

Materiality & ESG Performance

2023



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As we prepare for the upcoming EU Corporate Sustainability Reporting Directive (CSRD) legislation, we are proactively taking steps to ensure transparency and accountability.

We are not currently subject to CSRD requirements but will be for the financial year 2025.

Starting early allows us to provide clear and reliable sustainability information to our customers. This aligns with our commitment to full transparency, empowering our customers to reach their long-term environmental goals.

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Double Materiality Assessment

2023

Introduction

At Damstahl, we fully embrace the imperative of integrating our business strategies with environmental, social, and governance (ESG) principles, reflecting the values of our stakeholders and our global responsibility toward people and the planet.

The 2023 double materiality assessment marks a pivotal step in our sustainability journey, assessing ESG topics crucial to us and our stakeholders. More than a Corporate Sustainability Reporting Directive (CSRD) obligation, this paper initiates an ongoing dialogue on sustainable progress. Reflecting on our findings, Damstahl is dedicated to reviewing and updating our materiality matrix periodically, at least every two years, to ensure our strategies remain aligned with our stakeholders' evolving priorities and the dynamic challenges facing our industry.

Our methodology adheres to the European Financial Reporting Advisory Group (EFRAG)'s guidance under the CSRD on how to determine material information on sustainability impacts, risks and opportunities (IROs).

Distinguishing "double materiality" from "materiality". Double materiality integrates "financial materiality" such as outside-in factors with effect on the financials of an organization, determined by risks and opportunities and "impact materiality" such as inside-out factors with effect on people and the environment determined by the scope, scale and irremediability of the risk/opportunity [1].

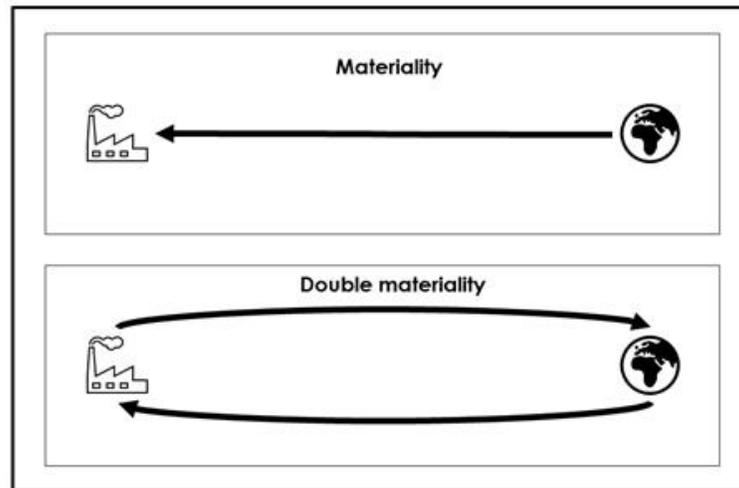


Figure 1: Double materiality. Source: CISL [2].

Approach

1

Scoping, research & identification

Identify all potential IROs for all Damstahl entities, using ESRS framework and available research.

2

Stakeholder involvement

Stakeholder engagement to get views and feedback on potential IROs

3

Analysis & prioritization

Evaluation and prioritization on all IROs based on impact and financial materiality

4

Validation & top management commitment

Validation of process and ensuring commitment by top management

Step 1: Our double materiality assessment is initiated by scoping the assessment boundaries, encompassing all Damstahl entities. It then delves into the expansive field of sustainability issues that may pose impacts, risks, or opportunities for Damstahl (not only limited to the disclosure requirements under ESRS).

Step 2: The identified issues underwent thorough evaluation through dialogues involving both internal and external stakeholders. In instances of limited direct stakeholder input, academia and expert perspectives were solicited to validate the initial identification of impacts, risks, and opportunities.

Step 3: All potential issues from step one is evaluated based on findings from step two on the following parameters for impact materiality:

- Scale of impact
- Scope of impact
- Irremediability of impact

And on the following parameters for financial materiality :

- Likelihood of occurrence
- Potential magnitude in the short, medium and long run.

Step 4: The findings from the analysis are validated with key internal stakeholders and discussed in the top management to ensure the integration of sustainable practices into our corporate strategy and to affirm executive commitment to our sustainable agenda.

Stakeholder involvement

One of the core principles of sustainability work at Damstahl is to create transparency for all our stakeholders.

To achieve this objective, we will involve our stakeholders in our assessment process. Our engagement strategy aims to expand the range and diversity of stakeholders considered in the coming years.

Below is a brief outline of the stakeholders involved in the process:

Internal stakeholders

- Management
- Employees and internal specialists

External stakeholders

- Suppliers and strategic partners
- Industry organizations
- Key customers
- Academics and external experts [3], [4], [5].

Our business model

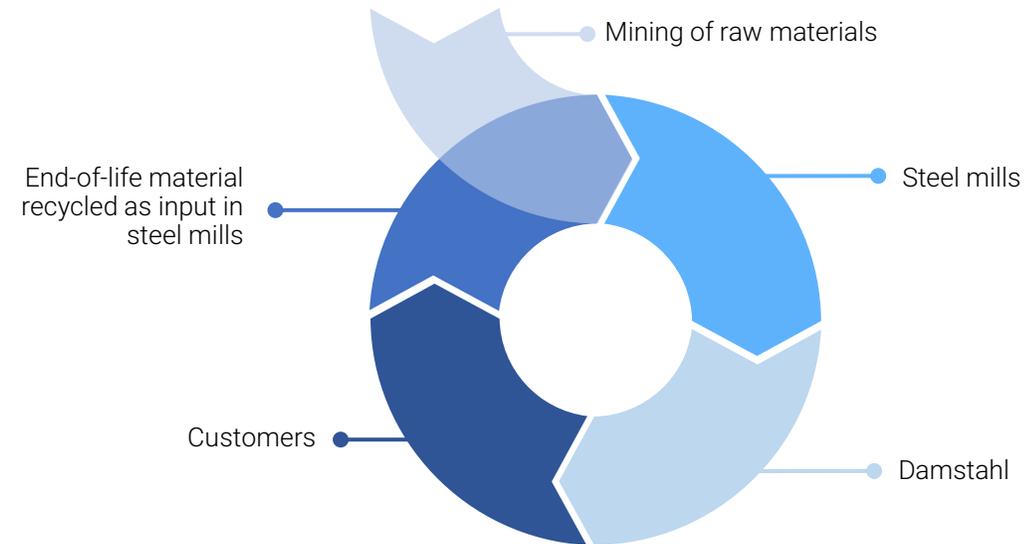
Our value chain is illustrated on the right.

Steel can be recycled endlessly, and much of the stainless steel in use today is derived from recycled sources.

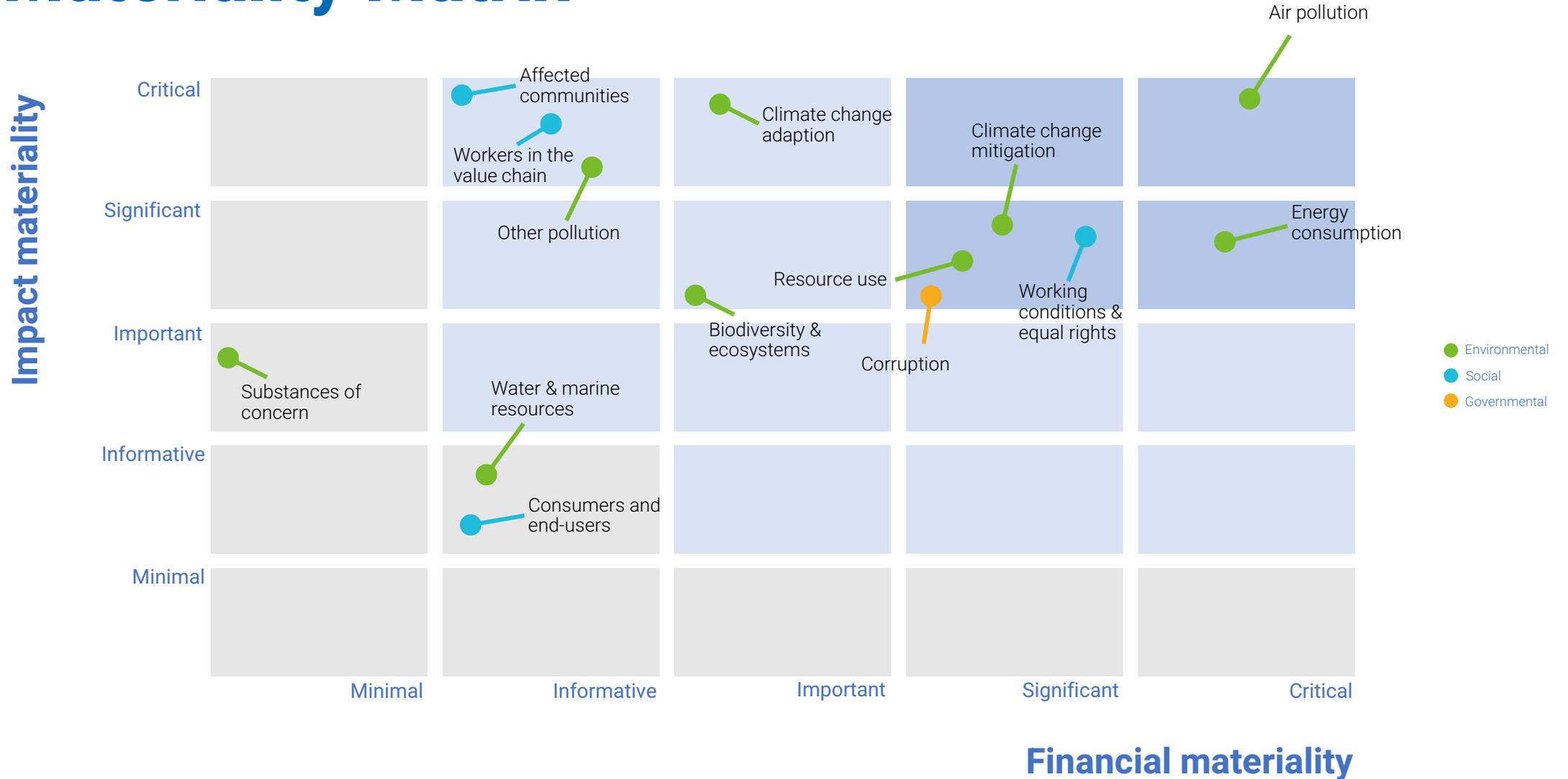
Our value chain begins with the gathering of scrap materials and the extraction of raw materials, which are then melted down in steel mills. The resultant product is subsequently delivered to Damstahl, where it is stored until sold. Stainless steel is utilized as a component in the manufacturing of goods for industries such as pharmaceuticals, clean water, wastewater treatment, and chemical manufacturing.

With a lifespan of up to 50 years, stainless steel retains its properties and, upon reaching end-of-life, is recycled into new material and goes through the circle once again.

Our materiality assessment accounts for stakeholders across all these stages.



Materiality Matrix



Analysis of results

The analysis identified multiple ESG topics as most material according to our stakeholders. Below is a brief description on the topics and their materiality as well as how they align with our selected Sustainable Development Goals (SDG).

Material topic	Description	ESRS	KPIs	Linked SDGs
Air pollution and climate change mitigation	The production of stainless steel is heavily polluting. Our approach to mitigation is creating transparency on specific emissions on our products to make our customers able to make well-grounded decisions on their carbon footprint.	E2	<ul style="list-style-type: none"> • Ton CO2e/ton steel • Number of available EPDs 	 
Resource use	The proportion of scrap used in stainless steel is one of the most efficient ways to bring down pollution to air and water as it has the collateral effect that less virgin raw materials is need for the steel production. Our approach is to prioritize suppliers with higher scrap rates and to secure optimization in resource in- and outflows.	E4, E5	<ul style="list-style-type: none"> • Scrap % • Scope 3 emissions 	 
Working conditions & equal rights	According to the ILO the mining industry is one of the most hazardous in the world, why we have a high focus on only doing business with trusted partners.	S1, S2, S3	<ul style="list-style-type: none"> • Number of signed code of conducts [6] • Number of audits with our suppliers • Number of whistleblower inquiries 	 
Corruption	According to the Corruption Perception Index multiple countries with mining operations are considered a high risk of corruption. [7]	G1	<ul style="list-style-type: none"> • Alignment with EU sanctions • Dialogue with partners and tracking of public KPIs on the field • Number of whistleblower inquiries 	 

ESG Performance

2023

GHG Emission statement

Scopes & categories	Unit	Damstahl Group	Damstahl Denmark	Damstahl Sweden	Damstahl Norway	Damstahl Finland	Damstahl Latvia	Damstahl Germany	Damstahl Switzerland	Delta Inox
Scope 1: Direct emissions from owned/controlled operations	tonCO2e	252	65	41	1	23	3	118	-	-
Scope 2: Indirect emissions from the use of purchased electricity, steam, heating, and cooling	tonCO2e	345	32	2	2	25	1	282	-	-
Upstream scope 3										
Category 1: Purchased goods and services	tonCO2e	173,230	62,177	30,020	6,008	6,082	872	67,481	357	233
Category 2: Capital goods	tonCO2e	2,749	973	16	-	-	-	1,737	-	22
Category 3: Fuel- and energy-related activities (not included in scope 1 or scope 2)	tonCO2e	134	38	1	1	10	0	85	-	-
Category 4: Upstream transportation and distribution	tonCO2e	9,217	4,186	1,015	494	507	69	2,932	15	-
Category 5: Waste generated in operations	tonCO2e	31	5	3	1	-	-	23	-	-
Category 6: Business travel	tonCO2e	22	15	2	1	0	1	2	0	0
Category 7: Employee commuting	tonCO2e	-	-	-	-	-	-	-	-	-
Category 8: Upstream leased assets	tonCO2e	100	70	6	-	-	-	23	-	-
Total Upstream scope 3 emissions	tonCO2e	185,483	67,464	31,063	6,505	6,599	941	72,282	372	255
Downstream scope 3 emissions										
Category 9: Downstream transportation and distribution	tonCO2e	4,476	789	1,016	264	360	231	1,706	49	60
Category 10: Processing of sold products	tonCO2e	-	-	-	-	-	-	-	-	-
Category 11: Use of sold products	tonCO2e	-	-	-	-	-	-	-	-	-
Category 12: End-of-life treatment of sold products	tonCO2e	61	29	9	2	2	0	19	0	0
Category 13: Downstream leased assets	tonCO2e	0	0	-	-	-	-	-	-	-
Category 14: Franchises	tonCO2e	-	-	-	-	-	-	-	-	-
Category 15: Investments	tonCO2e	-	-	-	-	-	-	-	-	-
Total Downstream scope 3 emissions	tonCO2e	4,537	818	1,026	266	362	231	1,726	49	61
Total emissions (location-based)	tonCO2e	190,616	68,380	32,131	6,775	7,009	1,177	74,407	421	316
Total emissions (market-based)	tonCO2e	190,311	68,357	32,131	6,775	7,009	1,177	74,125	421	316
Out of scope										
Out of scope (from upstream operations)	tonCO2e	-	1,983	-	182	-	11	-	27	-
Out of scope (from downstream operations)	tonCO2e	-	80	-	38	-	12	-	2	-

*Category 7, 10, 11, 14 & 15 is not reported but estimated to have very low impact.

**Damstahl Switzerland & Delta Inox scope 1 & 2 included in Damstahl Germany figures.

***Values of zero indicated with "-", if tonCO2e is rounded to zero it will show "0"

ESG Performance (E)

ESRS	DR/AR	Data indicator	Unit	Consolidated	Parent
GHG emissions					
E1-3	27b	Achieved GHG emission reduction (scope 1 & scope 2 location-based) <i>relative to previous year</i>	%	-45%	-35%
E1-3	27b	Achieved GHG emission reduction (scope 1 & scope 2 market-based) <i>relative to previous year</i>	%	-71%	-4%
E1-6	49	Absolute GHG emission, location-based (scope 1, 2 & 3)	tonsCO2e	190,616	68,380
E1-6	49	GHG emissions intensity, location-based (total GHG emissions per net revenue)	tonsCO2e/€M	480	484
E1-6	49	Absolute GHG emission, market-based (scope 1, 2 & 3)	tonsCO2e	190,311	68,357
E1-6	49	GHG emissions intensity, market-based (total GHG emissions per net revenue)	tonsCO2e/€M	479	484
		Stainless steel tonnage covered by EPDs or other third-party validated emissions	%	43	56
Energy consumption					
E1-5	35	Total energy consumption related to own operations	MWh	2,643	839
E1-5	35a	Total energy consumption from fossil sources	MWh	1,194	201
E1-5	35b	Total energy consumption from renewable sources	MWh	1,449	638
E1-5	35bi	Fuel consumption from renewable sources	MWh	-	-
E1-5	35bii	Consumption of purchased or acquired electricity, heat, steam, and cooling from renewable sources	MWh	1,449	638
E1-5	35biii	Consumption of self-generated non-fuel renewable energy	MWh	-	-
E1-5	AR 34	Percentage of renewable sources in total energy consumption	%	55	76
Polutions					
E2-5	32	Total amount of substances of very high concern that are generated or used during production or that are procured by main hazard classes of substances of concern	ton	-	-
E2-5	32	Total amount of substances of very high concern that leave facilities as emissions, as products, or as part of products or services by main hazard classes of substances of concern	ton	-	-
Water					
E3-4	27a	Total water consumption	m3	1,406	860
Biodiversity and ecosystems					
E4-5	38	Number of sites owned, leased or managed in or near protected areas or key biodiversity areas that undertaking is negatively affecting	Number	-	-
Ressource use					
E5-5	37avi	The rates of recyclable content in products	%	56	59
E5-5	37avi	The rates of recyclable content in products packaging (Plastic, paper, carton)	%	N/A	29
E5-5	37avi	The rates of recyclable content in products packaging (Wood)	%	N/A	N/A
E5-5	38a	Total Waste generated	ton	1,109	120
E5-5	38b	Recycled waste	ton	859	79
		- Hereof stainless scrap	ton	722	52
E5-5	38c	Non-recycled waste	ton	249	41
E5-5	38d	Percentage of non-recycled waste	%	22	34

DR/AR indicate the disclosure requirement or application requirement under the ESRS standard.

Values of zero indicated with "-", if unit is rounded to zero it will show "0".

N/A indicate that the data is currently unavailable.

ESG Performance (S)

ESRS	DR/AR	Data indicator	Unit	Consolidated	Parent
Own workforce					
S1-7	51a	Number of employees (head count)	Number	359	106
S1-7	51av	Number of female employees (head count)	Number	76	31
S1-7	51av	Proportion of female employees (head count)	%	21%	29%
S1-7	51av	Number of male employees (head count)	Number	283	75
S1-7	51av	Proportion of female employees (head count)	%	79%	71%
S1-7	51b	Average number of employees (head count)	Number	362	109
S1-7	51c	Number of employees (head count) at top management level	Number	2	2
S1-7	51c	Percentage of employees at top management level	%	1%	2%
S1-7	51c	Number of employees (head count) under 30 years old	Number	N/A	14
S1-7	51c	Percentage of employees under 30 years old	%	N/A	13%
S1-7	51c	Number of employees (head count) between 30 and 50 years old	Number	N/A	49
S1-7	51c	Percentage of employees between 30 and 50 years old	%	N/A	46%
S1-7	51c	Number of employees (head count) over 50 years old	Number	N/A	43
S1-7	51c	Percentage of employees over 50 years old	%	N/A	41%
S1-7	51d	Number of employee who have left undertaking ²	Number	48	13
S1-7	51d	Percentage of employee turnover	%	14	13
S1-9	57a	Percentage of employees that participated in regular performance and career development reviews	%	33	100
S1-10	60b	Percentage of people in its own workforce who are covered by health and safety management system based on legal requirements and (or) recognised standards or guidelines	%	100	100
S1-11	63a	Number of fatalities in own workforce as result of work-related injuries and work-related ill health	Number	-	-
S1-11	63a	Number of fatalities as result of work-related injuries and work-related ill health of other workers working on undertaking's sites	Number	-	-
S1-11	63a	Number of recordable work-related accidents for own workforce	Number	9	2
S1-18	88c	Number of incidents of discrimination	Number	-	-
S1-22	103 a	Percentage of its employees covered by collective bargaining agreements are within coverage rate by country (in the EEA)	%	13	31

DR/AR indicate the disclosure requirement or application requirement under the ESRS standard.

Values of zero indicated with "-", if unit is rounded to zero it will show "0".

N/A indicate that the data is currently unavailable.

ESG Performance (G)

ESRS	DR/AR	Data indicator	Unit	Consolidated	Parent
Governance					
G1-3	20b	Percentage of functions-at-risk covered by training programmes	%	100	100
G1-4	23b	Number of convictions for violation of anti-corruption and anti- bribery laws	Number	-	-
G1-4	23e	Number of confirmed incidents of corruption or bribery	Number	-	-
G1-5	29bi	Financial political contributions made	EUR	-	-
G1-6	33c	Number of outstanding legal proceedings for late payments	Number	-	-
		Whistleblower cases submitted	Number	-	-
		Whistleblower cases solved	Number	-	-
		Supplier code of conducts signed (vendor accounts)	Number	319	75
		Supplier code of conducts signed (percentage of purchased stainless steel in tonnage)	%	61	72
		ISO 9001-certified sites	Number	7	1
		ISO 14001-certified sites	Number	3	-

DR/AR indicate the disclosure requirement or application requirement under the ESRS standard. Values of zero indicated with "-", if unit is rounded to zero it will show "0".

EU Taxonomy

For the Parent Company 2023

Introduction to the EU Taxonomy

The EU Taxonomy establishes a classification system that delineates the criteria under which a company's economic activities can be deemed "sustainable". In accordance with Regulation (EU) 2020/852, Damstahl is first mandated to begin reporting under this taxonomy starting with the financial year 2025. Nevertheless, to enhance transparency and provide our stakeholders with early insights, we have conducted a preliminary screening of our activities to the best of our ability and without any auditor oversight. [8]

In the supplementing Regulation (EU) 2021/2139 it is specified that economic activities associated with the mentioned NACE codes is also subject for a technical screening. Manufacturing of iron and steel is mentioned as CCM3.9 and while Damstahl is not manufacturing stainless steel but only distributes it, we interpret our main activity of sales of stainless material as eligible under the taxonomy. [9]

Accounting Policy for EU Taxonomy

TURNOVER

The predominant portion of our sales come from stainless steel, an activity we classify as eligible under **CCM3.9**.

32% of our external sales is assumed to be taxonomy-aligned as "EAF high alloy steel" (stainless steel produced using an electric arc furnace) with a scrap input of 70% or more as it is based on EPDs and ISO-certified LCA data. However, our data on the 'Do No Significant Harm'-parameter for Pollution Prevention is not sufficient to secure compliance within BAT-levels for e.g., dust. We strive to increase the quality of this data in the coming years. [10]

Due to this we specify all external turnover as eligible but not aligned under the taxonomy.

CAPEX

The eligible CapEx costs cover additions to intangible assets, fixed assets and IFRS leases.

7% of our CapEx additions is reported as taxonomy-aligned for "data-driven solutions for GHG emissions reductions" under **CCM8.2** (category C) and is associated with an update to our e-commerce platform making our customers able to see emissions from material and calculate emissions on projects or reporting periods.

2% of our CapEx additions is reported as "infrastructure for personal mobility, cycle logistics" under **CCM6.13** (category C) and consists of a new house for bicycles with charging options.

Eligible CapEx activities consist of activities under **CCM3.20, CCM7.2/CE3.2 & CCM8.1**.

OPEX

The eligible OpEx costs cover expenditures related to human resources adaption needs, direct non-capitalized costs for R&D, maintenance and day-to-day servicing of assets. No staff costs are included.

0,1% of our OpEx expenditures is reported as taxonomy-aligned for "close to market research, development and innovation" under **CCM9.1** (category C) and is associated with consultancy regarding identifying climate mitigation options.

Eligible OpEx activities consists of activities under **CCM6.5, CCM6.6 & CCM7.2**.

TURNOVER

Economic Activities (1)	Code (2)	Absolute turnover (3)	Proportion of Turnover (4)	Substantial Contribution Criteria						DNSH criteria ('Does Not Significantly Harm')							Category (enabling activity) (20)	Category (transitional activity) (21)
				Climate Change Mitigation (5)*	Climate Change Adaptation (6)	Water (7)	Pollution (8)	Circular Economy (9)	Biodiversity and ecosystems (10)	Climate Change Mitigation (11)	Climate Change Adaptation (12)	Water (13)	Pollution (14)	Circular Economy (15)	Biodiversity (16)	Minimum Safeguards (17)		
Text		EUR'000	%	%	%	%	%	%	%	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	E	T
A. TAXONOMY-ELIGIBLE ACTIVITIES			100%															
A.1. Environmentally sustainable activities (Taxonomy-aligned)																		
			0%	0%	0%	0%	0%	0%	0%									
			0%	0%	0%	0%	0%	0%	0%									
			0%	0%	0%	0%	0%	0%	0%									
Turnover of environmentally sustainable activities (Taxonomy-aligned) (A.1)		0	0%	0%	0%	0%	0%	0%	0%	Y	Y	Y	Y	Y	Y	Y	0%	0%
A.2 Taxonomy-Eligible but not environmentally sustainable activities (not Taxonomy-aligned activities)																		
Turnover of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2)		95,043	100%															
Total (A.1+A.2)		95,043	100%															
B. TAXONOMY-NON-ELIGIBLE ACTIVITIES																		
Turnover of Taxonomy-non-eligible activities		0	0%															
Total (A+B)		95,043	100%															

CAPEX

Economic Activities (1)	Code (2)	Absolute CapEx (3)	Proportion of CapEx (4)	Substantial Contribution Criteria						DNSH criteria ('Does Not Significantly Harm')						Minimum Safeguards (17)	Category (enabling activity) (20)	Category (transitional activity) (21)
				Climate Change Mitigation (5)*	Climate Change Adaptation (6)	Water (7)	Pollution (8)	Circular Economy (9)	Biodiversity and ecosystems (10)	Climate Change Mitigation (11)	Climate Change Adaptation (12)	Water (13)	Pollution (14)	Circular Economy (15)	Biodiversity (16)			
Text		EUR'000	%	%	%	%	%	%	%	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	E	T
A. TAXONOMY-ELIGIBLE ACTIVITIES			42%															
A.1. CapEx of environmentally sustainable activities (Taxonomy-aligned)																		
Data-driven solutions for GHG emissions reductions	CCM8.2	39	7%	50%	0%	0%	0%	0%	0%		Y	Y	Y	Y	Y	Y	E	
Infrastructure for personal mobility, cycle logistics	CCM6.13	12	2%	100%	0%	0%	0%	0%	0%		Y	Y	Y	Y	Y	Y	E	
			0%	0%	0%	0%	0%	0%	0%									
CapEx of environmentally sustainable activities (Taxonomy-aligned) (A.1)		51	9%	9%	0%	0%	0%	0%	0%	Y	Y	Y	Y	Y	Y	Y	9%	0%
A.2 Taxonomy-Eligible but not environmentally sustainable activities (not Taxonomy-aligned)																		
CapEx of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2)		188	33%															
Total (A.1+A.2)		239	42%															
B. TAXONOMY-NON-ELIGIBLE ACTIVITIES																		
Capex of Taxonomy-non-eligible activities		327	58%															
Total (A+B)		566	100%															

OPEX

Economic Activities (1)	Code (2)	Absolute OpEx (3)	Proportion of OpEx (4)	Substantial Contribution Criteria						DNSH criteria ('Does Not Significantly Harm')							Category (enabling activity) (20)	Category (transitional activity) (21)
				Climate Change Mitigation (5)*	Climate Change Adaptation (6)	Water (7)	Pollution (8)	Circular Economy (9)	Biodiversity and ecosystems (10)	Climate Change Mitigation (11)	Climate Change Adaptation (12)	Water (13)	Pollution (14)	Circular Economy (15)	Biodiversity (16)	Minimum Safeguards (17)		
Text		EUR'000	%	%	%	%	%	%	%	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	E	T
A. TAXONOMY-ELIGIBLE ACTIVITIES			50%															
A.1. Environmentally sustainable activities (Taxonomy-aligned)																		
Close to market research, development and innovation	CCM9.1	9	0%	100%	0%	0%	0%	0%	0%		Y	Y	Y	Y	Y	Y	E	
			0%	0%	0%	0%	0%	0%	0%									
			0%	0%	0%	0%	0%	0%	0%									
OpEx of environmentally sustainable activities (Taxonomy-aligned) (A.1)		9	0%	0%	0%	0%	0%	0%	0%	Y	Y	Y	Y	Y	Y	Y	0%	0%
A.2 Taxonomy-Eligible but not environmentally sustainable activities (not Taxonomy-aligned activities)																		
OpEx of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2)		3,763	50%															
Total (A.1+A.2)		3,772	50%															
B. TAXONOMY-NON-ELIGIBLE ACTIVITIES																		
OpEx of Taxonomy-non-eligible activities		3,783	50%															
Total (A+B)		7,555	100%															

References

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On your side