Sustainability Report 2025

Producer Responsibility

Every goal we have achieved leaves its mark; together they make up our value

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LETTER TO STAKEHOLDERS

Five years is more than just a milestone. It is the amount of time needed to test an idea and demonstrate its ability to create shared value by addressing the complexities of reality. Erion reached this milestone in 2025, having become one of the **key players in the transition towards a more sustainable and circular development model for our country** in just a few years.

This edition of the Sustainability Report features a graphic design that directly reflects this identity, visually conveying the principle that the **value of each Collective Scheme strengthens the Erion System, which in turn generates value for each of its components**. This is a dynamic balance, with each element contributing to a broader, more coherent structure. Every goal we achieve leaves its mark, and it is the sum of all these marks that determines our value.

Over the years, growth has not just been about volume or results. Above all, it has been about building a foundation of relationships, skills, and responsibilities. It is a network that has successfully connected businesses, institutions, operators, citizens and educational communities. It is within this network of trust and collaboration that the Erion System has evolved into a catalyst for change.

This evolution is clearly illustrated by the fact that **the Erion System collected a total of 289,292 tonnes of waste in 2025 – an 8% increase on the previous year**. Specifically, our Collective Schemes managed 247,124 tonnes of **Household WEEE**, 4,040 tonnes of **Professional WEEE**, 5,345 tonnes of **Waste Batteries** and 32,783 tonnes of **Packaging Waste**. Of the total packaging waste collected, 30,810 tonnes were recycled, marking a 58% increase compared to 2024.

Overall, the recycling of **Household WEEE, Waste Batteries and Packaging Waste has enabled 89% of the materials derived from the treated waste to be returned to the production cycle**. This equates to the weight of 561 high-speed trains. Furthermore, **980,000 tCO_2e** were avoided during the year, which is equivalent to the emissions produced by a car circling the equator around 136,000 times. **349 million kWh of energy** were saved, equivalent to the annual consumption of around 129,000 Italian households. Additionally, **1.7 million cubic metres of water** were saved – enough to supply around 11,000 households.

This impact is even more significant in an ever-changing regulatory environment characterized by the introduction of Extended Producer Responsibility regimes for Textile products under **Directive (EU) 2025/1892** and tighter **European regulations on Batteries** and **Packaging**. Against this backdrop, Erion has continued to play an active role in institutional dialogue, making concrete contributions to debates on key issues relating to WEEE, Batteries, Packaging, Cigarette butts and Textiles. The prerequisite remains unchanged: an effective ecological transition requires rules, innovation and collective engagement.

As part of this process, the System's Collective Schemes have acted as complementary pillars of the same mission.

Erion WEEE has strengthened its cultural and social presence in the field of Waste Electrical and Electronic Equipment by facilitating and integrating the collection process into daily life through various initiatives. These include '**WEEEGoal**', '**Small WEEE, Big Coop**', '**We're sick and tired of WEEE**', '**WEEE4Comics**', '**Materia Viva Experience**', '**Make your move' and the 'If you don't give a damn, you're screwed**' campaign. The Collective Scheme has also collaborated with prominent figures from the associative and journalistic sectors. The programme was further enhanced by the 'Art for a sustainable future' event, which was held at the Chiostri di San Barnaba in Milan to celebrate Michelangelo Pistoletto's installation, '**I temp(l)i cambiano'**.

Erion Professional has optimized the management of Professional WEEE by engaging in structured dialogue with businesses and stakeholders, and by providing training and consultancy services throughout the entire process and across the entire value chain. In 2025, the Collective Scheme played a leading role at 'Ecomondo', the international trade fair, holding meetings and in-depth sessions, including '**Managing Professional WEEE: the challenge and value of the waste chain**'. The Exceed service advertising campaign was also featured in numerous industry magazines.

Erion Energy has continued to consolidate its position in the Battery sector against a backdrop of rising volumes and increasingly complex flows, particularly for lithium Batteries, and **strengthened its control over the operational waste chain** by internalizing its management and reviewing suppliers according to more stringent technical and environmental criteria.. The Collective Scheme has also introduced more precise volume planning systems and contributed to working groups on the European Battery Regulation at the CDCNPA (National Coordination Centre for Batteries and Accumulators).

Erion Packaging has strengthened its dialogue with institutions and stakeholders across the waste chain. This has enabled the Collective Scheme to expand its membership base and support businesses

within the evolving European regulatory framework for packaging. **In 2025, it organized training and information initiatives, helped improve the waste chain** and facilitated discussions at Ecomondo and within the manufacturing sector.

Erion Care has maintained a strong focus on reducing cigarette butt litter through national campaigns, local initiatives, and social media campaigns featuring popular content creators. In 2025, it continued its collaboration with **Legambiente** by organising the **Care Action Days**. It also took part in the '*Puliamo il Mondo*'' project.

Erion Textiles continued its journey through a pre-operational phase, focusing on analysis, research, and institutional dialogue. The Collective Scheme contributed to the development of the future EPR system by taking part **in studies on consumption and disposal behaviours, product-specific analyses, opinion polls** and regional pilot schemes.

In addition to the industrial and environmental aspects, 2025 also saw confirmation of the **organization's internal growth**. The 66 people currently comprising the Erion System – 46 of whom are women – represent the project's operational and cultural core, having collectively received **1,194 hours of training**. This is the true value of Erion's work, which, as will become clear from the following pages, is measured not only by the results achieved or projects completed, but also by its ability to build a professional and civic community over the years that shares a common vision. This is a community that has supported this evolution, helping to **turn an ambitious project into a reality with the capacity to have a tangible impact on the country's economy**.

Five years on, the direction remains the same: **to achieve sustainable development, we need to manage our resources responsibly**, turn waste into new opportunities and adopt an economic model that successfully combines circularity, innovation, environmental protection and collective responsibility.

We will continue along this path, building on our existing achievements and focusing on what we can still make possible.

PRESIDENTS

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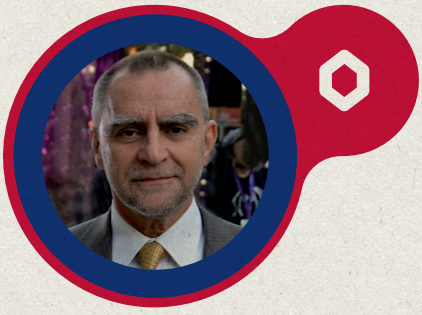

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INTRODUCTION: Erion System

1.1 ERION: EXTENDED PRODUCER RESPONSIBILITY

Erion is a leading non-profit, multi-Collective Scheme that helps Producers fulfil their Extended Producer Responsibility (EPR) obligations. It ensures the efficient, transparent and professional management of products at the end of their life cycle. The System promotes the circular economy through its six sector-specific Collective Schemes dedicated to Waste Electrical and Electronic Equipment (WEEE) in households and businesses, Waste Batteries (WB), packaging, tobacco products and textile waste. Coordinated by Erion Compliance Organization (ECO), the System facilitates the collection, treatment, recovery and recycling of waste, as well as the return of Secondary Raw Materials to production cycles.

The Erion System is committed to building a **more sustainable future**, strengthening the EPR model by focusing on efficiency, quality, transparency and innovation every day.

The **System's mission** starts at the waste disposal stage, acknowledging the important role played by consumers, professional users (including installers, distributors, and businesses) in ensuring that waste is **properly managed at the end of a product's life**.

For this reason, Erion systematically invests in communication, information, and awareness-raising activities. These activities aim to educate people, encourage responsible behaviour, and improve the quality of waste collected.

At the same time, the Erion System pays particular attention to the **quality of treatment processes and material recovery**. It promotes recovery and recycling through its Collective Schemes operating in the WEEE, WB and Packaging waste sectors. This makes a tangible contribution to developing the circular economy and reducing the environmental and social impacts associated with extracting new natural resources. This result is made possible by transforming waste into Secondary Raw Materials, which are then reintroduced into production cycles. In this context, waste is considered a valuable resource and a catalyst for change. Consequently, the System's strategy focuses on **continuously improving overall performance** by working across the entire value chain. This involves **engaging with suppliers** to optimize processes, **promoting sustainable transport and treatment solutions**, and **supporting research**, innovation, and experimental initiatives that anticipate regulatory and market developments. In line with this, Erion integrates its day-to-day operations with a steadfast commitment to supporting Producers, fostering strong relationships with stakeholders, and contributing to the public debate on EPR systems. This approach turns Erion's values into concrete actions, strengthening its position as a key player in driving a credible, effective and lasting ecological transition.

What is an EPR system?

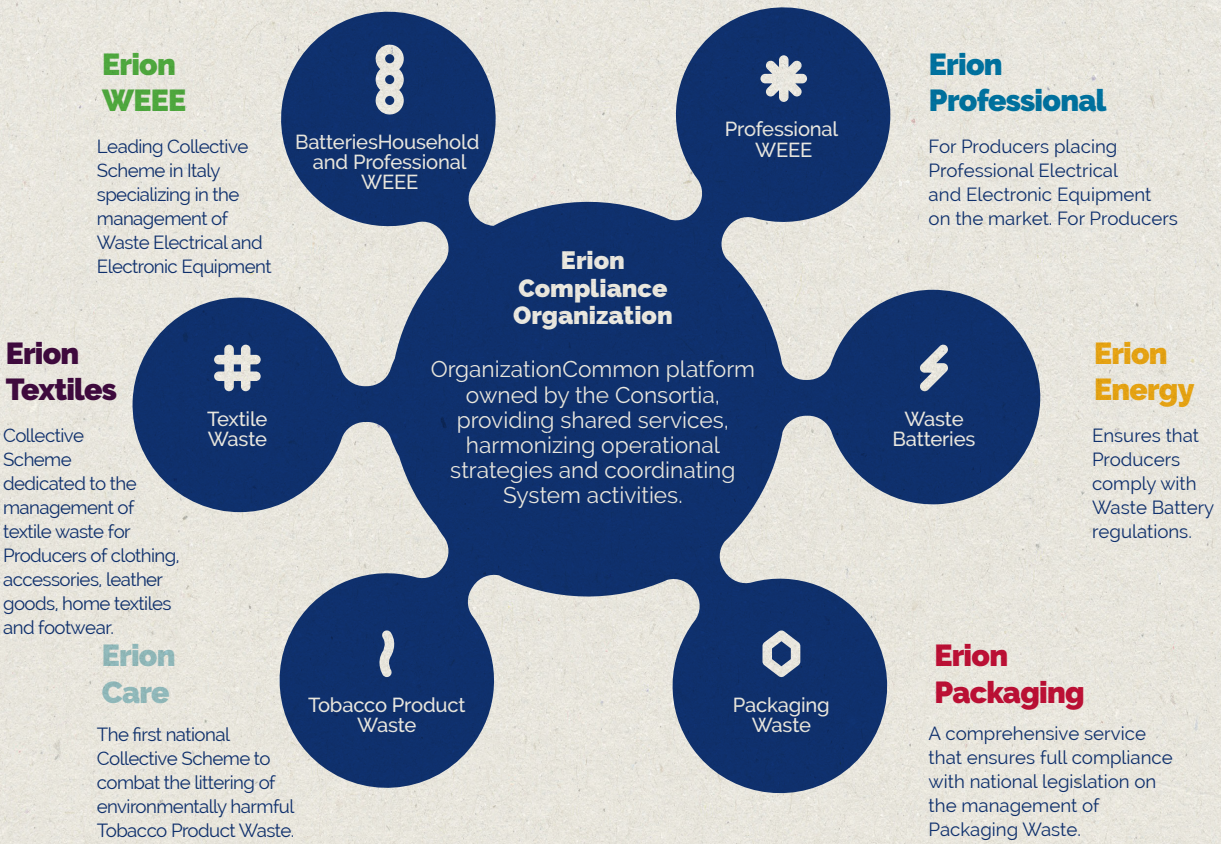
According to the **Extended Producer Responsibility** (EPR) principle, those who place products on the market are also responsible for ensuring that these products are properly managed once they become waste. In an EPR system, Producers organize and finance the collection, treatment and recycling of waste either individually or collectively, in accordance with environmental legislation.

By acting across the entire end-of-life chain, from providing disposal information to recovering materials, EPR promotes the transformation of waste into secondary raw materials. This reduces environmental impact and resource consumption.

1.2 THE COLLECTIVE SCHEMES AND ECO IN 2025

The Erion System represents Producers and operates on a not-for-profit basis. Its aim is to help achieve the objectives set out in European and national environmental legislation by strengthening the EPR model through greater efficiency, improved quality, increased transparency and greater innovation.

The System comprises **six sector-specific Collective Schemes** and **ECO**, a service company owned by the Collective Schemes. It oversees EPR sectors that differ in terms of their characteristics and operational models:



1.2.1 GOVERNANCE

The System's governance structure is designed to ensure consistency of approach, sound decision-making, and oversight of processes throughout the entire value chain. This translates the System's values into operational decisions and ongoing support for Producers. In each Collective Scheme and in ECO:

- the General Assembly approves the financial statements and appoints the Board of Directors, overseeing its work;
- the Board of Directors is responsible for defining strategic guidelines and making key management decisions;
- the President legally represents the organization and coordinates the work of the Board of Directors;
- the Board of Statutory Auditors oversees compliance with the law, the Bylaws and the principles of sound administration, with particular attention paid to ensuring that the organizational, administrative, and accounting structures are adequate.

Both the Collective Schemes and ECO are led by a General Manager, who is appointed by the Board of Directors based on proven managerial experience and expertise. The General Manager is responsible for the day-to-day management of the organization and for implementing operational plans in accordance with the powers delegated by the BoD. Following a gradual restructuring process, the General Manager of Erion Textiles was appointed in December 2025, marking the consolidation of the Collective Schemes and the launch of its operational phase. ECO relies on the Development and Institutional Relations Department for advocacy and lobbying, as well as for developing institutional relations.

The number of members of each Board of Directors as at 31/12/2025 is provided below:

Finally, the institutional bodies include the Governance Board, which acts as a liaison between the Collective Schemes but has no decision-making powers. Chaired by the ECO President, the Board comprises the General Managers and Presidents of the individual Collective Schemes.

Within this structure, the Management Team at ECO contributes to the operational and strategic coordination of the Collective Schemes, promoting the integration of their activities and ensuring the quality and consistency of the processes and content reported in the Sustainability Report.

ETHICS AND RESPONSIBILITY

To ensure the ethical and responsible conduct of its activities, the Erion System has adopted a Code of Ethics and Conduct. This sets out the appropriate standards of behaviour based on the principles of legality, fairness and transparency, which must be observed by all individuals acting on behalf of the System.

Furthermore, ECO and the operational Collective Schemes have adopted an Organisational Model that complies with Legislative Decree 231/2001. In accordance with Legislative Decree 24/2023, the System incorporates a whistleblowing procedure with dedicated internal channels through which employees and third parties can report irregularities and violations.

1.3 THE ERION SYSTEM'S STAKEHOLDERS

The Erion System operates within a broad and complex network of stakeholders, including Producers, members, Italian and European institutions, National Clearing Houses, associations, universities, research centres, the media, distributors, local authorities, waste collection companies, suppliers, and citizens and consumers. Engaging in dialogue with these partners is crucial to supporting the evolution of the sector, maintaining high-quality standards, and identifying effective responses to emerging needs. Ongoing dialogue enables the System to oversee processes more effectively, recognise changes, and make more informed operational and strategic decisions.

This approach was further strengthened in 2025. The role of **institutional** and sectoral stakeholders remains central, particularly in areas where the regulatory framework directly affects the Collective Schemes' operations. In such a constantly evolving regulatory landscape, Erion must engage in dialogue with institutions, associations and other stakeholders to keep up to date with legislative developments, understand their implications and translate them swiftly into operational decisions.

However, the relationship with stakeholders has increasingly taken the form of concrete oversight of processes that can link the needs of Producers with those of the entire **operational chain**.

In 2025, Erion updated its **financing model** with the aim of improving the reliability of economic estimates and enhancing the quality of reporting, and introduced a **new Members' Portal**. This new structure enabled a transition away from a system based primarily on historical data and subsequent adjustments, which was no longer fully suited to a context characterized by significant market fluctuations. Despite an initially challenging phase, the new tools have helped improve the collection of placed-on-the-market data, align the invoicing process more closely with actual sales, and ensure a more reliable definition of budgets, charges and system costs.

1.3.1 RELATIONS WITH SUPPLIERS

Key stakeholders in the System include **operational service providers**, particularly those in the logistics and waste treatment sectors. The year 2025 was significant in terms of consolidating the selection processes developed to enhance the network's quality, transparency and resilience. A notable feature is the balance given to qualitative and economic factors, both of which are considered essential when evaluating operators. This approach demonstrates a commitment to economic competitiveness, as well as to the structure, reliability, and organizational capacity of the service management partners involved.

The qualitative assessment covered areas such as professional ethics, authorizations and certifications, operational capability and reliability, and control and compliance. This demonstrates an approach to supplier relationships that goes beyond purely contractual terms, considering operational partners as **entities that directly affect the System's overall quality**, service continuity, and ability to respond in critical situations. From this perspective, strengthening the network requires the establishment of robust and transparent selection criteria that better align with the needs of the sectors covered by Erion.

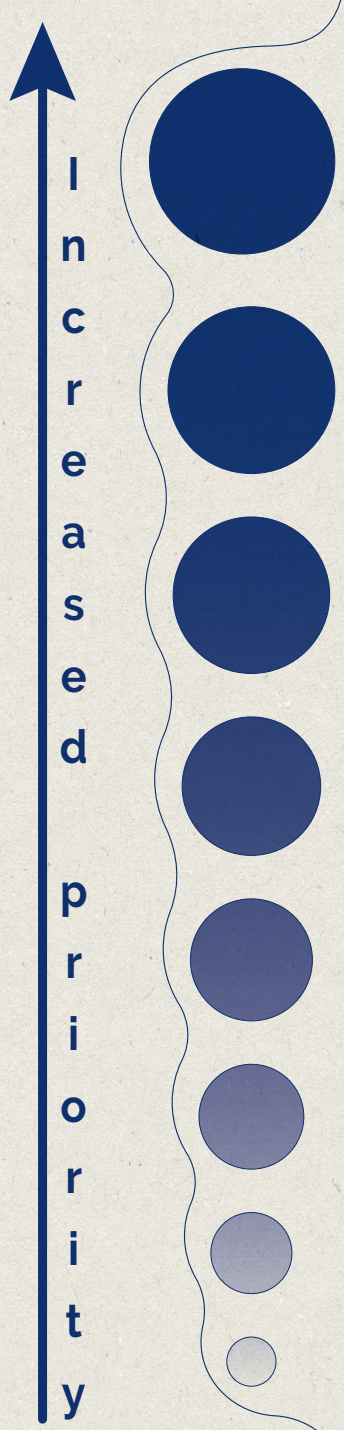
The relationship with suppliers is developed through the traditional processes of qualification, selection and monitoring described above, as well as through territorial agreements and arrangements that strengthen the System's operational presence throughout the waste chain. These tools, in particular, make it possible to expand the network of entities involved in collection and treatment, intercept new waste streams, and implement environmental services more widely across the regions. In this regard, agreements and protocols offer a practical way to collaborate with operators, improving the effectiveness of the organizational model and supporting Erion's goals of enhancing recycling and service quality. The year 2025 demonstrated the delicate balance between operational efficiency and network resilience. While reducing the number of suppliers can simplify operational oversight, it also highlights the importance of maintaining the robustness, continuity and adaptability of the waste chain over time. With this in mind, ongoing dialogue with operational stakeholders serves as a monitoring tool and a means of progressively improving selection and management models.

1.4 MATERIALITY ANALYSIS

Materiality analysis is the primary methodological framework set out in the GRI reporting standards and is an essential component of preparing a sustainability report. Materiality refers to the threshold beyond which an issue becomes relevant to an organization. This concept forms the basis for identifying issues to be included in the reporting scope and monitored through specific objectives, policies, and initiatives.

In 2025, Erion revisited its materiality analysis with the aim of clarifying, updating and aligning it with the evolution of the System. Developed in accordance with the 2021 GRI Standards, the process moved beyond a fragmented approach to topics, resulting in a **more organized and coherent representation of Erion's operations within EPR systems**. The focus is not only on identifying relevant topics, but above all on understanding the impact of the System's activities on the economy, the environment, and people, so as to set priorities for action and reporting in a more informed manner.

Erion's new list of priority material themes



Waste management, resources and circularity

This involves preventing, designing, implementing and monitoring management practices for specific waste categories. The aim is to achieve sustainability and optimize resources while fully complying with the principles of the circular economy.

Climate and energy

This refers to the strategies and actions adopted by Erion to monitor and reduce energy consumption and emissions that contribute to climate change. This includes emissions and energy consumption avoided through the recycling of secondary raw materials, which reduces the environmental impact of energy-intensive and mining activities.

Ethics, regulation and institutional dialogue

This refers to upholding high ethical and behavioural standards, including promoting transparency, preventing corruption, complying with regulations and constructively contributing to the development of public policies that make EPR systems clearer and more efficient.

Member satisfaction

This refers to the ability to meet Members' needs and expectations by providing quality services, transparent management, operational and strategic support, and opportunities for active participation. Member satisfaction directly impacts the reputation and sustainability of the Erion system, as well as the creation of shared value.

Employee development

This involves focusing on the needs of employees, respecting their individuality, and promoting their well-being and personal satisfaction. This includes providing safe and healthy working conditions, fair pay and opportunities for professional development, as well as fostering a sense of belonging within the workplace.

Responsible sourcing

This includes qualifying and managing suppliers to ensure they comply with environmental and social criteria. It also involves selecting suppliers responsibly and ensuring that they provide safe and fair working conditions.

Economic value preserved and distributed

This involves creating and distributing economic value through market opportunities. It contributes to the development of new services and the creation of jobs, as well as providing economic support for suppliers and employees.

Inclusive and collaborative innovation

This refers to the strategic partnerships, joint initiatives and knowledge-sharing that Erion establishes with its partners in order to develop valuable projects, accelerate innovation and encourage the adoption of waste management systems in developing countries. It also promotes the EPR model and practices associated with the circular economy.

In addition to assessing the impacts, the analysis included a phase aimed at identifying the expectations of external interested parties through the direct and indirect involvement of the organization's stakeholders.

The analysis revealed a high degree of alignment between the priorities expressed by stakeholders and those identified by Erion, emphasizing the importance stakeholders attributed to the issues examined.

The most obvious alignment concerns **waste management, resources and circularity** – an issue at the core of Erion's identity and activities from both perspectives. However, alongside this convergence, certain differences emerged that provided a more detailed view of the System's positioning.

Stakeholders value **ethics**, **regulation and dialogue** the most. This suggests that they view the System not only as a compliant and reliable entity, but also as an authoritative partner capable of leading dialogue with institutions and contributing constructively to the development of the regulatory framework.

Similarly, stakeholders place the utmost importance on **inclusive and collaborative innovation**. This is a particularly significant finding. Not only is Erion perceived as an entity that can efficiently manage waste, it is also seen as a platform that connects different stakeholders, fostering shared initiatives, dialogue, collaboration and the development of new solutions.

1.5 RESEARCH AND INNOVATION

Innovation is a core value within the Erion System, driving continuous process improvement and service evolution in support of EPR systems. This commitment takes shape through two complementary channels: (i) conducting studies and research initiatives promoted by ECO and the individual Collective Schemes within the System, aimed at analysing operational issues relevant to day-to-day activities, with the ultimate goal of enhancing the effectiveness of actions undertaken and supporting informed decision-making; and (ii) participating in research and innovation projects funded by the European Commission, which promote international cooperation and knowledge transfer, and keep us up to date with emerging technologies and solutions in the recycling sector.

Studies and Research

Numerous studies and research projects were carried out for the Erion system in 2025. While some were conducted to enhance the body of knowledge on strategic issues for the benefit of its Members, other initiatives had a public dimension, such as the following:

Assessment of the risk of fires caused by batteries in treatment facilities

In 2025, Erion Energy and Erion WEEE developed a structured programme **to prevent and analyse fire risks in facilities treating WEEE and Waste Batteries (WB)**, paying particular attention to the risks posed by lithium batteries. The initiative has been launched in response to the growing number of recorded fire incidents in the sector, and it is one of the operational procedures used to select and qualify waste treatment service providers.

The programme began in 2024 with the development of an assessment framework based on a dedicated checklist, in collaboration with the consultancy firm dss+. This framework is designed to systematically analyse the risk profile of facilities across three main areas: operational areas and risk control measures; management systems and safety culture; and historical performance relating to fire incidents. After a testing phase involving five pilot facilities, the tool was incorporated into information-gathering processes and subsequently used in document verification campaigns and site visits. The analyses conducted enabled a comparative assessment to be made across multiple sites.

This assessment used an evaluation grid to consider the main risk areas throughout the reception, storage and pre-treatment processes, as well as the key elements of governance, procedures, preparedness and training.

The most common issues were found to be concentrated in the operational storage and pre-treatment stages of WEEE.

There was also a strong relationship observed between the volume of material handled, the efficiency of the operational organization, and the maturity of the safety management system. The findings have established a shared knowledge base to inform discussions with suppliers, pinpoint areas for improvement and encourage the gradual implementation of technical, organizational and procedural measures to reduce residual risk. These measures will help to protect people, improve the resilience of facilities, and ensure the sustainability of the sector.

Sampling campaign for unsorted municipal waste

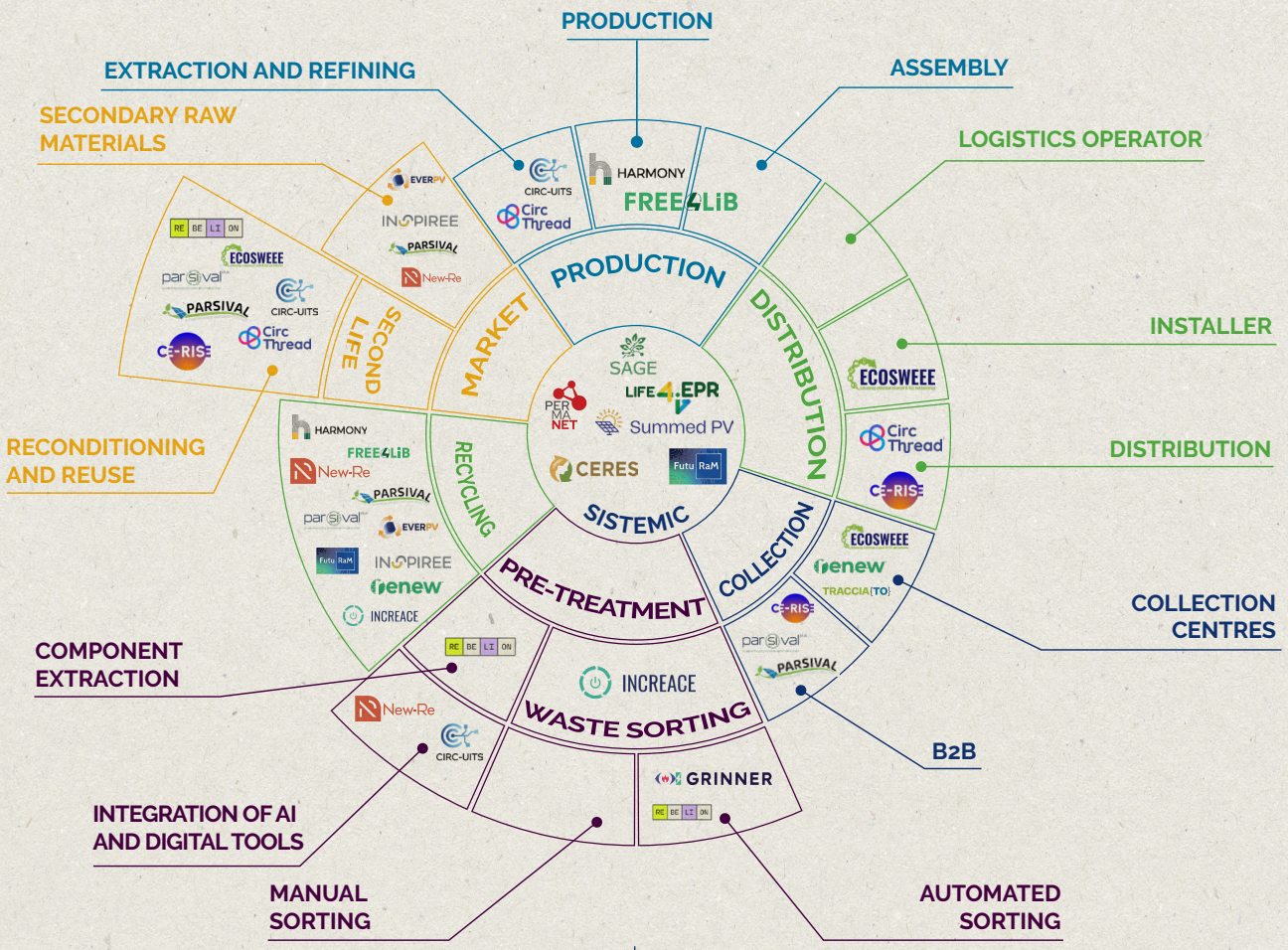
The study, 'Untapped potential in unsorted waste', was presented at E-Waste Day 2025. It provides a detailed overview of the valuable materials that are still present in residual municipal waste. The study highlights the potential for improving the effectiveness of separate waste collection and, consequently, the circularity of EPR systems. The survey was conducted by Erion, with operational support from the Institute for Wood Plants and the Environment (IPLA), and with methodological consultancy from Politecnico di Milano. The survey involved a sampling campaign carried out between July 2024 and July 2025, divided into two phases. The first phase focused on WEEE and WB, while the second phase was extended to include textile waste, EEE packaging waste, and, on a pilot basis, cigarette butts. The new analytical methodology, developed in collaboration with IPLA and based on established national standards[1], involved classifying waste into types, such as WEEE with or without batteries, single-cell or button cells, battery packs, and natural or synthetic textiles, shoes and accessories. Increasing the sample mass to approximately 300 kg per analysis enabled more robust capture of low-incidence waste streams such as WB and WEEE.

A total of 38 samples were collected from 15 Italian cities. Comparisons were made between the northern macro-regions of Lombardy, Piedmont and Veneto, and the southern macro-region of Campania and Lazio. Aggregated results show that unsorted waste contains an average of **1.04% by weight of WEEE (R4–R5) (equivalent to 1.98 kg per capita per year)**, **0.06% by weight of WB (equivalent to 0.12 kg per capita per year)** and **8.65% textile waste (equivalent to 17.67 kg per capita per year)**. When these figures are compared with the quantities collected through official channels in the same areas (**1.34 kg per capita** for WEEE, **0.06 kg per capita** for WB and **2.74 kg per capita** for textiles respectively), it is clear that a significant proportion of recyclable waste still ends up in the general waste stream. The evidence therefore supports a strategic approach involving strengthening infrastructure, improving the accessibility of collection points, and tailoring communication and awareness-raising campaigns to territorial specificities, paying particular attention to large urban centres. Technological sorting solutions should be considered as an additional measure where appropriate, with the aim of reducing resource loss, environmental impact and the costs associated with treating unsorted waste.

1 IPLA-CNR methodology and ANPA guidelines.

European projects

Erion is involved in seventeen research projects funded or co-funded by the European Commission. These projects cover end-of-life issues, eco-design and product reuse across a range of sectors.



Two significant research projects are presented below. These projects address some of the main challenges of the circular transition and complement each other in the process. One project focuses on sectoral evolution and technologies for recovering strategic materials, while the other focuses on applying digital innovation to trace and enhance components. The aim is to accelerate the development of more efficient, transparent and replicable industrial models.

Parsival and Parsival Plus

As Europe's photovoltaic installations gradually age, the time is approaching when large numbers of panels will reach the end of their lifespan. Funded by EIT Raw Materials, the Parsival and Parsival Plus projects have enabled Erion to improve photovoltaic recycling processes throughout Europe. These two initiatives have resulted in state-of-the-art technologies being developed for the high-quality recycling of photovoltaic waste, as well as methodologies for repairing and reconditioning ageing modules. Although recycling is well established at an industrial level, there are still significant challenges in recovering the critical materials contained within solar panels. One such material is silicon, which the European Commission considers to be strategically important, yet it is not currently recovered in modern industrial processes.

Erion's work has focused on quantifying the anticipated volumes of photovoltaic waste in four European countries: Italy, France, Germany and the Netherlands. The analysis also identified opportunities and obstacles in these markets with regard to adopting the proposed technologies.

In the medium term, silicon and silver are set to remain the main **drivers of value**, provided their purity and consistent quality can be guaranteed **on an industrial scale**. Success will depend not only on the performance of individual processes, but also on the ability to establish **credible value chains**. In line with the Erion System's approach, these chains comprise integrated system components such as technology, logistics, standards, traceability and governance. This approach prioritises innovation and collaboration between stakeholders to create efficient, transparent waste chains.

From a business perspective, the results therefore suggest that the market entry of the necessary technologies will depend more on their ability to integrate into existing industrial and regulatory contexts, such as sector agreements, integration with existing operators and infrastructure, than on their effectiveness as standalone technologies. In other words, turning innovation into impact – and impact into shared value – requires a step-by-step process. The transition of end-of-life photovoltaic systems will test the maturity of the entire European circular economy ecosystem, as well as presenting a technological challenge.

Circuits

CIRCUITS is an international research and innovation project, co-funded by the European Union as part of the Horizon Europe framework programme. Launched on **1 January 2023** and coordinated by **Politecnico di Milano**, it involves around **20 European partners**. The project aims to strengthen the **circularity and sustainability** of the electronic components sector – particularly within the **automotive** and **mass electronics** industries – by enabling eco-design, reuse, remanufacturing, data sharing, and process standardization via **digital**, **technological**, and **organizational solutions**. The project comprises **four industrial pilot schemes** that test advanced methodologies and tools, including AI-based ones, in real-world conditions. The aim is to enable new digital circular economy practices, such as reducing the carbon footprint and developing new business models across the electronics sector, to be replicated on a European scale. In this context, **Erion** participated in a **pilot** scheme focusing on the sorting, classification and recovery of **obsolete printed circuit boards (PCBs)**. The aim was to increase the efficiency of sorting and promote the reuse of valuable components containing **critical materials**. In collaboration with technical partners, Erion helped trial digital tools, including:

- an **HMI (Human-Machine Interface)** module that supports operational decision-making by clearly displaying useful information such as PCB classification results, indicators of the presence or value of strategic materials, and operational suggestions;
- a **Marketplace Module** that facilitates the market for reconditioned PCBs by making selected, qualified boards available alongside technical and traceability information. This helps to **balance supply and demand** and supports business models geared towards **reuse and remanufacturing**;
- an **AI-driven approach that improves selection** by testing 400 PCBs, thereby reducing material loss and strengthening the potential for setting up robust circular networks.

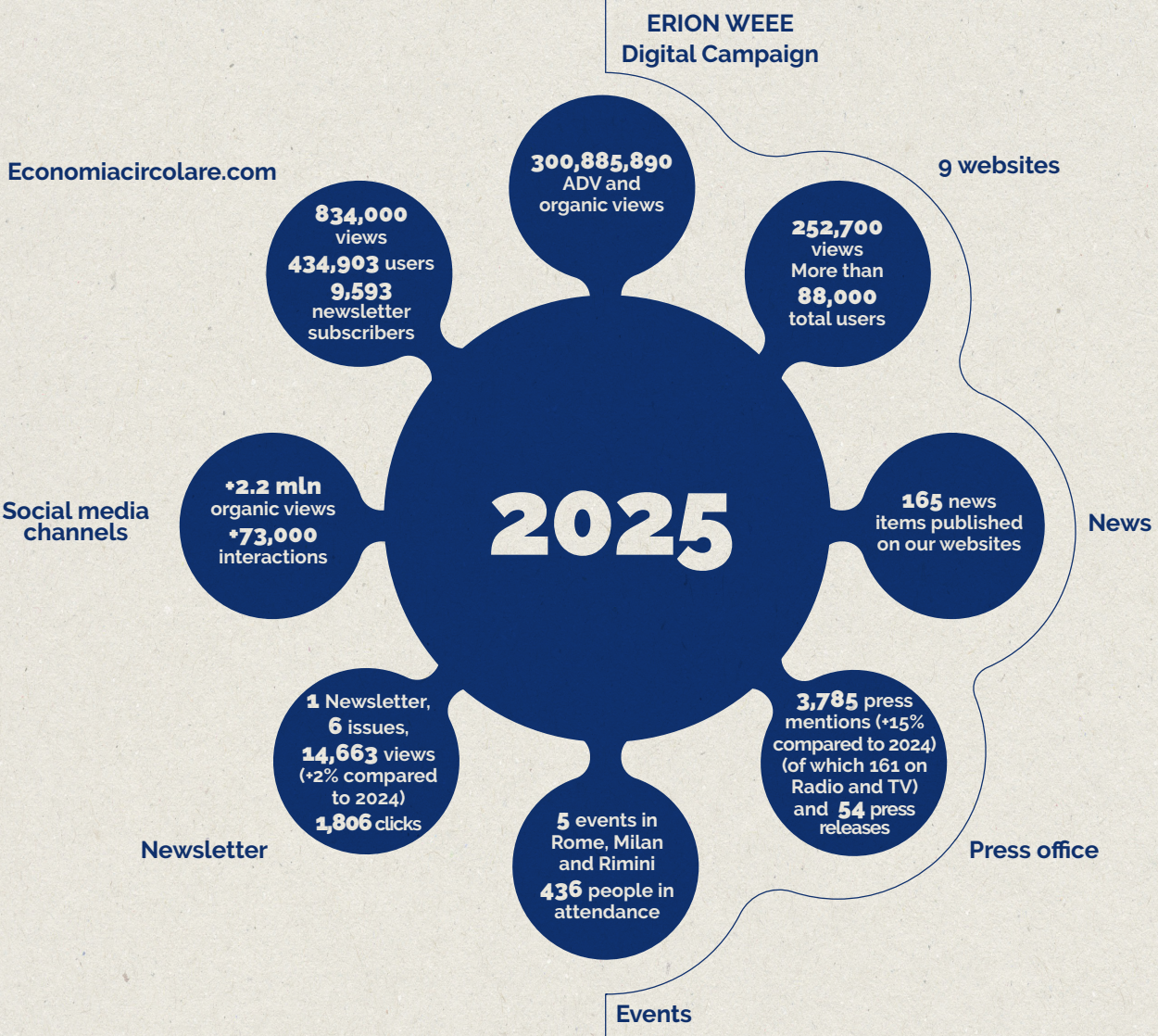
1.6 COMMUNICATION

In 2025, communication remained an essential tool for Erion when it came to engaging with stakeholders, institutions, the media, Producers, and the public. The System continued to highlight the Collective Schemes' achievements, disseminate awareness-raising content and strengthen its position on issues relating to Extended Producer Responsibility, sustainability and the circular economy, using a comprehensive ecosystem of digital channels, press office activities, newsletters and events. In 2025, Erion organized its communication strategy across a range of complementary channels.

- **Collective Schemes and ECO websites**: websites dedicated to individual Collective Schemes, containing sector-specific content and information relevant to activities and stakeholders.
- **EconomiaCircolare.com**: the online magazine promoted by Erion, which focuses on providing information and in-depth analysis on sustainability and the circular economy.
- **Social media**: the channels used to promote the System's content, campaigns, events and news.
- **ErioNews newsletter**: provides regular updates and in-depth coverage of the various Erion Collective Schemes.
- **Press office**: activities targeting radio, television, newspapers and general and specialist online publications with the aim of disseminating news, data and interviews.

In 2025, Erion's websites, social media channels, and newsletters **collectively generated almost 2.5 million organic views** of digital content.

All the numbers for 2025



1.6.1 WEBSITES

Within this ecosystem, the websites continued to serve as institutional and informational hubs. In 2025, **165 news** items were published, and the System's websites recorded **252,700 views**, reaching over **88,000 users in total**.

TOTAL 2025 VIEWS

Five years after going live, the average user session **duration** remains consistently **above one minute**, with some Collective Schemes, such as Erion Packaging, exceeding three minutes. This is particularly encouraging, given the increasingly fragmented nature of attention spans in the digital landscape.

1.6.2 PRESS OFFICE

In 2025, there was a significant evolution in the positioning and continuity of media relations activities. Erion recorded **3,785 press mentions** in **54 press releases**, which is a **15% increase** on the **3,286 mentions** recorded the previous year.

This important development establishes the System as a key reference point for the topics covered.

1.6.3 NEWSLETTER, ECONOMIA-CIRCOLARE.COM AND ERIONAIR

In 2025, the **ErioNews** newsletter continued to fulfil its role of keeping the System's stakeholders updated. **Six regular issues** were published during the year, alongside **two special editions** dedicated to the Sustainability Report and Ecomondo, respectively. ErioNews was viewed a total of **14,663 times** in 2025, which was a 2% increase on 2024, and received **1,806 clicks**.

In 2025, Erion supplemented the newsletter with **EriOnAir**, the System's web radio station, providing a new tool for direct communication and content dissemination. This initiative is part of Erion's ongoing efforts to expand the channels through which it engages with its stakeholders.

Produced by the CDCA (Documentation Centre on Environmental Conflicts) and supported by Erion, **EconomiaCircolare.com** is an online magazine with a specific focus that sets it apart from the other channels. It is dedicated to constructive journalism and in-depth analysis of sustainability and the circular economy. In 2025, the magazine received **834,000 views** from **434,903 users** and gained **9,593 subscribers to its newsletter**.

1.6.4 SOCIAL MEDIA CHANNELS

Social media remained one of the main dissemination channels for sharing the System's content. In 2025, the various social media posts generated a total of **2,226,844 views** and **73,315 interactions**.

1.6.5 EVENTS

In 2025, events remained an important means through which Erion could engage directly with its stakeholders, including institutions and Members, as well as the public. These events complemented the use of digital and traditional media in spreading the System's messages. A total of **436 people**[1] **attended** the five events held in **Rome**, **Milan** and **Rimini** throughout the year. Key events included the: Open Day at Erion's Milan offices on 4 April; '**Art for a sustainable future**' at Milan's Chiostri di San Barnaba on 21 May; '**Forum on circular models for growth**' at Rome's Hotel Nazionale on 10 June; and an event dedicated to unsorted waste and the role of communication in changing behaviour at Rome's Ara Pacis Museum on 14 October. In addition, Erion participated in **Ecomondo 2025**, setting up a System stand designed to showcase the synergies between the Collective Schemes. This was accompanied by dedicated events and networking sessions, generating **over 1,600 views on LinkedIn**.

1. This total does not include the number of visitors to the Erion System stand at Ecomondo 2025

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2.1.1

THE WEEE SECTOR AND ITS REGULATORY FRAMEWORK

Erion WEEE is a national Collective Scheme for the management of Waste Electrical and Electronic Equipment (WEEE) within the framework of Extended Producer Responsibility. It organizes and coordinates the activities necessary to ensure compliance with regulatory obligations throughout the entire chain, guaranteeing the correct treatment of waste and the recovery of Secondary raw materials.

The WEEE chain is a system which comprises a variety of stakeholders:

producers and **importers** of EEE, who finance the system through environmental contributions;

distributors and sales channels, both physical and online, which play a key role in the collection phase through the one-for-one and one-for-zero take-back service, enabling members of the public to hand in their WEEE to a distributor free of charge when purchasing new equipment or even without making a purchase;

municipal collection centres and **grouping places**, where WEEE is handed in and stored before being collected;

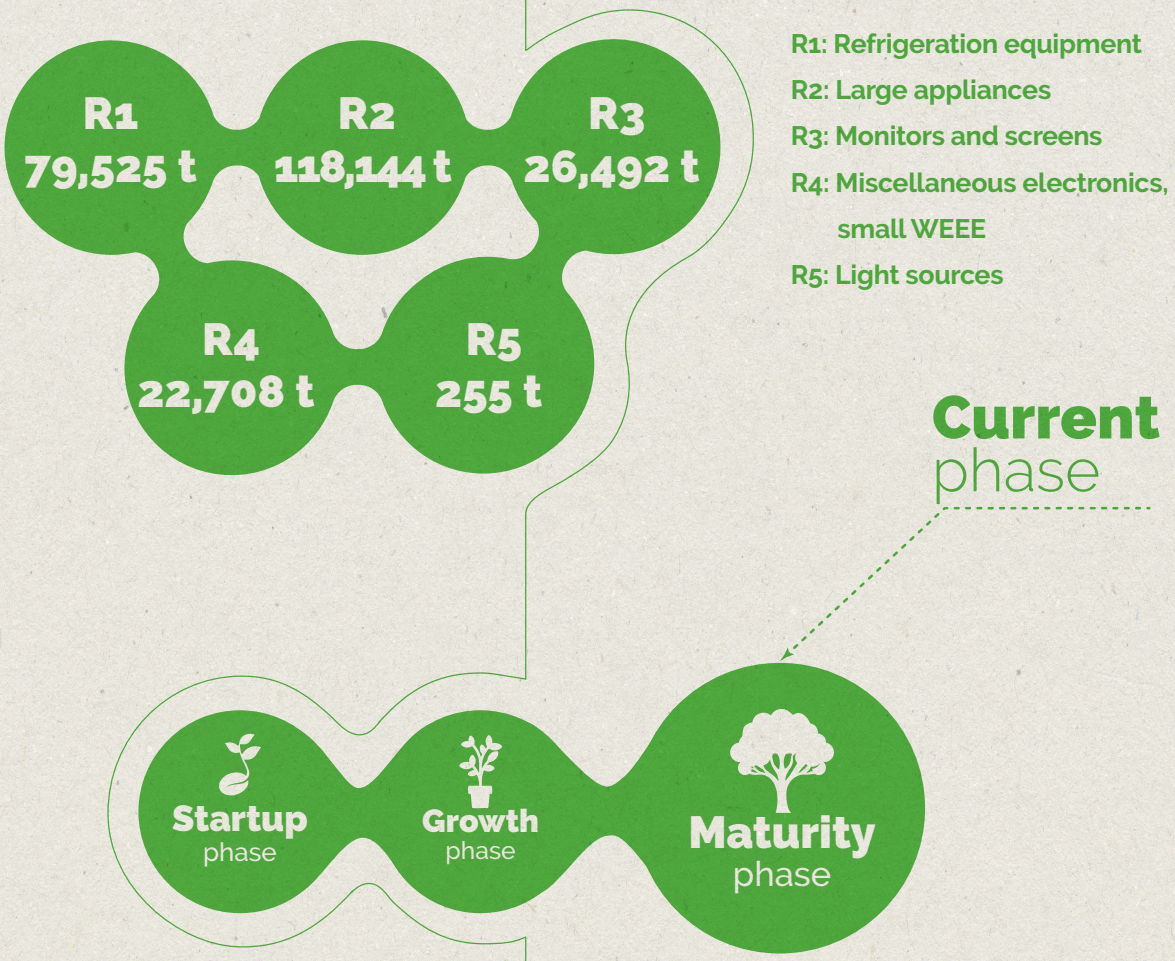
logistics operators, who ensure the safe transport of waste;

treatment facilities, which carry out WEEE decontamination, separation and preparation for recycling or energy recovery.

In 2025, Erion WEEE operated within a challenging regulatory and market environment. The WEEE legislation sets Italy a national collection target of 65% of the average volume of products placed on the market over the previous three years. This is a system-wide target, meaning it is not the responsibility of individual collective schemes, but rather the responsibility of the country as a whole to capture a very high proportion of products released for consumption. The difficulty of achieving adequate collection levels is not just an issue specific to Italy, but part of a wider European challenge. Growth in collection volumes continues to be constrained by complex chain structures and unmanageable waste streams.

In fact, the legislation allows local authorities and distributors to transfer WEEE to any authorized treatment operator. However, this reduces the system's ability to direct waste streams towards structured, traceable circuits that are consistent with the overall collection targets. This leads to fragmentation, which impacts national performance and widens the gap from the legislative target.

In this context, Erion WEEE reaffirmed its position as a leading player in the sector in 2025, acting as a hub between collection, logistics and treatment, while strengthening its oversight of processes. Having established a solid track record over the years, the Collective Scheme entered 2025 with a management model focused on efficiency, quality, and traceability. Erion WEEE collected and sent 247,124 tonnes of WEEE for treatment, achieving punctuality rates of over 99% for collecting WEEE from collection centres and grouping places.



Another challenge for the sector is the evolving nature of products, which increases their complexity and consequently imposes new safety requirements. The growing use of lithium batteries, in particular, necessitates more rigorous preventive measures and the segregation of waste streams at source to minimize risks during handling and transportation.

In terms of regulation, action is being taken at both the national and European levels. In 2025, Italian legislation was amended at the initiative of Erion WEEE to allow distributors to collect Household WEEE items free of charge when delivering new equipment to customers' homes, as part of the 'one-for-one' take-back scheme or as part of a general collection service. If distributors decide to offer this service, it will provide a valuable opportunity to increase collection volumes, as every delivery will become an opportunity to collect multiple items. At a European level, however, a permanent monitoring mechanism has been established to track the development of future WEEE regulations and inform discussions about the effectiveness of the system.

2.1.2

THE MATERIALITY PROCESS AND ITS SIGNIFICANT IMPACTS

Erion WEEE contributed to updating Erion's materiality analysis process by providing a specific perspective on the WEEE chain. In this context, the Collective Scheme has helped to simplify matters by advocating the consolidation of waste management, resources and circularity, as well as issues relating to waste treatment, the recovery of Secondary raw materials, and the prevention of environmental impact, into a single framework. The materiality analysis identifies several areas that are considered priorities by Erion WEEE:

the **quality and safety of treatment processes**, with particular attention to critical stages involving the handling of hazardous or high-risk components, such as lithium batteries;

the recovery of **Secondary raw materials**, in line with European objectives on critical raw materials and resource security;

transparency in economic and financial management;

dialogue with institutions and stakeholders, necessary to ensure the long-term sustainability of the entire WEEE system.

Similarly, health and safety issues are addressed throughout the chain. Erion WEEE highlights the fact that the primary impact is felt by suppliers operating in highly technically complex environments, such as treatment plants, logistics operators and collection platforms.

This emphasizes the importance of selecting the right suppliers and the need for regular monitoring and support initiatives to continuously improve safety and environmental performance.

2.1.3 STRATEGIC POSITIONING IN 2025

In 2025, Erion WEEE strengthened its position within the WEEE system by improving its chain management model. Key initiatives in this process included a new **supplier selection procedure, in-house** management of certain operational functions, and a clear position on the **end-of-life management of photovoltaic panels**. Erion WEEE's commitment to safeguarding the environment and future generations lies at the heart of its approach.

The supplier selection process

A key element of the 2025 strategy is the introduction of a new **supplier selection process** in collaboration with Erion Energy. This process fundamentally redefines the relationship between Erion WEEE and its network of treatment facilities and logistics service providers. The new procedure is based on structured, transparent criteria that provide a consistent framework for evaluating operators in the WEEE chain, ensuring **transparency, compliance and continuity of service**.

The analysis considers various aspects, which can be grouped into four categories:

1. **ethical and integrity** aspects, ranging from the presence of the 231 Model and the Code of Ethics to tax and certificate of social security compliance (DURC), anti-Mafia declarations and the quality of reporting. These cover audited financial statements, sustainability reports and the completeness of the required information;

2. the **authorizations and certifications** required to operate across the logistics and management chain, including categories for urban, non-hazardous, hazardous, cross-border, and intermediation waste, as well as the main management standards and specific transport and safety requirements. In the case of treatment service providers, the Collective Scheme is responsible for authorizing them to operate and overseeing the quality of their management systems. This includes End of Waste (EoW) certifications, ISO and the Eco-Management and Audit Scheme (EMAS) standards, as well as the accreditation of the facility for grouping and the relevant technical sub-categories of the WEEE Clearing House. The authorization level of the local unit is also overseen, with Integrated Environmental Authorisation (AIA) taking priority over ordinary or simplified authorizations;

3. the **operational size and reliability** of logistics service providers is measured by their experience, financial soundness, workload, service levels, business continuity plans and capacity to support the Collective Scheme in emergency situations. For treatment service providers, performance indicators and industrial maturity are incorporated instead: achievement of the recycling/recovery rates set out in the WEEE framework; ability to achieve EoW status for target fractions (such as plastics), supported by certifications; length of service and experience in treatment; existing partnerships with other collective schemes; adoption of advanced recovery technologies for strategic raw materials; service continuity throughout the contract; support in emergency situations; financial soundness, as measured by external credit ratings; punctuality of payments; proportion of volumes managed; and availability of a business continuity plan. For group R4, specific consideration is also given to the assessment and management of fire risk, with increasing sanctions as the risk level rises or in the event of incomplete documentation;

4. with regard to logistics service providers, there is a set of performance, reporting, quality **control and compliance** indicators. These indicators are used to monitor deviations, delays, documentation errors and critical payment issues to subcontractors, as well as sanctions relating to the WEEE Clearing House.

Tables 2.1.1 and 2.1.2 set out all the non-financial criteria relevant to the selection procedure for logistics and waste management suppliers, organized by category.

Table 2.1.1: key criteria for logistics service providers

Category	Criterion
1 PROFESSIONAL ETHICS	1.1-Organizational Model pursuant to Legislative Decree 231/2001
	1.2- Approval of the most recent financial statements submitted by an independent audit firm
	1.3-Code of Ethics
	1.4-Valid DURC certificate
	1.5-Anti-Mafia self-certification
	1.6-Sustainability report for the most recent financial year available
	1.7-Completeness of the data requested in the Information Request
2 LICENCES AND CERTIFICATIONS	2.1-Cat. 1 (urban)
	2.2-Cat. 4 (non-hazardous)
	2.3-Cat. 5 (hazardous)
	2.4-Cat. 6 (Cross-border)
	2.5-Cat. 8 (Intermediation)
	2.6-ISO 9001 (Quality)
	2.7-ISO 14001 (Environment)
	2.8-ISO 45001 (Health and safety)
	2.9-EMAS
	2.10-Third-party licence
	2.11-ADR (Agreement for transport of dangerous goods by road)
3 OPERATIONAL CAPACITY AND RELIABILITY	3.1-Ongoing collaboration with collective schemes for Household WEEE
	3.2-Years of experience in waste logistics
	3.3-Continuity of service
	3.4-Financial soundness
	3.5-Business continuity plan
	3.6-Support for the Collective Scheme during emergencies
	3.7-Volumes managed
	3.8-Service levels (WEEE Clearing House)
4 CONTROL AND COMPLIANCE	4.1-Permitted delays
	4.2-Levels of service reporting
	4.3-Errors identified by FIR (Form of Identification of Waste) checks
	4.4-Evidence of late payments to subcontractors
	4.5-Penalties issued by the WEEE Clearing House

Table 2.1.2: key criteria for treatment service providers

Category	Criterion
1 PROFESSIONAL ETHICS	1.1-Organizational Model pursuant to Legislative Decree 231/2001
	1.2- Approval of the most recent financial statements submitted by an independent audit firm
	1.3-Code of Ethics
	1.4-Sustainability report for the most recent financial year available
	1.5-Pre-qualification processes for facilities handling outgoing waste fractions
	1.6-Valid DURC certificate
	1.7-Anti-Mafia self-certification
	1.8-Completeness of the data requested in the Information Request
2 OPERATIONAL CAPACITY AND RELIABILITY	2.1-Recycling and recovery rates
	2.2-% EoW target fraction - Plastic
	2.3-Years of experience in waste treatment
	2.4-Ongoing collaboration with collective schemes for Household WEEE
	2.5-Advanced recovery technologies
	2.6-Methods for detecting radioactivity in incoming waste
	2.7-Service continuity
	2.8-Support for the Collective Scheme during emergencies
	2.9-Financial soundness
	2.10-Punctuality of payments
	2.11-Volumes managed
	2.12-Business continuity plan
	2.13-Fire risk assessment and management – R4
3 LICENCES AND CERTIFICATIONS	3.1-EoW - Iron and Aluminium (Reg. (EU) 333/2011)
	3.2-EoW - Copper and copper alloys (Reg. EU 715/2013)
	3.3-EoW - Glass (Reg. 1179/2021)
	3.4-EoW - Plastic (Authorization)
	3.5-ISO 9001 (Quality)
	3.6-ISO 14001 (Environment)
	3.7-ISO 45001 (Health and safety)
	3.8-ISO 50001 (Energy efficiency)
	3.9-EMAS
	3.10-Certified facility (with at least one certified characterising sub-category)
	3.11-Number of sub-categories covered for each group
	3.12-Type of authorization

The supplier selection process significantly **redistributes volumes** across facilities. While new operators enter the market, those that no longer meet the required standards are phased out. Therefore, the year 2025 is characterized by an intense period of managing takeovers, reorganizing logistics flows and refining contractual relationships.

This decision cements Erion WEEE's position as an organization that **proactively establishes a qualified chain** that aligns with its values of safety, quality and transparency, rather than simply allocating volumes.

Strengthening internal management

At the same time, the Collective Scheme continued to strengthen its **internal management** by taking on functions that had previously been outsourced to third parties, particularly Interzero. In 2025, efforts had increased in the areas of direct management of **information flows, transport** coordination, and operational oversight of relations with **treatment facilities**.
The main objectives of this development include:

- gaining a **more immediate and comprehensive overview** of what is happening throughout the chain;
- reducing **operational and reputational risk** by exercising more direct control over performance and compliance with required standards;
- providing institutions and Producers with more robust **data and analysis** to support dialogue and strategic decision-making.

In-house operations do not alter the pivotal role of chain operators. Instead, they strengthen Erion WEEE's ability to **coordinate activities, provide guidance** and respond to the growing complexity of regulatory and market environments in accordance with the new supplier selection procedure.

Position on photovoltaic panels for environmental protection

The third key aspect of our strategic positioning relates to the **end-of-life management of photovoltaic panels**. Erion WEEE has a clear approach to this environmental responsibility issue. Throughout the year, the Collective Scheme drew institutions' attention to critical issues relating to **insufficient environmental contributions** for non-subsidized modules. This emphasized the potential mismatch between available resources and the actual costs of collection and treatment. According to a recent study by "REF Ricerche", the number of photovoltaic panels destined for disposal each year is expected to increase by almost thirtyfold between 2025 and 2050. This will have significant implications for system owners, collective schemes and society as a whole. The number of decommissioned panels is expected to rise from around 427,000 in 2025 to over 12 million in 2050.

This will result in a corresponding increase in the volume of photovoltaic WEEE that needs to be collected and managed correctly each year, rising from 9,000 to 264,000 tonnes. Based on these figures, managing end-of-life photovoltaic panels becomes a serious environmental problem without adequate financial backing. Erion WEEE's approach must be viewed as a **safeguard for the environment and future generations**: on the one hand, it emphasizes the need to ensure that management **costs are covered** to avoid imbalances that could affect proper end-of-life management. On the other hand, it aims to prevent waste streams from growing **outside of channelling systems**.

2.1.4 AWARENESS-RAISING INITIATIVES AND STAKEHOLDER ENGAGEMENT

Effective communication and stakeholder engagement are fundamental to Erion WEEE's activities. In accordance with legislative provisions, the Collective Scheme consistently allocates **3% of its total revenue** to public awareness initiatives.

Public awareness campaigns aim to:

- raise awareness of what WEEE is and how it should be **disposed of properly** at collection centres and retail outlets;
- discourage the disposal of WEEE through unauthorized channels;
- highlight the environmental importance of properly managing this type of waste.

Awareness-raising initiatives in 2025

In 2025, Erion WEEE implemented a comprehensive, integrated communications plan to raise public awareness of WEEE and promote proper disposal practices, in line with national and European circular economy objectives. We would particularly like to highlight the following:

- "RAEEGoal" is a project carried out in collaboration with Giffoni Innovation Hub and Amiat, under the patronage of the City of Turin, with the aim of raising public awareness of the proper disposal of WEEE. During five Juventus FC home matches, fans were invited to dispose of small WEEE items free of charge at collection points set up at the Allianz Stadium entrances;
- "Small WEEE, Big Coop" is a pilot project promoted in collaboration with INRES COOP and COOP Lombardy, which encourages citizens to collect small WEEE items from groups R4 and R5. Five COOP stores were involved in the initiative, each with a dedicated collection point for small WEEE operating on a one-for-zero basis and staffed by hostesses. The stores were located in Brescia, Legnano, Lodi, Pavia and Treviglio;
- "Di RAEE ne abbiamo piene le scatole" (We've had enough of WEEE) is an integrated awareness and collection campaign for WEEE groups R3 and R4, run in collaboration with the waste management company Asia in Naples. The initiative involved installing computerized recycling points on the high street and dedicated bins in schools to facilitate the proper disposal of small electronic waste, and to promote more responsible behaviour among citizens and students;
- "WEEE4Comics" is a national competition that focuses on comics and sustainability. It was organized in collaboration with Giffoni Innovation Hub and Comics&Science, CNR Edizioni's popular science series. The winning comic was made available for free at events and trade fairs;
- the "Materia Viva Experience" (Living Matter Experience) is the first immersive exhibition on the themes of the circular economy and WEEE. It was staged again as part of the Green Med Symposium, one of the most important environmental events in southern Italy, which took place from 26 to 31 May 2025;
- the "Festa della Musica" (Music Festival) event took place from 20 to 22 June 2025. The Collective Scheme was present in 24 cities across 20 regions, with dedicated information and collection points for small WEEE items;
- the campaign, titled "Fai la tua mossa" (Make your move), was carried out in collaboration with A Sud, EconomiaCircolare.com, and Junker APP. It aimed to raise awareness among younger generations and local communities of the importance of separating WEEE for collection;
- ongoing support for the magazine EconomiaCircolare.com, which has been a key reference point for discussions on the circular economy in Italy for over five years;
- the awareness campaign, "Se te ne fotti, sei fottuto" (If you don't give a damn, you're screwed), featured billboards in major cities such as Bari, Milan and Rome, as well as digital activities and coverage in leading national newspapers. The campaign promoted the "one-for-zero" and "one-for-one" free take-back services.

Awareness-raising initiatives in 2025

- appearances on TV programmes such as 'Uno Mattina in Famiglia', 'UnoMattina', 'I Fatti Vostri' and 'Countdown';
- the 'Art for a sustainable future' event took place at the Chiostri di San Barnaba in Milan to celebrate the installation of Michelangelo Pistoletto's artwork 'I temp(l)i cambiano', created for the Collective Scheme;
- the 'Sustainability and awareness' event at the Ara Pacis Museum in Rome marked International E-Waste Day on 14 October 2025;
- the event, "Materia Viva": the contribution of recycling to the circular economy and the role of citizens and younger generations', took place in the auditorium of Mesagne Castle (Brindisi). Organized in partnership with the Research and Technology Organization CETMA, the event featured free screenings of the documentary film "Materia Viva" (Living Matter) for students;
- through its partnership with "Legambiente", Erion WEEE attended the "National Ecoforum", the "Comuni Ricicloni" event and "Festambiente", where a special WEEE collection was organized. The Collective Scheme also won the "Circular Economy" category at the "Innovation Award", an initiative dedicated to sustainability;
- the partnership with 29 leading social media content creators to create posts and videos about the separate collection of WEEE;
- a constant presence on social channels such as Facebook, LinkedIn, X, Instagram and YouTube;

The results of the communication initiatives were continuously monitored through regular surveys conducted by Ipsos. These surveys revealed increased awareness of the term 'WEEE' and the disposal methods available for this type of waste.

Erion WEEE also played an active role in the following Erion System events:

- the **Forum on circular models for growth**, organized by Erion on 10 June 2025, to mark the publication of its Sustainability Report. The event was held in the Sala Capranichetta at the Hotel Nazionale in Rome;
- **Ecomondo**, which took place from 3 to 6 November 2025.

The Collective Scheme pays particular attention to its **Member Producers**. Recognising that participation in the WEEE system is sometimes viewed as a burden, the Collective Scheme is expanding its range of services to include:

- training courses on regulatory, environmental and organisational issues;
- initiatives on cross-cutting issues, such as **using AI** to support business processes;
- **integrated waste management** services for businesses.

Another key aspect of stakeholder engagement is building relationships with institutions. Erion WEEE regularly engages with ministries, parliament and relevant authorities, providing ongoing regulatory improvement proposals. This includes studies and research into how the WEEE system functions, as well as the conditions necessary for the sustainable management of electronic waste.

The General Director of Erion WEEE presents the RAEE4Comics initiative at Ecomondo 2025.

2.1.5 FUTURE PROSPECTS

The main challenge for 2026 will be to maintain Erion WEEE's position as the leading Collective Scheme in the WEEE sector, both in terms of volumes managed and standing with institutions, chain operators and Producers. This will require ongoing operational and strategic oversight of the system to influence debate and decision-making at national and European levels.

A second key element is **strengthening member loyalty** in an increasingly competitive environment. The aim is to present the Collective Scheme as more than just a means of complying with regulations; it should also be seen as a trusted business partner with whom members can share challenges, needs, and medium- to long-term prospects. This approach aims to make Erion WEEE more appealing to its Members by expanding and improving the range of services offered. This is reflected in the operational support that the Collective Scheme provides for other types of waste, such as packaging, and its involvement of Producers in research and innovation projects. The Collective Scheme also offers specialized training programmes, which enhance its perceived value and set it apart from competing compliance solutions.

Another area of focus is **conducting ongoing studies and research**. The analyses promoted through the 'Untapped potential in unsorted waste' study are a case in point: producing robust, independent data enables the Collective Scheme to base its positioning on objective evidence. This allows it to propose solutions and interventions to various stakeholders with greater credibility. Erion WEEE's robust scientific output enables it to encourage ministries, regulatory bodies, and other stakeholders to reflect on existing policies and initiate review or improvement processes where necessary. This is achieved through studies, analyses, and well-argued technical positions. Erion WEEE does not merely react to regulations; it actively challenges them when critical issues or inconsistencies with operational reality arise.

The final crucial challenge for 2026 is to **maintain a European presence** in relation to the revision of the WEEE legislation. Thanks to the work carried out by ECO in collaboration with an advocacy agency in Brussels and its role within the WEEE Forum, the Collective Scheme aims to contribute to the shaping of the new framework, seeking to ensure that future regulations are designed in a way that is consistent with the needs and constraints of those who manage electrical and electronic waste on a daily basis.

Erion Professional

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GRI 413: 3-3
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GRI 415: 3-3
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GRI 417: 3-3
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2.2.1

THE PROFESSIONAL SECTOR AND ITS REGULATORY FRAMEWORK

Erion Professional was established to meet the **specific needs of the professional sector**, where the technical specifications, service lives, usage patterns and replacement cycles of equipment differ from those in a domestic context. Designed for professional use in sectors such as industry, hospitality, logistics, energy production, healthcare and automation, this type of equipment often forms an integral part of complex systems or continuous services.

In this context, Erion Professional upholds the values that define the entire Erion System: transparency, responsibility, regulatory rigour and a commitment to quality. These values are applied from a **consultative perspective**, with the Collective Scheme governed directly by Producers. This allows Erion Professional to understand their requirements and develop end-of-life management models that balance competitiveness, efficiency and environmental protection. As at 31 December 2025, Erion Professional has 914 members, and together with the Erion System has processed **4,040 tonnes** of professional WEEE.

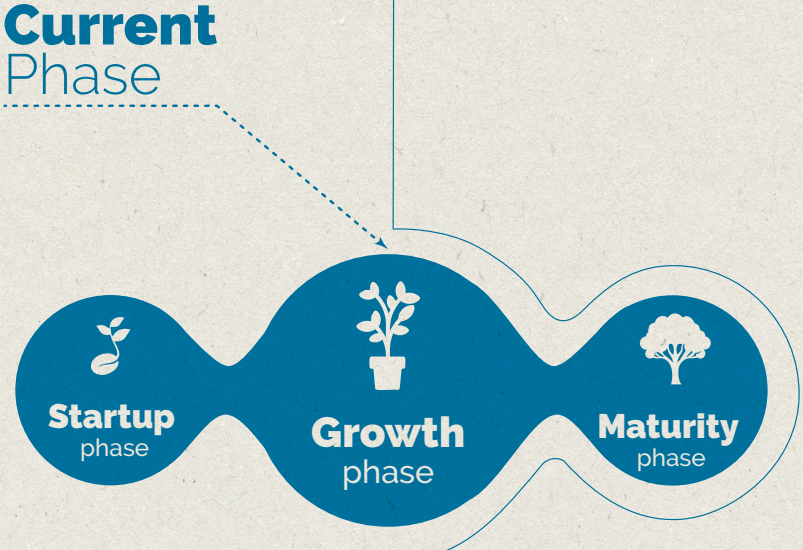
The regulatory framework is defined by Directive 2012/19/EU on WEEE, which was transposed into Italian law by Legislative Decree 49/2014.

This legislation assigns Producers responsibility for managing waste generated by Electrical and Electronic Equipment placed on the market, and Producers can fulfil this responsibility through individual or collective schemes. For professional equipment, the legislation distinguishes between:

- **historical WEEE** arising from equipment placed on the market before 31 December 2010, for which the holder remains financially responsible, unless it is replaced by equivalent new equipment;
- **new WEEE** arising from equipment placed on the market after that date, for which responsibility lies with the Producer who sold it.

In practice, however, end-of-life management in the professional sector is complicated by the fact that Producers may delegate the collection of WEEE to entities within their networks, such as dealers, distributors and retailers. Unlike with Household WEEE, Producers are only legally obliged to fund waste management if the professional consumer contacts them directly.

Despite a significant amount of equipment being placed on the market, which often generates valuable waste, this arrangement results in a relatively low level of 'formal' collection since the waste can follow untraceable channels. To help bridge this gap, Erion Professional participates in working groups and industry associations to promote the development of a regulatory framework resulting in specific Professional WEEE legislation, as well as greater transparency regarding waste streams and responsibilities throughout the chain.



2.2.2
THE MATERIALITY PROCESS AND ITS SIGNIFICANT IMPACTS

Erion Professional contributes to the System's materiality analysis process by providing specialized insights into professional WEEE. This is achieved through structured discussions with management and the analysis of evidence generated by Exceed projects, bespoke services, and system and supplier monitoring. This involvement ensures that the Collective Scheme's operational activities are systematically linked to the environmental, social and economic factors considered during the reporting process.

For the Collective Scheme, particularly significant impacts include the **circularity of materials**, the **recovery of resources from complex equipment**, the **safe management of hazardous components and substances**, and climate-changing emissions associated with collection and treatment activities. Health and safety issues in the workplace are also a concern, particularly at treatment facilities and when carrying out activities on customers' premises. These are complemented by **regulatory compliance** monitoring, **traceability of streams**, and the **combatting of informal channels**. Such channels may be more prevalent in the B2B sector than among households, posing reputational and regulatory risks to businesses.
In this context, consultancy services and structured collection models offered to Producers, including training for sales networks and operational partners, as well as support in defining internal procedures, are considered to have a material impact. This is because they enable a greater quantity of professional WEEE to be disposed of in controlled systems. Looking ahead, this will transform a regulatory obligation into an opportunity for member companies to create environmental, economic and competitive value, while enhancing the Group's ESG reporting.

2.2.3
STRATEGIC POSITIONING IN 2025

In 2025, Erion Professional reaffirmed its position as the only Italian collective system dedicated entirely to Professional WEEE, further strengthening its reputation as a specialist partner for Producers. The Collective Scheme is evolving from a model that focused primarily on regulatory compliance to a more **consultative approach**. In this new model, membership is the starting point for creating customized service solutions rather than the ultimate objective. The Exceed models are already well-established in certain key sectors and are gradually being supplemented by 'tailor-made' projects, which are being developed in collaboration with major industrial partners.

These projects aim to incorporate end-of-life management into commercial proposals for customers, setting them apart from competitors' offerings. For example, they ensure the simultaneous collection of multiple categories of WEEE present at the same site. This transformation is based on a deeper understanding of our membership base, achieved by mapping and profiling our Members according to sector, product type, and service needs. It also involves identifying the specific requirements of the different sectors served. Erion Professional's strategic positioning is based on three key elements: regulatory expertise; operational monitoring of the system; and co-designing solutions with Producers that combine compliance, efficiency and environmental responsibility. Members also have the opportunity to leverage synergies with the other Collective Schemes within the Erion System, which provides an integrated platform of services for various waste types and industrial sectors.

2.2.4 AWARENESS-RAISING INITIATIVES AND STAKEHOLDER ENGAGEMENT

To encourage better management of Professional WEEE, Erion Professional is investing in awareness-raising initiatives for its Members and other parties involved in the chain. These include forums in which Producers can discuss operational challenges, use cases, and opportunities for improvement, as well as training programmes for sales networks and logistics partners. Information materials and operational guidelines on proper waste disposal are also produced. The Collective Scheme organises stakeholder engagement sessions to gather direct feedback from businesses, understand the barriers and drivers for action across different sectors, and evaluate the effectiveness of its services. This can be achieved, for instance, by monitoring either the uptake of collection services or the quality of the waste streams collected. This structured dialogue facilitates the **development of stronger partnerships, the identification of replicable pilot cases** and the provision of concrete evidence from industrial practice to inform institutional discussions.

Furthermore, awareness-raising activities foster a culture of shared responsibility at the end of a product's life cycle by involving not only environmental managers, but also the commercial and procurement departments of companies. Looking ahead, engaging stakeholders will be crucial in aligning the expectations of Producers and regulatory developments with the Group's sustainability objectives, thereby making the Professional WEEE sector more transparent and collaborative.

Furthermore, Erion Professional was a key player at **Ecomondo 2025**. The Collective Scheme had a presence at the **large System stand**, where it ran a programme of events dedicated to stakeholders. These included **meetings and in-depth sessions** organized by Erion throughout the four-day event. One such event was "**Managing Professional WEEE: the challenge and value of the waste chain**". In addition, in 2025, **Erion Professional** launched a **communications campaign** to promote its **Exceed** services and raise stakeholder awareness of the importance of correctly managing Professional WEEE. The campaign involved creating a media **plan targeting trade magazines** selected for their relevance to the intended professional audience, and was supported by **bespoke creative content**. The aim was to raise the profile of the service in reputable publications and reach professionals, companies and stakeholders active in the relevant sectors.

Exceed services managed by Erion Professional.

2.2.5 FUTURE PROSPECTS

The Collective Scheme has identified several strategic priorities for developing its key activities. These include:

- **Re-launching the strategic positioning** to strengthen the role of the Collective Scheme as a point of reference for professional equipment Producers. This will involve shifting from predominantly 'mandatory' relationships to ongoing partnerships based on value-added services, environmental awareness, and opportunities associated with end-of-life management.

- **Expanding and customizing service models** by evolving the Exceed models from schemes centred on a few mature sectors to a modular portfolio of solutions that can be adapted for individual Producers, while maintaining the same integrated management approach at a more granular level. This involves collaborating with Members to develop targeted projects for large-scale systems, such as food preservation, industrial automation and business continuity, as well as equipment with long and very short lifecycles.

- **Mapping and profiling of members**: completing and systematically utilizing the mapping of the approximately 900 Members to identify action priorities, retain the loyalty of companies already actively involved and initiate new project collaborations with those less interested in services that go beyond minimum compliance requirements. This approach will establish the basis for developing service packages tailored to the unique needs of various sectors.

- **Strengthening system control** by enhancing supplier qualification and monitoring processes and integrating health and safety, treatment quality and compliance with environmental regulations throughout the entire waste management chain in a more structured way. Erion Professional aims to ensure that its sustainability reporting is increasingly aligned with the operational practices of those involved.

- **Engaging with stakeholders** by continuing to hold direct dialogue with Producers through targeted stakeholder engagement initiatives. This will involve companies from different sectors, and will help to understand their expectations and critical issues, as well as the levers that could be used to promote more structured end-of-life management models. Involving selected Producers as key partners will enable the testing and co-design of solutions that can be replicated for the benefit of the entire system.

Through these guidelines, Erion Professional aims to transform the management of Professional WEEE from a regulatory obligation into a **strategic opportunity**. This new approach will establish material circularity, service quality, and environmental protection as tangible drivers of competitiveness for Producers and their value chain.

Erion Energy

GRI 2-6
GRI 2-28
GRI 308-1
GRI 413: 3-3
GRI 413-1
GRI 415: 3-3
GRI 415-1
GRI 417: 3-3
GRI 417-1

2.3.1 THE WB SECTOR AND ITS REGULATORY FRAMEWORK

Erion Energy is the Erion System Collective Scheme responsible for **managing Waste Batteries** (WB) of all main types, including portable batteries for small electronic devices, industrial batteries for logistics and energy storage, and automotive batteries (including those for electric and hybrid vehicles). These batteries contain hazardous substances such as zinc, cadmium, mercury and lead. If not managed correctly, these substances can damage the ecosystem. However, the waste also contains valuable recyclable materials, such as nickel, lithium and iron, which can be recovered and reused to contribute to the circular economy.

The waste chain managed by the Collective Scheme includes **Producers** and **importers**, as well as **traditional** and **online distributors**. It also encompasses **municipal** and **large-scale retail collecting points**, specialized **logistics** operators and mechanical and physicochemical **treatment plants**. The latter use hydrometallurgical processes to recover metals and lithium. By the end of 2025, Erion Energy had 1,381 Producers.

In 2025, the Collective Scheme collected around 5,300 tonnes of WB nationwide, achieving a service level of 97% and confirming the operational efficiency of its take-back operations.

The regulatory framework underwent significant changes with the introduction of the EU Battery Regulation and the subsequent incorporation of its provisions into national legislation in 2025.

In this context, Erion Energy played an active role in the National Coordination Centre for Batteries and Accumulators (CDCNPA), helping to define the key principles that were subsequently incorporated into the legislative decree that harmonized European and national waste regulations. The aim is to ensure that a consistent regulatory framework is applied throughout the entire battery lifecycle, particularly during the end-of-life phase, both in Italy and across Europe.

At the same time, updates were made to waste classification codes and to the rules governing authorizations and movements in 2025, particularly cross-border ones. These changes directly impact the sector, necessitating a review of authorizations for logistics operators and facilities, and requiring greater attention to the safe management of lithium batteries and more precise traceability of waste streams. Against this backdrop, Erion Energy has supported its network of operators in adapting to the new requirements. This has involved promoting the development of new sorting and treatment facilities dedicated to lithium batteries, thereby helping to establish a more specialized and secure national waste chain.

Current
Phase

2.3.2
THE MATERIALITY PROCESS AND ITS SIGNIFICANT IMPACTS

From Erion Energy's perspective, the most significant impacts lie within the following overarching topics: Waste management, resources and circularity, and Climate and Energy. These impacts are primarily concentrated in the operational phases of the waste chain, namely **collection**, **transport and treatment**. The three main priorities are **preventing the release of hazardous substances, reducing the risk of fire** associated with **lithium batteries** in waste streams, and **enhancing the efficiency of metal and lithium recovery** via mechanical processes and hydrometallurgical treatments. During the year, work began to review the **reporting boundaries** on these issues. The Collective Scheme oversees and governs the collection, transportation, sorting and preliminary treatment stages. However, some of the most significant environmental impacts may arise **during subsequent stages of management**, particularly during hydrometallurgical treatment. This stage is typically managed by external operators and falls outside the operational scope of Erion Energy. Nevertheless, the Collective Scheme recognizes the importance of considering the **water consumption** and **emissions** produced at these stages for a thorough evaluation of the environmental impact of the entire chain.

Erion Energy also provides a forward-looking assessment of the potential social impact of regulatory changes within the sector. These changes could generate indirect benefits throughout the value chain by increasing the use of Secondary Raw Materials.

2.3.3 STRATEGIC POSITIONING IN 2025

In 2025, Erion Energy further consolidated its position as a leader in the battery sector. This occurred in a context characterised by increased waste volumes, with a higher proportion of lithium batteries in particular being collected. In response to changes in the waste mix and the rapid growth of electric mobility and energy storage applications, the operational processes and economic models of the Collective Scheme have been further refined. From an operational perspective, Erion Energy took the strategic decision to **streamline the waste chain by eliminating an intermediate step**. In 2025, the Collective Scheme **ceased relying on Interzero** — the third party that had coordinated some of its activities and suppliers — and **assumed a more direct control** of the operational chain, which is now managed by ECO. This transfer has given Erion Energy greater direct control over logistics and treatment operations, while also enabling more effective monitoring of environmental and safety standards.

During the year, Erion Energy conducted a **supplier selection process for contract renewals**, leveraging significant system synergies. This involved introducing stricter technical and environmental qualification criteria, as well as risk management standards. Particular attention was paid to the safe handling and storage of batteries. According to feedback from facilities and logistics operators, this approach has strengthened the Collective Scheme's position as a controlling body and valuable partner to responsible operators.

From an economic and management perspective, a **system for planning volumes and contributions** was finalized during the year. Producers were required to submit quarterly reports on quantities placed on the market and, consequently, a system was introduced to promptly monitor these declarations. This has enabled more accurate budget forecasting and reduced the risk of imbalances between revenue and treatment costs, which is a particular concern for lithium-based chemicals. It has also ensured that the Collective Scheme is economically sustainable while protecting the interests of member Producers.

At an institutional level, Erion Energy has prioritized its involvement in the **CDCNPA working groups**, focusing particularly on operational areas that are important for the national battery management system. Discussions centred on the **interpretive alignment of the new EU Battery Regulation**, particularly with regard to its impact on collection obligations, new product categories and responsibilities throughout the waste chain. At the same time, the working groups addressed issues relating to **harmonizing information flows and improving traceability**. The aim was to enhance data quality and increase system transparency.

Another topic of discussion was **optimizing collection methods across the country**. This included coordination between collective systems, distributors, and logistics operators, as well as the management of lithium batteries, which is becoming an increasingly central issue due to safety concerns and rising volumes. Against this backdrop, Erion Energy adopted a technical approach centred on operational feasibility. This approach promotes shared solutions to ensure regulatory compliance, economic sustainability, and improved overall collection performance.

2.3.4 AWARENESS-RAISING INITIATIVES AND STAKEHOLDER ENGAGEMENT

The growth of the battery sector and the increasing complexity of regulations mean that engaging in dialogue with a wide range of stakeholders is essential. These stakeholders include Producers, distributors, industry operators, institutions, schools and citizens. In 2025, Erion Energy continued its activities to raise awareness and analyse citizens' behaviour. This began with a major project analysing municipal waste, entitled "*Untapped potential in unsorted waste*", which was carried out in collaboration with other entities within the System. Despite a concurrent Ipsos Doxa Italia survey showing a high level of awareness, the study highlighted the significant presence of portable WB in unsorted waste. While most citizens are aware that batteries should be disposed of separately and recognize their environmental hazards, this does not always translate into the correct behaviour.

A sociological analysis of citizens' responses revealed the phenomenon of **social desirability bias**, whereby people tend to answer in ways that are perceived as socially acceptable or in line with social expectations, rather than reflecting their actual behaviour. This creates a discrepancy between what people say they do and what they actually do.

To address this discrepancy, Erion Energy has adopted a more **experiential and interactive** approach to its initiatives.

Erion Energy at Ecomondo 2025.

The aim is to improve communication and encourage consistent, practical behaviour among the public. One such initiative is the educational project "**Energia in gioco**", which was developed in collaboration with the CDCNPA and is supported by Erion Energy. Building on the previous "Energia al Cubo" format of the Collective Scheme, this initiative combines educational materials for schools with gamification tools, including a video game dedicated to the proper disposal of batteries. Aimed at primary and lower secondary schools, the project seeks to engage students, teachers and families by presenting the concepts of recycling, preventing littering and recovering raw materials in a more accessible and memorable way.

Throughout the year, Erion Energy has increased its visibility at significant technical and institutional forums by delivering presentations at major conferences such as the **E-TECH Electric Mobility Technology Exposition** and the **International Congress for Battery Recycling (ICBR)**. These events have provided valuable opportunities to engage in dialogue with Producers, electric mobility operators, treatment facilities, and European stakeholders. This has helped to establish the Collective Scheme as a competent and authoritative partner on end-of-life battery management issues. At **Ecomondo**, the Collective Scheme renewed its commitment for 2025 at its System stand, with panel discussions focusing on the issue of WB.

Finally, the Collective Scheme engaged with Producers and sector operators by holding webinars and technical meetings, and by providing updates on regulatory developments. Topics covered included collection obligations for professional batteries and electric vehicles, financial guarantee requirements, and the new rules governing cross-border movements. Erion Energy is also involved in the activities of EUCOBAT (European Compliance Organizations for Batteries). It contributes to the exchange of best practices and promotes in-depth discussions on regulatory developments at the EU level in Italy.

2.3.5 FUTURE PROSPECTS

2026 is set to be another transformative year for the battery sector. The full implementation of the European Regulation and related national legislation will require significant **support for Producers as they adapt to new requirements**. These range from designing more sustainable products and introducing collection obligations to providing financial guarantees to cover end-of-life costs. Erion Energy intends to continue its active participation in institutional forums, proposing the founding principles of the future regulatory framework to help establish clear, consistent and applicable rules for the sector.

At an operational level, the Collective Scheme aims to strengthen its relationships with and collaborations within the **network of facilities that specialize in sorting and treating batteries**. The objective is to gradually increase the capacity to recover critical raw materials from this waste stream while maintaining stringent safety standards.

Refinement of the supplier selection criteria, coupled with in-house management of certain operational functions, has resulted in greater control over the quality of processes, costs and overall environmental performance in waste management.

The findings from product analyses and surveys of public behaviour will inform **new, targeted awareness campaigns**. Over the coming years, Erion Energy intends to build on this knowledge by developing educational and communication initiatives that will reduce the amount of used batteries in unsorted waste. These initiatives will promote an increasingly circular and safe management system that meets the expectations of Producers, institutions and local communities.

Erion Packaging

GRI 2-6
GRI 413: 3-3
GRI 413-1
GRI 415: 3-3
GRI 415-1
GRI 417: 3-3
GRI 417-1

2.4.1 THE PACKAGING SECTOR AND ITS REGULATORY FRAMEWORK

Erion Packaging is a Collective Scheme within the Erion System responsible for managing **packaging waste from products placed on the market by Producers and importers of Electrical and Electronic Equipment (EEE), including the accompanying components, accessories, spare parts and batteries**. Established in 2020, the Collective Scheme was created to guide undertakings towards a new approach to fulfilling their Extended Producer Responsibility (EPR) obligations regarding packaging. It enables its Members to adopt an **integrated and coordinated** model for managing EPR obligations relating to **EEE, batteries and their respective packaging within the Erion System. This approach offers benefits in terms of administrative simplification, consistent processes and monitoring of regulatory compliance**.

The Collective Scheme is responsible for managing transport packaging and packaging waste from industrial and commercial facilities, including production sites, distribution centres and logistics hubs. It also handles the primary packaging of large household appliances produced by installers. Furthermore, the Collective Scheme fulfils financing obligations relating to separately collected household packaging waste. These obligations are met through agreements with CONAI and industry consortia, in accordance with the national regulatory framework.

Therefore, Erion Packaging can provide its Members with a direct service for managing packaging generated on private property, ensuring that they meet their EPR obligations in a cost-effective manner.

On 29 December 2022, the Ministry of the Environment and Energy Security recognized Erion Packaging through Ministerial Decree No. 547 as an independent system for collecting, recovering and recycling paper, plastic and wooden packaging. This made Erion Packaging the **first Italian multi-material Collective Scheme** composed of packaging users.

In terms of recycling, the Collective Scheme has focused on developing and consolidating its network of facilities and affiliated collecting points. Further implementation of the protocols launched in 2024 took place in 2025. This involved direct agreements and targeted campaigns to engage new stakeholders in the area. This framework includes an agreement with UNIRIMA (the National Union of Recovery and Recycling Paper Companies), which enables additional volumes of cellulosic packaging to be collected. It also incorporates an agreement with AIRES (the Italian Association of Specialized Appliance Retailers), uniting major EEE retailers in their support of coordinated packaging management in the retail sector. Significant efforts were made to identify the entities responsible for generating packaging waste within the scope of the Collective Scheme. This resulted in additional agreements being established with logistics companies, manufacturing facilities and operators dedicated to the sustainable management of this packaging.

Current Phase

Erion Packaging's year was marked by a total recycled volume of over twenty-six thousand tonnes through direct activities, taking into account all packaging collected, including paper and cardboard, plastic, wood, and mixed materials. This was achieved through agreements, brokerage activities and census data.

Collected (EWC codes)	Recycled weight (tonnes)
15.01.01 – Paper and cardboard packaging	**12,038**
15.01.02 – Plastic packaging	**1,505**
15.01.03 – Wooden packaging	**4,834**
15.01.06 – Mixed packaging - Paper fraction at the calculation point (after the final sorting stage)	**4,611**
01.06 – Mixed packaging - Plastic fraction at the calculation point (after the final sorting stage)	**3,015**
15.01.06 – Mixed packaging - Wood fraction at the calculation point (after the final sorting stage)	**619**
15.01.06 – Mixed packaging - Foreign fraction (after the final sorting stage)	**-***
TOTAL	**26,622**

** The amount of the non-recycled foreign fraction is 4,572 tonnes.*

Taking into account the **4,188 tonnes of packaging waste collected separately** and financed through agreements with industry consortia, the total quantity recycled by the Collective Scheme was 30,810 tonnes. The following results were achieved as a percentage of the amount placed on the market:

		2025			
		PAPER	WOOD	PLASTIC	TOTAL
Released for consumption - Erion Packaging	t	25,566	6,319	7,866	**39,752**
Total recycled and percentage of the amount placed on the market - Erion Packaging	t	19,689	5,453	5,668	**30,810**
	%	**77.01%**	**86.29%**	**72.05%**	**77.50%**
Recycling of packaging waste from the so-called 'household' stream - managed via industry consortia	t	3,040	-	1,148	**4,188**
Recycling of packaging waste from the so-called 'C&I' stream – managed directly	t	16,649	5,453	4,520	**26,622**

The Collective Scheme has therefore met all legal targets.

2.4.2 THE MATERIALITY PROCESS AND ITS SIGNIFICANT IMPACTS

The main priority for Erion Packaging is to identify the environmental impact of packaging management and recycling. This involves taking action to reduce resource consumption throughout the product lifecycle and end-of-life management, including water usage. **Water consumption** is a significant issue, both in terms of the amount used in suppliers' treatment and recovery processes and due to the indirect effect of increased packaging circularity, which helps avoid the need for water withdrawals in production. Intercepting packaging, including primary packaging, before it enters standard recycling streams helps to reduce the environmental footprint of recycling processes. This is because the chain is shorter and the recycled material can be separated more effectively upstream.

Health and safety throughout the chain is also a key issue, with particular attention paid to contracted facilities processing the Collective Scheme's packaging. This involves auditing and inspecting operating conditions, as well as ensuring compliance with the requirements set out in the agreements between the Collective Scheme and its operators. There is also a commitment to enhancing the quality and reliability of environmental and performance data provided by chain partners.

2.4.3 STRATEGIC POSITIONING IN 2025

2025 marks Erion Packaging's third year of operation, representing another step forward in its consolidation within the EPR framework for packaging. Although still in its start-up phase, the Collective Scheme is experiencing significant growth. The number of Members has risen from 46 to 72 and the volume of packaging placed on the market is approaching 40,000 tonnes, up from around 30,000 tonnes in 2024. This growth stems from two sources: firstly, the participation of Producers who are already part of the Erion System for WEEE and WB; and secondly, the entry of new companies that have decided to join Erion Packaging despite already participating in other collective systems for WEEE and WB. These companies recognize the solid and competitive position of the Collective Scheme when it comes to managing EPR obligations for packaging.

In terms of authorization, 2025 is to be considered a transition year. The monitoring period set out in the recognition decree has been extended by the Ministry of the Environment and Energy Security (MASE) by thirteen months, bringing the new expiry date forward to 31 October 2026. With the support of ISPRA (Italian Institute for Environmental Protection and Research), this extension will allow MASE to assess the ability of the Collective Scheme to meet the new recycling targets applicable from 2025, in line with EU and national legislation. It will also hopefully conclude the assessment process that began in 2023 with the issuance of the final approval for the Autonomous System. This final regulatory approval is a crucial step that will be instrumental in attracting new Members and strengthening the Collective Scheme's credibility within the packaging market.

2.4.4 AWARENESS-RAISING INITIATIVES AND STAKEHOLDER ENGAGEMENT

During the authorization process, Erion Packaging increased its engagement activities with key stakeholders in the packaging sector in 2025. These stakeholders included institutions, Members, affiliated companies, trade associations and industry consortia. Targeted communication and marketing campaigns were launched to raise awareness of the EPR framework for packaging and of the procedures for joining the Collective Scheme. Aimed at both existing Erion System Members and external companies, these campaigns coincided with the expansion of the Collective Scheme's membership base. Additionally, an information and training programme was launched to help companies in the sector understand and comply with the new Packaging Regulation requirement.

The Collective Scheme's participation in the 'Cantine d'Italia' (Italian Wineries) event with Erion Professional was a notable promotional achievement. Both Collective Schemes have supported 'Go Wine' on its journey towards sustainability by providing practical, up-to-date expertise on improving waste management and making industry events more environmentally responsible. At the launch of the 2026 Guide to Italian Wineries in Milan, which was attended by over 350 people, the two Collective Schemes gave presentations on operational and regulatory guidance.

They presented themselves as partners who can help wineries turn their sustainability commitments into tangible action.

This collaboration was further emphasized through targeted communication, including a presence in information materials and at the event (with QR codes offering further details), mentions in the press release and a dedicated social media campaign. These measures reinforced the visibility of the Collective Schemes' role in supporting the production sector's transition to more circular models.

The benefits of signing the Collective Scheme agreement for managing packaging were communicated through direct testimonials from the involved Producers, distributors and operators. Particular reference was made to the added economic and environmental value generated throughout the entire chain.

From an institutional standpoint, discussions are ongoing with all stakeholders regarding the renewal of the ANCI-CONAI framework agreement, which outlines the financial arrangements for the separate collection of urban packaging in Italy. Erion Packaging is participating in technical working groups to help define the rules and fees that will affect the current system, valued at around 800 million euros, and expected to grow under the new agreement.

Following the adoption of the new EU Packaging Regulation, the Collective Scheme has launched a training and information programme for its Members. The first seminar, held in 2025, focused on explaining the new regulatory framework and analysing its potential impact on packaging placed on the market. These initiatives will gradually expand as the implementation framework at national and European levels becomes clearer.

Erion Packaging at the Cantine d'Italia event.

2.4.5 FUTURE PROSPECTS

Looking ahead to the coming years, Erion Packaging's strategic priority is to obtain the final MASE authorization. This authorization is crucial for strengthening its position in the packaging sector and expanding the Collective Scheme's membership base. At the same time, the Collective Scheme anticipates growth in the volumes it manages and its collection network. This growth will not be linear, but will accelerate over time in response to rising regulatory targets and new EU legislative requirements in the lead-up to 2030.

Work on traceability and data quality is ongoing and will continue into the future. In 2025, on-site audits were introduced at certain suppliers and a dedicated project was launched to improve how Collective Scheme Members calculate the packaging they place on the market using streamlined reporting methods. These measures will be reinforced to enable more rigorous monitoring of collection and recycling results in response to growing institutional and market demand for transparency.

Finally, the purpose of Erion Packaging is to continue supporting its Members in adapting to the new regulatory framework. This will be achieved by developing specialized tools and initiatives, such as guidelines, training sessions, and discussion events, as well as by maintaining an active role in sector-specific forums with CONAI, industry consortia, other autonomous systems and representative associations. The Collective Scheme thus aims to contribute to the achievement of recycling targets and the dissemination of packaging design and management models that are increasingly oriented towards circularity and reuse.

Erion Care

GRI 2-6
GRI 413: 3-3
GRI 413-1
GRI 415: 3-3
GRI 415-1
GRI 417: 3-3
GRI 417-1

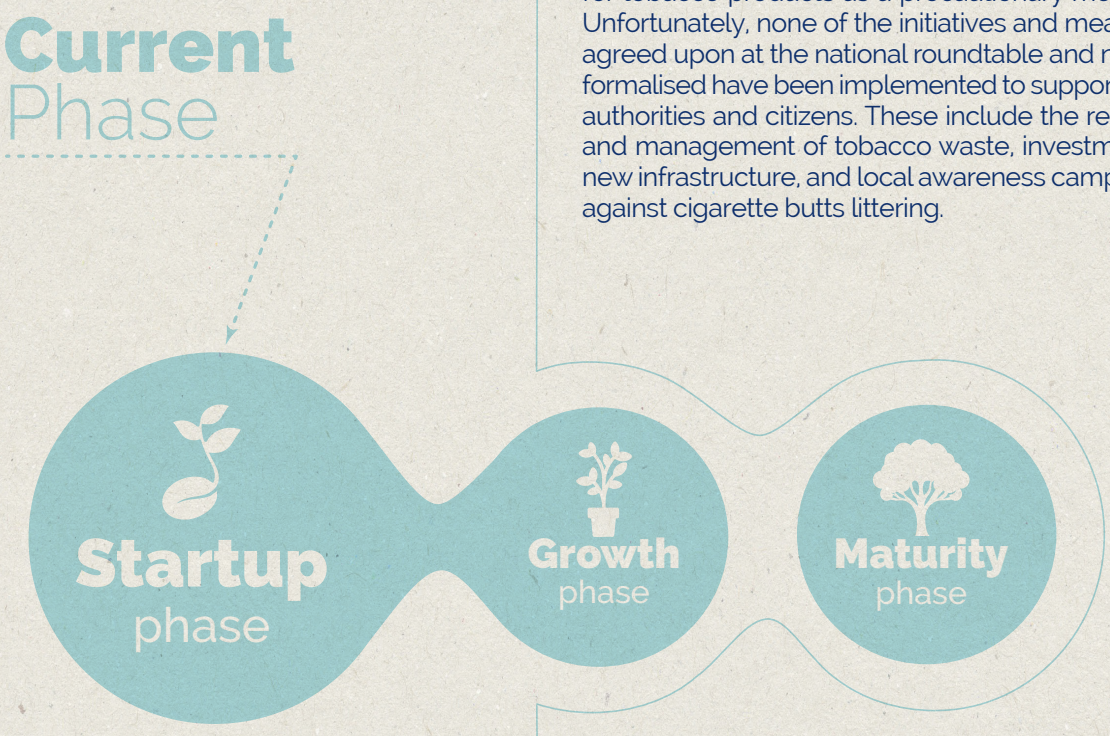
2.5.1
THE TOBACCO SECTOR AND ITS REGULATORY FRAMEWORK

Erion Care was established to implement the principles and objectives of Directive (EU) 2019/904 on the reduction of the impact of certain plastic products on the environment, with a particular focus on the pollution caused by **littering cigarette butts and other tobacco products containing Single Use Plastic (SUP) filters**.
Legislative Decree No. 196 of 2021 (the 'SUP Decree'), which implemented the Directive, gives local authorities a central role. They are responsible for urban waste management and for providing the necessary collection infrastructure. The SUP Decree introduces the EPR principle to the tobacco sector, requiring Producers to contribute proportionately to the costs of collection, transportation, treatment and cleaning. They are also required to implement measures to prevent littering and run communication and awareness-raising campaigns to combat the dumping of this waste in the environment.

The waste in question – cigarette ends (including those from heat-not-burn products such as heated tobacco) and used filters containing shredded tobacco – falls within the category of urban waste. Currently, there are no legally prescribed targets for the separate collection or recycling of this waste, which is predominantly managed within the residual dry waste stream. Local authorities are responsible for managing it, either directly or by entrusting it to public service operators. The Collective Scheme does not carry out collection or treatment activities directly, nor does it entrust them to operators in the free market.

Italy is **one of Europe's leading tobacco producers**, making it a particularly interesting country in which to develop an EPR system dedicated to this sector. However, from a regulatory perspective, there has been no significant progress in implementing the SUP Decree, even with regard to tobacco products. Apart from the general obligations set out in the Decree, specific EPR regulations for waste generated by this sector are still lacking.

In fact, the infringement procedure initiated by the European Commission regarding the national SUP Decree's non-compliance with the aforementioned Directive has not yet concluded. In May 2024, the Commission sent Italy a letter of formal notice challenging the incompatibility of certain provisions of the Decree with EU legislation, including those affecting the tobacco EPR. In March 2026, the Commission issued a reasoned opinion largely upholding its objections and calling on the Italian government to comply within two months. Following this, and pending resolution of the matter, the Ministry of the Environment and Energy Security decided to suspend the national roundtable on the EPR process for tobacco products as a precautionary measure. Unfortunately, none of the initiatives and measures agreed upon at the national roundtable and not yet formalised have been implemented to support local authorities and citizens. These include the removal and management of tobacco waste, investment in new infrastructure, and local awareness campaigns against cigarette butts littering.



2.5.2 THE MATERIALITY PROCESS AND ITS SIGNIFICANT IMPACTS

Updating the material topics for the Collective Scheme meant bringing them into line with the latest international standards, with particular attention paid to the impacts generated along the value chain.

The Collective Scheme continues to play a leading role in designing and implementing the EPR system for tobacco products, with topics related to waste management, resources, circularity, ethics, regulation and institutional dialogue remaining central to its position.

Furthermore, the first overarching topic recognizes the potential for Erion Care to indirectly protect water resources by identifying and promoting **good practices and sustainable production and consumption models** throughout the production chain. Although Erion Care's activities do not involve the direct use of water in production or waste treatment processes, the Collective Scheme recognizes the connection between the tobacco sector and water resources throughout the product's life cycle. This is achieved by promoting the efficient use of water during tobacco production, as well as by preventing used filters from being disposed of in waterways and seas, where they can have serious consequences for aquatic ecosystems. With this in mind, Erion Care aims to protect water resources by raising awareness of the importance of reducing littering and managing waste more effectively.

2.5.3 STRATEGIC POSITIONING IN 2025

In 2025, the Collective Scheme underwent a consolidation phase to strengthen its strategic position within an ongoing regulatory framework characterised by uncertainty.

In late 2025, the European Commission published non-binding guidelines on how Member States should calculate the cost of cleaning up litter. The guidelines focused particularly on street sweeping and litter management, the costs of which should be covered by Producers.

In the absence of definitive guidance from national and European institutions on the SUP Decree and its implementation, the Collective Scheme is continuing its technical work. This work involves assessing the impact of the Commission's guidelines and formulating proposals to **inform the development of the regulatory framework**.

This will further consolidate its role as a primary point of contact for public and private sector operators, the Ministry for the Environment, and the general public.

While awaiting the full implementation of the EPR system for tobacco products, Erion Care has continued to work on the system's technical and organizational aspects. A key part of preparing for the operational phase involved **designing the Portal through which affiliated entities** (local authorities and operators) can register and enrol, which was completed in 2025. This platform will give local authorities and service providers access to the financial resources made available by the Collective Scheme. They will then be able to launch local communication and awareness campaigns, while also benefiting from Erion Care's operational and methodological support.

To complete the digital infrastructure, the Collective Scheme has developed a replicable campaign format. This includes communication tools and materials such as billboards, press conference content, and information toolkits. Local authorities can use and adapt these materials to encourage proper disposal of cigarette butts in their area.

2.5.4 AWARENESS-RAISING INITIATIVES AND STAKEHOLDER ENGAGEMENT

As it is not yet possible to implement the EPR system in full or to fund municipal activities on a large scale, Erion Care has chosen to dedicate a significant proportion of its resources to raising **citizens' awareness through direct initiatives**. In 2025, the Collective Scheme built on and expanded the communication activities launched in previous years. These included the 'Senza Filtri' press campaign, projects with content creators, partnerships with environmental associations, and CareActionDays, which focused on collecting cigarette butts and took place across the country. The Collective Scheme also participated in trade fairs with stands and talks dedicated to tackling littering.

One of the most significant initiatives was the collaboration with Legambiente, with whom national awareness campaigns were held. These included the 'Puliamo il Mondo' initiative, which raised awareness of cigarette butt littering within an established environmental volunteering format that attracted widespread participation. In October 2025, Erion Care sponsored and took part in a cigarette butt collection day in Genoa, working alongside the Plastic Free association.

At the same time, the Collective Scheme has experimented with digital communication tools and language. It has used social media to swiftly disseminate important messages and share visual content with the public, including the '#SenzaFiltri' campaign. For this campaign, the Collective Scheme collaborated with well-known influencers and content creators. The aim is to enhance Erion Care's reputation as a leading authority in technical, institutional and cultural terms by promoting responsible behaviour in the management of cigarette ends.

The awareness-raising activities carried out by the Collective Scheme were presented at the 29th Ecomondo trade fair in Rimini, which took place from 3 to 6 November, at a stand dedicated to the Erion System.

Care Action Days at Sempione Park in Milan.

2.5.5 FUTURE PROSPECTS

Looking ahead to 2026, Erion Care's primary goal is to overcome the current regulatory impasse and **fully implement the EPR system** for tobacco products. This will enable the activation of the subscriber Portal and the finalization of agreements with local authorities and delegated operators. This will provide local authorities with the financial resources and operational tools they need to support their waste management activities and awareness-raising campaigns, marking a turning point in the fight against cigarette butt littering.

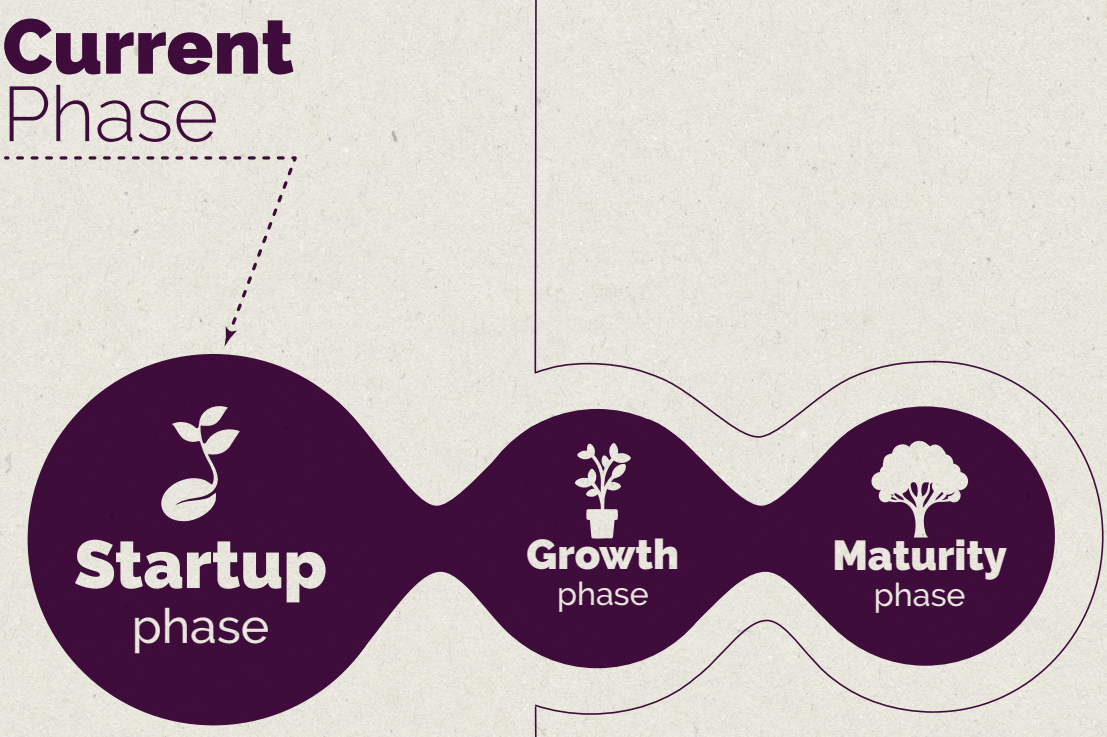
At the same time, the Collective Scheme intends to strengthen its institutional dialogue with the Ministry of the Environment and Energy Security, as well as with other sector stakeholders. The Collective Scheme will continue to play a proactive role in shaping the regulatory and operational framework to ensure an effective and fair EPR model that delivers tangible environmental benefits to communities and local areas.

Erion Textiles

GRI 2-6
GRI 413: 3-3
GRI 413-1
GRI 415: 3-3
GRI 415-1
GRI 417: 3-3
GRI 417-1

2.6.1 THE TEXTILE SECTOR AND ITS REGULATORY FRAMEWORK

Erion Textiles is the Collective Scheme within the Erion System that supports producers in the management of end-of-life textile products, promoting collection, traceability, and the development of a more circular and responsible value chain. Despite the fact that national regulatory obligations were still lacking in the fashion and clothing sector, Erion Textiles strengthened its position within the EPR landscape in 2025. Some of the sector's leading companies joined the Collective Scheme during the year. By the end of 2025, Erion Textiles had 14 Members and **ranked among the leading Producer Responsibility Organizations (PRO) in Italy and Europe in terms of volumes placed on the market**. In line with its Collective Scheme structure, Erion Textiles only includes Producers for EPR purposes. These are entities that place fashion and clothing products on the national market, i.e., a group of Italian and international brands that have joined forces in order to prepare effectively for future EPR obligations. In terms of regulations, the framework underwent rapid changes in 2025. The European legislation on EPR for textile products has recently been adopted, and the Ministry of the Environment and Energy Security is drafting a national decree to implement these regulations in the near future. The discussed timelines suggest that the decree could come into force in March 2026. In the best-case scenario, the EPR regime is expected to be fully operational by the end of 2026.



2.6.2
THE MATERIALITY PROCESS AND ITS SIGNIFICANT IMPACTS

For Erion Textiles, this review of the materiality analysis is particularly significant: as the Collective Scheme is not yet operational, it is more important to assess future impacts than to provide a snapshot of current operations. Erion Textiles confirms that its priority focus is on contributing to the creation of public policy. Its member companies have chosen to join voluntarily because they recognize the opportunity to play an active role in shaping European and national legislation at a time when the rules for the textile sector are still being established.

Another issue that the Collective Scheme considers fundamental is responsible sourcing throughout the supply chain. This involves selecting and assessing suppliers based on environmental and social criteria.

This process is considered central due to its significant impact on the environment, working conditions, human rights and the potential reputational implications for member brands.

Of all the environmental issues, waste management, resource utilization and the circular economy are given top priority. These issues lie at the heart of the EPR system, encompassing everything from the proper management of post-consumer waste to the production of secondary raw materials via reuse and recycling processes. The climate and energy sector, which covers contributions to climate change and energy resource management, is also considered important. However, water resources are not a relevant issue for Erion Textiles, since the processing methods used for textile products do not involve significant water usage at present.

Finally, the Collective Scheme places great importance on innovation and on creating networks to support the sector's transition to a circular economy. Although textile reuse is well established in Italy, the recycling sector is still in its infancy and requires investment in technology, industrial models and partnerships to facilitate its development.

2.6.3
STRATEGIC POSITIONING IN 2025

In 2025, Erion Textiles had strategically established itself along two main lines: **representing the interests of its Producers** in dialogue with stakeholders **and building a solid membership base** in anticipation of the EPR system coming into force.

Initially, the Collective Scheme acted as an advisory body to the Ministry of the Environment and Energy Security while the national decree was being drafted. It provided the perspective of the companies involved on issues such as the scope of application, targets, compliance timelines, and potential competitive impacts. Erion Textiles' stated aim is to help establish a sustainable, circular chain, bearing in mind that the Collective Scheme and its Members will be responsible for its implementation.

Meanwhile, Erion Textiles has **consolidated and expanded its membership base**, attracting new brands and establishing itself as the leading Collective Scheme for Producers seeking to fulfil their future EPR obligations in a structured manner.

Although membership is still voluntary, the addition of major international groups from the fashion and sports retail sectors has strengthened the Collective Scheme's overall standing, making it the largest in Italy in terms of volumes placed on the market.

At this stage, on-the-ground operations are intentionally restricted. Although Erion Textiles **does not yet manage the collection or treatment of textile waste directly**, it has started collaborating with ECO's Operations department to identify and map the operators involved in collection, sorting, and recycling. While waiting for the legislation to come into force, the Collective Scheme is defining its priorities, contributing to the drafting of the rules, building alliances, and preparing for the future textile waste management value chain in collaboration with ECO. In fact, numerous internal working groups are focusing on issues of paramount importance for 2026. These include the eco-contribution working group and the working group on simplifying administrative burdens, which Erion Textiles coordinates at a European level within the Textiles PRO Forum. This group comprises key European textile EPR collective schemes, including Refashion and Re-Viste. In 2025, the Collective Scheme coordinated two research projects: one focusing on the traceability of textile waste, and the other on the Digital Product Passport (DPP). The aim was to develop expertise in this area and support Producers in implementing these initiatives.

2.6.4 AWARENESS-RAISING INITIATIVES AND STAKEHOLDER ENGAGEMENT

In line with the pre-operational phase, Erion Textiles' stakeholder engagement activities in 2025 focused on institutional decision-makers and other stakeholders within the evolving EPR landscape. The Collective Scheme participates in consultations on legislation and contributes to the review of draft decrees by providing evidence and observations gathered from the perspective of our Member Producers. This advisory role is the primary means by which Erion Textiles can generate systemic value ahead of the launch of the EPR system.

In terms of stakeholder engagement, Erion Textiles organized several informative webinars in 2025, as well as participating in events and conferences on EPR and Eco-design for Sustainable Products Regulation (ESPR) legislation, recycling, and green communication. These events featured leading experts in these fields and provided Producers with insights to help them address these issues and prepare for future regulatory obligations. It is also worth noting the collaboration with Ipsos Doxa Italia, which resulted in the creation of the 'Textile Observatory'. This involved two research waves throughout the year, providing a snapshot of **consumer habits**, **particularly** with regard to **the disposal of clothing** and other textile items in Italy.

Additionally, two further studies focusing specifically on textiles were conducted:

- the technical-scientific study conducted by Erion on unsorted waste, which involved analysing 38 products to quantify the presence of textile waste in municipal waste bags in 15 Italian municipalities;

- **the opinion poll**, conducted by **Ipsos Doxa Italia**, which investigated the role of communication in changing people's behaviour.

In terms of local engagement, the 'TRACCIA-TO' project has launched public awareness initiatives in Turin's San Salvario district. The Collective Scheme is also exploring the possibility of launching textile waste collection pilot projects in partnership with several major local authorities. These projects could establish public-private partnerships for waste disposal relatively quickly, while also gathering evidence to inform the design of a more effective EPR system in the future.

Once the regulatory framework has been finalized, Erion Textiles' stakeholder engagement activities will gradually expand to encompass other key stakeholders, including consumers, collection operators, sorting and treatment facilities, and third-sector organizations involved in reuse and social sustainability. The ultimate goal is to establish an integrated chain that prioritizes environmental performance, social protection and economic sustainability. The groundwork for this dialogue was laid in 2025 through discussions with associations representing key sector players.

President Raffaele Guzzon at the event "Sustainability and Awareness": an investigation into unsorted waste and the role of communication in transforming behavior.

2.6.5 FUTURE PROSPECTS

The objectives outlined for 2026 demonstrate Erion Textiles' ongoing growth. Firstly, the Collective Scheme intends to **further expand its membership base**, recognizing that new national legislation will require more Producers to join an EPR system. The ambition is to maintain its position in terms of the volume of products placed on the market while continuing to be an attractive option for brands that want to manage their textile waste responsibly and proactively.

Furthermore, Erion Textiles has identified strengthening relationships with future collection, sorting and treatment providers as a strategic priority, with the aim of establishing a chain capable of meeting the requirements of the future decree.

This involves designing effective solutions for collecting and preparing textiles for reuse and defining development pathways for recycling textile products. Although textiles are currently recognised as the weakest link in the chain, they also offer the greatest potential for innovation.

The long-term objective of the Collective Scheme is to contribute to the development of an EPR model for textile products that **goes beyond mere regulatory compliance**. This will be achieved by promoting responsible sourcing practices throughout the supply chain, encouraging research into recycling technologies, and creating tools that measure environmental and social impacts. In this vision, the period from 2025 to 2026 represents a time for establishing the operational foundations. It is a time to define the rules, partnerships and priorities that will maximize the environmental, economic and social benefits of the EPR system for textiles once it is fully operational, while recognizing the commitment of those Producers who have chosen to take the lead.

Erion Compliance Organization (ECO)

GRI 2-6
GRI 402: 3-3
GRI 402-1
GRI 413: 3-3
GRI 413-1
GRI 415: 3-3
GRI 415-1
GRI 417: 3-3
GRI 417-1

2.7.1 THE ECO MODEL: FROM VALUES TO MISSION

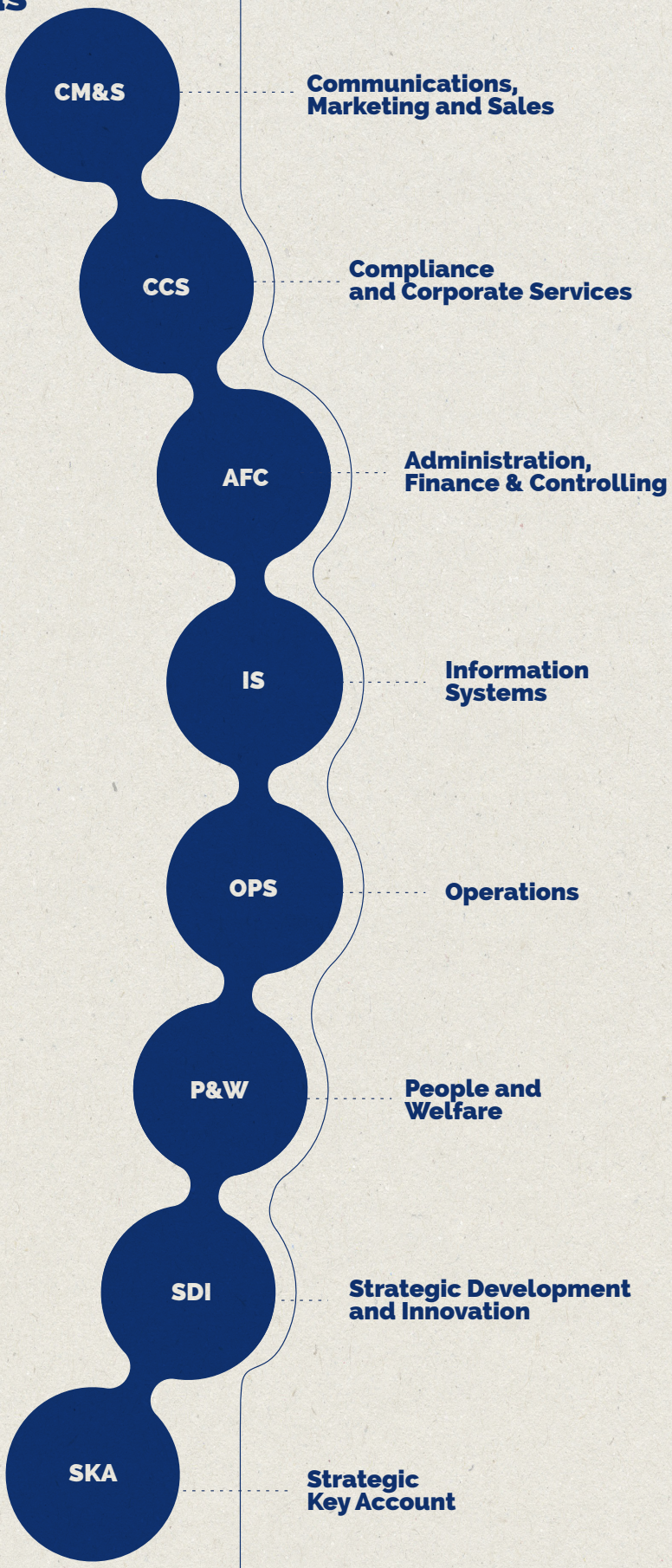
Erion Compliance Organization (ECO) is a service platform that integrates and coordinates cross-functional expertise in order to support the System's Collective Schemes and help them achieve their regulatory compliance and sustainable development objectives. ECO ensures the consistent and effective management of activities by setting up specialized teams, shared processes, and unified strategies for the Collective Schemes, all of which are aligned with a shared vision.

Every day, ECO enhances and shares a common pool of technical, regulatory and operational expertise with the Collective Schemes' Members and Producers. This knowledge base is derived from practical experience and ongoing engagement with institutions, associations and sector stakeholders. These standards ensure the highest levels of quality and transparency in the management of the Extended Producer Responsibility obligations. ECO's medium- to long-term strategic objectives are structured around four key areas to guide the planning and evaluation of activities.

These are:

- **efficiency and standardization**. Developing and overseeing common processes, procedures and tools to ensure that Collective Schemes and Producers receive high-quality services through the efficient use of resources and rigorous cost control;
- **reputation and authoritativeness**. Strengthening the positioning of ECO and the System as competent, credible and proactive partners in dialogue with institutions, trade associations, sector operators and citizens at national and international levels;
- **integrated approach to process management**. Adopting a holistic approach to activities and leveraging synergies between functions, Collective Schemes and EPR chains, with the aim of making the System's overall actions more effective and coherent;
- **active and concrete promotion of the circular economy and sustainability**. Translating environmental and social objectives into projects, initiatives and services that can generate measurable impacts across product lines, with a particular focus on waste prevention, high-quality recycling and the development of new circular solutions.

Functional areas of ECO



Thanks to ECO's evolving operational scope, this model was further strengthened in 2025, with ECO taking on an even more direct role in waste chain management.

2.7.2 EVOLUTION OF ECO'S OPERATIONAL MODEL AND SCOPE IN 2025

As early as 2024, ECO had begun a significant internal reorganization, establishing new departments, updating key roles and strengthening cross-functional teams in order to support the Collective Schemes. This process became fully operational in 2025, resulting in a tangible expansion of the scope of its activities.

A key step was ECO's **registration with the Register of Environmental Operators under category 8 (intermediation and trade)**. This allowed the Organization to conduct waste intermediation activities directly on behalf of the Collective Schemes within the System. In 2025, ECO continued to operate within its initial classification while adapting its **ISO 14001 certification** to the new scope. The aim was to consolidate the transition to a higher classification and ultimately achieve Class A status, which would enable the management of unlimited quantities in the waste intermediation sector.

At the same time, ECO began the process of **taking over certain operations**, particularly waste chain management, which had previously been carried out by third parties. This decision addresses three main requirements:

- **greater managerial autonomy**, to monitor critical activities more closely and achieve the System's objectives;
- **expanding the portfolio of services** offered to the Collective Schemes and their Producers, establishing ECO as a more comprehensive partner across the entire value chain, from compliance to operational management;
- **strengthening risk control**, thanks to greater proximity to operations on the ground and a more direct use of monitoring and control systems.

Therefore, the evolution of the operational scope is not a break with the past, but a logical progression from the path that began in 2024. Through organizational and strategic decisions, ECO is establishing itself as a hub of expertise and services that support all the Collective Schemes within the System, paving the way for operational implementation.

2.7.3 RISK MANAGEMENT AND RESPONSIBLE PROCUREMENT

Effective risk management across EPR chains is a key element of the Erion model, implemented through the management of supplier relationships. In line with the material topic of Responsible procurement, ECO strengthened the tools and processes used to assess and monitor risks associated with services entrusted to the supply chain in 2025. Particular attention was paid to **fire risk in facilities** handling highly critical waste, such as lithium batteries, due to the potential chemical and physical hazards they pose. Throughout the year, ECO supported Erion Energy and Erion WEEE Collective Schemes in their **systematic fire risk assessment** process with suppliers by carrying out the following tasks directly:

- collecting structured information on the **prevention and protection measures** adopted;
- conducting **documentary and on-site checks** of safety conditions;
- updating the criteria for **assessing and ranking suppliers** to incorporate specific parameters related to fire risk management and operational continuity.

This work forms part of a broader framework that integrates risk assessment with procurement processes. Throughout the entire waste chain, this framework considers economic, operational, environmental and social aspects. It represents a shift towards more responsible procurement practices involving the selection and management of suppliers to reduce risks, improve environmental performance and ensure the safety of people and areas where facilities operate.

2.7.4 ECO SUPPORTS THE SYSTEM WITH INTEGRATED SERVICES FOR COLLECTIVE SCHEMES AND PRODUCERS

Strengthening the role of ECO as a service platform provides **day-to-day support for the Collective Schemes** of the System and its Member Producers. It offers a structured service that covers EPR responsibilities throughout the entire lifecycle.

In 2025, work continued on developing and consolidating an integrated service portfolio. This included the following:

- **regulatory and compliance consultancy** Services for the analysis, interpretation and application of EPR regulations, paying particular attention to national and European legislative updates and the specific needs of Producers;
- **circular knowledge transfer**. Support for eco-design and the development of circular solutions, sharing of knowledge and best practices, participation in research and innovation projects on EPR schemes;
- **awareness and communication**. Design and implementation of information and awareness-raising campaigns for users and stakeholders in the chain. This includes integrated digital communication initiatives targeting local residents;
- **integrated waste management**. Support with designing and monitoring operational services for waste collection, transportation, treatment and recycling in line with the environmental and quality standards defined by the Collective Schemes;
- **training**. Dedicated courses, webinars and training sessions for Producers, suppliers and, where relevant, institutional stakeholders to disseminate up-to-date knowledge on regulations, processes and sector innovations.

The **Strategic Key Account**, function plays a structured role in managing relations with key Producers. It acts as the primary point of contact between the Producers' requirements and ECO's service offerings. This monitoring enables any new requirements to be quickly identified, bespoke solutions to be suggested, and Producers to be encouraged to play an active role in developing the System. Particular attention has been paid to **supporting smaller, younger Collective Schemes** that are currently in the start-up or consolidation phase:

- **Erion Textiles**, which has continued to grow its membership base throughout the year, securing the backing of several major distribution and retail chains and confirming the growth potential of the Collective Scheme within the new textile EPR framework.
- **Erion Care**, ECO is assisting with the implementation of the EPR regime, supporting the definition of processes and services for Producers, and carrying out communication activities targeting various stakeholders.
- **Erion Packaging**, ECO is actively supporting the expansion of the Collective Scheme's membership and the process of becoming accredited by the Ministry of the Environment and Energy Security.

EVENTS ORGANIZED BY ECO IN 2025

Awareness-raising initiatives also remained at the heart of ECO's efforts in 2025. In particular, 2025 was marked by a renewed focus on events, notably:

1. The '***Forum on circular models for growth***', organized by Erion to celebrate the publication of its Sustainability Report, took place on 10 June in the Sala Capranichetta at the Hotel Nazionale in Rome. The event encouraged shared reflections **on leveraging the circular economy to boost the country's competitiveness, engaging institutions and businesses**.

The Director of Development and Institutional Relations opens the forum.

2. The event, '***Sustainability and awareness: a survey on unsorted waste and the role of communication in changing behaviour***', took place at the Ara Pacis Museum in Rome on 14 October, in celebration of International E-Waste Day. General Managers from the System Collective Schemes and representatives from Ipsos Doxa attended the event. Ipsos Doxa conducted a study on public awareness of proper waste disposal practices, the results of which were presented at the event.

A discussion among the General Managers of the Erion System Collective Schemes, taking place during the Sustainability and Awareness event.

3. The four-day **Ecomondo** event, which took place from 3 to 6 November, centred on stakeholders and the core themes of the Erion System: environmental sustainability and the circular economy. ECO oversaw the creation of an interactive stand dedicated to its Collective Schemes, which hosted a variety of events to promote and communicate Erion's initiatives.

Erion System's stand at Ecomondo 2025.

2.7.5 A RENEWED COMMITMENT TO SUSTAINABILITY IN THE COMPANY

In addition to its work in support of EPR chains, ECO continues to improve its internal environmental and social performance, in line with the System's objectives and its employees' expectations.

The initiatives launched in previous years were confirmed and consolidated in 2025. These included:

- the option to **work remotely for up to three days a week**, with the aim of reducing commuting time and improving work-life balance;
- the promotion of **soft mobility**, including providing designated bicycle parking areas and paying close attention to the choice of vehicles used for business travel;
- the Organization is gradually replacing its **fleet of cars** with electric and hybrid vehicles. It is also installing **charging stations** at its headquarters to promote more sustainable mobility practices.

In 2025, several cross-cutting projects focusing on welfare and organizational wellbeing were developed or enhanced. These included internal training programmes and discussion opportunities, as well as initiatives designed to encourage employee engagement and team building. The aim was to foster a sense of belonging and collaboration between departments.

2.7.6 FUTURE PROSPECTS

By 2026, ECO will need to take another significant step forward in its evolution. This will reinforce its role as a key operational and coordinating body for the Erion System Collective Schemes. Against a backdrop of accelerating regulatory, operational and industrial changes impacting EPR chains, the challenge for ECO will be to strengthen its oversight capabilities by offering Collective Schemes an even more integrated, robust and scalable service model. In this regard, particular importance will be attached to completing the process of achieving Class A status in Category 8 of the Register of Environmental Operators. This will enable the Organization to strengthen its intermediation capabilities and expand its area of operation. At the same time, the process of internalizing operations will continue. This is intended to increase managerial autonomy, enable more timely decision-making and provide direct control of processes and risk management. All these changes are in line with the need to ensure greater continuity and effectiveness throughout the entire operational chain.

Another area of focus will be providing targeted guidance to newer Collective Schemes, such as Erion Textiles and Erion Care, during their consolidation phase in 2026. This will involve reinforcing services, tools, organizational structures, and management models to facilitate their growth. Similarly, ECO will continue to actively support Erion Packaging on its journey towards definitive accreditation, a vital step in strengthening the Collective Scheme's national position. Overall, 2026 will be a pivotal year for ECO. It will strengthen its position as a centre of expertise and enhance the efficiency of its operational activities. It will also drive integration and efficiency across the entire System. This will enable ECO to address the growing complexity of waste chains and environmental, industrial, and regulatory challenges with greater resilience.

ENVIRONMENTAL DATA: Erion system

3.1.1 REPORTING SCOPES AND ACTIVITIES

Reporting on the environmental impacts of the Erion System focuses on activities related to waste management operations. The analysis covers waste streams for which structured and representative data is available for the reference year: **Household WEEE**, **WB** and **Packaging Waste**.

This approach enables the analysis to focus on the System's most significant environmental impacts. These activities form the core of Erion's operations and contribute directly to the collection, treatment and recovery of waste.

This section provides a detailed analysis of the environmental performance of the Erion System, focusing on key aspects of the waste chain: **management, recycling, environmental impact**, and **benefits to the environment**.

The first aspect concerns **waste management**, which is defined as the set of activities through which the Erion System oversees reported waste streams: Household WEEE, WB and Packaging Waste. The aim of this section is to represent the System's operational scope by analysing the total quantities managed, their distribution across the various sectors, and the proportion of hazardous waste.

Scope of the Report

The Report covers the operational activities overseen by the Collective Schemes for which Erion has sufficient and complete data. For **Household WEEE**, the Report covers transportation from Collection centres and Grouping places to treatment facilities, as well as processing operations carried out at these facilities. For **WB**, this includes transportation to designated facilities, as well as selection and sorting activities. For **Packaging Waste**, it includes transportation to facilities, followed by sorting operations.

Activities excluded from the scope

The reporting scope excludes water and energy consumption and waste generation by Erion's offices and staff. These impacts were deemed immaterial in relation to the scale of the reported operational activities. This category includes consumption relating to general office services (e.g. air conditioning, domestic hot water and utilities), auxiliary services (e.g. IT equipment, printers and catering equipment) and staff travel.

Professional WEEE is also excluded from overall environmental reporting. Currently, there is no comprehensive system in place for tracking the impact of this waste stream throughout the entire management chain.

The second aspect is **recycling**, which is the main destination for managed waste and a key indicator of the System's contribution to the circular economy. The analysis shows how many tonnes of waste were sent for recycling and which types of materials were recovered. This highlights the important role of Secondary Raw Materials in reducing reliance on virgin resources.

The third aspect relates to the **environmental impact** of the activities required for waste management and treatment. These impacts are measured using three key indicators: energy consumption, atmospheric emissions and water usage. To ensure greater transparency, this section distinguishes between the impacts resulting from the Collective Schemes' direct management and those associated with the indirect stages of the waste cycle.

The fourth aspect is the **environmental benefits** of recycling. Material recovery makes it possible to avoid, either wholly or in part, the environmental impacts that would otherwise be generated by the extraction and production of virgin raw materials. For this reason, this section compares the net impact of the Collective Scheme's operations with hypothetical alternative scenarios for each waste stream. This enables us to quantify the environmental value generated by the Erion System.

Indirect activities

In addition to the activities included within the scope, there are upstream and downstream stages over which Erion has no direct control. Although these activities are not within the System's operational scope, they help us to understand how waste chains function as a whole.

Indirect activities relating to **Household WEEE** include transporting waste from citizens' homes to Collection centres or Grouping places, and transporting fractions from these facilities to their final destinations. Other indirect activities include the industrial processes of recycling, energy recovery and disposal.

For WB, the stages preceding delivery to the collection systems managed by the Collective Scheme are outside its direct scope. Activities that follow selection and sorting are also considered indirect, including the transportation of fractions to final treatment facilities and industrial processes such as recovery, recycling or disposal.

For Packaging Waste, activities that occur before delivery to the relevant facilities are outside the direct scope of the analysis. Activities that occur after sorting, including subsequent industrial processing, recycling, energy recovery and disposal, are also considered to be indirect.

3.1.2 MANAGEMENT PERFORMANCE OF THE ERION SYSTEM

[GRI 301: 3-3, GRI 301-1, GRI 306: 3-3, GRI 306-1, GRI 306-2, GRI 306-3, GRI 306-4, GRI 306-5]

In 2025, the Erion System processed **289,292 tonnes of waste**, reaffirming its pivotal role in managing various waste chains related to the principle of Extended Producer Responsibility. This total includes **Household WEEE**, **Professional WEEE, WB**, and **Packaging Waste**.

Household WEEE accounts for the largest share at **247,124 tonnes**, constituting **85.5%** of the total waste managed. This is followed by **Packaging Waste (11%)**, **Waste Batteries (2%)**, and **Professional WEEE (1.5%)**.

Compared to 2024, the total quantity of waste managed by the Erion System increased by **8%. Packaging Waste** saw the most significant growth, with an increase of **60%**. In contrast, **Household WEEE** showed more modest growth of **4%**. Conversely, there was a **7%** decrease in both **WB** and **Professional WEEE**

Table 3.1.1 – Total waste managed by the Erion System during the 2023–2025 period

Waste stream	Unit of measurement	2023	2024	2025
Household WEEE	tonne	232,023	237,728	247,124
Professional WEEE	tonne	2,896	4,358	4,040
WB	tonne	5,853	5,719	5,345
Packaging Waste	tonne	11,500	20,545	32,783
Total waste managed	**tonne**	**252,272**	**268,350**	**289,292**

Some waste managed by the Erion System contains substances that could be hazardous to the environment and human health if not treated properly. Examples include **heavy metals**, **insulating foams**, **ozone-depleting gases** and **mercury**.

In 2025, the Erion System managed **113,718 tonnes** of hazardous waste. Around **95%** of this waste was **hazardous Household WEEE**, classified under European regulations by **EWC codes 20 01 23, 20 01 35 and 20 01 21**. Specifically, WEEE belonging to groups **R1** (cooling equipment), **R3** (monitors and screens), and **R5** (light sources) are considered hazardous.

The remaining **5%** consists of **hazardous Professional WEEE** and **hazardous Waste Batteries**. The former is classified under **EWC codes 16 02 11, 16 02 13, 20 01 21** and **20 01 23**, and the latter under codes **16 06 01, 16 06 02, 16 06 03 and 20 01 33**.

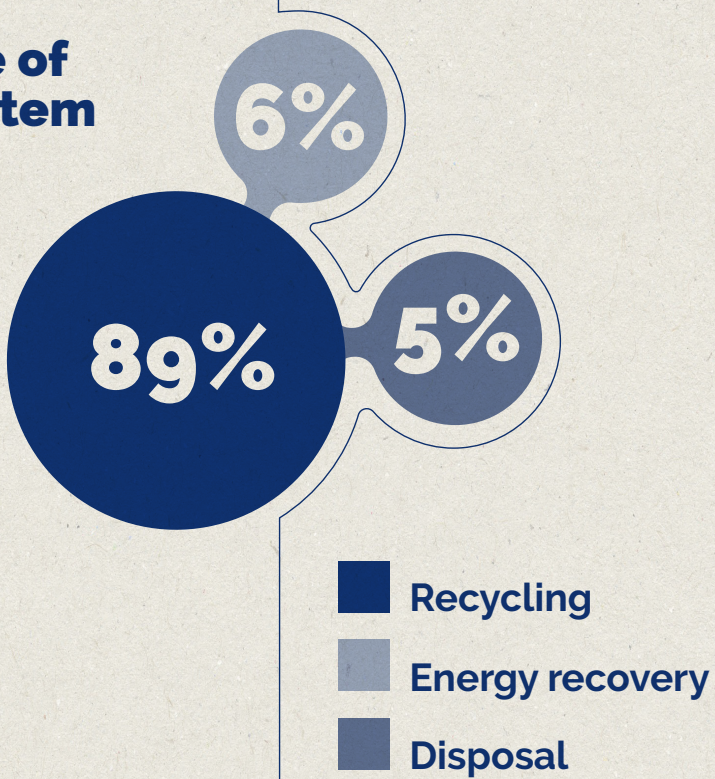
Table 3.1.2 – Total hazardous waste managed during the 2023–2025 period

Waste stream	Unit of measurement	2023	2024	2025
Hazardous Household WEEE	tonne	110,093	107,636	108,280
Hazardous Professional WEEE	tonne	584	809	597
Hazardous Waste Batteries	tonne	5,260	5,144	4,841
Total Hazardous Waste managed	**tonne**	**115,937**	**113,589**	**113,718**

3.1.3 RECYCLING PERFORMANCE OF THE ERION SYSTEM

In 2025, the Erion System's recycling activities for the three reported waste streams – **Household WEEE**, **WB** and **Packaging Waste** – enabled 89% of managed waste to be diverted to recycling. This represented a **1 percentage point** increase on 2024.

Recycling performance of the Erion System in 2025



As shown by the data in **Table 3.1.3**, recycling is the predominant treatment method for all waste streams analysed. This approach aligns with the European waste hierarchy, which prioritizes recycling over energy recovery and disposal.

A total of **219,626 tonnes** of **Household WEEE** were sent for recycling, accounting for **89%** of the WEEE managed. Of the total **WB** managed, **4,442 tonnes** were recycled (equivalent to **83%**), while **30,810 tonnes** of **Packaging Waste** were sent for recycling (equivalent to **94%**).

Table 3.1.3 – Recycling, energy recovery and disposal performance of output fractions from the treatment of Household WEEE, WB and Packaging Waste

	Household WEEE		WB		Packaging Waste	
Destination	Quantity (tonnes)	%	Quantity (tonnes)	%	Quantity (tonnes)	%
Recycling	219,626	89%	4,442	83%	30,810	94%
Energy recovery	15,812	6%	-	0%	1,187	4%
Disposal	11,686	5%	903	17%	786	2%
Total	**247,124**	**100%**	**5,345**	**100%**	**32,783**	**100%**

For Household WEEE, the quantities of materials recovered, sent for recycling, and disposed of following treatment are estimated based on self-declarations provided by suppliers of the Collective Scheme. This data is collected using **RepTool**, software developed by the WEEE Forum and made available internationally to facilitate tracking of fractions obtained from processing WEEE. In 2025, **iron** and **plastic** were the materials most frequently recovered from WEEE. They accounted for **61%** and **15%**, respectively, of the total weight of materials sent for recycling.

Table 3.1.4 - Output fractions of Household WEEE sent for recycling in 2025

Material	Quantity (tonnes)
Iron	133,605
Plastic	33,207
Cement	20,084
Glass	10,665
Aluminium	6,705
Copper	5,939
Other Metals	5,408
Other materials	4,013
Total	**219,626**

For **WB**, the materials recovered in the largest quantities were **lead**, accounting for **53%** of the volumes sent for recycling, and **iron and steel**, accounting for **31%**. These were followed by **zinc**, at **8%**, and certain **Critical Raw Materials** such as cobalt, copper, and lithium, which together accounted for **6%** of the recovered materials. The quantities are calculated using the **Battery Tool**. This tool is based on primary data reported by treatment facilities and secondary data from literature studies, described in detail in Appendix 2.

Table 3.1.5 - Output fractions of WB sent for recycling in 2025

Material	Quantity (tonnes)
Lead	2,369
Ferrous metals	1,382
Zinc	368
Critical raw materials and other materials	287
Aluminium	36
Total	**4,442**

The main materials recovered from Packaging Waste were **paper (64%)**, **wood (18%)** and **plastic (18%)**. These figures are based on reports submitted by facilities working with Erion Packaging.

Table 3.1.6: Output fractions of Packaging Waste sent for recycling in 2025

Material	Quantity (tonnes)
Paper	19,689
Plastic	5,668
Wood	5,453
Total	**30,810**

3.1.4 ENVIRONMENTAL IMPACTS RESULTING FROM THE DIRECT AND INDIRECT MANAGEMENT OF THE ERION SYSTEM

[GRI 302: 3-3, GRI 302-1, GRI 302-2, GRI 302-3, GRI 302-4, GRI 302-5, GRI 305: 3-3, GRI 305-1, GRI 305-2, GRI 305-3, GRI 305-4, GRI 305-5]

Having presented the volumes of waste managed and the associated recycling performance, this section analyses the environmental impact of managing the reported waste. The objective is to measure the impact of operational activities within the scope of the analysis to provide a more comprehensive overview of the Erion System's environmental performance.
The analysis considers the impact on three areas: **energy**, **climate**, and **water**.

The first concerns the energy consumption associated with transporting, treating, selecting and sorting managed waste. The second measures the greenhouse gas emissions generated by these activities, expressed in tonnes of CO_2 equivalent. The third refers to water consumption related to waste treatment processes and management activities, where reportable based on available data.

These three areas represent the main impacts associated with waste management. Together, they provide an integrated view of the Erion System's contribution to reducing environmental impact, which will be explored in greater detail in the section dedicated to environmental benefits.

The impacts are calculated for the waste streams included in the reporting scope: **Household WEEE**, **WB** and **Packaging Waste**. For each waste stream, the analysis considers the activities managed by the System, such as transport to facilities and treatment, selection and sorting operations, in accordance with the boundaries described in Section 3.1.1.

Energy consumption resulting from the direct management of the Erion System

In 2025, the Erion System's activities primarily involved energy consumption related to transporting and subsequently treating, selecting and sorting waste. The amount of energy consumed varies depending on the characteristics of the individual waste streams, the distance travelled by the waste, and the type of processing required to separate and recover the various fractions.

Analysing the data enables the identification of the most energy-intensive stages and provides insight into the relative importance of the various waste chains. Generally, energy consumption is influenced by the volumes managed and the complexity of the treatment processes required to produce recyclable or recoverable fractions. In the case of **Household WEEE**, energy consumption is associated with transporting it from Collection centres and Grouping places to treatment facilities, and with the activities carried out at these facilities. For **WB**, energy consumption relates to transportation to designated facilities, as well as selection and sorting operations. For **Packaging Waste**, the covered activities include transportation to facilities and subsequent sorting stages.

Table 3.1.7: Energy consumption from Erion WEEE's direct management in 2025, categorized by activity and energy source

Activity	Energy source	Unit of measurement	Energy consumption
Transport from Collection centre to treatment facility	Diesel	GJ	61,746
Primary treatment	Non-renewable grid electricity	GJ	16,965
	Diesel (self-generated)	GJ	4,376
	Renewable grid electricity	GJ	38,944
	Photovoltaic electricity	GJ	15,065
Total		**GJ**	**137,096**

Table 3.1.8: Energy intensity from Erion WEEE's direct management in 2025, categorized by activity

Activity	Unit of measurement	Energy intensity
Transport from Collection centre to treatment facility	GJ/tonne	0.25
Primary treatment	GJ/tonne	0.30
Total	**GJ/tonne**	**0.55**

For **WB**, the reported energy consumption relates to activities directly managed by Erion Energy, such as transport from Collection centres to sorting facilities, and selection and sorting operations. In 2025, these activities resulted in a total energy consumption of **1,102 GJ**, with an overall energy intensity of **0.2 GJ per tonne**. Data shows that activities directly managed by Erion Energy accounted for approximately **1%** of the total energy consumption throughout the entire end-of-life battery cycle.

Table 3.1.9 – Energy consumption from Erion Energy's direct management in 2025, categorized by activity and energy source

Activity	Energy source	Unit of measurement	Energy consumption
Transport from Collection centre to sorting facility	Diesel	GJ	**922**
Selection and sorting	Non-renewable grid electricity	GJ	180
Total		**GJ**	**1,102**

Table 3.1.10: Energy intensity from Erion Energy's direct management in 2025, categorized by activity

Activity	Energy source	Unit of measurement	Energy consumption
Transport from Collection centre to sorting facility	Diesel	GJ/tonne	**0.17**
Selecting and sorting	Non-renewable grid electricity	GJ/tonne	0.03
Total		**GJ/tonne**	**0.2**

For **Packaging Waste**, the reported energy consumption relates to transportation from waste producers to the facility, as well as to the sorting processes. In 2025, these activities resulted in consumption totalling **2,020 GJ**, equating to an energy intensity of **0.062 GJ per tonne**.

Table 3.1.11: Energy consumption from Erion Packaging's direct management in 2025, categorized by activity and energy source

Activity	Energy source	Unit of measurement	Energy consumption
Transport and sorting from waste producers to facility	Diesel	GJ	**2,020**

Table 3.1.12: Energy intensity from Erion Packaging's direct management in 2025, categorized by activity

Activity	Energy source	Unit of measurement	Energy consumption
Transport and sorting from waste producers to facility	Diesel	GJ/tonne	**0.062**

Energy consumption resulting from the indirect management of the Erion System

In addition to the activities managed directly by the Collective Schemes, the analysis also considers the energy consumption resulting from indirect management stages. These are activities that take place either before or after Erion's area of operation, but which are necessary for completing the waste management cycle, from initial collection to industrial recycling, energy recovery, and the disposal of residual waste.

Indirect energy consumption for **Household WEEE** includes transporting waste from households to Collection centres or Grouping places, transport following initial treatment, and the subsequent processes of industrial recycling, energy recovery, incineration, and landfilling. In 2025, the total energy consumption was **1,101,705 GJ. Industrial recycling** was the main component, accounting for **94%** of the total indirect energy consumption of the waste processing.

Table 3.1.13: Energy consumption from Erion WEEE's indirect management in 2025, categorized by activity

Activity	Unit of measurement	Energy consumption
Transport from households to Collection centre/ Grouping place	GJ	51,150
Transport following initial treatment	GJ	6,047
Industrial recycling	GJ	1,035,721
Energy recovery, incineration, and landfill	GJ	8,787
Total	**GJ**	**1,101,705**

For **WB**, the downstream stages of activities managed directly by Erion Energy resulted in energy consumption totalling **84,223 GJ**. As before, the largest proportion is attributable to recycling and residual waste disposal operations, accounting for around **94%** of the total. This figure is linked to the nature of battery treatment processes. In particular, pyrometallurgical processes require a high level of energy input in order to reach the temperatures necessary for melting the metal oxides present in the batteries and converting them into metal alloys.

Table 3.1.14: Energy consumption from Erion Energy's indirect management in 2025, categorized by activity

Activity	Unit of measurement	Energy consumption
Transport from sorting facility to recycling facility	GJ	2,787
Shredding	GJ	1,951
Recycling and waste disposal	GJ	79,485
Total	**GJ**	**84,223**

Indirect energy consumption relating to **Packaging Waste** includes activities following sorting, such as recycling, energy recovery, and landfill disposal, as well as transporting residual waste to energy recovery or disposal facilities. Total consumption amounted to **137,928 GJ** in 2025. Almost all of this figure can be attributed to treatment activities, accounting for **137,496 GJ**.

Table 3.1.15: Energy consumption from Erion Packaging's indirect management in 2025, categorized by activity

Activity	Unit of measurement	Energy consumption
Treatment (recycling/energy recovery/landfilling)	GJ	137,496
Transport of residual waste to recovery facilities/landfill sites	GJ	432
Total	**GJ**	**137,928**

Overall, the data show that a significant proportion of the energy consumed at the end of the waste cycle is accounted for by indirect activities. In particular, the largest proportion is associated with the recycling and industrial treatment stages, which require energy but enable the recovery of materials and reduce the need for virgin raw material.

Greenhouse gas emissions resulting from the direct management of the Erion System (Scope 1 and Scope 2)

As with energy consumption, atmospheric emissions were calculated using the aforementioned tools, which were adopted for the various waste chains reported. The results are expressed in **tonnes of CO_2 equivalent (tCO_2e)**, which is the unit of measurement used to represent the carbon footprint. CO_2 equivalence allows us to measure the impact of various greenhouse gases on global warming by converting them into a single, standardized unit. This enables us to compare and aggregate emissions from gases with different climate-changing properties.

Scope 1, Scope 2 and Scope 3 emissions

The **GHG Protocol Corporate Standard** categorizes greenhouse gas emissions into three main 'scopes'. This classification system distinguishes between the various emission sources associated with an organization's activities.

Scope 1 – covers the direct greenhouse gas emissions generated by sources that are owned or controlled by the organization.

Scope 2 – covers the organization's indirect emissions associated with purchased and consumed energy, such as electricity.

Scope 3 – covers all other indirect emissions generated throughout the organization's value chain, including both upstream and downstream activities.

In the case of the Erion System, the reported emissions relate to activities that are directly managed by the Collective Schemes. Where representative data is available, it also relates to the indirect stages of the waste management cycle that are necessary for its completion.

Scope 1 and **Scope 2** emissions vary depending on the type of waste managed and the operational activities carried out by each Collective Scheme. For this reason, emissions generated by the Erion System's direct management are presented separately for each waste stream.

For **Household WEEE**, Scope 1 and Scope 2 emissions are associated with the transport and treatment activities managed by Erion WEEE.

Scope 1 emissions include direct emissions generated from the use of fuel for:

- transporting Household WEEE from Collection centres and Grouping places to treatment facilities;
- processing Household WEEE at the facilities.

By contrast, **Scope 2** emissions encompass indirect emissions associated with the electricity used by treatment facilities. The calculation takes into account the electricity purchased from the grid, distinguishing between renewable and non-renewable sources, and the electricity self-generated by photovoltaic systems. An emission factor of zero was assigned to electricity from renewable sources.

In 2025, the emissions generated from the direct management activities of Household WEEE amounted to **14,378 tCO_2e**. The main component was **Scope 1** emissions, which amounted to **12,019 tCO_2e** and were primarily linked to transporting waste to treatment facilities. **Scope 2** emissions totalled **2,359 tCO_2e**.

Table 3.1.16: Emissions generated by Erion WEEE's direct management activities (Scope 1 + Scope 2)

Activity	Energy source	Unit of measurement	Emissions
Transport from Collection centre to treatment facility	Diesel	t CO_2e	11,617
Primary treatment	Diesel	t CO_2e	402
Total Scope 1	Diesel	t CO_2e	**12,019**
Primary treatment*	Non-renewable grid electricity	t CO_2e	2,359
Total Scope 2	Non-renewable grid electricity	t CO_2e	**2,359**
Total Scope 1 + Scope 2	**Diesel and non-renewable grid electricity**	**t CO_2e**	**14,378**

**An emission factor of zero has been assigned to purchases of electricity from renewable sources.*

The overall emissions intensity of Erion WEEE's direct activities is **0.059 tCO_2e/tonne of managed Household WEEE**. Of this, **0.049 tCO_2e/tonne** is attributable to Scope 1 and **0.010 tCO_2e/tonne** to Scope 2.

Table 3.1.17: Emissions intensity generated by Erion WEEE's direct management activities (Scope 1 + Scope 2)

	Unit of measurement	Intensity
Scope 1	tCO2e/tonne	0.049
Scope 2	tCO2e/tonne	0.010
Total Scope 1 + Scope 2	**tCO2e/tonne**	**0.059**

For **WB**, Scope 1 and 2 emissions are associated with Erion Energy's directly managed activities. These include transport from Collection centres to selecting and sorting facilities, and subsequent operations at these facilities.

Scope 1 emissions originate from the fuel used for transporting WB and from activities involving the direct combustion of fossil fuels, including processes used for separating metals from other materials, such as rubber, plastic and wood.

By contrast, **Scope 2** emissions encompass the indirect emissions produced by the grid electricity used in the selection and sorting facilities.

In 2025, Erion Energy's direct activities generated **65 tCO_2e** of emissions. **Scope 1** emissions were the main contributor at **58 tCO_2e**, while **Scope 2** emissions amounted to **7 tCO_2e**. These figures confirm that activities directly managed by Erion Energy account for **less than 1%** of total emissions generated throughout the entire end-of-life battery cycle.

Table 3.1.18: Emissions generated by Erion Energy's direct management activities (Scope 1 + Scope 2)

Activity	Unit of measurement	Emissions
Scope 1		
Transport from Collection centre to selection and sorting facility	t CO_2e	58
Scope 2		
Selection and sorting	t CO_2e	7
Total Scope 1 + Scope 2	**t CO_2e**	**65**

Table 3.1.19: Emissions intensity generated by Erion Energy's direct management activities (Scope 1 + Scope 2)

	Unit of measurement	Intensity
Scope 1	t CO_2e/tonne	0.011
Scope 2	t CO_2e/tonne	0.001
Total Scope 1 + Scope 2	**t CO_2e/tonne**	**0.012**

For **Packaging Waste**, Scope 1 and Scope 2 emissions relate to activities that are directly managed by Erion Packaging. These activities include transporting waste from producers to sorting facilities and subsequent sorting operations.

Scope 1 emissions result from the diesel fuel used to transport Packaging Waste to the facility. However, Erion Packaging does not directly manage any activities that fall under Scope 2.

The sorting operations included in the scope do not generate any indirect emissions related to the purchase and consumption of electricity.

In 2025, Erion Packaging's directly managed activities resulted in the emission of **153 tCO_2e**, all of which were attributable to Scope 1.

Table 3.1.20: Emissions generated by Erion Packaging's direct management activities (Scope 1 + Scope 2)

Activity	Unit of measurement	Emissions (scope 1 and 2)
Scope 1	t CO_2e	153
Transport and sorting from waste producers to facility		
Total Scope 1 + Scope 2	**t CO_2e**	**153**

Table 3.1.21: Emissions intensity generated by Erion Packaging's direct management activities (Scope 1 + Scope 2)

	Unit of measurement	Intensity
Total Scope 1 + Scope 2	t CO_2e/tonne	0.005

Greenhouse gas emissions resulting from the indirect management of the Erion System (Scope 3)

In addition to emissions from activities directly managed by the Collective Schemes, the Erion System also reports Scope 3 indirect emissions. These emissions are associated with the upstream and downstream stages of the direct operational scope and are necessary for completing the waste management cycle. This includes everything from the initial delivery and transport following primary treatment, to recycling, energy recovery, and disposal.

Indirect emissions from Household WEEE include the transportation of waste from citizens' homes to Collection centres or Grouping places, as well as the transportation of waste after initial treatment, industrial recycling and thermal disposal activities involving energy recovery, incineration and landfill.

In 2025, the total Scope 3 emissions associated with the indirect management of **Household WEEE** amounted to **198,368 tCO_2e**. The largest proportion of these emissions stem from industrial recycling, which is the most significant component of the waste chain's indirect emissions impact.

Table 3.1.22: Emissions generated by Erion WEEE's indirect management activities (Scope 3)

Activity	Unit of measurement	Emissions (Scope 3)
Transport from homes to Collection centres/Grouping places	t CO_2e	3,834
Transport following initial treatment	t CO_2e	1,138
Industrial recycling	t CO_2e	189,186
Thermal disposal with energy recovery, incineration, landfill	t CO_2e	4,210
Total Scope 3	**t CO_2e**	**198,368**

For **WB**, Scope 3 indirect emissions stem from activities following selection and sorting, including transportation to recycling facilities, shredding, and recycling and residual waste disposal.

In 2025, these emissions totalled **3,004 tCO_2e. Recycling and waste disposal** activities were the main contributor, accounting for **77%** of the total. This figure is primarily linked to the energy-intensive nature of pyrometallurgical processes.

Shredding accounts for **17%** of the total, largely due to electricity consumption. The remaining **6%** is accounted for by **transportation from the selection and sorting facility to the recycling facility**.

Table 3.1.23: Emissions generated by Erion Energy's indirect management activities (Scope 3)

Activity	Unit of measurement	Emissions (Scope 3)
Transport from sorting facility to recycling facility	t CO_2e	175
Shredding	t CO_2e	504
Recycling and waste disposal	t CO_2e	2,325
Total Scope 3	**t CO_2e**	**3,004**

For **Packaging Waste**, Scope 3 indirect emissions are associated with activities following sorting, including recycling, energy recovery, landfill, and transporting residual waste to energy recovery or disposal facilities.

In 2025, the waste chain's total indirect emissions were **10,596 tCO_2e**. Almost all of this figure was attributable to treatment activities **(10,563 tCO_2e)**, with transport having a negligible impact.

Table 3.1.24: Emissions generated by Erion Packaging's indirect management activities (Scope 3)

Activity	Unit of measurement	Emissions (scope 3)
Treatment (recycling/energy recovery/landfill)	t CO_2e	10,563
Transport of residual waste to energy recovery/landfill	t CO_2e	33
Total Scope 3	**t CO_2e**	**10,596**

Water consumption resulting from the direct management of the Erion System

Water consumption associated with the direct management of the Erion System relates to operational activities overseen by the Collective Schemes and included within the reporting scope. For 2025, this consumption is reported for **WB** and **Packaging Waste**.

For **WB**, water consumption attributable to Erion Energy's direct management relates to the transportation of waste from Collection centres to selection and sorting facilities, and to subsequent activities carried out at these facilities. In 2025, this amounted to **4,305 m^3**. Compared to the total water consumption of the entire end-of-life battery cycle, this figure is negligible, accounting for **less than 1%**.

Table 3.1.25– Water consumption of Erion Energy's direct management in 2025, categorized by activity

Activity	Unit of measurement	Water consumption
Transport from Collection centre to selection and sorting facility	m^3	796
Selection and sorting	m^3	3,509
Total	**m^3**	**4,305**

For **Packaging Waste**, water consumption from direct management is associated with transportation and sorting activities from waste producers to the facility. In 2025, this equated to **859 m^3**.

Table 3.1.26 – Water consumption of Erion Packaging's direct management in 2025, categorized by activity

Activity	Unit of measurement	Water consumption
Transport and sorting from waste producers to facility	m^3	859

Water consumption resulting from the indirect management of the Erion System

The System's greatest water consumption is concentrated in indirectly managed activities, i.e. in stages that are downstream of the Collective Schemes' direct operational scope. These activities include industrial processes such as treatment, recycling, energy recovery and waste disposal.

Water consumption from Erion Energy's direct management of **WB** is negligible, accounting for less than 1% of the total. Total indirect water consumption in 2025 amounted to **1,770,475 m³**. The largest proportion of this was due to **recycling and residual waste disposal**, accounting for around **88%** of the total. This was followed by shredding, and to a much lesser extent, transport to the recycling facility.

Table 3.1.27: Water consumption of Erion Energy's indirect management in 2025, categorized by activity

Activity	Unit of measurement	Water consumption
Transport to the recycling facility	m³	2,404
Shredding	m³	198,309
Recycling and waste disposal	m³	1,569,762
Total	**m³**	**1,770,475**

When it comes to Packaging Waste, the most water is consumed during the recycling phase, particularly when paper is recycled.

Table 3.1.28: Water consumption of Erion Packaging's indirect management in 2025, categorized by activity

Activity	Unit of measurement	Water consumption
Treatment (recycling/energy recovery/landfill)	m³	4,299,444
Transport of residual waste to energy recovery/landfill sites	m³	183
Total	**m³**	**4,299,627**

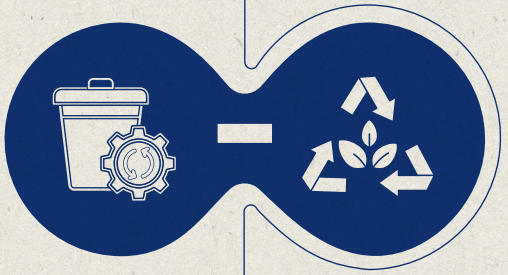
3.1.5 ENVIRONMENTAL BENEFITS OF THE ERION SYSTEM

In addition to quantifying the environmental impacts of waste management, treatment and recycling activities, the Erion System also quantifies the **environmental benefits** of proper waste management and subsequent material recovery.

Recycling makes it possible to obtain **Secondary Raw Materials** that can then be reintroduced into production cycles, reducing the need to extract virgin raw materials. The environmental benefits stem precisely from this substitution: for every material that is recovered, the environmental impact of producing that same material using natural resources is either wholly or partially avoided.

For this reason, the analysis considers the System's net impact, which is calculated as the difference between:

impacts generated by waste management and treatment operations.



impacts avoided by substituting virgin raw materials with Secondary Raw Materials

This makes it possible to represent both the environmental cost of the activities necessary for material recovery and the environmental value generated by recycling.
To make the assessment more comprehensive, the benefits are calculated by comparing two scenarios:

- **Scenario A – Work carried out by Erion Collective Schemes**. This represents the net impact of the management activities carried out by the Collective Schemes across the various reported sectors.

- **Scenario B – Hypothetical alternative scenario**. This represents the net impact that would have occurred in the absence of Erion Collective Schemes, based on alternative assumptions defined for each waste stream.

Alternative scenarios were constructed for each sector specifically to provide the most realistic point of comparison possible. These scenarios are based on industry experience and operational evidence, as well as data from the literature. They take into account the characteristics of different types of waste and their potential treatment options.

Therefore, comparing the two scenarios allows us to estimate the environmental benefits of the Erion System's operations, highlighting the contribution of recycling to reducing energy consumption, climate-changing emissions and water consumption.

For **Household WEEE**, environmental benefits are calculated using the **WEEE-CO_2 Tool**. This tool allows a comparison to be made between the management scenario adopted by Erion WEEE and a hypothetical alternative scenario

The comparison is based on two scenarios:

Scenario A – Proper management of Household WEEE
This is the scenario in which Erion WEEE actually operates. Household WEEE is managed through controlled processes of collection, transportation, treatment and recycling. The associated energy consumption, climate-changing emissions and other environmental impacts are as described in the preceding paragraphs.

Scenario B – Partially correct management of Household WEEE
This represents an alternative scenario based on the same quantity of waste as in Scenario A. Here, it is assumed that 50% of Household WEEE is managed by organizations that focus exclusively on maximising the economic value of recyclable materials such as iron, aluminium and copper. In this scenario, there is no guarantee that components with a greater environmental impact, such as the climate-changing gases found in refrigerators, will be properly managed. However, the remaining 50% of waste is managed by a system with performance levels equivalent to those of Erion WEEE.

Comparing the two scenarios enables us to quantify the environmental benefits of properly managing Household WEEE. It highlights the importance of treating the most critical fractions in a controlled manner and of recycling Secondary Raw Materials. This is valuable not only in terms of material recovery, but also in terms of reducing climate-changing emissions and other impacts associated with the end of products' lifecycles.

Table 3.1.29: Comparison of energy consumption and emissions in the Household WEEE recycling process (Scenarios A and B)

Activity	Scenario A		Scenario B	
Unit of measurement	**GJ**	**t CO_2e**	**GJ**	**t CO_2e**
Transport from households to Collection centres/ Grouping places	51,150	3,834	51,150	3,834
Transport from Collection centres/Grouping places to primary treatment facility	61,746	11,617	61,746	11,617
Primary treatment	75,349	2,762	16,965	841,730
Transport following primary treatment	6,046	1,138	5,212	981
Industrial recycling	1,035,721	189,187	973,386	166,538
Energy recovery, incineration, landfill	8,787	4,210	16,938	108,429
Avoided impacts	-6,312,874	-505,428	-4,980,958	-448,503
Net impacts	**-5,074,075**	**-292,680**	**-3,855,561**	**684,626**

	Energy consumption (GJ)	Emissions (tCO_2e)
Scenario A	-5,074,075	-292,680
Scenario B	-3,855,561	684,626
Environmental benefits (B-A)	**1,218,514**	**977,306**

ERION WEEE BENEFITS

338,476,076 kWh
of energy saved equivalent to the average annual consumption of **125,361** households.

977,306 tCO_2 e
of avoided emissions equivalent to the annual absorption capacity of **977 km^2** of forest.

133,605 tonnes
of ferrous metals recovered equivalent to the weight of **18** Eiffel Towers.

5,939 tonnes
of copper recovered equivalent to the amount needed to clad **65** Statues of Liberty.

6,705 tonnes
of aluminium recovered equivalent to **419,062,500** cans.

33,207 tonnes
of plastic recovered equivalent to **13,282,800** garden chairs.

For **WB**, environmental benefits are calculated using the **Battery Tool** developed by Erion Energy. This tool enables the net impact of the management scenario overseen by the Collective Scheme to be compared with a hypothetical alternative scenario designed to represent the potential consequences of Erion Energy's absence. Once again, the tool's logic links the environmental value of the System to its ability to transform waste into Secondary Raw Materials. This reduces the demand for virgin resources and the energy required to extract and process them.

The comparison considers two scenarios:

Scenario A – Management by Erion Energy
This represents the current operations of the Collective Scheme. In this context, Erion Energy ensures the widespread collection, proper treatment and recycling of end-of-life batteries. The aim is to maximize material recovery and reduce the environmental impact associated with waste management.

Scenario B – Management without Erion Energy
This scenario assumes a reduction in the collection of portable batteries due to the absence of awareness-raising, coordination and widespread collection activities carried out by Erion Energy. It is also assumed that the volumes collected by dedicated centres and WEEE treatment facilities would decrease in the absence of the Collective Scheme's operational influence.

In this scenario, a significant proportion of portable batteries would not be sent for proper treatment and recycling, but would instead be incinerated. This would lead to higher levels of greenhouse gas emissions and increased resource consumption. However, for **Industrial** and **Automotive** batteries, Scenario B assumes that the same quantities are managed as in Scenario A. In fact, this waste is produced by professional users who are legally required by waste legislation to entrust its end-of-life management to specialist operators.

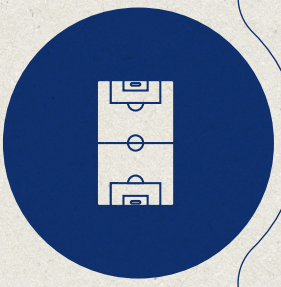
Table 3.1.30: Comparison of energy consumption, emissions, and water usage in the WB recycling process (Scenarios A and B)

Activity	Scenario A			Scenario B		
Unit of measurement	**GJ**	**tCO_2e**	**m^3**	**GJ**	**tCO_2e**	**m^3**
Transport to sorting facility	922	58	795	922	58	795
Selection and sorting	179	8	3,508	169	7	3,317
Transport to recycling facility	2,787	175	2,405	2,391	150	2,064
Shredding	1,951	504	198,309	1,913	394	157,186
Recycling and residual waste	79,486	2,325	1,569,761	73,590	2,216	1,541,905
Avoided impacts	-220,625	-8,249	-7,736,759	-205,720	-7,112	-6,845,332
Net impacts	**-135,300**	**-5,179**	**-5,961,981**	**-126,735**	**-4,287**	**-5,140,065**

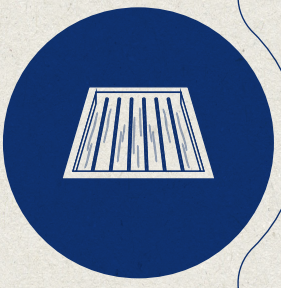
	Energy consumption (GJ)	Emissions (tCO_2e)	Water usage (m^3)
Scenario A	-135,300	-5,179	-5,961,981
Scenario B	-126,735	-4,287	-5,140,065
Environmental benefits (B-A)	**8,565**	**892**	**821,916**

ERION ENERGY BENEFITS

2,379,281 kWh of energy saved equivalent to the consumption of **54,321** LED light bulbs left on for a year.



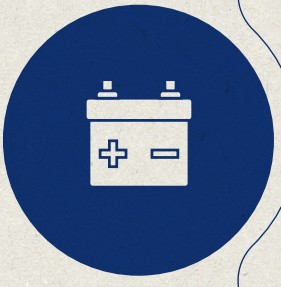
892 tCO_2e of avoided emissions equivalent to the annual carbon absorption capacity of a forest the size of **124** football pitches.



821,916 m^3 of water saved equivalent to **328** Olympic-sized swimming pools.

1,382 tonnes of ferrous metals recovered equivalent to the weight of approximately **3** Vittorio Emanuele Galleries.

368 tonnes of zinc recovered equivalent to **64,599,350** one-euro coins.



2,369 tonnes of lead recovered equivalent to approximately **236,923** lead-acid batteries.

36 tonnes of aluminium recovered equivalent to **2,275,377** cans.

The **Pack-Tool** is a third dedicated tool that allows the environmental impacts of two different Packaging Waste management scenarios to be compared:

Scenario A – Management by Erion Packaging represents the Collective Scheme's current operating model. This scenario is based on data reported by Erion Packaging's collaborating facilities with regard to recycling efficiency, energy recovery rates, and the proportion sent to landfill.

Scenario B – Management without Erion Packaging represents a hypothetical alternative scenario in which the same quantity of packaging waste as in Scenario A is managed by applying average recycling, energy recovery and landfill disposal rates derived from literature data. Furthermore, in this scenario, volumes collected by installers as part of take-back services are deemed to have been disposed of through the household waste stream.

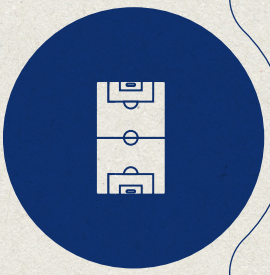
Table 3.1.31: Comparison of energy consumption, emissions, and water usage in the Packaging Waste recycling process (Scenarios A and B)

Activity	Scenario A			Scenario B		
Unit of measurement	**GJ**	**tCO_2e**	**m^3**	**GJ**	**tCO_2e**	**m^3**
Transport and sorting from waste producers to facility	2,020	153	859	2,016	153	857
Treatment (recycling, energy recovery, landfill)	137,496	10,563	4,299,444	135,247	11,520	4,195,340
Transport of residual waste to energy recovery/landfill sites	432	33	183	944	59	401
Avoided impacts	-501,563	-19,751	-11,938,694	-471,010	-18,759	-10,973,729
Net impacts	**-361,615**	**-9,002**	**-7,638,208**	**-332,803**	**-7,027**	**-6,777,131**

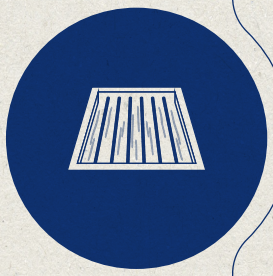
	Energy consumption (GJ)	Emissions (tCO_2e)	Water usage (m^3)
Scenario A	-361,615	-9,002	-7,638,208
Scenario B	-332,803	-7,027	-6,777,131
Environmental benefits (B-A)	**28,812**	**1,975**	**861,077**

ERION PACKAGING BENEFITS

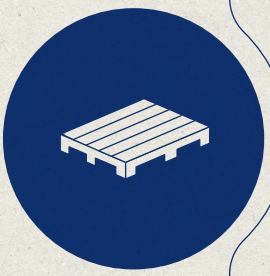
8,003,333 kWh of energy saved equivalentto the consumption of **182,724** LED light bulbs left on for a year.



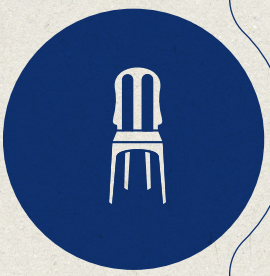
1,975 tCO_2 e of avoided emissions equivalent to the annual carbon absorption capacity of a forest the size of **276** football pitches.



861,077 m^3 of water saved equivalent to **344** Olympic-sized swimming pools.



5,453 tonnes of wood equivalent to **272,650** wooden pallets.



5,668 tonnes of plastic recovered equivalent to **2,267,200** garden chairs.

19,689 tonnes of paper recovered equivalent to **7,875,600** reams of 500 A4 sheets.

The total benefits of the Erion system are set out below, representing the sum of the benefits of the Erion WEEE, Energy and Packaging consortia.

ERION SYSTEM TOTAL BENEFITS

980,173 tCO_2e of avoided emissions, equivalent to those produced by a car travelling 135,878 times around the equator.

348,858,690 kWh of energy saved equivalent to the average annual consumption of 129,206 households.

1,682,993 m^3 of water saved equivalent to the average consumption of 11,219 households of 3 people.

SOCIAL DATA: Erion system

3.2 SOCIAL DATA

Erion's approach to human resources management is based on three core principles:

Wellbeing of people

creating an inclusive and fair environment

Flexibility

supporting a healthy work-life balance

Training

promoting personal and professional growth

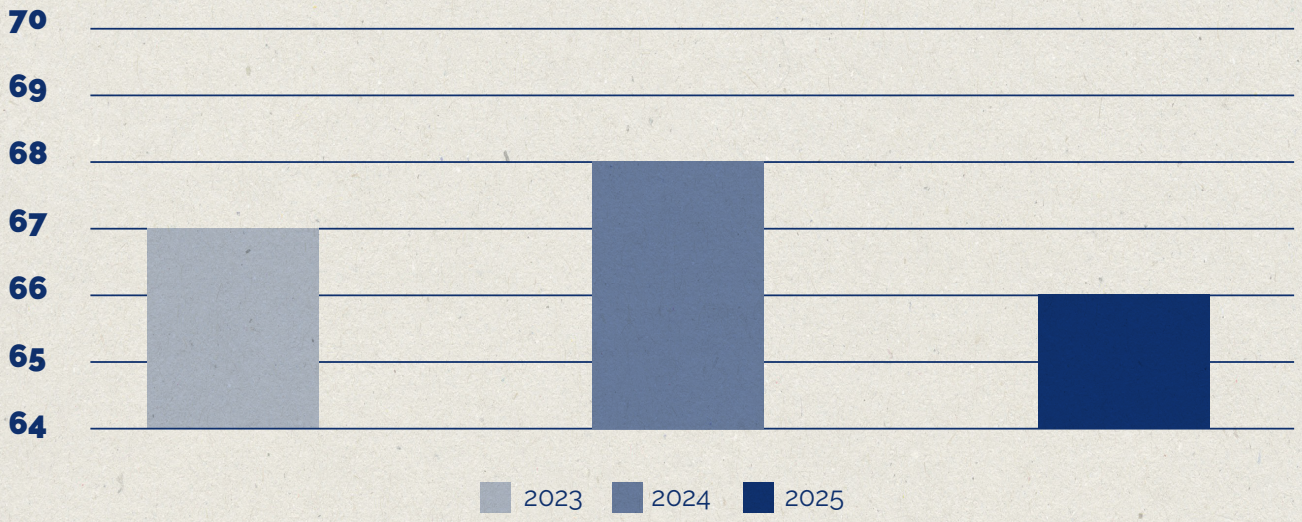
3.2.1 THE PEOPLE OF ERION

People are a vital part of the Erion System's operations and growth. In 2025, the organization prioritized developing human capital, consolidating flexible working models, strengthening professional development pathways and monitoring team development.

Table 3.2.1 Erion System employees

Indicator	2025
Total number of employees as at 31 December	**66**
Change compared to 2024	**-2 (- 3%)**

As at 31 December 2025, Erion had 66 employees, a 3% decrease from the 68 employees it had in 2024.

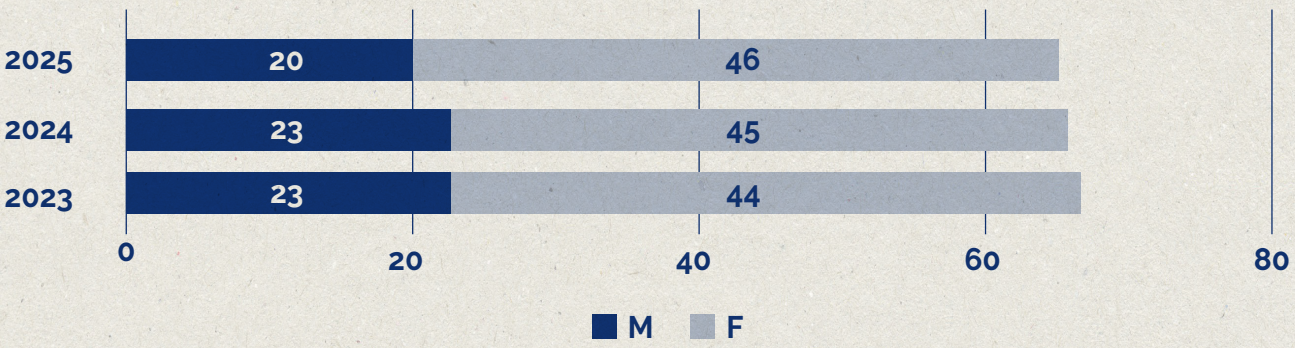


Number of employees of the Erion System, 2023–2025.

Table 3.2.2 Erion's workforce

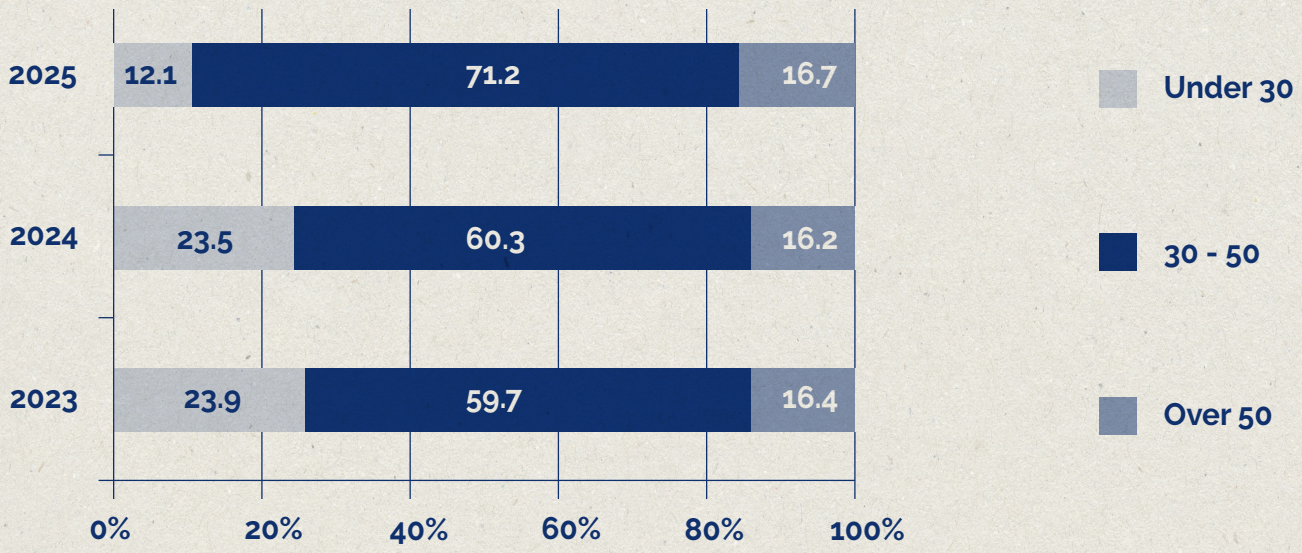
Indicator	2025
Total number of employees	**66**
Women	**46 (69.7%)**
Men	**20 (30.3%)**
Under 30 years old	**8 (12.1%)**
Between 30 and 50 years old	**47 (71.2%)**
Over 50 years old	**11 (16.7%)**

Almost 70% of Erion's employees are women. Although Erion does not actively pursue policies aimed at empowering women, the number of female employees has steadily increased since 2023.



Workforce distribution by gender, 2023–2025.

Eight out of seventeen management and executive positions are held by women. The proportion of staff aged under 30 decreased significantly from 23.5% in 2024 to 12% in 2025 due to staff turnover and ageing, resulting in a change to the age breakdown of the workforce.



Workforce distribution by age group, 2023–2025.

3.2.2 CONTRACTUAL FRAMEWORK AND ORGANIZATION OF WORK

In 2025, the Erion System evolved its contractual framework and work organization processes to meet the need for growth and consolidation of activities, while ensuring employment stability and operational flexibility. The focus was on strengthening the organizational structure and striking a balance between management continuity and skills development.

Table 3.2.3 Contractual structure

Indicator	2025
Full-time	**60**
Part-time	**6**
Open-ended contract	**60**
Fixed-term contract	**5**
Apprenticeship	**1**

Table 3.2.4 Type of contract and employment by gender, 2023-2025 (GRI 2.7)

Employees by contract type and gender									
	2023			2024			2025		
	F	M	Total	F	M	Total	F	M	Total
Fixed-term contract	4	4	**8**	5	4	**9**	4	1	**5**
Open-ended contract	39	19	**58**	37	19	**56**	41	19	**60**
Apprenticeship	1	0	**1**	1	0	**1**	1	0	**1**
Total	44	23	**67**	45	23	**68**	46	20	**66**

Table 3.2.5 Breakdown of staff by professional role and gender (GRI 405-1)

Staff by professional role and gender (GRI 405-1)									
	2023			2024			2025		
	F	M	Total	F	M	Total	F	M	Total
Executives	3	4	**7**	3	4	**7**	3	6	**9**
Middle managers	6	5	**11**	5	4	**9**	5	3	**8**
Clerical staff	35	14	**49**	35	15	**50**	38	11	**49**
Total	**44**	**23**	**67**	**45**	**23**	**68**	**46**	**20**	**66**

TRAINEES

In 2025, Erion recruited nine trainees and interns, both curricular and extracurricular. They participated in a variety of projects and activities, becoming integrated into different areas of the organization.

3.2.3 STAFF TURNOVER AND TRENDS

Erion has reported the rates of new hires and exits for the reporting year[1]. These have been categorized as positive or negative turnover, respectively, and broken down by gender and age group.

Table 3.2.6 Staff trends (GRI 401-1)

Indicator	2025
Total hires	**12**
Total exits	**14**
Total positive turnover	**18%**
Total negative turnover	**21%**

To monitor organizational changes more closely, turnover figures are broken down by department in order to assess team stability and identify areas with higher staff turnover. The greatest impact of staff turnover has been on the SDI and Operations departments, resulting in a net reduction in SDI staff numbers.

Table 3.2.7 - Turnover per team (GRI 401-1)

Dept.	Hires	Exits	Positive turnover %	Negative turnover %
Administration Finance and Controlling	**1**	**2**	**1.5**	**3**
Legal & Corporate Affairs	**1**	**0**	**1.5**	**0**
Communication Marketing & Sales	**0**	**0**	**0**	**0**
Compliance & Corporate Services	**0**	**0**	**0**	**0**
Information Systems	**0**	**0**	**0**	**0**
Operations	**5**	**4**	**7.6**	**6.1**
People & Welfare	**0**	**0**	**0**	**0**
Strategic Development & Innovation	**3**	**7**	**4.5**	**10.6**
Strategic Key Account	**0**	**0**	**0**	**0**
Executives	**1**	**1**	**1.5**	**1.5**

1 Turnover rates were calculated by dividing the number of employees hired or departed in 2025 by the total number of employees at the end of the year.

3.2.4 FLEXIBILITY, WELFARE AND WORK-LIFE BALANCE

In 2023, ECO introduced the Agile Future model to promote a better work-life balance. This flexible contractual arrangement allows employees to work remotely for up to three days a week, without any strict constraints on the start and finish times of their working day. The model is based on three fundamental principles:

- **trust**: a fundamental element in building a solid and lasting relationship between an organization and its employees;
- **responsibility**: the personal commitment required of each individual to ensure the quality of their work;
- **flexibility**: it offers more autonomy over how one's work is carried out.

At the same time, Erion has launched a number of practical initiatives to promote staff wellbeing and engagement. One such initiative is **Welfare Coaching**, which comprises a series of six voluntary sessions designed to support and enhance all-round personal and professional development. This is complemented by **Business Coaching**, which comprises ten sessions aimed at developing skills and promoting personal growth as part of a wider talent development strategy

Table 3.2.8 Flexibility and part-time work

Indicator	2025
People who use flexible working arrangements	**60**
Part-time workers	**6**

3.2.5 TRAINING AND DEVELOPMENT OF COMPETENCIES

Erion recognizes that training and knowledge sharing are essential for the success and development of its employees. Investing in training equips staff with the skills needed to overcome workplace challenges and achieve their goals, thereby fostering an ongoing culture of learning

Table 3.2.9 Training

Indicator	2025
Total training hours	**1,194**
Change compared to 2024	**- 646 h (- 35%)**
Average hours per participant	**17.1**

The decline in training hours recorded in 2025 is attributable to the natural conclusion of the extensive internal training campaign launched in 2024, which brought the figure back in line with values more consistent with the multi-year average.

3.2.6 RELATIONSHIP BETWEEN MANAGEMENT AND STAFF

In 2025, Erion further improved its internal feedback process by conducting an organizational wellbeing survey, which had already been launched in previous years as a monitoring tool. This survey included a detailed section on management evaluation, which was introduced in the previous edition. The purpose of this section was twofold: to provide employees with a structured forum for discussion, and to offer department heads useful insights to help them strengthen their leadership skills. The process included presenting the results by area, as well as holding dedicated feedback sessions facilitated by an external consultant to ensure open and confidential dialogue. The survey findings were shared with managers to help them identify areas for improvement and develop management practices that prioritize people and promote organizational wellbeing.

ECONOMIC DATA: Erion system

3.3

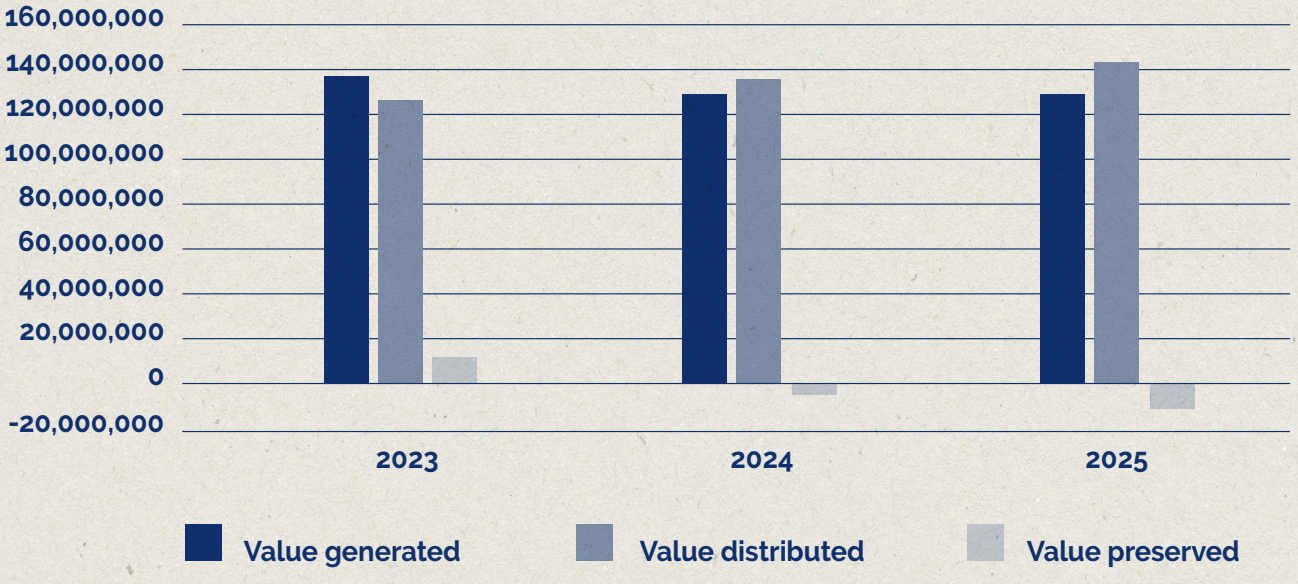
3.3 ECONOMIC DATA

THE CREATION AND DISTRIBUTION OF VALUE IN THE TERRITORY

Throughout 2025, the Erion System continued to generate and redistribute economic value across the entire chain, confirming its role as an enabler of circular models and a source of support for the stakeholders involved.

The directly generated economic value stands at EUR **132.3 mln.** This consists mainly of revenue from the Collective Schemes activities (EUR 130.9 mln), and, to a lesser extent, financial income. In line with the System's operating model, this value was channelled entirely towards operating and developing the waste chains, resulting in a **distributed economic value of approximately EUR 142 mln**.

The Erion System has strengthened its role in redistributing value across the chain, significantly increasing the resources allocated to operational activities. Although the generated economic value remained largely stable compared to 2024, the distributed value increased more markedly in 2025, surpassing EUR 140 mln.



Value generated, retained and distributed by Erion, 2023–2025.

This trend has resulted in a greater negative preserved value than in the previous year, totalling approximately **minus EUR 9.8 mln**. This figure is not surprising given the non-profit nature of the Erion System, whereby operating surpluses from all PROs are set aside as reserves to cover future costs and deficits in subsequent financial years

The bulk of the distributed resources is earmarked for core **waste collection and treatment** activities, accounting for over 87% of the total (EUR 123.8 mln). This highlights the important role that end-of-life management operations play in the Erion model. These are complemented by investments in **communication and awareness-raising activities** totalling EUR 6.3 mln, which are essential for promoting correct behaviour among citizens and increasing collection rates, as well as the costs of running the organizational structure, including **staff remuneration** (EUR 6.7 mln) and other operating expenses (EUR 4.7 mln). Although smaller, the share allocated to the Public Administration is still significant at EUR 0.6 mln.

The tables below provide a breakdown of the economic value generated, distributed and preserved by ECO and the individual Collective Schemes.

Table 3.3.1 Economic value (EUR) generated, distributed and preserved by ECO in 2025

ECO	2025
Economic value directly generated	**8,642,322**
Economic value distributed	**7,806,650**
Economic value preserved	**835,673**

Table 3.3.2 Economic value (EUR) generated, distributed and preserved by Erion WEEE in 2025

WEEE	2025
Economic value directly generated	**108,273,713**
Economic value distributed	**120,325,307**
Economic value preserved	**-12,051,594**

Table 3.3.3 Economic value (EUR) generated, distributed and preserved by Erion Energy in 2025

ENERGY	2025
Economic value directly generated	**6,154,618**
Economic value distributed	**5,628,732**
Economic value preserved	**525,885**

Table 3.3.4 Economic value (EUR) generated, distributed and preserved by Erion Professional in 2025

PROFESSIONAL	2025
Economic value directly generated	**2,349,628**
Economic value distributed	**2,517,676**
Economic value preserved	**-168,047**

Table 3.3.5 Economic value (EUR) generated, distributed and preserved by Erion Packaging in 2025

PACKAGING	2025
Economic value directly generated	**3,962,270**
Economic value distributed	**2,900,807**
Economic value preserved	**1,061,464**

Table 3.3.6 Economic value (EUR) generated, distributed and preserved by Erion Care in 2025

CARE	2025
Economic value directly generated	**10,663,729**
Economic value distributed	**10,645,256**
Economic value preserved	**18,474**

Table 3.3.7 Economic value (EUR) generated, distributed and preserved by Erion Textiles in 2025

TEXTILES	2025
Economic value directly generated	**25,050**
Economic value distributed	**19,721**
Economic value preserved	**5,329**

Finally, the table below analyses the indirect economic impacts in 2025, driven by efficiency incentives and reduced costs for local authorities. These incentives are intended for municipal Collection Centres and Grouping places. They are designed to promote higher collection volumes, improved collection quality, and infrastructure modernization. Facilities that fulfil the efficiency and eligibility criteria set out in the Programme Agreement between the various stakeholders are awarded these incentives. These stakeholders include ANCI (National Association of Italian Municipalities), retail trade associations, Coordination Centres, and Collective Schemes. The total value of the incentives exceeded **EUR 21 mln** in 2025.

Conversely, the System's direct waste management expenses are represented by logistics and treatment costs. In the absence of the System's services, these costs would otherwise be borne by local authorities. In 2025, these costs totalled over **EUR 62 mln**, which was an increase on 2024. Finally, the reduction in costs for local authorities is the sum of the previous two items, indicating the amount these authorities saved thanks to the System's operations, amounting to over EUR 84 mln in 2025

Table 3.3.8 Indirect economic impacts (EUR)

Year	Efficiency incentives (EUR)	Logistics and treatment (EUR)	Reduced costs (EUR)
2023	**17,415,006**	**54,136,909**	**71,551,915**
2024	**19,075,817**	**58,549,225**	**77,625,042**
2025	**21,706,931**	**62,612,492**	**84,319,423**

Appendix and Methodological note

Appendix 1: Methodological note on the preparation of the Report and materiality analysis

This document is updated annually and has been prepared in accordance with the 2021 version of the Sustainability Reporting Standards, published by the Global Reporting Initiative (GRI).

The following principles were adhered to in order to ensure the quality and proper presentation of the information:

- accuracy;
- balance;
- clarity;
- comparability;
- completeness;
- sustainability context;
- timeliness;
- verifiability

The Sustainability Report provides information and data on Erion for the 2025 financial year, covering the period from 1 January to 31 December.

The employee data reported in this document relates to the Erion System and includes ECO employees, as well as Directors of the Collective Schemes who are classified as employees of their respective Collective Schemes.

The reporting of environmental data on waste collection and management covers the Erion WEEE, Erion Professional, Erion Energy and Erion Packaging Collective Schemes. Data on the Erion Care and Erion Textiles Collective Schemes is not currently available as they are not yet fully operational. As in the previous reporting cycle, this document reports on the environmental impact generated by the Erion System for the three main waste categories: Household WEEE, WB and Packaging Waste.

Regarding the reporting of economic data, as the Erion Collective Schemes are not subject to accounting consolidation obligations, the System's overall economic data has been reclassified in this Sustainability Report. While this process is not subject to audit, the aim is to provide an accurate and transparent representation of the economic impact in accordance with GRI Standards.

The Report underwent an internal audit involving the SDI and Communication teams, the General Manager, the Director of Development and Institutional Relations at ECO, and the Directors of the sector Collective Schemes. It was also audited by the independent firm BDO Italia S.p.A., and their report can be found in the 'Assurance' section on page 117.

In order to conduct the 2025 materiality analysis in accordance with the latest version of the GRI Standards, two approaches were adopted in parallel:

1. identification of the organization's positive and negative actual and potential impacts on the economy, the environment, people and their human rights, with direct involvement of senior management;
2. identification of the expectations of interested parties through engagement with the organization's stakeholders, from whom feedback is gathered regarding the identification and assessment of impacts.

The analysis results in a list of material topics reflecting issues that significantly impact the organization, on which action and reporting commitments should focus.

The directors of the individual Collective Schemes and ECO were involved in selecting the internal material topics and identifying the information needed to understand the main impacts generated by the organization's activities, as well as the scale of these impacts.

Topics and impacts that had previously been identified as material to the organization were reassessed and grouped into macro-categories. At the same time, new impacts were identified in light of changes in the operating and regulatory environment.

The identification and assessment of impacts and related topics took place at dedicated meetings, which were attended by each Collective Scheme director and the general manager.

The significance level of each identified impact was determined based on the importance and probability values associated with it.

This assessment model was used to compile a structured list of Erion's material topics[1], which was formally validated during a plenary meeting

The significance level of each identified impact was determined based on the importance and probability values associated with it.

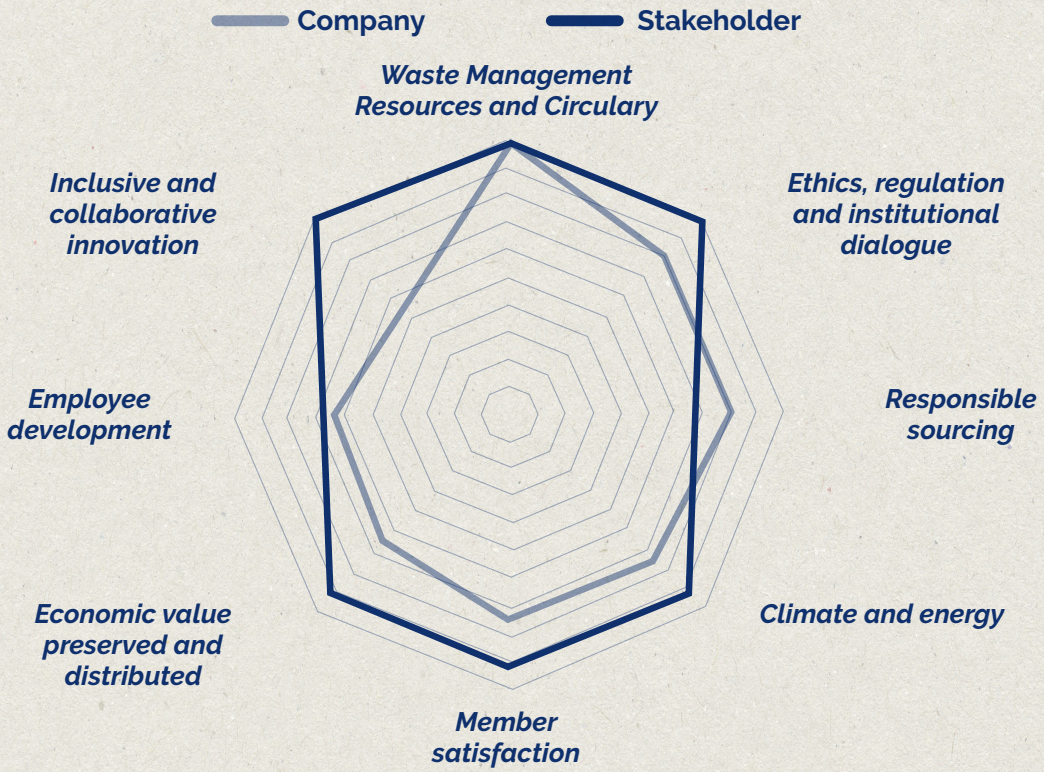
At the same time, the stakeholder engagement process has been updated to 2025, with Erion's material issues being assessed by its key stakeholders through both direct and indirect consultation channels.

Stakeholders categories consulted

Therefore, Erion's working group was responsible for identifying the categories of key stakeholders and interested parties, some of which were the subject of a documentary analysis. The presence or absence of each priority topic and its frequency of appearance were verified in each document representative of a stakeholder category. These frequency values were then aggregated to provide an overall indication of the topic's relevance.

1 The list of priority topics can be found on page 14 of Chapter 1.4.

Comparative evaluation of material themes



The values attributed to material issues by Erion and its stakeholders, including areas of agreement and disagreement.

To support and complement the indirect analysis, a direct stakeholder engagement process was conducted, involving interviews with a key stakeholder from each Collective Scheme. These interviews provided valuable insights into how stakeholders perceive Erion's approach to sustainability. They also helped to identify the sector's impacts, challenges and opportunities, and potential areas for collaboration and synergy to support Erion's future strategic development.

They also helped to identify the sector's impacts, challenges and opportunities, and potential areas for collaboration and synergy to support Erion's future strategic development.

Appendix 2: Methodological note for calculating environmental data

Three distinct calculation tools were used to assess the environmental impact of managing the reported waste streams, in line with the specific characteristics of the analysed waste chains. These tools were the **WEEE-CO_2 Tool** for Household WEEE, the **Battery Tool** for WB and the **Pack Tool** for Packaging Waste.

The three tools are all based on a **Life Cycle Assessment (LCA)** approach. They enable the estimation of the environmental impact of end-of-life management activities, as well as the impact that is avoided by recovering materials and reintroducing them into production cycles as Secondary Raw Materials.

Net impacts are calculated as the algebraic sum of:

- the **impacts generated** by collection, transport, treatment, recycling, energy recovery and disposal activities;
- the **avoided impacts**, resulting from the substitution of virgin raw materials with Secondary Raw Materials and, where applicable, from energy recovery.

WEEE-CO_2 Tool

Erion WEEE used the **WEEE-CO_2 Tool**, developed by the **WEEE Forum** and made available to its members, to assess the environmental impacts resulting from the proper management of **Household WEEE**.

The latest version of the tool uses a **Life Cycle Assessment (LCA)** methodology to estimate the environmental impact of the end-of-life phase of electronic waste, particularly with regard to **CO_2-equivalent emissions and energy consumption**.

The scope of the analysis covers the main operational phases of the waste chain: transporting WEEE from citizens' homes to collecting points; transporting it to treatment facilities; mechanical treatment and fraction separation; transporting the fractions to their final destinations; and finally, recycling, energy recovery and disposal of residual components.

The data used includes both primary information relating to transport and quantities collected, derived directly from Erion WEEE's operations, and secondary information from internationally recognized open-source databases, or provided directly by the WEEE Forum.

The tool enables the calculation of net impacts as the sum of the impacts generated by end-of-life management, as well as the impacts avoided by reintroducing Secondary Raw Materials into production cycles and recovering energy.

Battery Tool

The **Battery Tool** was developed in-house in 2023 with the support of the consultancy firm **dss+**. It is used to calculate the environmental impact of Erion Energy's **WB** management.

The tool is based on a **LCA** approach and considers the entire waste management cycle, from collection and transport to selection, sorting, shredding, recycling and final disposal.

Both primary and secondary data were used in the analysis. The primary data relate to transport from the collecting point to the selection facility, as well as to sorting activities at pre-treatment facilities. They also relate to recycling processes, but only for specific chemical compositions. Secondary data drawn from the scientific literature and the **Ecoinvent** database were used for the treatment stages that could not be observed directly.

Due to the heterogeneous nature of the battery stream in terms of formats and chemical composition, the analysis identifies five main groups: **lithium**, **nickel**, **lead**, **zinc** and **sodium-based** batteries. The waste categories considered correspond to those set out in Directive 2006/66/EC: **Portable**, **Automotive** and **Industrial**.

The Battery Tool estimates the environmental impact of each stage of the process, including transportation, sorting, shredding, and recycling. Where necessary, it distinguishes between pyrometallurgical and hydrometallurgical processes. The tool calculates the following indicators: **CO_2-equivalent emissions, energy consumption and water consumption**.

As in previous cases, the net impacts are calculated by adding together the impacts generated by operational activities and the impacts avoided by reintroducing Secondary Raw Materials, obtained through recycling processes, back into production cycles.

Pack Tool

In 2024, Erion Packaging developed the **Pack Tool** in collaboration with **Interzero Italy S.r.l.** to assess the environmental impacts associated with the management of **industrial Packaging Waste from Electrical and Electronic Equipment (EEE)**.

Based on **LCA** methodology, the tool allows for the estimation of potential environmental impacts associated with the end-of-life management of **wood**, **paper** and **plastic** packaging. It also allows to quantify the impacts avoided by recycling and regenerating recoverable materials

The scope of the analysis covers the main stages of the end-of-life cycle of industrial packaging, including transporting waste from generation sites to sorting and treatment facilities, recycling recoverable materials, managing residual waste through energy recovery or landfill disposal, and transporting non-recyclable materials to incinerators or landfills.

The data used includes primary information from Erion Packaging regarding the collection and transportation of materials to sorting facilities, as well as data reported by treatment facilities, and secondary data drawn from scientific literature.

The Pack Tool calculates the environmental impacts, including **CO_2-equivalent emissions, energy consumption** and **water consumption**.

For information on the equivalencies used to estimate environmental benefits, please refer to the table in Appendix 2.

Table Appendix 2 - Environmental equivalences

Material	Conversion	Assumption
Total recycling	High-speed train	454 tonnes each
Ferrous metals	Eiffel Tower	7,300 tonnes each
	Vittorio Emanuele Gallery (Milan)	350 tonnes each
Copper	Statue of Liberty cladding	90 tonnes each
Aluminium	Can	16 g each
Plastic	Garden chair	2.5 kg each
Zinc	1 Euro coin	5.7 g each
Lead	Lead battery	10 kg each
Wood	Wooden pallet	20 kg each
Paper	Ream of 500 A4 sheets	2.5 kg each

Environmental impact	Conversion	Assumption
Energy	Typical family	ARERA document 'The update of the protective conditions in Q2 2024 in detail', published on 28 March 2024
	LED bulbs left on for one year	LED light bulb power: 5 W
Emissions	Square kilometres of forest	CO_2 absorbed per square kilometre of forest per year: 1,000 tonnes of CO_2
	Forests the size of football pitches	CO_2 absorbed per square metre of forest per year: 0.001 tonnes of CO_2 Size of a football pitch: 7,140 square metres
	Car driving laps around the equator	Small petrol-powered car, EURO 3 class, emissions: 180 g CO_2/km
Water	Olympic-size pools	Volume of water contained in a swimming pool: 2,700 cubic metres
	Water usage for a family of three people	ARERA document 'The numbers of public services', published on 9 July 2024

Appendix 3:

Supplementary recycling performance data

The table below provides an overview of the recycling performance of Household WEEE, categorized as defined by the relevant legislation.

Table App.3: **Household WEEE (output fractions of quantities for recycling, energy recovery and disposal by grouping)**

Household WEEE	R1		R2		R3		R4		R5	
Destination	Quantity (tonnes)	%	Quantity (tonnes)	%	Quantity (tonnes)	%	Quantity (tonnes)	%	Quantity (tonnes)	%
Recycling	66,481	84%	107,865	91%	24,878	94%	20,165	89%	237	93%
Energy recovery	10,498	13%	3,072	3%	847	3%	1,385	6%	10	4%
Disposal	2,546	3%	7,207	6%	767	3%	1,158	5%	8	3%
Total	**79,525**	**100%**	**118,144**	**100%**	**26,492**	**100%**	**22,708**	**100%**	**255**	**100%**

GRI Content Index

Statement of use	Reporting in accordance with the GRI Standards for the period 1 January 2025 to 31 December 2025
GRI Standards used	GRI 1: Foundation 2021
GRI Sector Standard	N/A

GRI Indicator	Sustainability Report	Notes	
GRI 2: General Disclosures 2021			
The organization and its reporting practices			
2-1	Organizational details	**Appendix 1**: Methodological note on the preparation of the Report and materiality analysis	-
2-2	Entities included in the organization's sustainability reporting	**Appendix 1**: Methodological note on the preparation of the Report and materiality analysis	-
2-3	Reporting period, frequency and contact point	**Appendix 1**: Methodological note on the preparation of the Report and materiality analysis	-
2-4	Restatement of information	**Appendix 1**: Methodological note on the preparation of the Report and materiality analysis	-
2-5	External assurance	**Appendix 1**: Methodological note on the preparation of the Report and materiality analysis	-
Activities and workers			
2-6	Activities, value chain and other business relationships	**1. Erion System** 1.2 The Collective Schemes and ECO in 2025 **2. The Collective Schemes and ECO** 2.1 Erion WEEE 2.2 Erion Professional 2.3 Erion Energy 2.4 Erion Packaging 2.5 Erion Care 2.6 Erion Textiles 2.7 Erion Compliance Organization (ECO)	-
2-7	Employees	**3. Data** 3.2 Social data	-
2-8	Workers who are not employees	**3. Data** 3.2 Social data	-
Governance			
2-9	Governance structure and composition	**1. Erion System** 1.2 The Collective Schemes and ECO in 2025 1.2.1 Governance	-
2-10	Nomination and selection of the highest governance body	**1. Erion System** 1.2 The Collective Schemes and ECO in 2025 1.2.1 Governance	-
2-11	Chair of the highest governance body	**1. Erion System** 1.2 The Collective Schemes and ECO in 2025 1.2.1 Governance	-
2-14	Highest governance body's role in sustainability reporting	**1. Erion System** 1.2 The Collective Schemes and ECO in 2025 1.2.1 Governance **Appendix 1**: Methodological note on the preparation of the Report and materiality	-
2-16	Communication of critical concerns	**1. Erion System** 1.2 The Collective Schemes and ECO in 2025 1.2.1 Governance	-

Strategy, policies and practices			
2-22	Statement on sustainable development strategy	Letter to stakeholders	-
2-23	Policy commitments	**1. Erion System** 1.1 Erion, Extended Producer Responsibility 1.2 The Collective Schemes and ECO in 2025 **3. Data** 3.1 Environmental data	-
2-24	Embedding policy commitments	**1. Erion System** 1.2 The Collective Schemes and ECO in 2025 1.3 The Erion System's stakeholders **3. Data** 3.1 Environmental data	-
2-25	Processes to remediate negative impacts	**1. Erion System** 1.1 Erion, Extended Producer Responsibility 1.2 The Collective Schemes and ECO in 2025 1.3 The Erion System's stakeholders **3. Data** 3.1 Environmental data	-
2-26	Mechanisms for seeking advice and raising concerns	**1. Erion System** 1.2 The Collective Schemes and ECO in 2025	-
2-27	Compliance with laws and regulations	GRI Content Index	There were no instances of non-compliance with national laws and regulations in 2025
2-28	Membership associations	**1. Erion System** 1.3 The Erion System's stakeholders **2. The Collective Schemes and ECO** 2.1 Erion WEEE 2.3 Erion Energy	-
Stakeholder engagement			
2-29	Approach to stakeholder engagement	**1. Erion System** 1.3 The Erion System's stakeholders	-
2-30	Collective bargaining agreements	**3. Data** 3.2 Social data	-
GRI 3 Material topics			
Material topics (2021)			
3-1	Process to determine material topics.	**1. Erion System** 1.4 Materiality analysis **Appendix 1**: Methodological note on the preparation of the Report and materiality analysis	-
3-2	List of material topics	**1. Erion System** 1.4 Materiality analysis **Appendix 1**: Methodological note on the preparation of the Report and materiality analysis	-
3-3	Management of material topics	**1. Erion System** 1.4 Materiality analysis **Appendix 1**: Methodological note on the preparation of the Report and materiality analysis	-

GRI 200: Economic			
GRI 201: Economic Performance (2016)			
3-3	Management of material topics	**1. Erion System** 1.4 Materiality analysis **3. Data** 3.3 Economic data **Appendix 1**: Methodological note on the preparation of the Report and materiality analysis	-
201-1	Direct economic value generated and distributed	**3. Data** 3.3 Economic data	-
GRI 203: Indirect economic impacts (2016)			
3-3	Management of material topics	**1. Erion System** 1.4 Materiality analysis **3. Data** 3.3 Economic data **Appendix 1**: Methodological note on the preparation of the Report and materiality analysis	-
203-1	Infrastructure investments and services supported	**3. Data** 3.3 Economic data	-
203-2	Significant indirect economic impacts	**3. Data** 3.3 Economic data	-
GRI 204: Procurement practices (2016)			
3-3	Management of material topics	**1. Erion System** 1.4 Materiality analysis **Appendix 1**: Methodological note on the preparation of the Report and materiality analysis	-
204-1	Proportion of spending on local suppliers	**1. Erion System** 1.3 The Erion System's stakeholders	-
GRI 205: Anti-corruption (2016)			
3-3	Management of material topics	**1. Erion System** 1.2 The Collective Schemes and ECO in 2025 1.2.1 Governance 1.4 Materiality analysis **Appendix 1**: Methodological note on the preparation of the Report and materiality analysis	-
205-2	Communication and training about anti-corruption policies and procedures	**1. Erion System** 1.2 The Collective Schemes and ECO in 2025 1.2.1 Governance	-
205-3	Confirmed incidents of corruption and actions taken	**1. Erion System** 1.2 The Collective Schemes and ECO in 2025 1.2.1 Governance GRI Content Index	There were no incidents of corruption in 2025

GRI 206: Anti-competitive behaviour (2016)			
3-3	Management of material topics	**1. Erion System** 1.4 Materiality analysis **Appendix 1**: Methodological note on the preparation of the Report and materiality analysis	-
206-1	Legal actions for anti- competitive behaviour, anti-trust, and monopoly practices	**1. Erion System** 1.2 The Collective Schemes and ECO in 2025 1.2.1 Governance	-
GRI 300: Environmental			
GRI 301: Materials (2016)			
3-3	Management of material topics	**1. Erion System** 1.4 Materiality analysis **3. Data** 3.1 Environmental data 3.1.2 Management performance of the Erion System 3.1.3 Recycling performance of the Erion System **Appendix 1**: Methodological note on the preparation of the Report and materiality analysis	-
301-1	Materials used by weight or volume	**3. Data** 3.1 Environmental data 3.1.2 Management performance of the Erion System 3.1.3 Recycling performance of the Erion System	The indicator has been adapted to the specificities of Erion
GRI 302: Energy (2016)			
3-3	Management of material topics	**1. Erion System** 1.4 Materiality analysis **3. Data** 3.1 Environmental data 3.1.4 Environmental impacts resulting from the direct and indirect management of the Erion System **Appendix 1**: Methodological note on the preparation of the Report and materiality analysis	-
302-1	Energy consumption within the organization	**3. Data** 3.1 Environmental data 3.1.4 Environmental impacts resulting from the direct and indirect management of the Erion System	-
302-2	Energy consumption outside the organisation	**3. Data** 3.1 Environmental data 3.1.4 Environmental impacts resulting from the direct and indirect management of the Erion System	-
302-3	Energy intensity	**3. Data** 3.1 Environmental data 3.1.4 Environmental impacts resulting from the direct and indirect management of the Erion System	-
302-4	Reduction of energy consumption	**3. Data** 3.1 Environmental data 3.1.4 Environmental impacts resulting from the direct and indirect management of the Erion System	-
302-5	Reductions in energy requirements of products and services	**3. Data** 3.1 Environmental data 3.1.4 Environmental impacts resulting from the direct and indirect management of the Erion System	-

GRI 305: Emissions (2016)			
3-3	Management of material topics	**1. Erion System** 1.4 Materiality analysis **3. Data** 3.1 Environmental data 3.1.4 Environmental impacts resulting from the direct and indirect management of the Erion System **Appendix 1**: Methodological note on the preparation of the Report and materiality analysis	-
305-1	Direct greenhouse gas (GHG) emissions (Scope 1)	**3. Data** 3.1 Environmental data 3.1.4 Environmental impacts resulting from the direct and indirect management of the Erion System	-
305-2	Indirect greenhouse gas (GHG) emissions from energy consumption (Scope 2)	**3. Data** 3.1 Environmental data 3.1.4 Environmental impacts resulting from the direct and indirect management of the Erion System	-
305-3	Other indirect greenhouse gas (GHG) emissions (Scope 3)	**3. Data** 3.1 Environmental data 3.1.4 Environmental impacts resulting from the direct and indirect management of the Erion System	-
305-4	GHG emissions intensity	**3. Data** 3.1 Environmental data 3.1.4 Environmental impacts resulting from the direct and indirect management of the Erion System	-
305-5	Reduction of GHG emissions	**3. Data** 3.1 Environmental data 3.1.4 Environmental impacts resulting from the direct and indirect management of the Erion System	-
GRI 306: Waste (2020)			
3-3	Management of material topics	**1. Erion System** 1.4 Materiality analysis **3. Data** 3.1 Environmental data 3.1.2 Management performance of the Erion System 3.1.3 Recycling performance of the Erion System **Appendix 1**: Methodological note on the preparation of the Report and materiality analysis	-
306-1	Waste generation and significant waste-related impacts	**3. Data** 3.1 Environmental data 3.1.2 Management performance of the Erion System 3.1.3 Recycling performance of the Erion System **Appendix 3:** Supplementary recycling performance data	-
306-2	Management of significant waste-related impacts	**3. Data** 3.1 Environmental data 3.1.2 Management performance of the Erion System 3.1.3 Recycling performance of the Erion System **Appendix 3:** Supplementary recycling performance data	-

306-3	Waste generated	**3. Data** 3.1 Environmental data 3.1.2 Management performance of the Erion System 3.1.3 Recycling performance of the Erion System **Appendix 3:** Supplementary recycling performance data	The indicator has been adapted to the specificities of Erion
306-4	Waste diverted from disposal	**3. Data** 3.1 Environmental data 3.1.2 Management performance of the Erion System 3.1.3 Recycling performance of the Erion System **Appendix 3:** Supplementary recycling performance data	The indicator has been adapted to the specificities of Erion
306-5	Waste directed to disposal	**3. Data** 3.1 Environmental data 3.1.2 Management performance of the Erion System 3.1.3 Recycling performance of the Erion System **Appendix 3:** Supplementary recycling performance data	The indicator has been adapted to the specificities of Erion
GRI 308: Supplier environmental assessment (2016)			
3-3	Management of material topics	**1. Erion System** 1.4 Materiality analysis **Appendix 1**: Methodological note on the preparation of the Report and materiality analysis	-
308-1	New suppliers that were screened using environmental criteria	**1. Erion System** 1.3 The Erion System's stakeholders **2. The Collective Schemes and ECO** 2.1 Erion WEEE 2.3 Erion Energy	-
GRI 400: Social			
GRI 401: Employment (2016)			
3-3	Management of material topics	**1. Erion System** 1.4 Materiality analysis **Appendix 1**: Methodological note on the preparation of the Report and materiality analysis	-
401-1	New employee hires and employee turnover	**3. Data** 3.2 Social data	-
GRI 402: Labor/management relations (2016)			
3-3	Management of material topics	**1. Erion System** 1.4 Materiality analysis **2. The Collective Schemes and ECO** 2.7 Erion Compliance Organization (ECO) **3. Data** 3.2 Social data **Appendix 1**: Methodological note on the preparation of the Report and materiality analysis	-
402-1	Minimum notice periods regarding operational changes	**2. The Collective Schemes and ECO** 2.7 Erion Compliance Organization (ECO) **3. Data** 3.2 Social data	The disclosure was used to describe the relationship between management and staff, and the organization's staff development initiatives, particularly with regard to recruitment and training

GRI 404: Training and Education (2016)			
3-3	Management of material topics	**1. Erion System** 1.4 Materiality analysis **3. Data** 3.2 Social data **Appendix 1**: Methodological note on the preparation of the Report and materiality analysis	-
404-1	Average hours of training per year per employee	**3. Data** 3.2 Social data	-
GRI 405: Diversity and equal opportunity (2016)			
3-3	Management of material topics	**1. Erion System** 1.4 Materiality analysis **3. Data** 3.2 Social data **Appendix 1**: Methodological note on the preparation of the Report and materiality analysis	-
405-1	Diversity of governance bodies and employees	**3. Data** 3.2 Social data	-
GRI 413: Local communities (2016)			
3-3	Management of material topics	**1. Erion System** 1.4 Materiality analysis 1.5 Research and innovation **The Collective Schemes and ECO** 2.1 Erion WEEE 2.2 Erion Professional 2.3 Erion Energy 2.4 Erion Packaging 2.5 Erion Care 2.6 Erion Textiles 2.7 Erion Compliance Organization (ECO) **Appendix 1**: Methodological note on the preparation of the Report and materiality analysis	-
413-1	Operations with local community engagement, impact assessments, and development programmes	**1. Erion System** 1.5 Research and innovation **2. The Collective Schemes and ECO** 2.1 Erion WEEE 2.2 Erion Professional 2.3 Erion Energy 2.4 Erion Packaging 2.5 Erion Care 2.6 Erion Textiles 2.7 Erion Compliance Organization (ECO)	-
GRI 415: Public policy (2016)			
3-3	Management of material topics	**1. Erion System** 1.1 Erion, Extended Producer Responsibility 1.4 Materiality analysis **2. The Collective Schemes and ECO** 2.1 Erion WEEE 2.2 Erion Professional 2.3 Erion Energy 2.4 Erion Packaging 2.5 Erion Care 2.6 Erion Textiles 2.7 Erion Compliance Organization (ECO) **Appendix 1**: Methodological note on the preparation of the Report and materiality	-
415-1	Political contributions	**1. Erion System** 1.4 Materiality analysis 1.5 Research and innovation **2. The Collective Schemes and ECO** 2.1 Erion WEEE 2.2 Erion Professional 2.3 Erion Energy 2.4 Erion Packaging 2.5 Erion Care 2.6 Erion Textiles 2.7 Erion Compliance Organization (ECO)	The disclosure was used as a reference to describe the Collective Schemes' commitment to regulatory compliance and dialogue with the institutions

GRI 417: Marketing and labelling (2016)			
3-3	Management of material topics	**1. Erion System** 1.1 Erion, Extended Producer Responsibility 1.4 Materiality analysis 1.5 Research and innovation **2. The Collective Schemes and ECO** 2.1 Erion WEEE 2.2 Erion Professional 2.3 Erion Energy 2.4 Erion Packaging 2.5 Erion Care 2.6 Erion Textiles 2.7 Erion Compliance Organization (ECO) **Appendix 1**: Methodological note on the preparation of the Report and materiality analysis	-
417-1	Requirements for information and labelling of products and services	**1. Erion System** 1.1 Erion, Extended Producer Responsibility 1.5 Research and innovation **2. The Collective Schemes and ECO** 2.1 Erion WEEE 2.2 Erion Professional 2.3 Erion Energy 2.4 Erion Packaging 2.5 Erion Care 2.6 Erion Textiles 2.7 Erion Compliance Organization (ECO)	The disclosure was used to describe the innovative projects and institutional communication activities carried out by the Collective Schemes

ERION WEEE, ERION PROFESSIONAL, ERION ENERGY, ERION PACKAGING, ERION CARE, ERION TEXTILES, ERION COMPLIANCE ORGANIZATION S.C.A.R.L. ("ERION SYSTEM")

Independent Auditors' Report on the Sustainability Report

As at December 31st, 2025

This report has been translated into English from the original, which was prepared in Italian and represents the only authentic copy, solely for the convenience of international readers.

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Independent Auditors' Report on the Sustainability Report 2025

To the Board of Directors of
Erion Compliance Organization S.c.a.r.l.

We have been engaged to perform a limited assurance engagement on the Sustainability Report of Erion System for the year ended on December 31st, 2025.

Responsibilities of the Directors for the Sustainability Report

The Directors of Erion Compliance Organization S.c.a.r.l. are responsible for the preparation of the Sustainability Report in accordance with the "GRI Sustainability Reporting Standards (GRI Standards)" issued by the GRI - Global Reporting Initiative, as described in the paragraph "Methodological note on the preparation of the Report and materiality analysis" of the Sustainability Report identified by them as reporting standards.

The Directors are also responsible for such internal control as they determine is necessary to enable the preparation of a Sustainability Report that is free from material misstatements, whether due to frauds or errors.

The Directors are also responsible for the definition of the objectives regarding the sustainability performance and the reporting of the achieved results, as well as for the identification of the stakeholders and the significant matters to report.

Auditors' independence and quality control

We are independent in accordance with the ethics and independence principles of the International Code of Ethics for Professional Accountants (including International Independence Standards) (IESBA Code) issued by the International Ethics Standards Board for Accountants, based on fundamental principles of integrity, objectivity, professional competence and diligence, confidentiality and professional behaviour.

Our firm applies International Standard on Quality Management 1, which requires the firm to design, implement and operate a system of quality management including policies or procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

Auditors' responsibility

Our responsibility is to express, based on the procedures performed, our conclusion about the compliance of the Sustainability Report with the requirements of the GRI Standards. We carried out our work in accordance with the criteria established in the *International Standard on Assurance Engagements 3000 (Revised) - Assurance Engagements Other than Audits or Reviews of Historical Financial Information ("ISAE 3000 Revised")*, issued by the International Auditing and Assurance Standards Board (IAASB) for limited assurance engagements. This standard requires that we plan and perform the engagement to obtain limited assurance whether the Sustainability Report is free from material misstatement. A limited assurance engagement is less in scope than a reasonable assurance engagement carried out in accordance with *ISAE 3000 Revised*, and, consequently, does not enable us to obtain assurance that we would become aware of all significant matters and events that might be identified in a reasonable assurance engagement.

The procedures performed on the Sustainability Report were based on our professional judgment and included inquiries, primarily with company's personnel responsible for the preparation of the information included in the Sustainability Report, documents analysis, recalculations and other procedures in order to obtain evidences considered appropriate.

Specifically, we carried out the following procedures:

1. analysis of the process relating to the definition of material aspects included in the Sustainability Report, with reference to the criteria applied to identify priorities for the different stakeholder categories and to the internal validation of the process results;
2. analysis of processes that support the generation, collection and management of data and information to the department responsible for the preparation of the Sustainability Report.

   In particular, we performed interviews and discussions with the management of Erion Compliance Organization S.c.a.r.l. and limited analysis of documentary evidence in order to gather information about the accounting and reporting systems used in preparing the Integrated Report, as well as on the internal control procedures supporting the gathering, aggregation, processing and transmission of data and information to the department responsible for the preparation of the Sustainability Report.

Furthermore, for significant information, taken into consideration the activities and the characteristics of the Company:

a) with reference to the qualitative information contained in the Sustainability Report, we carried out interviews and we have acquired supporting documentation to verify its consistency with the available evidence;

b) with reference to quantitative information, we carried out both analytical procedures and limited checks to ascertain, on a sample basis, the correct aggregation of data.

Conclusion

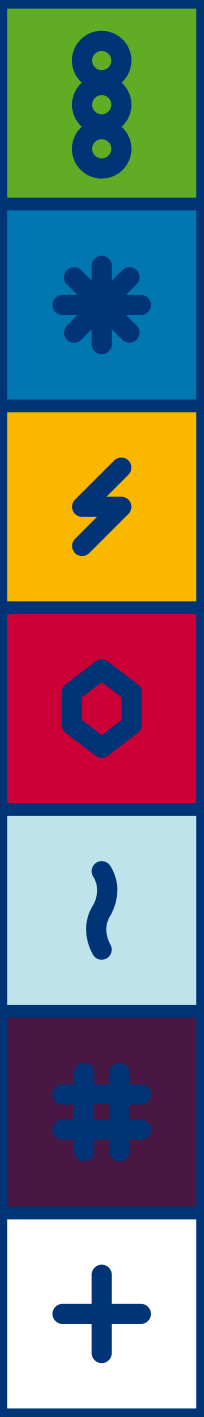
Based on the work performed, nothing has come to our attention that causes us to believe that the Sustainability Report of Erion Compliance Organization S.c.a.r.l for the period ended on December 31st, 2025 is not prepared, in all material respects, in accordance with the "GRI Sustainability Reporting Standards (GRI Standards)" issued by the GRI - Global Reporting Initiative, as described in the paragraph "Methodological note on the preparation of the Report and materiality analysis" of the Sustainability Report.

Milano, June 3, 2026

BDO Italia S.p.A.

Signed in the original by:
Cinzia Frattola
Partner

This report has been translated into English from the original, which was prepared in Italian and represents the only authentic copy, solely for the convenience of international readers.



erion

Producer Responsibility

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