	<ul style="list-style-type: none"> Sustainability criteria (minimum requirements) for suppliers Sustainability profiling of suppliers Monitoring actions (audits, etc.) 	<ul style="list-style-type: none"> Criteria created and implemented in the procurement process 80 % of purchases 	<ul style="list-style-type: none"> Responsible procurement practices fulfilling our policy commitments No reported major violations in the value chain

* The content and methodology for calculating this figure are described in section G1.

Stakeholder Interests and Views

We actively engage in dialogue with our key stakeholders. Representatives of our stakeholders also participated in the double materiality assessment. The table below describes our key stakeholder groups, their sustainability-related expectations, the forms of stakeholder communication, and how the management of these expectations is integrated into our business model and strategy.

Stakeholder	Expectations and Requirements	Feedback	Communication to Stakeholders	Impact on Operations, Business and Strategy – Realization in 2025
Employees	<ul style="list-style-type: none"> • Clear mission and strategy and sustainable financial situation • Secure employment • Fair and equal treatment and management • Safe and healthy working environment • Fair and motivating rewarding • Training and development • Work-life balance • Compliance 	<ul style="list-style-type: none"> • Employee satisfaction survey • Development and 1 to 1 discussions • Co-operation Committee • Occupational Health & Safety Committee • Exit interviews • Training feedback • Whistleblowing channel • SpeakUp channel 	<ul style="list-style-type: none"> • Intranet • Monthly and weekly info meetings & recordings • Teams channels • Info screens • Development and 1 to 1 discussions • Co-operation Committee • Occupational Health & Safety Committee 	<ul style="list-style-type: none"> • Employee satisfaction survey overall rating 4.09/5 in 2025 • Employee retention rate 97 % in 2025 • Monthly and weekly info meetings held according to schedule
Customers & partners	<ul style="list-style-type: none"> • Customer and business understanding • Technical value of products • Honest dialogue • Functional technical solutions • Long lifecycle • Training and skill development • Achieving sustainable development • Compliance with regulations and sustainability 	<ul style="list-style-type: none"> • Annual customer satisfaction survey + Falcony feedback (reclamations). The analysis of feedback is done in management review. • ESG survey • Email communication to sales contact • HubSpot/marketing • Trade fairs presence • Whistleblowing channel 	<ul style="list-style-type: none"> • Salesframe marketing & technical info • Sales visits & trainings • Webinars • SBA newsletters • Social media • YouTube • Trade fairs presence 	<ul style="list-style-type: none"> • Customer feedback to sales contacts is not reported collectively • Internal weekly sales meeting held to manage priority customer needs • Customer survey in 2025
Owners	<ul style="list-style-type: none"> • Continuity of profitable business • Sustainable and profitable revenue growth • Product development • Compliance with accounting requirements 	<ul style="list-style-type: none"> • Annual strategy meeting (Board and Management team) • Board thematic meetings with the process owner present • One-to-one discussions between the CEO and the Owner (Chairman of the Board) 	<ul style="list-style-type: none"> • Annual strategy meeting (Board and Management team) • Board thematic meetings with the process owner present • One-to-one discussions between the CEO and the Owner (Chairman of the Board) 	<ul style="list-style-type: none"> • Strategy revision in 2025 • Feedback in one-to-one meetings
Suppliers, subcontractors & contractors	<ul style="list-style-type: none"> • Mission and strategy • Liquidity • Long-term partnership • Open and proactive communication • Co-operation, feedback and support to enable product development • Sustainability, risk management • Shared emission targets 	<ul style="list-style-type: none"> • Regular meeting with raw-material suppliers • Meetings with sub suppliers as needed • Audits by yearly audit plan • Questionnaires to suppliers and possibility to send feedback • Whistleblowing channel 	<ul style="list-style-type: none"> • Regular meeting with raw-material suppliers • Meetings with sub suppliers as needed • Audits by yearly audit plan 	<ul style="list-style-type: none"> • Meetings with sub suppliers as planned • Audits by yearly audit plan

Identifying and Assessing Impacts, Risks, and Opportunities

Our materiality assessment process was structured into several phases: mapping the sustainability context, assessing ESRs sustainability topics and engaging stakeholders, providing a more detailed description and evaluation of sustainability impacts, risks and opportunities relevant to the company in accordance with the ESRs standards, and finally setting the materiality threshold by management.

The main objective of the materiality assessment was to identify and evaluate the risks and opportunities that could have a material impact on the implementation of our strategy and the achievement of our objectives, as well as our material impacts on society and the environment.

During the sustainability context mapping phase, we identified Stalatube’s key stakeholders, mapped our value chains and their most significant actors, and assessed the impacts of our operations on the environment, society, and our most important stakeholders. We also reviewed sustainability impacts typical of our industry. When assessing impacts across our operations and value chain and defining the topics, we considered our strategy description, sustainability roadmap, code of ethics, identified business-related megatrends, international sourcing, and geographical specificities of our operations and their impacts. The mapping and identification work was carried out through workshops involving The Management Team and representatives from across functions.

The second phase involved engaging our key stakeholders. Our own employees, customers, and suppliers were identified as the most critical stakeholder groups. Surveys were sent to all employees, key customers, and our largest suppliers. The results of the stakeholder surveys and stakeholder expectations were taken into account when evaluating sustainability impacts, risks, and opportunities.

In the third phase, we described and assessed in more detail the impacts related to sustainability matters as well as the associated financial risks and opportunities. Sustainability topics were evaluated in terms of how they may affect our financial performance and development, and which of them create or erode company value.

Sustainability topics and the materiality of related impacts, risks and opportunities were assessed based on the following criteria:

IMPACTS

Severity and likelihood (potential)

RISKS OR OPPORTUNITIES

Scale and likelihood (potential)

SBM-3

Material Impacts, Risks, and Opportunities

Based on the double materiality assessment, the following sustainability topics were identified as the most material:

- E1 Climate change: climate change mitigation, energy use, and energy sources
- E5 Circular economy: resource use, inputs and outputs
- S1 Own workforce: working conditions, social dialogue, health and safety, training and skills development, DEI
- G1 Business conduct: corporate culture and supplier relationships

The table below presents the material impacts, risks, and opportunities for each sustainability topic. In addition, more detailed descriptions of the content of implications, risks, and opportunities are provided for each topic area.

E1 Climate Change, Key Material Topics		
Topic	Why this topic is material to Stalalube	IRO
Climate change adaptation	Climate change may raise raw material costs and limit availability, but resilient supply chains and low-carbon solutions offer competitive advantage and growth.	Risk, opportunity
Climate change mitigation	GHG-emissions from operations, raw materials and logistics contribute to climate change	Impact
	Customers increasingly prefer suppliers with credible climate targets and low-carbon solutions.	Opportunity
	Optimised designs and lighter products enable customers to reduce their carbon footprint	Opportunity
	Climate-related regulation, increasing regulation creates additional compliance requirements and resource needs.	Risk
Energy	Energy-intensive production and fluctuating energy prices affect cost competitiveness.	Impact, risk

S1 Own Workforce, Key Material Topics		
Topic	Why this topic is material to Stalalube	IRO
Working conditions	Secure and long-term employments are essential due to specialised production methods and accumulated know-how.	Impact, opportunity
	Employee experience directly affects recruitment, employee engagement and retention and business continuity.	Risk, opportunity
Health and safety	Safe working conditions are critical for employee well-being, operational continuity and trust.	Impact, risk, opportunity
Training and skills development	Skilled and motivated employees are a prerequisite for executing strategy and maintaining competitiveness.	Risk, opportunity
Diversity and equal treatment	Fair, equal, and transparent employment practices support trust, compliance and high employee retention.	Impact, opportunity
Freedom of association, social dialogue, employees' participation rights	We respect employees' right to freely associate, join trade unions, engage in collective bargaining, and participate in open, constructive discussions with management. We ensure working conditions comply with the law and industry regulations.	Impact, opportunity

G1 Business Conduct, Key Material Topics		
Topic	Why this topic is material to Stalalube	IRO
Corporate culture and sustainable business	Corporate culture and ethics, ethical business conduct supports long-term performance, trust and employee engagement	Impact, opportunity
	ESG performance and access to financing, sustainability performance increasingly influences access to financing and growth opportunities.	Risk, opportunity
	Whistleblower and grievance mechanisms, effective channels enable early detection of misconduct and strengthen transparency.	Impact, opportunity
	Compliance and integrity, strong compliance reduces the risk of misconduct, corruption and reputational damage	Impact, risk
Management of relationships with suppliers	Sustainable sourcing and supplier conduct, supplier sustainability assessments help manage supply chain risks.	Impact, risk, opportunity

E5 Resource Use and Circular Economy, Key Material Topics		
Topic	Why this topic is material to Stalalube	Topic
Resource inflows	High recycled content reduces upstream emissions and supports circular economy objectives.	Impact, opportunity
	Optimised product design reduces material use and resource intensity.	Impact, opportunity
	Fluctuations in steel availability and prices may impact competitiveness and cash flow.	Risk
Resource outflows	High-performance solutions increase resource efficiency and sustainability benefits for customers.	Opportunity
	Full recycling of stainless steel scrap supports circularity and reduces waste.	Impact

ENVIRONMENT

Climate Change

Material Impacts, Risks, and Opportunities

Stalatube has identified several material climate change-related impacts, risks, and opportunities that influence our strategy and business model. These have been assessed across the entire value chain, with particular focus on raw material sourcing, production processes, and greenhouse gas emissions. The assessment followed the double materiality principle, considering both Stalatube's environmental impacts and the financial risks and opportunities arising from climate change.

As a result of the assessment, eight material climate-related impacts, risks, and opportunities (IRO) were identified. These primarily relate to the availability and carbon intensity of raw materials, energy consumption, emissions across the value chain, and regulatory developments. The assessment is updated when significant changes occur in Stalatube's operating environment or value chain.

From an adaptation perspective, climate change poses a key risk for Stalatube, particularly regarding the availability and pricing of stainless steel. A warming climate, regulatory changes, and increasing competition for low-emission raw materials may lead to supply disruptions and higher costs. To manage these risks, we conduct systematic supplier assessments and maintain regular dialogue with suppliers to ensure security of supply and anticipate regulatory developments. A resilient value chain also creates an opportunity for Stalatube to strengthen its competitive position.

From a mitigation perspective, climate change is closely linked to Stalatube's Scope 1, 2, and 3 greenhouse gas emissions, the majority of which arise from raw material production and transportation. We aim to reduce emissions through targeted measures across our own operations and the supply chain. We are committed to emission reductions through the Science-Based Targets initiative (SBTi). Lighter, durable, and fully recyclable stainless steel solutions enable Stalatube's customers to reduce their carbon footprint.

Increasing regulatory requirements for upstream operators may lead to additional obligations and higher resource needs. We continuously monitor climate-related regulatory developments and collaborate with suppliers and partners to respond to new requirements. This proactive approach supports Stalatube's long-term competitiveness while contributing to climate change mitigation.

Energy consumption is a significant factor affecting both environmental impacts and costs, as Stalatube's manufacturing processes are energy-intensive. We invest in energy-efficient buildings, machinery, and production solutions to reduce the emission intensity of our operations. The transition to fossil-free energy plays a key role in reducing Scope 2 emissions and supporting the wider energy transition. Contracts for fossil-free energy have been in force at Stalatube's Finnish site since the beginning of 2025. Stalatube has also invested long term in own solar energy generation, and through energy efficiency actions and increased number of solar energy panels, the contribution of solar energy to total consumption has grown markedly.

SBM-3

E1 Climate Change			
Topic	Material Impact, Risk or Opportunity	IRO	Actions
Climate change adaptation	The impact of global warming on the production and availability of steel raw materials, increased competition for raw materials, and rising costs.	Risk	We prepare for potential challenges in material availability through systematic supplier management, evaluation, and analysis, including regular supplier surveys and audits. We also actively monitor regulatory developments.
	Cost impacts and the opportunity for improved business performance and growth if our value chain is resilient.	Opportunity	
Climate change mitigation	Greenhouse gas emissions from our operations (Scope 1, 2 and 3), including emissions from raw material production and the transportation of raw materials and finished products, contribute to climate change.	Impact	We conduct GHG accounting, commit to emission reductions through the Science Based Targets initiative (SBTi), manage suppliers, collaborate across the value chain, and identify emission-reduction opportunities.
	Positive differentiation and increased business as customers choose suppliers that prioritize climate change mitigation.	Opportunity	We conduct GHG accounting, advance our SBTi commitment, manage suppliers, and communicate our climate actions.
	Enabling customers to achieve a lower carbon footprint through lighter products and optimized product solutions, supporting business growth.	Opportunity	This topic is included in our strategy and guides our actions
	Increasing regulatory requirements for upstream operators may entail additional obligations and greater resource needs.	Impact, risk	We monitor regulatory developments and cooperate closely with our suppliers.
Energy	Energy-intensive manufacturing, high energy consumption, and unpredictable or rising energy prices.	Impact, risk	We reduce energy intensity and Scope 2 emissions through facility systems and the efficient use of machinery and raw materials.
	The Nordic countries have sufficient energy availability. Transition to fossil-free energy supports fossil-free energy production and reduces our Scope 2 emissions and emission factor.	Opportunity	Contracts for fossil-free energy have been signed for our Finnish site and have been in force since January 2025.

Transition Plan for Climate Change Mitigation

Stalalube is committed to climate change mitigation and has joined the Science Based Targets initiative (SBTi). We have submitted our near-term and net-zero targets for validation. Our target is to reduce Scope 1 and 2 emissions by 42 % by 2030 from the 2021 baseline. In addition, we aim to reduce Scope 3 emissions by 52% per produced tonne by 2030, relative to the 2021 baseline. Stalalube’s long-term objective is to achieve net-zero emissions by reducing Scope 1, 2, and 3 emissions by 90 % by 2050 from the 2021 baseline.

Stalalube’s transition plan includes improvements in material and energy efficiency. We are committed to reducing emissions intensity annually and improving energy efficiency. We are increasing the share of fossil-free energy and developing processes to support the transition towards low-carbon production.

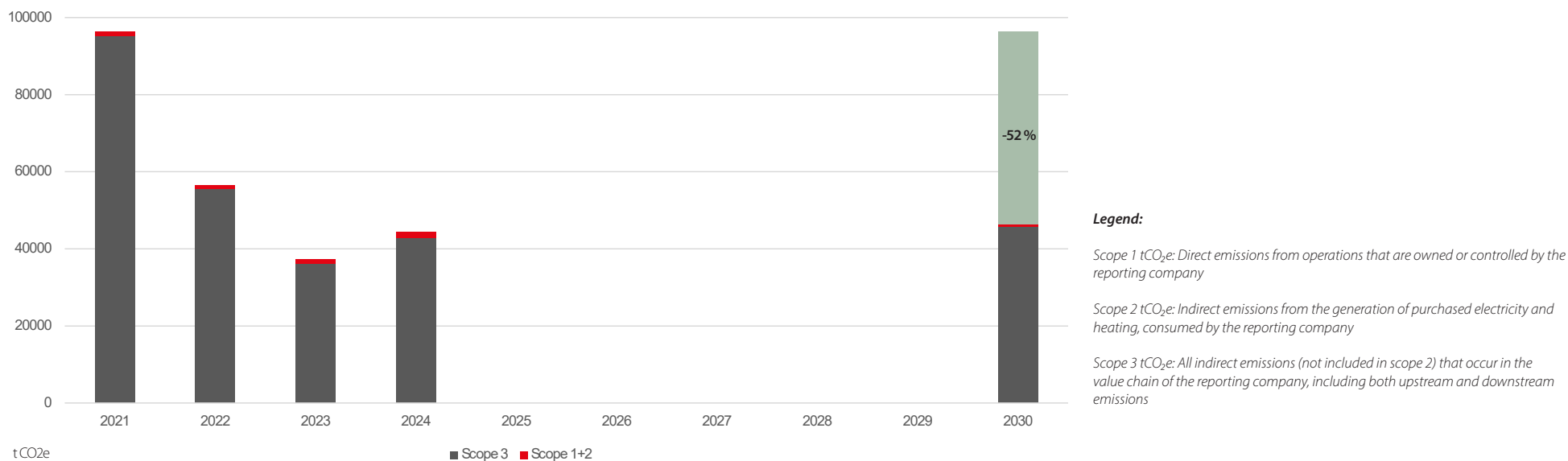
The reduction of Scope 1 emissions is achieved through the gradual electrification of Stalalube-managed vehicles, including forklifts and company cars, and by phasing out fossil fuels.

One concrete measure to reduce Scope 2 emissions is the transition to cleaner energy sources.

For Scope 3 emissions, we focus particularly on reducing the emissions intensity of raw materials and transportation. Stalalube gathers information on suppliers’ emission reduction plans and establishes strategic partnerships with suppliers that support the green transition of steel production and the use of lower-emission raw materials.

Transportation modes are optimized through improved load factors and return shipments. Freight forwarders provide annual transportation emissions reports, and changes in emissions are monitored through calculations. Lower-emission transportation options are prioritized whenever feasible.

Stalalubes’ near-term emission target



Policies

Stalatable's environmental policy defines principles related to responsible resource use. We promote the circular economy of stainless steel by targeting a minimum of 75 % recycled steel content in products and by providing information on product recyclability. Increasing the share of recycled steel is a key focus area, as recycled materials significantly reduce indirect emissions. The share of fossil-free energy is continuously growing.

Stalatable emphasizes material and energy efficiency throughout production and aims to minimize waste. We return 100 % of production scrap to the recycling loop as new raw material.

Greenhouse gas emissions are monitored and calculated in accordance with the GHG Protocol across all scopes (Scope 1–3). Stalatable communicates its environmental impacts, targets and progress annually.

Suppliers and partners are expected to adhere to the same responsibility principles, particularly regarding environmental performance, and supplier sustainability is regularly assessed.

All these policies have been approved by board, which is the highest authority.

Policy / Document	Detailed Description
Strategy	Strategy combines vision and mission with concrete goals, such as promoting the lowest carbon footprint in the market.
Sustainable Procurement Policy	Prioritise low-emission raw material suppliers and guide the sustainability of the supply chain.
Environmental Policy	Guides emission reduction, material efficiency (production processes), energy efficiency, and the proportion of recycled raw materials.

E1-5

Energy Consumption and Mix

In 2025 the company's total electricity consumption amounted to 4,672 MWh, of which 8 % was sourced from renewable energy (solar) and 87 % was fossil free. This total energy consumption accounts for 100 % of the annual production volume.

We continue to develop energy consumption monitoring, and energy efficiency has been improved through targeted technical improvements. These include the ongoing development of building automation systems, intelligent ventilation control linked to production lines, and the gradual phase-out of internal combustion forklifts. Two electric forklifts have been introduced, resulting in annual fuel savings of approximately 25,000 liters.

Additional investments include heat recovery from welding lines, the installation of new heat production sources (three air-to-water heat pumps installed), and optimizing their utilization to increase overall energy efficiency across the entire facility.

From 2025 onwards, fossil-free electricity has been used at Stalalube's Lahti site in Finland, supporting the reduction of energy-related emissions.

Stalalube has invested in own solar energy generation, and through energy efficiency and increased solar energy production, the share of total energy consumption in Finland was over 9 %. In the peak month, solar energy generation was almost 60 % of the total consumption.

Electricity Consumption (MWh)

Year	Finland (MWh)	Finland solar electricity (MWh)	Poland (MWh)	Total (MWh)
2024	4 589	267	201	5 057
2025	4 081	377	166	4 624

District Heating Consumption

Year	Finland (MWh)	Poland (m ³)
2024	1 369	27 000
2025	857	29 257

Resource Use and Circular Economy

Material Impacts, Risks, and Opportunities

In our materiality assessment, the starting point was the analysis of resource inflows, such as raw materials, and resource outflows, including final products and side streams. The focus was on the analysis of material sourcing as well as the realized and potential sustainability impacts of the final products, including related risks and opportunities. The most significant resource inflows are raw materials (stainless steel) and energy (electricity and heat). Water, chemicals, and packaging materials play a smaller role in procurement volumes.

The most significant outflows are final products, such as hollow sections and structural products. In addition, side streams are generated, including production scrap and emissions. Below, we describe Stalalube's principles, actions, and targets related to promoting sustainability in the areas of resource use and the circular economy.

E5 Resource Use and Circular Economy			
Topic	Material Impact, Risk or Opportunity	IRO	Actions
Resource inflows, including resource use	Steel sourcing channels support the sustainability of the industry.	Impact	We manage and assess suppliers, with a focus on sustainability and circular economy practices.
	A share of recycled steel in suppliers' supply chains reduces emissions from raw materials.	Opportunity	We set minimum requirements for recycling rates, and we monitor supplier reporting annually.
	Procurement of steel from Finland and Europe lowers the emission factor of Stalalube's products, reduces transport-related emissions, and facilitates comparability with other industry players.	Opportunity	We calculate and document emission impacts annually, comparing results between different suppliers.
	Limited availability of raw materials and rising prices may weaken competitiveness, particularly if emissions or costs increase.	Risk	We calculate and document emission impacts annually as part of supplier management and market monitoring.
Resource outflows related to products and services	Investing in product design and high-technology solutions reduces consumption and enables a positive carbon handprint for customers.	Impact, opportunity	We develop optimized, customer-centric products, specialization in selected solutions and materials. We use manufacturing technologies that enable high efficiency in material and resource use, thereby reduce emissions.
	Increasing the use of stainless steel with high recycled content reduces the need for primary raw materials and reduces product emissions.	Impact	We set minimum requirements for recycling rates, and monitor supplier reporting annually, supported by continuous monitoring and collaboration with suppliers.
	Recycling stainless steel supports the circular economy and the reuse of resources.	Impact	Our processes are developed to enable efficient material use and minimize waste. We recycle our materials.

E5-1

Policies

Stalalube's Environmental Policy outlines the principles governing resource use. We ensure a minimum recycled steel content of 75 % in our products. Our objective is to increase the share of recycled steel by promoting the circular economy of stainless steel and by providing information on the recyclability of our products.

We focus on efficient use of materials and aim to reduce waste generated in production. One hundred percent of production scrap is returned for recycling as new raw material.

We monitor and manage the use of hazardous substances to prevent potential harm to the environment and to employees. Hazardous auxiliary substances are replaced whenever possible, and any hazardous substances used are collected and handled in a way that prevents adverse impacts.

All these policies have been approved by board, which is the highest authority.

Policy / Document	Detailed Description
Strategy	Strategy combines vision and mission with concrete goals, such as, ensuring sustainable procurement and promoting lowest carbon footprint in market.
Sustainable Procurement Policy	Defines general sourcing operating principles, sustainable and traceable material sourcing.
Environmental Policy	Guides resource efficiency, promotes circular economy, and also supports and improves material circulation.

E5-2, E5-3, E5-4

Actions and Resources

To achieve our target of increasing recycled content and to ensure the promised minimum level, we collect information on recycled content when selecting steel suppliers. The recycled content values of all suppliers are reviewed annually. We monitor the amount of recycled steel used in production in real time and can react if needed.

All production scrap is collected and sorted by steel grade to enable the most efficient recycling possible. We monitor scrap volumes monthly and aim to reduce them through production methods, machinery development, and production planning.

We manage auxiliary substances and chemicals used in our operations to ensure proper handling and disposal. We maintain a chemical register and follow manufacturers' instructions regarding use, storage, protective measures, and disposal. All chemicals used in production are collected, labeled, and delivered to professional operators for further treatment.

Targets

Policy / Document	Detailed Description	Target	Actual 2025
Circular economy solutions	Product concepts that enable material savings (STALA Smart Solutions)	Material and component efficiency, bus body structure	Percentage weight reduction 25 %
Responsible raw materials	Recycled content of purchased steel	75 %	93 %
Optimisation of resource use	Material efficiency, material waste	Material loss rate of 8.3 % 100 % recycling of generated waste	8.3 % 100 %

Resource Inflows

The most material resource inputs for the Group's operations are stainless steel as a raw material, energy (electricity and heat), mentioned in E1), water, chemicals, and packaging materials.

Inflows, Covers 100 % of Production *	Amount 2024	Amount 2025	Unit
Welding gases	409 855	362 890	Nm ³
Welding and lasercutting gases	259	410	t
Pickling liquids	8.9	10	t
Other process chemicals	8.1	9.1	m ³
Packaging material, plastic/PE, PET, LDPE	21.8	28.6	t
Packing material, cardboard	30	28.2	t
Packing material, plywood	4 690	1 050	m ²
Packing material, wood	310	285	m ³
EUR pallets new and re-used	400	300	pcs

* Stainless steel purchase volume confidential

Resource Outflows

Stalatube's business is based on the development and manufacture of high-quality, durable, high-strength stainless steel hollow sections and structural products. Our products are used, for example, in the bus industry and demanding structural applications where durability and safety are critical. The final products serve industrial and infrastructure needs, and their long life cycle and maintenance-free nature support sustainable development. Stainless steel is 100 % recyclable at the end of its life cycle.

Sustainability is integrated into product development. Lighter but stronger structures reduce material use and lower emissions related to transportation and installation. For example, a new body structure concept for bus bodies enables up to 30 % weight reduction, reducing life-cycle emissions. We offer value-added services to our customers by improving their material efficiency through technical consulting and optimized product solutions.

Customization and lighter yet stronger structures reduce material demand and transportation and installation-related emissions. All production scrap is directed to recycling, supporting a closed material loop. Stainless steel is maintenance-free and does not require coatings, which minimizes waste streams and environmental risks. All products are 100 % recyclable, ensuring no material loss at the end of life. Using recycled steel significantly reduces emissions in steel production. Primary raw material extraction and processing are emission intensive. Increasing recycled steel content reduces the need for primary raw materials and lowers emissions from steel manufacturing, making stainless steel a valuable and desirable material.

Stainless Steel Circular Ecosystem



Product Features

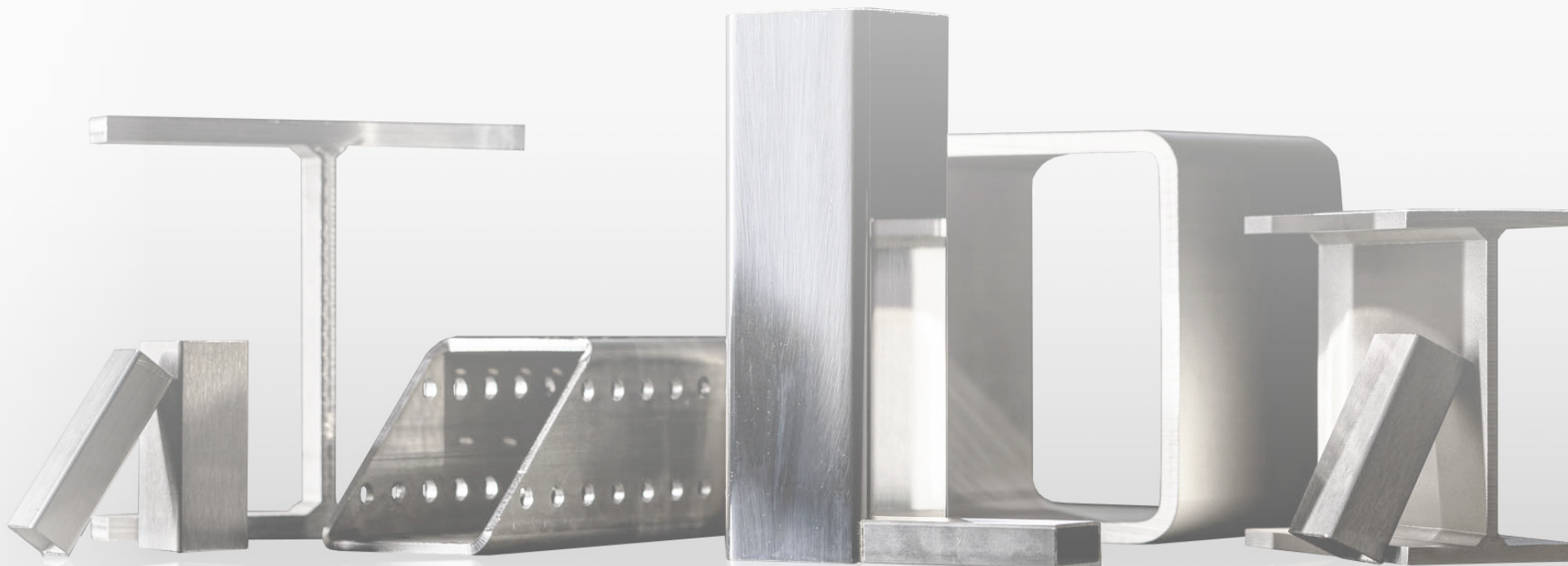
Stainless steel tubes and profiles (square and rectangular tubes, profiles, and I-beams) with high yield and tensile strength, corrosion and fire resistance, and good elongation. The materials used are austenitic, ferritic, duplex, and Lean Duplex grades. Our products are used in the transport equipment, energy, construction, and process industries.

Circular Economy and Waste Management

All products are 100 % recyclable, meaning that no material is lost at the end of its life cycle; instead, it is fully recyclable and returned to its raw material form. In terms of material efficiency, we tailor our products to each customer and offer lighter but stronger material options that reduce the overall material requirement. All production scrap is sent for recycling. The target for recycled content in purchased steel is at least 75 %.

The products are maintenance-free, meaning they do not require coatings. This means they do not contain harmful or toxic chemicals or paints that need to be maintained and renewed at regular intervals.

Material Outflows, Covers 100 % of Production	Amount 2024	Amount 2025	Unit
Finished product stainless steel content	100	100	%
Scrap	7.8	8.3	%
Recycling rate of scrap	100	100	%
Share of recycled raw materials	88	93	%
Product lifetime	> 50	> 50	years



SOCIAL

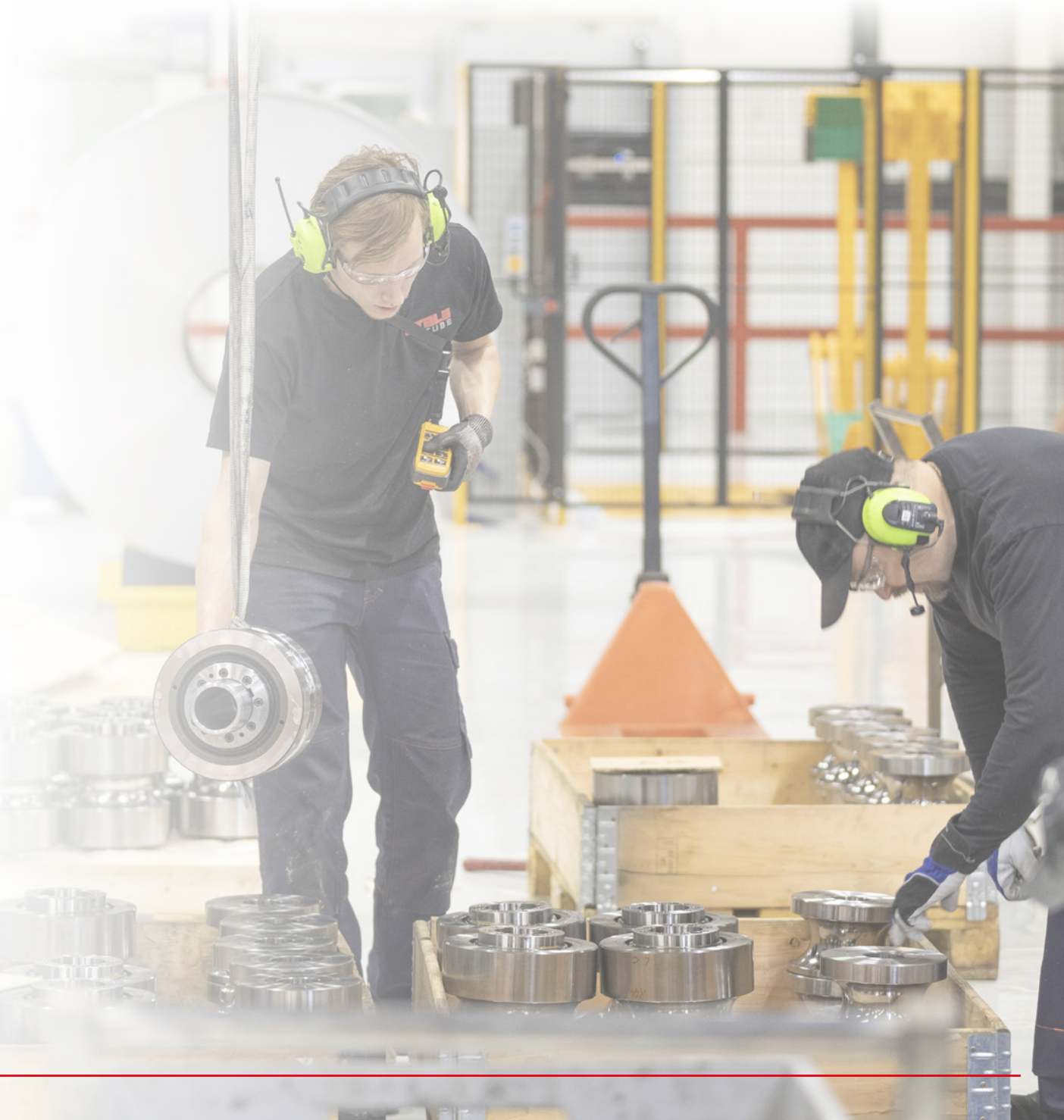
Own Workforce

Material Impacts, Risks, and Opportunities

Our workforce consists of diverse individuals who achieve outstanding results by working together. Our company has a long history and a strong corporate culture, centered around us, the Stalalube employees. Our skilled and enthusiastic employees make Stalalube successful as a company. At Stalalube, everyone continuously contributes to making the company and its culture even better. To constantly improve our employee experience and employer brand, we engage in ongoing dialogue with all employees and encourage everyone to openly and courageously present suggestions for development and improvement and share their feedback.

Stakeholder feedback highlights the importance of continued investments in a secure financial foundation, secure employment, fair and equal working practices related to compensation, flexible working hours, social dialogue, freedom of association, workers' rights, and collective bargaining, as well as health and safety. These efforts are essential for strengthening employee satisfaction, improving financial performance, and supporting employee retention and the recruitment of new talent.

We recognize securing a skilled and motivated workforce and maintaining a high employee retention rate as essential to the company's long-term competitiveness. Continuous development of employee competencies remains a prerequisite for achieving our profitability and strategic objectives. Given that our production methods are highly specialized and require hands-on learning, insufficient availability of qualified personnel would limit our ability to execute strategy, pursue new business opportunities, or fulfill customer needs.



SBM-3

S1 Own Workforce			
Topic	Material Impact, Risk or Opportunity	IRO	Actions
Working conditions	Secure and long-term employments, strong employee experience, and flexible working arrangements are key to high employee retention, recruitment, and operational efficiency. Experience-based knowledge accumulated over time supports our specialized production methods and competitiveness. Work-life balance further strengthens employee wellbeing and employer attractiveness. Shift and night work enable continuous production but require careful management due to shift workers' health impacts.	Impact, risk, opportunity	We support secure and long-term employments through competitive salaries, systematic HR practices, and continuous training and skills development. We strengthen the employee experience via open communication, participation, and regular surveys. Flexible working arrangements, including flexible hours, remote work, working hours bank, and individual solutions, support work-life balance and employee retention. We ensure proper induction for shift and night work, monitor their health impacts with occupational health care, and provide wellbeing support as needed.
Health and Safety	Investing in occupational health and safety reduces accidents and absences, strengthens employee wellbeing, and prevents financial losses. Neglecting safety increases accident risks and harms both wellbeing and company's financial performance. In contrast, well-managed safety and healthy working conditions improve job satisfaction, support recruitment, and enhance overall company performance.	Impact, risk, opportunity	We ensure a safe workplace through systematic safety management, including ISO 45001 practices, a zero-accident target, continuous improvement, a strong safety culture, and preventive practices, supported by occupational health care, wellbeing services, and through training.
Training and skills development	Our unique business and production methods require practical, experience-based learning, making skilled and knowledgeable personnel essential for maintaining competitiveness and executing our strategy. Limited future labor availability and insufficient expertise could hinder order intake, weaken business performance, and jeopardise strategic progress. At the same time, continuous training and skills development remains critical for our profitability and long-term market leadership.	Risk, opportunity	We invest in continuous training and skills development, and structured onboarding, while systematically monitoring employee retention and future competence needs. Strengthening expertise is essential for achieving profitability targets and securing long-term market leadership through a skilled workforce.
Diversity and equal treatment	We uphold fair and equal treatment in all aspects of work and enforce a zero-tolerance policy for harassment or inappropriate behaviour, ensuring a safe and healthy work community. Actions to promote diversity and equal treatment are implemented in accordance with our Equality and Non-Discrimination Plan.	Impact, opportunity	Fair and equal treatment is upheld in all interactions, recruitment process, working conditions, compensation and career development. Policies are reviewed regularly. Employees and managers receive training. Confidential reporting channels are in place, and whistleblowers are protected. Employee surveys support monitoring, and implementation of the Equality and Non-Discrimination Plan is reviewed on an ongoing basis.
Freedom of association and employee participation rights	All our employees have the right to associate and join trade unions and be represented. This increases trust and supports a functional work community.	Impact	We respect employees' rights to freely associate, join trade unions, engage in collective bargaining, and participate in open, constructive discussions with management. We ensure that all working conditions comply with legal and industry requirements.

S1-1, S1-3

Policies and Actions

Labor and human rights

Stalatube's Labor and Human Rights Policy is part of our broader commitment to sustainability. We are committed to supporting and promoting labor and human rights in every aspect of our operations. We recognize that respect for these rights is a fundamental requirement for sustainable development and responsible business conduct.

The Labor and Human Rights Policy is supported and complemented by other company policies and internal guidelines, including HR, data protection, occupational health and safety, whistleblowing, and procurement policies, as well as detailed implementation guidelines. These documents provide detailed guidance on implementing human rights principles in daily operations. We set and regularly review measurable targets to monitor the effectiveness of these policies.

Furthermore, our participation in the United Nations Global Compact reflects our ongoing commitment to conducting business in an ethical, sustainable, and environmentally responsible manner, with particular attention to the principles of labour and human rights, the environment, and anti-corruption.

We maintain zero tolerance for human trafficking, forced labor, bonded labor, slavery or any form of modern slavery and child labor. We follow the minimum working age requirement, which aligns with ILO conventions, and protect young workers (those above the minimum age but under 18). We prohibit practices such as limiting employees' mobility, imposing unreasonable recruitment fees, seizing identity documents, or withholding pay.

Our DEI Policy supports the development of a work community in which all members are treated with respect. We do not tolerate inappropriate behaviour, discrimination, or harassment.

The DEI Policy commits all personnel to promoting equality and non-discrimination - We do not discriminate against anyone based on race, nationality, gender, religion, disability, sexual orientation, political opinions, or any other characteristic unrelated to their work. We do not tolerate any form of harassment, exploitation, or sexually or culturally inappropriate behaviour.

Fair and equal treatment is upheld in all our processes and operations such as recruitment, working conditions, compensation, training and career development. We ensure that our working conditions exceed legal or industry-specific requirements and align with the principles of non-discrimination. This applies to all forms of employment, including fixed-term and part-time employees.

Moreover, everyone has both the right and the obligation to intervene in any inappropriate conduct, bullying, harassment, or discrimination they observe. Such unacceptable behaviour must be reported without delay.

Stalatube commits to and adheres to the following legal and regulatory frameworks:

UN Universal Declaration of Human Rights

ILO Declaration on Fundamental Principles and Rights at Work

OECD Guidelines for Multinational Enterprises

UN Guiding Principles on Business and Human Rights (UNGPR)

Applicable national legislation in countries of operation

S1-1, S1-3

Secure Employments

We strive to ensure the profitability of our business, as this supports the stability of employments. As a rule, we enter into permanent employment contracts. A large proportion of our employees have worked in the company for 10–15 years or even 20–25 years. Employee well-being and satisfaction are therefore vital to us. Most of our employees work full-time. Opportunities to transition to part-time retirement or reduced working hours are assessed on a case-by-case basis, taking into account the individual's ability to cope at work as well as the need to support a healthy work–life balance. Fixed-term employment contracts are concluded when necessary, for example, in project work, temporary substitutions, internships, or summer jobs.

Working Hours

In line with our Working Hours Policy, each employee's employment contract specifies the regular working hours to be followed. The standard threshold for full-time work is typically 40 hours per week. In some countries, flexible working hours are available in accordance with local legislation and/or collective bargaining agreements. The purpose of flexible working hours is to align work with fluctuating workloads better and to provide employees with the opportunity to balance work and personal needs more flexibly.

Employees who work beyond the standard hourly limit (up to a maximum of 48 hours per week, excluding emergencies) are entitled to overtime compensation in accordance with the applicable local collective bargaining agreement or labor legislation. Overtime is voluntary, and all overtime must be approved in advance by the employee's line manager.

Employee wellbeing and the ability to cope at work are essential to us. When needed, working hours and flexibility arrangements take into account different family situations, ageing employees, and others in varying life circumstances. We maintain a positive attitude toward family leave and its use, and we ensure that employees continue to receive essential workplace information even during family or other types of extended leave. For employees returning from family leave or other extended leave, we offer re-onboarding and/or training.

White-collar employees have access to flexible working hours. Partial remote work (approximately 50 % of working hours, depending on the role) is generally available to all white-collar employees. In Finland, blue-collar employees use a shift-swapping system and a working hours bank.

We have established a guideline that, as a rule, we do not employ individuals under the age of 18. The only exception is in Finland, where we offer a summer internship program organized by the Employers' Union, for a limited number of individuals aged at least 15. The program lasts for 2 weeks or 10 working days. The working hours during the summer internship period is 6 hours per day, 30 hours per week, which is below the maximum limit for the young employees in the local collective bargaining agreement.

Social Dialogue, Freedom of Association, Workers' Rights, and Collective Bargaining

In line with our Employee Relations Policy, and Labor and Human Rights Policy, we are committed to promoting and safeguarding social dialogue as part of fair working practices. This includes the right of employees and their representatives to freely associate, join trade unions, engage in collective bargaining, and participate in open, constructive discussions with management. The Employees elect their own representatives for the local collaboration committees in accordance with collective agreements and/or legislation, with each term lasting typically two (in Finland) or four (in Poland) years. Our continuous target is that 100 % of the workforce is covered by employee representatives in countries with at least 20 employees. We actively support inclusive communication channels and ensure that no one is subjected to retaliation or discrimination for participating in social dialogue activities.

Fair Compensation

We pay adequate remuneration, and salaries are paid in a timely manner, which enhances employees' sense of security at work. Competitive compensation supports employee retention, strengthens employee satisfaction, and facilitates the recruitment of new talent. Our Performance Management Policy is designed to encourage open and transparent communication about job expectations, performance, and compensation.

Stalalube's Compensation and Benefits Policy outlines that our goal is to ensure all employees receive wages that exceed local minimum wage and living wage benchmarks. Our goal is also to conduct annual reviews of wage levels to ensure they keep pace with inflation, changes in the cost of living, and market trends, and to adjust wages accordingly. We strive to reduce wage disparity by promoting fair compensation practices and supporting employees' financial wellbeing at all levels of the organization. Analyses are conducted by comparing country-specific employee wages with the respective living wage levels in each country. In 2025 100 % of the employees are paid over the living wage.



Training and Skills Development

We aim to employ the best talent. In line with our Training and Development Policy, we are committed to fostering a company culture that enables the professional and personal growth of our employees and their career advancement. Career opportunities are offered based on individual skills, performance, and the requirements of the role.

For the company's success, the onboarding program for new employees must be designed to support its critical functions and processes. Every person starting in a new role is provided with both a role-specific and a general induction program. The purpose of our comprehensive onboarding program is to ensure the success of each new Stalatube employee by familiarizing them with our organization, its functions, guidelines, and their own role from day one. It is in our interest to ensure that employees adopt their new tasks and responsibilities as quickly as possible, creating a foundation for early success in their employment.

All employees are encouraged to participate in training that strengthens their skills, enhances their performance, and supports long-term career development. We ensure that training is inclusive, meaningful, and easily accessible. We promote internal mobility and competence development as part of our commitment to decent work and equal opportunities for all.

All employees have access to the necessary skills, knowledge, and resources to perform their roles effectively, align with the organization's strategy and targets, and promote personal and professional development.

Average Hours of Training Per Employee Per Year (Target 20 h)

	2024	2025
Male	94	12
Female	153	43
White collars	69	25
Blue collars	25	10
Management	56	45
Total average of employee	46	19

Training and skills development (S1-12) is calculated by collecting and aggregating data on employee training during the reporting period.

Percentage of Employees Who Attended Annual Development Discussions

	Target	2024	2025
Male	95 %	86 %	56 %
Female	95 %	96 %	100 %
Total	95 %	91 %	78 %



S1-1, S1-3, S1-15

Pay Equity and Total Annual Remuneration

We ensure equal pay for all employees and regularly review compensation practices to monitor gender and pay gaps. Our target is to achieve zero gender pay gap. We provide a competitive and fair benefits package that supports employees' health, financial security, and work-life balance.

Total annual remuneration ratio includes all operating countries. When comparing the ratio of the highest-paid individual's total annual compensation to the median of total annual compensation, the calculation of the median excludes individuals who started or left during the reporting year, those who were on extended leave of over three months during the reporting year, and the salary of the highest-paid individual. To calculate the total annual remuneration ratio, we use data obtained from payroll and financial systems. The data includes salaries, short-term and long-term incentives, and fringe benefits.

	Unit	2025
Gender Pay Gap *	%	-1
Annual Total Remuneration Ratio **	Times	5.73

* The gender pay gap defined as the difference in average pay levels between female and male employees, expressed as a percentage of the average pay level of male employees

** The annual total remuneration ratio of the highest-paid individual to the median annual total remuneration for all employees (excluding the highest-paid individual)

S1-1, S1-3, S1-13

Health and Safety Metrics

Occupational Health and Safety

We are committed to providing a healthy and safe working environment for employees, contractors, and visitors, as well as to continuously developing our ISO 45001-certified occupational health and safety management system and complying with applicable legislation. Our goal is an accident-free workplace, supported by systematic risk identification, preventive measures, and continuous improvement.

Occupational health and safety risks, including preparedness and emergency risks, are identified as part of comprehensive risk management. When risks cannot be fully eliminated, their impacts are mitigated through appropriate protective and emergency equipment. A strong preventive safety culture is built on clear roles and responsibilities, adherence to instructions, and active reporting of accidents, hazards, and near misses, all of which are addressed through corrective and preventive actions. Induction and guidance ensure safety for both employees and external parties.

Employee wellbeing is a key priority. We work closely with occupational health care to manage workloads, support ergonomic working methods, and promote physical and mental wellbeing. Maintaining a healthy work-life balance is essential, and in Finland, we complement occupational health care with health insurance and mental wellbeing support services. Wellbeing coaching has been available to all Group personnel during the reporting period.

	2024	2025
Share of employees covered by the occupational health and safety management system (%)	100	100
Preventive safety work * (h)	1051	1471
Safety observations and safety initiatives (pcs)	55	99
Number of near misses	10	11
Number of work-related diseases	1	2
Number of work-related accidents (zero-time)	2	3
Number of commuting accidents (zero-time)	3	1
Number of lost-time accidents	0	0
Lost working hours	0	0
Lost Time Incident Frequency Rate (LTIFR) **	0	0
Sick leave rate Finland / Poland (%)	1.8 / 6.2	1.2 / 5.5
Sick leave days Finland / Poland	351 / 375	258 / 379
Fatal occupational diseases	0	0
Fatal occupational accidents, amount	0	0

* Preventive safety work: Includes OHS committee meetings, Safety briefings, Emergency training, Safety walks, and management of safety observations

** Number of lost time injuries in the reporting period x 200 000 / Total hours worked in the reporting period

Processes to Remediate Impact

We are committed to open communication between employees and employer representatives. We provide opportunities for employees to give feedback and suggestions on workplace development initiatives to enhance employee engagement. The Employees elect their own representatives for the local collaboration committees in accordance with collective bargaining agreements and/or legislation, with each term lasting typically two (in Finland) or four (in Poland) years.

In every situation, we strive to act responsibly, in compliance with the law, and in accordance with our company's ethical values. If any shortcomings or concerns arise in our operations, we want to be informed. Employees are encouraged to provide feedback or concerns through established channels. We actively ensure that no one is subjected to retaliation or discrimination for participating in social dialogue activities or raising concerns.

Finland	Poland
<p>The Dialogue Committee (Co-operation Committee) and the Health and Safety Committees meet regularly (min. 4 times a year) to review essential company matters and discuss the future outlook.</p> <p>The primary role of the Dialogue Committee is to foster workplace development, using tools such as the Workplace Development Plan and the Equality and Non-Discrimination Plan. An annual contract is made between the employer and the employees' representatives regarding the activities of the Dialogue Committee and the matters to be addressed in the regular meetings.</p> <p>The Health and Safety Committee meetings address issues related to occupational health and safety, including trends in accidents and hazardous situations, as well as related tasks. A primary responsibility of the committee is to monitor the implementation and development of safety within the company and to support and facilitate the execution of development projects.</p>	<p>The Employer's decision-making requires that they first consult their employees on the matter, i.e.</p> <ul style="list-style-type: none"> • Concluding agreements suspending the application of labour law provisions • Granting consent to the monitoring of sanitary facilities • Concluding agreements on the application of less favourable employment conditions for employees • Concluding agreements on the introduction of an interrupted working time • specifying a list of hazardous jobs for employees working at night <p>The rights and obligations of the employer and employee are specified in the Work Regulations.</p>

Channels to Raise Concerns

We provide confidential reporting channels for our employees and external stakeholders for reporting compliance concerns or legal issues. All reports are handled with strict confidentiality and investigated thoroughly. We are committed to ensuring that whistleblowers are fully protected against retaliation in accordance with applicable legislation. When violations or concerns are identified through our reporting channels or due diligence processes, we commit to:

- Promptly investigating the matter
- Taking immediate action to stop ongoing violations
- Implementing preventive and corrective measures and actions to prevent recurrence
- Providing or cooperating in remediation for affected parties
- Reviewing and updating our processes to address systemic issues



SpeakUp

SpeakUp is our internal reporting channel available on the intranet. It provides employees with the opportunity to raise employment-related concerns confidentially and, where desired, anonymously. The channel is maintained by the HR team, which handles all reports confidentially and as promptly as possible.

The SpeakUp channel was introduced in 2025.



Whistleblowing Channel

Our Whistleblowing channel is available on our website and is accessible to employees as well as external stakeholders. It enables the reporting of suspected misconduct or violations of applicable legislation, the UN Guiding Principles on Business, Labor and Human Rights, our Code of Conduct, or other policies and values. Reports may be submitted confidentially and anonymously.

The Whistleblowing channel was introduced in 2023.



Direct Contact

In addition to formal reporting channels, employees may raise concerns directly with their line manager or the HR team. This option supports open dialogue and enables early identification and resolution of issues through regular management and HR processes.

Targets

Topic	Detailed Description	Indicator	Actual 2024	Actual 2025	Target
Training and skills development	All employees have access to the necessary skills, knowledge, and resources to perform their roles effectively, align with the organization's strategy and targets, and promote personal and professional development.	Average hours of training per employee / year	46 h	19 h	≥ 20 h / year / employee
		Employee attendance in annual development discussions	91 %	78 %	≥ 95 %
Health and safety	Accident prevention	Lost time incident frequency rate (LTIFR)	0	0	0
Employee retention *	Our continuous annual target is to keep the retention rate high	Retention rate	98 %	97 %	≥ 90 %
Leadership gender diversity	Top management includes mid and top management and excludes members of the board of directors.	% of female at top management level	27 %	26 %	30 % of female at the top management level
Female representation	Number of female employees in whole workforce	% of female in whole workforce	23 %	23 %	No actual target, informative only
	Number of female employees in the office workforce	% of female in office workforce	49 %	44 %	50 % of female employees in the office workforce
Labor and human rights	Zero reported grievances related to labor and human rights.	Number of observations in the reporting channels	0	0	Zero reported grievances related to labor and human rights.
	Collective bargaining agreements coverage where applicable	Collective bargaining agreements coverage	100 %	100 %	100 % of the workforce is covered by collective bargaining agreements in countries where collective bargaining agreements are applicable.
	Workforce representative coverage where applicable	Workforce representative coverage	100 %	100 %	100 % of the workforce is covered by employee representatives in countries with at least 20 employees.
Fair compensation, equal pay	The gender pay gap, which refers to the difference in average salaries between female and male employees expressed as a percentage of the average salaries of male employees. **	Annual Equal Pay Analysis	-1 %	-1 %	Zero pay gap in female's salaries
Fair compensation, adequate wages	Living wages	Annual Analysis	100 %	100 %	100 % of the salaries exceed local minimum and living wage

* Employee retention % includes over 4 months employments

** Gender pay gap (%) = (Average male salary – Average female salary) / Average male salary × 100 (Positive value indicates higher average salaries for men and negative value indicates higher average salaries for women)

Characteristics of the Employees

Number of Own Employees (Headcount) by Gender

Country	2024			2025		
	Male	Female	Total	Male	Female	Total
Finland	58	22	80	60	24	84
Poland	24	3	27	27	2	26
Others	4	1	5	8	1	9
Total	92	26	112	92	28	119

Country	2025			
	Management	White Collars	Blue Collars	Total
Finland	9	38	37	84
Poland	-	6	20	26
Others	-	9	-	9
Total	9	53	57	119

Social Protection

In all countries of operation, social protection is provided in accordance with statutory legislation.

Work-life Balance

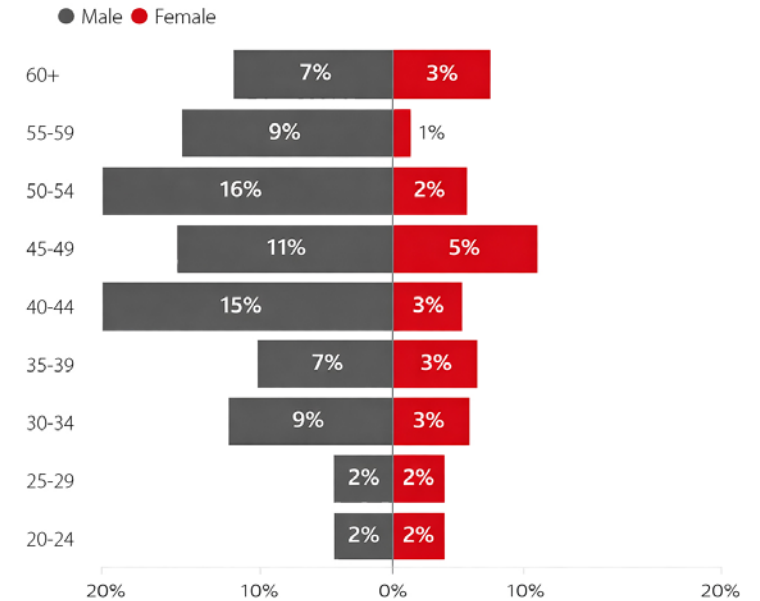
All employees are entitled to parental leave.

Workforce Composition and Demographics

Most of our employees are in permanent employment. Agency workers are used to support short-term operational needs. In addition to balancing factory capacity, temporary agency workers are also used to streamline the recruitment process for production and warehouse tasks.

2025	Permanent Employees	Temporary Employees	Agency Temporary Employees
Finland	81	2	2
Poland	25	1	-
Others	9	-	-

The average age of the personnel is 46 years. The age distribution is described below.



Gender Distribution in Management and Top Management

We are committed to promoting gender equality and advancing diversity, equity, and inclusion across Stalalube. We monitor gender diversity at both the leadership and workforce levels and have set long-term targets to support balanced representation.

We have set a target for women to represent 30 % of top management. Top management includes mid- and top-level positions and excludes members of the Board of Directors.

	Headcount 2024	Share 2024	Headcount 2025	Share 2025
Male	22	73 %	25	74 %
Female	8	27 %	9	26 %
Total	30	100 %	34	100 %

Gender Distribution in Total and Office Workforce

Women represent a minority of our total workforce and are primarily employed in office-based roles. Currently, we have no women in blue-collar positions, as typically no female candidates apply for open production roles.

We have set a target for women to represent 50 % of the office workforce, and the current level suggests we are close to achieving it.

GOVERNANCE

Business Conduct

Material Impacts, Risks, and Opportunities

Stalatube's strategy and business model are based on sustainable and ethical practices that support long-term performance and stakeholder trust. We prioritise a strong corporate culture and ethical operating principles that promote employee engagement and transparency. ESG performance is an integral part of our strategy, as it significantly impacts access to financing and future growth opportunities.

We have implemented effective reporting and complaint channels that enable early detection of misconduct and increase transparency. We adhere to strict compliance and integrity principles that reduce the risk of corruption, misconduct, and reputational damage. In addition, we ensure sustainable procurement and supplier responsibility through systematic assessments, which support supply chain risk management and responsible growth.



G1 Business Conduct			
Topic	Material Impact, Risk or Opportunity	IRO	Actions
Corporate culture and sustainable business practices	Customer satisfaction Sustainable marketing and transparent, truthful communication help our customers make choices aligned with our strategy, strengthen trust, and increase customer satisfaction and loyalty.	Opportunity	We conduct regular customer surveys, processing and further developing customer feedback.
	Employee satisfaction A good employee experience reflects the success of corporate culture; employee well-being and engagement affect productivity and reputation. Poor corporate culture may lead to low employee satisfaction, negatively impacting business.	Risk, opportunity	We carry out semi-annual employee surveys and development discussions, supporting continuous improvement of corporate culture.
	Access to financing ESG performance and commitment to sustainability influence access to financing and its cost; weak responsibility may increase costs. In the short term, lack of financing has limited impact, but growth and development require funding.	Risk, opportunity	We prepare sustainability reporting and ESG assessments, alongside the development of investor communication.
	Protection of whistleblowers A legally required whistleblower channel increases trust and transparency. The channel enables early detection and correction of misconduct.	Impact, opportunity	We maintain a reliable reporting channel through an external provider, supported by employee training and transparent processes.
	International commitments and strengthening the company's sustainability profile Commitment to sustainability enhances competitive advantage and company profile.	Opportunity	We integrate the UN Global Compact (UNGC) principles into business, with annual EcoVadis assessment and continuous improvement actions.
	Ethical business principles Clear guidelines reduce misconduct and support sustainability.	Impact, opportunity	We provide regular training and update guidelines ensuring compliance and best practices.
Relationships with suppliers	Relationships with suppliers, raw material suppliers and freight forwarders are key partners in promoting sustainability. Risk in unethical practices, e.g., poor working conditions in the supply chain. Sustainable, international procurement and supplier sustainability assessment. Impact in on local entrepreneurs, we support their business by purchasing services.	Impact, risk	We conduct supplier ESG assessments, updating contract terms and including sustainability assessments as part of audits.

Business Conduct Policies and Corporate Culture

Stalatube has a long history and a strong corporate culture with people at its core. We provide all employees with equal opportunities for professional development and for contributing to the company's direction and culture. While we operate internationally, Stalatube remains deeply rooted locally, and its Finnish heritage is an integral part of our identity and corporate culture.

Stalatube's values underpin and guide our corporate culture. These values are defined by the owners and management team, approved by the Board of Directors, and embraced across the organisation. We introduce our values and corporate culture to all new employees during onboarding. Maintaining a strong corporate culture is a key priority for Stalatube, particularly in supporting employee satisfaction and ensuring the long-term availability of a skilled workforce. We strive to foster a people-centred culture in which everyone has a genuine opportunity to contribute and influence.

The Management Team regularly addresses corporate culture in its meetings, assessing its implementation and identifying actions required to sustain and strengthen it. Stalatube's values and corporate culture closely align with the company's strategy, which emphasises building a strong employer brand. Responsibility for the company's culture and values is shared jointly by The Management Team and the CEO.

We assess our corporate culture and job satisfaction through an employee satisfaction survey conducted twice a year. The Board of Directors also reviews the results. Our target average for job satisfaction is at least 4 out of 5. Job satisfaction is one of our key performance indicators, monitored by management, and the results are communicated to personnel monthly. In 2025, our job satisfaction score was 4.09, based on the average of responses from surveys conducted that year. The survey is distributed to all Stalatube employees twice annually.

Through our annual employee survey, we assess employee satisfaction across key areas, including leadership, working atmosphere, opportunities to influence, fair and equal treatment, recognition, opportunities for skills and career development, and support for competence development and career paths. The survey results are reviewed by HR and individual teams, and improvement actions to enhance job satisfaction are proposed. The Management Team decides on the actions to be implemented.

We continuously develop our employee experience and employer brand. Together with our employees, we have defined the cornerstones of our culture in line with our values and identified areas for further development. We collaborate to plan concrete measures to strengthen our everyday culture, and our external employer branding reflects the outcomes of this internal work.

Sustainable marketing is an integral part of Stalatube's customer relationship management and strategy. Its objective is to provide customers with transparent and reliable information that supports informed decision-making and promotes sustainable growth and economic development. Sustainable marketing strengthens trust, supports customers in making responsible choices, differentiates Stalatube from competitors, and enhances customer loyalty. This, in turn, improves customer satisfaction and reinforces long-term customer relationships.

We regularly monitor customer experience through surveys, and the results, together with the Net Promoter Score (NPS), guide the development of our products, services, and communications. This ensures that our marketing activities support both business objectives and sustainability principles.

G1-1

Stalatube has established a Code of Conduct that applies to all employees. The Code of Conduct is reviewed as part of the onboarding process, and regular training sessions are provided for all personnel. The most recent training sessions were held in September 2025, and additional training is provided whenever the guidelines are updated.

The Code of Conduct covers, among others, the following areas:

- anti-corruption and anti-bribery,
- prevention of money laundering,
- human rights,
- health and safety,
- equal treatment and pay,
- prevention of bullying and harassment, and
- reporting channels for suspected misconduct.

Procurement and sales have been identified as the internal functions most exposed to corruption and bribery risks. Employee awareness and understanding of corruption and bribery prevention have been strengthened, and an Anti-Corruption and Anti-Bribery Policy and related guidelines have been established. In September 2025, general training was provided to all employees, along with targeted training for the sales function. During the training, mechanisms for identifying corruption and bribery risks were reviewed and are outlined in the Anti-Corruption and Anti-Bribery Policy.

In 2025, no cases of corruption or bribery, or violations of laws on combating corruption or bribery were identified, and no convictions or fines were imposed.

Topic	2024	2025
Number of corruption or bribery cases	0	0
Number of convictions for violations of laws on combating corruption and bribery	0	0
Amount of fines imposed for violations of laws on combating corruption and bribery (EUR)	0	0

Whistleblowing

We operate a confidential Whistleblowing Channel managed by an independent external service provider to ensure impartiality and data security. The channel allows employees and other stakeholders to report suspected or observed misconduct or activities that may violate European Union or national legislation, the Whistleblower Protection Act, our Code of Conduct, or the Group's values and policies.

Reports should be submitted without delay if there is a suspicion of unlawful conduct, misconduct, or actions contrary to the public interest. Reports can be made anonymously, and all submissions are handled with strict confidentiality and investigated thoroughly. We are committed to protecting whistleblowers against any form of retaliation in accordance with applicable legislation.

Standards and Sustainability Guidelines

We supply all our products in compliance with applicable requirements and standards, and we continuously improve product quality in close cooperation with our customers. Our quality management system is certified to the international ISO 9001 standard. We are also certified according to the environmental standard ISO 14001 and the occupational health and safety standard ISO 45001. In addition, we hold ISO 3834-2 certification for welding quality management and EN 1090-1 certification.

As part of our commitment to sustainable and responsible business practices, Stalatube has integrated the Ten Principles of the United Nations Global Compact into its strategies and operations. We are committed to respecting human and labour rights, protecting the environment, preventing corruption, and contributing to broader societal goals.

Demonstrating our commitment to society, our people, and the environment, we conduct a comprehensive annual assessment of our sustainability practices through EcoVadis. The EcoVadis assessment covers 21 sustainability criteria across four core themes: Environment, Labour and Human Rights, Ethics, and Sustainable Procurement. In our first assessment, completed in December 2024, we were awarded an EcoVadis Silver Medal. The assessment will be renewed in the beginning of 2026.

We are committed to reducing greenhouse gas emissions through the Science Based Targets initiative.

Reporting and Ratings

Stalatube follows recognised standards and guidelines to continuously improve our sustainability performance and provide transparent insight into our progress.



SCIENCE
BASED
TARGETS

DRIVING AMBITIOUS CORPORATE CLIMATE ACTION

Science-Based Targets

By committing to the Science Based Targets initiative, we ensure that our climate targets are science-based and consistent with a 1.5°C pathway.

WE SUPPORT



We support the UN Global Compact

By supporting the UN Global Compact, we align our operations and values with its ten principles related to human rights, labour standards, environmental protection, and anti-corruption.



EcoVadis

EcoVadis enables transparent assessment of our sustainability performance and continuous improvement across environmental, social, ethical, and sustainable procurement practices, offering valuable insight for both our customers and us.

Stalatube currently holds an **EcoVadis Silver Medal**.



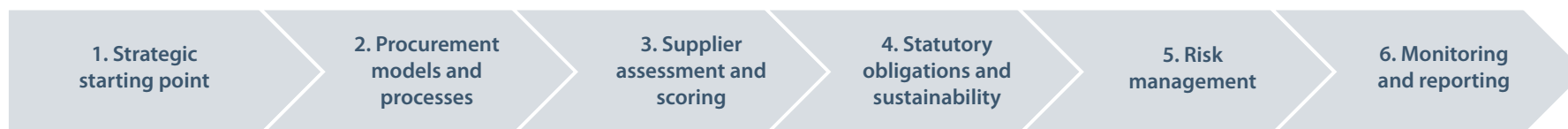
Spotlight: EcoVadis Sustainability Rating

EcoVadis is one of the world's leading providers of sustainability ratings, assessing companies' environmental, social, and ethical performance across global value chains. Its methodology is based on internationally recognised standards and evaluates companies across four key areas: Environment, Labour and Human Rights, Ethics, and Sustainable Procurement.

EcoVadis assessments provide transparent and comparable insights into sustainability performance, supporting continuous improvement and responsible business practices. The evaluation is based on documented policies, actions, and measurable results, enabling both companies and their stakeholders to track progress over time.

Stalatube has been awarded an EcoVadis Silver Medal, reflecting our commitment to responsible business practices and continuous improvement across environmental, social, and governance topics. The EcoVadis assessment supports our sustainability development by identifying strengths, areas for improvement, and opportunities to enhance our performance further.

Relationships with Suppliers



Strategic Starting Point

Our procurement and supplier management are aligned with our strategy, which emphasises competitive global sourcing to support the achievement of our sustainability objectives. In line with these principles, a Sustainable Procurement Policy has been established and is reviewed annually; the latest update was completed in 12/2025. The policy defines procurement principles, sustainability criteria, procurement-related risks, and supplier management. The most significant risks are identified and assessed annually as part of procurement target setting.

Overall, our supplier management model includes policies, risk management, audits, and regular assessments to ensure compliance with legal requirements and to achieve and promote our environmental and social requirements.

Procurement Models and Processes

Supplier management is documented in the process covering supplier data management and the entire procure-to-pay process. In addition, we operate an annual cycle that includes:

- general operating principles applicable to all suppliers,
- supplier-specific annual calendars, and
- quarterly recording and monitoring of supplier delivery reliability targets, lead times, disruptions, and delivery performance.

The annual cycle is updated each year and includes procurement objectives and concrete actions to achieve them.

Supplier Assessment, Scoring, Statutory Obligations, and Sustainability

Supplier performance is assessed annually based on documented criteria. The assessment includes scoring related to quality, ESG, and service capability. The results are used in supplier evaluation, approval, and the continuous development of supplier management. Supplier management practices are described in a separate document.

All steel suppliers undergo sustainability profiling every two years based on an ESG assessment. The assessment questionnaire, which forms one of the key inputs, is sent to all new suppliers and to existing suppliers every two years. The assessment is conducted through a questionnaire and a desktop audit.

The assessment covers the following areas:

- ISO 9001, 14001 & 45001; certification or compliance with standards
- Suppliers must follow fair labor practices, respect human rights, and uphold ethical business standards aligned with the UN Guiding Principles and the Universal Declaration of Human Rights
- Ethical working conditions, social sustainability (we prohibit any form of forced labour, child labour, or human rights violations)
- Environmental targets (reduction of emissions, percentage of recycled steel, sustainability program)

Otherwise, the compliance of raw material suppliers is ensured through an annual statutory compliance questionnaire (RoHS, REACH, CMRT, EMRT, sanctions, radiation safety) and annual audits conducted in accordance with the audit programme. The audit scope is based on the requirements of ISO 9001, ISO 14001, and ISO 45001 standards.

No new or existing supplier is approved without the required statutory documentation. In addition, suppliers must meet the requirements of the ESG questionnaire. At present, we do not have a supplier-specific Code of Conduct; however, our objective over the coming years is for all suppliers to sign or otherwise align with Stalalube's Code of Conduct.

Monitoring and Reporting

Results are monitored through Power BI, monthly reviews, and management reviews. Key metrics monitored include, for example:

- emissions of purchased steel raw materials,
- share of recycled steel, and
- delivery reliability.

The final list of approved suppliers is confirmed during the management review.

G1-2

Development of Sustainability

The company places strong emphasis on supplier management and on ensuring a high share of recycled content in purchased raw materials. Our target is a minimum of 75 % recycled steel, with the most recent achievement exceeding 90 %. In addition, we monitor raw-material emission factors and calculate Scope 3 supply-chain emissions annually.

A key objective of supplier management is the regular ESG assessment and scoring of suppliers. Furthermore, an essential goal for the coming years is that all suppliers sign or otherwise align with Stalalube's Code of Conduct.

In 2025, training was provided for the procurement team, with a focus on collaboration with suppliers to enhance their sustainability performance.

Supplier Management Policies

Policy / Document	Detailed Description	Highest Responsible Body
Strategy	Strategy combines vision and mission with concrete goals, such as ensuring sustainable procurement and promoting the lowest carbon footprint in the market.	Board
Sustainable Procurement Policy	Defines general sourcing operating principles.	The board approves, and the purchase director is responsible for implementation.
Supplier year clock	Describe the objectives of supplier collaboration.	Sourcing
Sourcing processes	Supplier evaluation criteria and process	Sourcing

SUSTAINABILITY REVIEW APPENDIX

Waste Generated in Operations, Covers 100 % of Production

	Amount 2024	Amount 2025	Unit
Mixed waste	25	46	t
Waste	13	15	t
Energy waste	13	14	t
Biowaste	3	1	t
Cardboard / paperboard	3	4	t
Carton / paper	1	1	t
Dangerous waste	79	85	t
Chemical waste acid	9	18	t
Paper	1	1	t
Waste water	2 154	2 052	m ³

Incidents of Discrimination and Other Human Rights Incidents

	2024	2025
Number of complaints submitted through the whistleblowing channel	0	0
Number of complaints submitted through channels intended for employees to raise concerns	0	0
Number of discrimination cases	0	0
Number of human rights issues and incidents related to the company's own workforce	0	0
Number of human rights issues and incidents related to the supply chain	0	0
Total amount of sanctions and compensation related to human rights violations	0	0

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10/2/2026